

# PRIVACY POLICY

In the following, we provide information about the processing of personal data when using

- our app heycare
- our website heycare.com
- our profiles in social media.

Personal data is all data that can be related to a specific natural person, e.g. their name or IP address.

## 1. General

### 1.1 Contact details

The controller pursuant to Art. 4 para. 7 of the EU General Data Protection Regulation (GDPR) is heynannyly GmbH, Am Galgenberg 21, 91315 Höchstadt, Germany, e-mail: [team@heycare.com](mailto:team@heycare.com). We are legally represented by Anna Schneider, Julia Kahle.

Our data protection officer can be contacted via heyData GmbH, Schützenstraße 5, 10117 Berlin, [www.heydata.eu](http://www.heydata.eu), e-mail: [datenschutz@heydata.eu](mailto:datenschutz@heydata.eu).

## 1.2 Scope of data processing, processing purposes and legal bases

The scope of data processing, processing purposes and legal bases are explained in detail below. The following legal bases for data processing can generally be considered:

- Art. 6 para. 1 s. 1 lit. a GDPR serves as the legal basis for processing operations for which we obtain consent.
- Art. 6 para. 1 s. 1 lit. b GDPR is the legal basis insofar as the processing of personal data is necessary for the performance of a contract, e.g. when a site visitor purchases a product from us or we perform a service for them. This legal basis also applies to processing that is necessary for pre-contractual measures, for example in the case of inquiries about our products or services.
- Art. 6 para. 1 s. 1 lit. c GDPR applies if we fulfill a legal obligation by processing personal data, as may be the case in tax law, for example.
- Art. 6 para. 1 s. 1 lit. f GDPR serves as the legal basis if we can rely on legitimate interests to process personal data, e.g. for cookies that are required for the technical operation of our website.

## 1.3 Data processing outside the EEA

Insofar as we transfer data to service providers or other third parties outside the EEA, adequacy decisions of the EU Commission pursuant to Art. 45 para. 3 GDPR guarantee the security of the data during

transfer, insofar as these are available, as is the case, for example, for the UK, Canada and Israel.

When data is transferred to service providers in the USA, the legal basis for the data transfer is an adequacy decision by the EU Commission if the service provider is also certified under the EU US Data Privacy Framework.

In other cases (e.g. if there is no adequacy decision), the legal basis for data transfer is usually standard contractual clauses, i.e. unless we indicate otherwise. These are a set of rules adopted by the EU Commission and form part of the contract with the respective third party. According to Art. 46 para. 2 lit. b GDPR, they guarantee the security of data transfer. Many of the providers have issued contractual guarantees that go beyond the standard contractual clauses and protect the data beyond the standard contractual clauses. These are, for example, guarantees regarding the encryption of the data or regarding the obligation of the third party to inform the data subject if law enforcement agencies wish to access data.

## **1.4 Storage period**

Unless expressly stated in this privacy policy, the data stored by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted, i.e. the data will be blocked and not processed for other purposes. This applies, for example, to data that we must retain for commercial or tax law reasons.

## 1.5 Rights of the data subjects

Data subjects have the following rights vis-à-vis us with regard to their personal data:

- Right to access,
- Right to rectification or erasure,
- Right to restriction of processing,
- **Right to object to the processing,**
- Right to data portability,
- **Right to withdraw consent at any time.**

Data subjects also have the right to complain to a data protection supervisory authority about the processing of their personal data. Contact details of the data protection supervisory authorities can be found at <https://www.bfdi.bund.de/DE/Service/Anschriften/Laender/Laender-node.html>.

## 1.6 Obligation to provide data

In the context of a business relationship or other relationship, customers, interested parties or third parties must only provide us with the personal data that is necessary for the establishment, execution and termination of the business relationship or for the other relationship or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude a contract or provide a service or will no longer be able to perform an existing contract or other relationship.

Mandatory information is marked as such.

## **1.7 No automated decision-making in individual cases**

In principle, we do not use fully automated decision-making in accordance with Article 22 GDPR to establish and implement a business relationship or other relationship. If we use these procedures in individual cases, we will provide separate information about this if this is required by law.

## **1.8 Contact**

When you contact us, e.g. by email or telephone, the data you provide us with (e.g. names and email addresses) will be stored by us in order to answer your questions. The legal basis for the processing is our legitimate interest (Art. 6 para. 1 s. 1 lit. f GDPR) in answering inquiries addressed to us. We delete the data collected in this context after storage is no longer necessary or restrict processing if there are statutory retention obligations.

