

GDPR Annex to the SciSure Privacy Statement

If you are

- visiting our websites from the European Union or the European Economic Area,
- or if you use the services of our subsidiaries based in the European Union,

we only process your personal data in accordance with the following Privacy Policy for EU/EEA which outlines your specific rights under the GDPR:

1. Processing of Personal Data & Legal Basis

This Privacy Policy covers our treatment of personally identifiable information that we gather when you are accessing or using our products and services, including without limitation access to products and services by or through the SciSure.com and/or labfolder.com websites, any third-party integration with our products and services, and any software owned, operated or licensed by us. We will process your personal data based on the purposes and on the legal basis set out below.

1.1 Personal Information

We process personal data that falls into the following categories:

- 1.1.1 Information and content you provide: Information you actively share with us, such as during registration, sign-ups, or through direct email communication.
- 1.1.2 General Usage Data: Information gathered automatically when you use our website or services, including your IP address, usage patterns, and device/browser details.

The legal basis for processing the aforementioned data is the performance of our contractual obligations in accordance with Art. 6 (1) (1) (b) GDPR (regarding data necessary for registration and service provision), or where you have consented in accordance with Art. 6 (1) (1) (a) GDPR (regarding voluntary data like newsletter sign-ups), or our legitimate interests in accordance with Art. 6 (1) (1) (f) GDPR (regarding data collected via automated tracking for website optimization and security).

1.2 General Usage Data

When using our website or services, it will automatically send certain information to our servers, where it is temporarily stored in log files. The following information is collected without any action on your part and stored until it is automatically deleted:

- IP address of the device requesting access to our server

- date and time of access
- operating system of the device
- unique device identifier (IMEI number)
- device type
- date and time of server requests
- referrer-URL (previously visited web page)
- duration and information about pages visited
- language preferences and location

We further process information when you register for or use our services such as:

- duration of membership/registration
- number of uploaded files
- number of entries
- number of group entries
- last date of activity
- further statistical data, if applicable

All of the aforementioned, (technical) data is collected to analyze the behavior of our website and services so we can ensure a reliable connection between the website and our servers, analyze system security and stability, identify potential sources for errors, generally improve functionality of our website and the services offered thereunder, as well as other administrative purposes.

We will do our best to anonymize or pseudonymize such data, unless it would be in conflict with the intended use of the data.

Legal basis for processing such data is Art. 6 (1) (1) (f) GDPR with our legitimate interest in the processing of such data being based on the aforementioned purposes.

1.3 Information and content you provide

We further process information you choose to share with us when using the website or services, e.g. register for an account, subscribe to our newsletter or contact us via email or contact form, such as:

- any content you upload
- experiments and linked data
- sample information

- protocols
- e-mail address
- name of your contact person
- job title
- company name
- address
- phone number
- VAT number
- preferred language and currency
- time zone
- any purchase order number
- any e-mail address of invoice receivers
- masked credit card or bank account details

We process the aforementioned data to comply with our contractual obligations to provide certain services through the website in accordance with Art. 6 (1) (1) (b) GDPR.

1.4 Support request

If you have any problems or questions regarding the use of our website or service, you can contact us via <https://www.scisure.com/contact-us>. In order for us to know who sent the request and to be able to answer it, we need to process the data provided in the request (e.g. your name, email address). The legal basis for processing such data is Art. 6 (1) (1) (b) GDPR.

2. Cookies and Similar Technologies

2.1 General

"Cookies" are small text, image or data files or tag code snippets downloaded on your device when using our website. They are widely used to make websites work and function with greater efficiency, and to provide customization and to improve performance. Some Cookies stay on your device only for the duration of your web session and expire when you close the website; other Cookies are stored for longer than your web session, including after you exit the website.

2.2 Necessary Cookies

Some cookies are strictly necessary for using our website and the services offered thereunder by enabling basic functionality, such as providing a secure login and remembering your progress when navigating through the website.

The legal basis for the processing of these cookies is our legitimate interest as defined in Art. 6(1) (1) (f) GDPR. The basis for our legitimate interest is to guarantee the security and functionality of the website. In addition, storing the essential cookies on your device is absolutely necessary as defined in Section 25 (2)(2) of the German Telecommunications Digital Services Data Protection Act (TDDDG) to be able to provide you access to the website and the services that you have requested thereunder.

2.3 Analytics and Tracking Cookies

In order to track specific usage data as set out in Section 1.2 based on your consent, we use [cookies](#).

The legal basis for the processing of these cookies is your consent as defined in Art. 6(1) (1) (a) GDPR, which can be revoked at any time.

3. Data Retention

In general, we will only process your personal data to the extent necessary to fulfil its respective purpose. When we no longer need the data to fulfil our contractual or legal obligations, it will be removed from our systems and records and/or measures will be taken to anonymize your personal data in accordance with applicable data protection laws, so that it is no longer identifiable. In particular, log files mentioned in Section 1.2 are generally deleted within 14 days unless you have given your consent to a longer storage period.

