

PRIVACY POLICY

FOR PRICENXT.COM AND APP.PRICENXT.COM

Version 1.0 – as of 12 October 2026

Thank you for your interest in our website. The protection of your personal data is very important to us. Below you will find information on how we handle your data collected through your use of our website. Your data is processed in accordance with the statutory data protection provisions.

1. CONTROLLER

The controller within the meaning of the General Data Protection Regulation (GDPR) is

Kunststoff Information GmbH

Saalburgstraße 157

61350 Bad Homburg

Phone: +49 (0) 6172 9606-0

E-mail: info@pricenxt.com

For enquiries regarding data protection, you can contact us at datenschutz@ki.de.

2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

You can contact the data protection officer at

Proliance GmbH

www.proliance.ai

Data protection officer

Leopoldstr. 21

80802 München

E-mail: datenschutzbeauftragter@proliance.ai

When contacting the data protection officer, please state the company to which your enquiry relates. Please also refrain from enclosing sensitive information, such as a copy of your identity card, with your enquiry.

3. GENERAL INFORMATION ON DATA TRANSFERS TO THIRD COUNTRIES

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA).

For data transfers to certain third countries, there may be an adequacy decision of the European Commission pursuant to Article 45(1) GDPR. Such a decision establishes that an adequate level of data protection exists in the third country. A list of the adequacy decisions adopted to date can be viewed at the following link: [Data protection adequacy for non-EU countries](#).

In addition, the scope of an adequacy decision may be limited to a specific group of recipients or made subject to further conditions.

For example, the adequacy decision for data transfers to the USA applies only to companies certified under the EU-U.S. Data Privacy Framework. The certification status of a participating company can be viewed at the following link: [Participant Search \(dataprivacyframework.gov\)](#).

Where your data is transferred to recipients in third countries for which no adequacy decision exists, there is a risk that authorities there may access your data for security and surveillance purposes without you being informed of this or being able to take legal action.

To ensure an adequate level of data protection when your data is transferred to recipients in such third countries, we therefore ensure that appropriate safeguards within the meaning of Article 46 GDPR are in place.

For this reason, standard contractual clauses adopted by the European Commission pursuant to Article 46(2)(c) GDPR are regularly concluded either by us or by the service providers we use. They oblige the recipient of the data in the third country to process the data in accordance with the European level of protection. The clauses can be viewed at the following link: [Publications on the Standard Contractual Clauses \(SCCs\) - European Commission](#). If you require further details on the modules of the standard contractual clauses or supplementary measures concluded by us in an individual case, we will be happy to provide you with a copy. In this case, simply contact us using the contact details given above under "Controller".

For certain recipients, data transfers may also be based on binding corporate rules (BCR) approved by the supervisory authorities pursuant to Article 46(2)(b) GDPR. These can be viewed at the following link: [Approved Binding Corporate Rules | European Data Protection Board](#).

Where the standard contractual clauses or binding corporate rules are not sufficient to ensure the level of protection, additional technical, contractual or organisational measures are taken to safeguard the data transfer. In addition, it is regularly reviewed and assessed whether these additional measures continue to ensure a sufficient level of data protection or whether further supplementary measures need to be taken.

Where relevant, further information on data transfers to third countries can be found below in the descriptions of the respective processing or of the services used, under "*Processing in third countries*".

4. DATA PROTECTION INFORMATION FOR WEBSITE VISITORS

4.1. Processing in connection with web hosting

4.1.1. Usage data and server log files

Description and purpose of the processing

When you access our website, it is technically necessary for data to be transferred between your internet browser and our web server for communication purposes. During an ongoing connection for communication between the internet browser and the web server, the following data is regularly generated:

- IP address of the requesting entity (router or mobile device),
- date and time of the request,
- name of the requested file,
- website from which the file was requested (referrer URL),
- access status,
- amount of data transferred,
- web browser and operating system used,
- language used.