## **1.9 Customer surveys**

From time to time, we conduct customer surveys to get to know our customers and their wishes better. We collect the data requested in each case. It is our legitimate interest to get to know our customers and their wishes better, so that the legal basis for the associated

data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We delete the data once the results of the surveys have been evaluated.

## 1.10. Cookie information

As part of our online services, information is stored in the terminal equipment of website visitors (e.g. cookies) or information that is already stored in the terminal equipment (e.g. IP addresses) is accessed. Please refer to the following sections to find out what information this is in detail.

This storage and access takes place on the basis of the following provisions:

- Insofar as this storage or access is absolutely necessary for us to provide the service of our website expressly requested by website visitors (e.g. to implement a chatbot used by the website visitor or to ensure the IT security of our website), it is carried out on the basis of Section 25 para. 2 no. 2 of the Telecommunications Digital Services Data Protection Act (TDDDG).
- Otherwise, this storage or access is based on the consent of the website visitor (Section 25 para. 1 TDDDG).

Downstream data processing is carried out in accordance with the following sections and on the basis of the provisions of the GDPR.

## 1.11. Log files

When using our online services, information is automatically transmitted to us, which the browser transmits to our server in order to ensure the stability and security of our online services. This is our legitimate interest, so the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

These data are:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

This data is also stored in log files. They are deleted when their storage is no longer required, at the latest after 14 days.

## 1.12. Job advertisements

We publish job advertisements on our website, on pages linked to the website or on third-party websites.

The data provided as part of the application is processed to carry out the application process. Insofar as this is necessary for our decision

to establish an employment relationship, the legal basis is Art. 6 para. 1 lit. b GDPR in conjunction with Section 26 para. 1 BDSG. We have marked the data required to carry out the application process accordingly or refer to it. If applicants do not provide this data, we will not be able to process the application.

Further data is voluntary and not required for an application. If applicants provide further information, this is based on their consent (Art. 6 para. 1 s. 1 lit. a GDPR).

We ask applicants to refrain from providing information on political opinions, religious beliefs and similar sensitive data in their CV and cover letter. They are not required for an application. If applicants nevertheless provide such information, we cannot prevent their processing as part of the processing of the CV or cover letter. Their processing is then also based on the consent of the applicants (Art. 9 para. 2 lit. a GDPR).

Finally, we process applicants' data for further application procedures if they have given us their consent to do so. In this case, the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR.

We pass on the applicants' data to the responsible employees in the HR department, to our data processors in the area of recruiting and to the other employees involved in the application process.

If we enter into an employment relationship with the applicant following the application process, we will only delete the data after the employment relationship has ended. Otherwise, we will delete the data no later than six months after rejecting an applicant.

If applicants have given us their consent to use their data for further application procedures, we will only delete their data one year after receipt of the application.

## 2. Newsletter

We reserve the right to inform users who have already used our services or purchased goods about our offers from time to time by email or other means if they have not objected to this. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest lies in direct advertising (Recital 47 GDPR). Users can object to the use of their email address for advertising purposes at any time at no additional cost, for example via the link at the end of each email or by sending an email to our email address stated above.

Interested parties have the option of subscribing to a free newsletter. We process the data provided during registration exclusively for the purpose of sending the newsletter. Registration takes place by selecting the corresponding field on our website, by ticking the corresponding field in a paper document or by another clear action, whereby interested parties declare their consent to the processing of their data, so that the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR. Consent can be withdrawn at any time, e.g. by clicking on the corresponding link in the newsletter or by sending a message to the email address provided above. The processing of the data until revocation remains lawful even in the event of revocation.

Based on the consent of the recipients (Art. 6 para. 1 s. 1 lit. a GDPR), we also measure the opening and click rate of our newsletters in order to understand which content is relevant for our recipients.