If you have created an account, you can delete it at any time and we will delete your personal data linked with your account. This also applies if we process your personal data based on your consent and you choose to withdraw your consent. Before we delete all the data associated with your account, we will ask for your voluntary consent to anonymize such data and continue to make it accessible to other users to help them with their journey. If you do not consent, we will delete your data as set out above.

We may store your personal data even after you have deleted your account or have withdrawn your consent if we are legally required to do so. If we are subject to statutory retention periods, we will lock your data and only process it to comply with our legal obligation.

4. Recipients of Data

Your personal data will not be transferred to third parties except as set out in this Section 4.

4.1 Recipients of Personal Data

Personal data, which does not contain Sensitive Data is only shared with third parties if and insofar as

- you have given your express consent in accordance with Art. 6 (1) (1) (a) GDPR which can be withdrawn at any time,

- the disclosure of such data is necessary for the establishment, exercise or defense of legal claims in accordance with Art. 6 (1) (1) (f) GDPR,
- the disclosure is required by mandatory legal provisions in accordance with Art. 6 (1) (1) (c) GDPR, or
- the disclosure is legally permissible and necessary to operate the website and including the services offered thereunder in accordance with our contractual obligations towards you in accordance with Art. 6 (1) (1) (b) GDPR.

4.2 External Service Providers

We may commission service providers to provide IT and other administrative support (e.g. service providers offering IT hosting or maintenance support) to process your personal data for the purposes described in this data protection notice. These service providers may have access to your personal data to the extent necessary to provide such services. Any access to your personal data is limited to those who need the information to complete your requests.

These service providers are contractually obliged to comply with applicable data protection laws and only process your data in accordance with our instructions (pursuant to Art. 28 GDPR). The same applies to any sub-processors to the extent that our processors use such with our prior consent.

These service providers are:

Third-party Service Provider	Service / Purpose	Location	Data Categories
Amazon Web Services (AWS) EU	Cloud hosting, storage, and backup services	Luxembourg (EU); data hosted in Germany (EU)	Customer account data, application data, backups
Billwerk	Billing and invoicing system	Germany (EU)	Customer billing information, subscription data
Microsoft 365	Internal email and collaboration services	Ireland (EU)	Customer communications, support requests
Freshworks	CRM system	Germany (EU)	Customer contact information, support interactions
Intercom	Messaging and notifications solution	Ireland (EU)	Customer contact details, communications, support conversations
Zoho	Billing and invoicing system	Netherlands (EU)	Customer billing information, subscription data
HubSpot	CRM, customer communications, marketing automation	Ireland (EU); data hosted in Germany (EU)	Customer contact information, support interactions, marketing preferences
Wasabi	Cloud object storage	United States (legal entity); data hosted in Germany (EU)	Customer backups, file storage
Zendesk	Customer support ticketing system	Ireland (EU); data hosted in EU data centers	Customer support communications, contact details

ProdPad	Product management and feedback tool	United Kingdom	Customer feedback, feature requests, contact information
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The data processed within the scope of these contracts will not be stored for longer than necessary, but at most for the duration of the contractual relationship with the relevant service provider or other legal requirements.

5. Transfer of Personal Data

In case we transfer your personal data to a third country, we will ensure that the recipient is subject to an adequate level of data protection, e.g. by agreeing so-called EU standard contractual clauses with the recipient or other appropriate safeguards as set out in Art. 46 (2) GDPR.

6. Your Rights as Data Subject

6.1 Right of access and/or portability

You have the right to access any personal data that we hold about you (Art. 15 GDPR) and the right to have that data provided to you in a structured, commonly used, and machine-readable format under the requirements of Art. 20 GDPR so that you can provide or "port" that data to another provider.

In case you request access to your data, we kindly ask you to specify your request in order to make it easier for us to compile the requested data.

6.2 Right to rectification

If your personal data is not or no longer accurate, you can request us to correct any inaccurate or incomplete data accordance with Art. 16 GDPR.

6.3 Right to erasure

You can request the deletion of your personal data subject to the conditions set out in Art. 17 GDPR. Whether we can comply with your request to delete your personal data depends on whether it is still required to fulfil our legal obligations.

6.4 Right to restriction of processing

Within the framework of the requirements set out in Art. 18 GDPR, you can request a restriction of the processing of your personal data.

6.5 Right to object

In accordance with Art. 21 GDPR, i.e. where the processing of your data is based on our legitimate interest, you can object to the processing of such data on grounds relating to your particular situation at any time. However, we cannot always comply with this request, e.g. if we are required by law to process your data in order to fulfil our legal obligations.

6.6 Right to complain

If you are under the impression that we have not complied with applicable data protection laws when processing your data, you can lodge a complaint with us under <https://www.jamsadr.com/dpf-dispute-resolution> or with the competent data protection authority, in particular in the member state of your residence, your place of work, or the location of the alleged infringement.