The purpose of the processing and our legitimate interest are to ensure a smooth connection between your internet browser and our website and the technically error-free provision of our services, and to be able to detect, prevent and trace attacks on our website. The log files are used to evaluate the stability, functionality and security of the system. The processing of this data is strictly necessary in order to provide you with the website.

Legal basis for the processing

The legal basis for the processing of the data is Article 6(1)(f) GDPR.

Recipients

As part of the processing, your data is transferred to the following categories of recipients or recipients that we use as part of the processing to achieve the stated purposes:

- hosting service providers,
- *IT support and administration service providers.*

These are, in particular, the following recipients:

- HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA
- HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin, Germany

In the event of irregularities or attacks, the data may, in individual cases, also be disclosed to:

- *information security consultants and IT forensic experts*
- *lawyers,*
- *investigating authorities,*
- *courts.*

Processing in third countries

Your data is transferred to HubSpot, Inc. in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission in respect of companies certified under the EU-U.S. Data Privacy Framework. HubSpot, Inc. is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

The server log files are collected by our hosting service provider HubSpot as part of the operation of HubSpot CMS and deleted in accordance with its specifications. We ourselves do not store this data in our own systems and do not analyse it.

In individual cases, in the event of attacks or attempted attacks, the data may be retained for longer where this is necessary until the conclusion of investigative or court proceedings or for the exercise of legal claims.

4.1.2. HubSpot CMS content management system

To create and operate our website, we use the HubSpot CMS content management system of HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

In the European Union (EU) and the European Economic Area (EEA), the service is offered by HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin, Germany.

Description and purpose of the processing

HubSpot CMS is a service for creating and managing websites and their content. We use the services to provide you with our website.

Personal data collected on this website is stored on the host's servers. This may include, in particular, IP addresses, contact requests, meta and communication data, website accesses, log files and other data generated when a website is visited.

To deliver the website quickly and securely, HubSpot uses the content delivery network of Cloudflare, Inc. as a sub-processor. In particular, your IP address and the technical data of the page request are processed.

Cookies and similar technologies, in particular JavaScript, may be used to store and read data on your terminal device where this is necessary to display the website, to provide the website functions and to ensure security (technically necessary cookies). Further details can be found below under "*Processing in connection with cookies and similar technologies*".

The purpose of the processing and our legitimate interest are to be able to manage our online presence and the content of our website efficiently and to make them available to you for use.

Legal basis for the processing

Where we use cookies and similar technologies in the course of integrating the content management system, or where data is stored on or read from your terminal device by the service, this is done pursuant to § 25(2) no. 2 of the German Telecommunications Digital Services Data Protection Act

(TDDDG). Any subsequent processing is carried out on the basis of Article 6(1)(f) GDPR. Our legitimate interest lies in technically improving our website and providing our online presence efficiently.

Recipients

When the service is used, the data collected via our websites is transferred to the following recipients:

- HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA
- HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin, Germany

Processing in third countries

Your data is transferred to HubSpot, Inc. in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission in respect of companies certified under the EU-U.S. Data Privacy Framework. HubSpot, Inc. is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

As a result of the integration of the content management system, data is transferred to the recipients named above and processed there for as long as is necessary to achieve the stated purposes.

4.2. Processing in connection with cookies and similar technologies

4.2.1. Access to and storage of information in terminal equipment

When you use our website, information (e.g. IP address) may be accessed in, or information (e.g. cookies) may be stored on, your terminal equipment. Such access or storage may involve further processing of personal data within the meaning of the GDPR.

Where such access to information or such storage of information is strictly necessary for the technically error-free provision of our services, this is done on the basis of § 25(2) no. 1 or no. 2 of the German Telecommunications Digital Services Data Protection Act (TDDDG).

Where such an operation serves other purposes (e.g. designing our website in line with demand), it is carried out on the basis of § 25(1) TDDDG only with your consent. You can withdraw your consent at any time with effect for the future.

Where personal data is subsequently processed, this is done on the basis of the GDPR and the German Federal Data Protection Act (BDSG). We explain this processing to you separately in our privacy policy.