We send newsletters with the following tools:

- Mailchimp of the provider Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA The provider processes content, usage, meta/communication data and contact data in the USA. Further information can be found in the provider's privacy policy at <https://mailchimp.com/legal/privacy/>
- Twilio of the provider Twilio Ireland Limited, 70 Sir John Rogerson's Quay, Dublin 2, D02 R296, Ireland The provider processes content, usage, meta/communication data and contact data in the EU. Further information can be found in the provider's privacy policy at <https://www.twilio.com/legal/privacy>
- HubSpot of the provider HubSpot, Inc., 25 1st Street Cambridge, MA 0214, USA The provider processes content, usage, meta/communication data and contact data in the EU. Further information can be found in the provider's privacy policy at <https://legal.hubspot.com/de/privacy-policy>
- Firebase (for push messages). The provider processes content data, usage data, meta/communication data and contact data.

## 3. heycare.com

### 3.1 Web hosting and provision of the website

Our website is hosted by Webflow. The provider is Webflow, Inc, 398 11th St., Floor 2, San Francisco, CA 94103, USA. The provider

processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data, in the USA. Further information can be found in the provider's privacy policy at <https://webflow.com/legal/eu-privacy-policy>.

It is our legitimate interest to provide a website, so the legal basis for the data processing described is Art. 6 para. 1 s. 1 lit. f GDPR.

The legal basis for the transfer to a country outside the EEA is an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

We use the following content delivery networks for our website:

- jsDelivr. The provider is Prospect One SP. Z O.O. SP. K., Ul. Karmelicka 5 5, 31-133 Krakow, Poland.
- Webflow. The provider is Webflow, Inc, 398 11th St., Floor 2, San Francisco, CA 94103, USA.

The provider processes the personal data transmitted via the website, e.g. content, usage, meta/communication or contact data, in the USA.

We have a legitimate interest in using sufficient storage and delivery capacities in order to ensure optimal data throughput even during large load peaks. The legal basis for the data processing described is therefore Art. 6 para. 1 s. 1 lit. f GDPR.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses issued in accordance with the review procedure pursuant to Art. 93 para. 2 GDPR (Art. 46 para. 2 lit. c GDPR), which we have agreed with the provider.

The legal basis for the transfer to a country outside the EEA is an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

## **3.2 Contact form**

When you contact us via the contact form on our website, we store the data requested there and the content of the message.

The legal basis for the processing is our legitimate interest in responding to inquiries addressed to us. The legal basis for the processing is therefore Art. 6 para. 1 s. 1 lit. f GDPR.

We delete the data collected in this context after storage is no longer necessary or restrict processing if there are statutory retention obligations.

## **3.3 Technically necessary cookies**

Our website uses cookies. Cookies are small text files that are stored in the web browser on the end device of a site visitor. Cookies help to make the website more user-friendly, effective and secure. Insofar as

these cookies are necessary for the operation of our website or its functions (hereinafter referred to as "technically necessary cookies"), the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing customers and other site visitors with a functional website.

Specifically, we set technically necessary cookies for the following purpose or purposes:

- Cookies that adopt language settings

## **3.4 Third-party providers**

### **3.4.1 Webflow**

We use Webflow to create websites. The provider is Webflow, Inc, 398 11th St., Floor 2, San Francisco, CA 94103, USA. The provider processes usage data (e.g. websites visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in setting up and maintaining a website and thus presenting ourselves to the outside world.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

We delete the data when the purpose for which it was collected no longer applies. Further information can be found in the provider's privacy policy at <https://webflow.com/legal/eu-privacy-policy>.

### **3.4.2 Google Analytics**

We use Google Analytics for analysis. The provider is Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. The provider processes usage data (e.g. websites visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. a GDPR. Processing is carried out on the basis of consent. Data subjects can withdraw their consent at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing until the revocation.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

The data will be deleted when the purpose of its collection no longer applies and there is no obligation to retain it. Further information can be found in the provider's privacy policy at <https://policies.google.com/privacy?hl=de>.

### **3.4.3 Google Tag Manager**

We use Google Tag Manager for analysis and advertising. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The provider processes usage data (e.g. websites visited, interest in content, access times) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. a GDPR. Processing is carried out on the basis of consent. Data subjects can withdraw their consent at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing until the revocation.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

We delete the data when the purpose for which it was collected no longer applies. Further information can be found in the provider's privacy policy at <https://policies.google.com/privacy?hl=de>.

### **3.4.4 Mailchimp**

We use Mailchimp to manage emails and for email marketing. The provider is Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. The provider processes usage data (e.g. websites visited, interest in content, access times), content

data (e.g. entries in online forms), contact data (e.g. email addresses, telephone numbers) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. a GDPR. Processing is carried out on the basis of consent. Data subjects can withdraw their consent at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing until the revocation.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

The data will be deleted when the purpose for which it was collected no longer applies and there are no retention obligations to the contrary. Further information can be found in the provider's privacy policy at <https://mailchimp.com/legal/privacy/>.

### **3.4.5. Snitcher**

We use Snitcher to identify opportunities, to generate leads. The provider is Snitcher B.V., Oude Enghweg 2, 1217 JC Hilversum, Netherlands. The provider processes usage data (e.g. web pages visited, interest in content, access times), contact data (e.g. e-mail addresses, telephone numbers), meta/communication data (e.g. device information, IP addresses) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR . We have a legitimate interest in effectively supporting our sales team through helpful tools.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://www.snitcher.com/privacy-policy>.

### **3.4.6. heyData**

We have integrated a data protection seal on our website. The provider is heyData GmbH, Schützenstraße 5, 10117 Berlin, Germany. The provider processes meta/communication data (e.g. IP addresses) in the EU.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing website visitors with confirmation of our data protection compliance. At the same time, the provider has a legitimate interest in ensuring that only customers with existing contracts use its seals, which is why a mere image copy of the certificate is not a viable alternative to confirmation.

The data is masked after collection so that there is no longer any personal reference. Further information can be found in the provider's privacy policy at <https://heydata.eu/datenschutzerklaerung>.

## 4. heycare app

### 4.1 Hosting

The following service providers are used to host our app platform:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Dublin, Ireland.
- Digitalocean LLC, 101 Avenue of the Americas 10th Floor, New York, NY 10013, USA.
- Render Services, Inc, San Francisco, 525 Brannan St Suite 300, USA.

The providers process the personal data transmitted via the platform, e.g. content, usage, meta/communication data or contact data, in the EU.

It is our legitimate interest to provide a platform, so the legal basis for the data processing described is Art. 6 para. 1 s. 1 lit. f GDPR.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses issued in accordance with the review procedure pursuant to Art. 93 para. 2 GDPR (Art. 46 para. 2 lit. c GDPR), which we have agreed with the provider.

We use the Content Delivery Networks:

- Firebase. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Dublin, D04e5w5, Ireland.
- DigitalOcean. The provider is Digitalocean LLC, 101 Avenue of the Americas 10th Floor, New York, NY 10013, USA

We have a legitimate interest in using sufficient storage and delivery capacities in order to ensure optimal data throughput even during high load peaks. The legal basis for the data processing described is therefore Art. 6 para. 1 s. 1 lit. f GDPR.

The legal basis for the transfer to a country outside the EEA is an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

## 4.2 Coaching

Users can book appointments with us on our platform. For this purpose, we process meta or communication data in addition to the data entered. The legal basis for data processing is the contract concluded with the user in accordance with Art. 6 para. 1 s. 1 lit. b GDPR. If we use a tool from a third-party provider for the agreement, the information on this can be found under "Third-party providers". Insofar as sensitive data is processed, the legal basis is Art. 9 para. 2 lit. a GDPR.

## 4.3 Reviews

Users can leave reviews on our platform. For this purpose, we process meta or communication data in addition to the data entered. We have a legitimate interest in receiving feedback from users. The legal basis for data processing is therefore Art. 6 para. 1 s. 1 lit. f GDPR. If we use a tool from a third-party provider for the agreement, the information on this can be found under "Third-party providers".

## 4.4 Users (via Company Code)

We process personal data of users who have created an account on our platform via a company code received from their employer in order to use our services. The legal basis for this processing is the contract concluded with the user (Art. 6 para. 1 lit. b GDPR).

We may receive the user's e-mail address from their employer in order to provide them with a coupon approved by their employer.

We transmit the following usage data to the employer in order to invoice the services used: Name, date, number of hours, personnel number if applicable, reason for use and the amount relevant for payroll accounting.

At the request of the user or after the contract with the employer has expired, or after 2 years without activity, the user data will be deleted.

We share controller responsibility with the employers for providing the coupons and processing the data required for payroll accounting. For this purpose, a joint controllership agreement has been

concluded that regulates the rights and obligations of both parties. Both parties ensure that only the personal data required for legitimate process handling is collected. In addition, both parties are responsible for informing the data subjects about the data processing in accordance with Art. 13 and 14 GDPR. The data subjects can assert their rights against both parties.

## 4.5 Nannies

We process personal data of nannies so that they can offer their services to families on our platform.

The legal basis for the processing of this data is the contract concluded with the nanny (Art. 6 para. 1 lit. b GDPR).

The user data will be deleted at the request of the user or after 2 years without activity.

## 4.6 Third-party providers

### 4.6.1 Calendly

We use Calendly to plan appointments. The provider is Calendly LLC, BB&T Tower, 271 17th St NW, Atlanta, GA 30363, USA. The provider processes usage data (e.g. websites visited, interest in content, access times), contact data (e.g. email addresses, telephone numbers) and master data (e.g. names, addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. a GDPR. Processing is carried out on the basis of consent. Data subjects can

withdraw their consent at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing until the revocation.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

We delete the data when the purpose for which it was collected no longer applies. Further information can be found in the provider's privacy policy at <https://calendly.com/pages/privacy>.

## **4.6.2 cal.eu**

We use cal.eu to schedule appointments. The provider is Cal.com, Inc., 2261 Market Street, #4382, San Francisco, CA 94114, USA. The provider processes master data (e.g., names, addresses), contact data (e.g., email addresses, telephone numbers), and usage data (e.g., websites visited, interest in content, access times) in the USA.

The legal basis for processing is Art. 6 (1) (a) GDPR. Processing is based on consent. Data subjects can revoke their consent at any time by contacting us, e.g., using the contact details provided in our privacy policy. Revocation does not affect the lawfulness of processing prior to revocation.

The transfer of personal data to a country outside the EEA is based on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e., a country outside the EEA) is guaranteed because the EU Commission has decided, within the framework of an adequacy decision pursuant to Art. 45 (3) GDPR, that the third country offers an adequate level of protection.

We delete the data when the purpose for which it was collected no longer applies. Further information is available in the provider's privacy policy at <https://cal.com/privacy>.

### **4.6.3 Sentry**

We use Sentry to monitor applications and to track errors in applications or on websites. The provider is Functional Software, Inc, 132 Hawthorne Street San Francisco, CA 94107, USA. The provider processes usage data (e.g. websites visited, interest in content, access times), content data (e.g. entries in online forms) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in appropriately monitoring the functionality of our applications.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

The data will be deleted when the purpose of its collection no longer applies and there is no obligation to retain it. Further information can be found in the provider's privacy policy at <https://sentry.io/privacy/>.

### **4.6.3 Stripe**

We use Stripe for payments. The provider is Stripe Payments Europe Ltd, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland. The provider processes payment data (e.g. bank details, invoices, payment history) and master data (e.g. names, addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. b GDPR. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

We delete the data when the purpose for which it was collected no longer applies. Further information can be found in the provider's privacy policy at <https://stripe.com/de/privacy#translation>.

## 4.6.4 Postmark

We use Postmark to send e-mails. The provider is ActiveCampaign, LLC, 1 N Dearborn St., 5th Floor, Chicago, Illinois 60602, USA. The provider processes usage data (e.g. websites visited, interest in content, access times), contact data (e.g. email addresses, telephone numbers), meta/communication data (e.g. device information, IP addresses) and master data (e.g. names, addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in sending emails in a simple way.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

The data will be deleted when the purpose of its collection no longer applies and there is no obligation to retain it. Further information can be found in the provider's privacy policy at <https://postmarkapp.com/privacy-policy>.

## 4.6.5 Mailchimp

We use Mailchimp to manage emails and for email marketing. The provider is Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. The provider processes usage data (e.g. websites visited, interest in content, access times), content

data (e.g. entries in online forms), contact data (e.g. email addresses, telephone numbers) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. a GDPR. Processing is carried out on the basis of consent. Data subjects can withdraw their consent at any time, e.g. by contacting us using the contact details provided in our privacy policy. The revocation does not affect the legality of the processing until the revocation.

The transfer of personal data to a country outside the EEA takes place on the legal basis of an adequacy decision. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed because the EU Commission has decided in an adequacy decision pursuant to Art. 45 para. 3 GDPR that the third country offers an adequate level of protection.

The data will be deleted when the purpose for which it was collected no longer applies and there are no retention obligations to the contrary. Further information can be found in the provider's privacy policy at <https://mailchimp.com/legal/privacy/>.

#### **4.6.6. PostHog**

We use PostHog for A/B testing and product analysis. The provider is PostHog, Inc., San Francisco, 2261 Market St#4008, San Francisco, CA, USA. The provider processes contact data (e.g., email addresses, telephone numbers), meta/communication data (e.g., device information, IP addresses), and usage data (e.g., websites visited, interest in content, access times) in the EU.

The legal basis for processing is Art. 6 (1) (f) GDPR. We have a legitimate interest in further developing our product based on user feedback.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://posthog.com/privacy>.

#### **4.6.7. Intercom Fin**

We use Intercom Fin for a live chat. The provider is Intercom R&D Unlimited Company 2nd Floor, Stephen Court, 18-21 St. Stephen's Green, Dublin 2, Ireland. The provider processes contact data (e.g. email addresses), content data (e.g. entries in online forms), meta/communication data (e.g. device information, IP addresses) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR . The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://www.intercom.com/legal/privacy>.

#### 4.6.8. heyData

We have integrated a data protection seal on our website. The provider is heyData GmbH, Schützenstraße 5, 10117 Berlin, Germany. The provider processes meta/communication data (e.g. IP addresses) in the EU.

The legal basis for processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing website visitors with confirmation of our data protection compliance. At the same time, the provider has a legitimate interest in ensuring that only customers with existing contracts use its seals, which is why a mere image copy of the certificate is not a viable alternative to confirmation.

The data is masked after collection so that there is no longer any personal reference. Further information can be found in the provider's privacy policy at <https://heydata.eu/en/privacy-policy>.

## 5. Data processing on social media platforms

We are represented on social media networks in order to present our organization and our services. The operators of these networks regularly process their users' data for advertising purposes. Among other things, they create user profiles from their online behavior,

which are used, for example, to display advertising on the pages of the networks and elsewhere on the Internet that corresponds to the interests of the users. For this purpose, the network operators store information on user behavior in cookies on the user's computer. It is also possible that the operators may combine this information with other data. Users can find further information and information on how users can object to processing by the site operators in the privacy policies of the respective operators listed below. It is also possible that the operators or their servers are located in non-EU countries, meaning that they process data there. This may result in risks for users, e.g. because the enforcement of their rights is made more difficult or government agencies gain access to the data.

When users of the networks contact us via our profiles, we process the data provided to us in order to respond to the inquiries. This is our legitimate interest, so the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

## 5.1 Facebook

We maintain a profile on Facebook. The operator is Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here:

<https://www.facebook.com/policy.php>. You can object to data processing via the settings for advertisements:

<https://www.facebook.com/settings?tab=ads>.

We are jointly responsible for processing the data of visitors to our profile on the basis of an agreement within the meaning of Art. 26 GDPR with Facebook. Facebook explains exactly which data is processed at

[https://www.facebook.com/legal/terms/information\\_about\\_page\\_insi](https://www.facebook.com/legal/terms/information_about_page_insi)

ghts\_data. Data subjects can exercise their rights both against us and against Facebook. However, according to our agreement with Facebook, we are obliged to forward requests to Facebook. Data subjects will therefore receive faster feedback if they contact Facebook directly.

## **5.2 Instagram**

We maintain a profile on Instagram. The operator is Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://help.instagram.com/519522125107875>.

## **5.3 Tiktok**

We maintain a profile on Tiktok. The operator is TikTok Technology Limited, whose registered office is at 10 Earlsfort Terrace, Dublin, D02 T380, Ireland. The privacy policy is available here: <https://www.tiktok.com/de/privacy-policy>.

## **5.4 YouTube**

We maintain a profile on YouTube. The operator is Google Ireland Limited Gordon House, Barrow Street Dublin 5, Ireland. The privacy policy is available here: <https://policies.google.com/privacy>.

## **5.5 LinkedIn**

We maintain a profile on LinkedIn. The operator is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. The privacy policy is available here: <https://www.linkedin.com/legal/privacy-policy>. You can object to data processing via the settings for advertisements: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

## 5.6 Xing

We maintain a profile on Xing. The operator is New Work SE, Dammtorstraße 29-32, 20354 Hamburg. The privacy policy is available here: <https://privacy.xing.com/en/privacy-policy>.

## 6. Changes to this privacy policy

We reserve the right to amend this privacy policy with effect for the future. A current version is always available here.

## 7. Questions and comments

If you have any questions or comments regarding this privacy policy, please do not hesitate to contact us using the contact details above.