Further information on the processing of your personal data and the relevant legal bases in this context can be found in the following sections on the specific processing activities on our website.

4.2.2. Cookies and similar technologies

4.2.2.1. General information

On this website, we use services that use cookies and similar technologies to store data in the browser of your terminal device and to read data already stored. Cookies, your browser's local storage, pixels and so-called tags may be used for this purpose.

Cookies are small text files that can be stored and read on your terminal device.

A distinction is made between session cookies, which are deleted as soon as you close your browser, and persistent cookies, which are stored beyond the individual session for a certain period of time.

In addition to cookies, we may use your browser's session storage or local storage to store and read data.

We may also integrate pixels into our websites. Pixels are small individualised, invisible image files that are loaded when the page is built and can be used to track user activities.

Finally, we may use tags on our websites. Tags are small HTML or JavaScript code fragments or markers that enable services for website analysis or user tracking to distinguish or identify users and to track certain user activities.

Further details on the cookies and similar technologies we use can be found below in the descriptions of the cookie categories and in our consent management platform, which is displayed to you when you visit our website. You can use the platform to give consent and also to withdraw it easily.

You can call up the platform again at any time to change your settings: on our website via the "Manage cookies" link at the bottom of every page, and in our application under "Settings".

Please note that, without the use of certain cookies and similar technologies, our websites may not be displayed correctly and some functions may no longer be technically available.

4.2.2.2. Category "Necessary"

Services in this category may use cookies and similar technologies to store and read information on your terminal device. We use them for the purpose of and in our interest in

- enabling the website to be displayed and providing its basic functions, in particular page navigation and access to login areas,
- enabling consent to be given and withdrawn,
- protecting our forms against abusive entries and
- protecting our website against cyber attacks and attempted fraud.

The services and the corresponding cookies and similar technologies in this category are used on the basis of § 25(2) no. 1, no. 2 TDDG. Any subsequent processing is carried out on the basis of Article 6(1)(f) GDPR.

4.2.2.3. Category “Preferences”

Services or external content and media from third-party providers in this category may use cookies and similar technologies to store and read information on your terminal device. We use them

- to enable content and media from third-party providers to be loaded,
- to make our websites appealing to you and to operate them efficiently, and
- to provide you with certain settings and other functions of the website.

The services and the corresponding cookies and similar technologies in this category are used on the basis of your consent pursuant to § 25(1) TDDDG. Any subsequent processing is carried out on the basis of your consent pursuant to Article 6(1)(a) GDPR.

4.2.2.4. Category “Statistics”

Services in this category may use cookies and similar technologies to store and read information on your terminal device. We use them

- to be able to count and distinguish you as an individual website visitor and to produce statistical analyses of your interactions with and your use of our websites,
- to design our websites in line with demand and adapt them to users’ interactions,
- to be able to test changes to the website and measure users’ responses to them (A/B testing), and
- to monitor the technical functionality of our website and enable errors to be fixed.

For this purpose, we and the services regularly store individual pseudonymous identifiers (recognition features) consisting of numbers and letters in cookies on your terminal device when you visit our website and read them again when you visit again.

The use of pseudonyms makes it possible to distinguish and recognise users individually. However, the natural person behind a pseudonym cannot, as a rule, be identified directly, and in particular not by name, without further additional data.

Other technologies may also regularly be used to read recognition features from your terminal device, e.g. in the case of so-called browser or device fingerprinting, in which data on characteristics of the browser you use (e.g. type and version of the browser) and its configuration (e.g. preferred language), on characteristics of your terminal device (e.g. manufacturer and model of your mobile phone, operating system) or of the hardware you use (e.g. screen resolution) is used to recognise you pseudonymously as a distinct user.

The services and the corresponding cookies and similar technologies in this category are used on the basis of your consent pursuant to § 25(1) TDDDG. Any subsequent processing is carried out on the basis of your consent pursuant to Article 6(1)(a) GDPR.

4.2.2.5. Category “Marketing”

Services in this category may use cookies and similar technologies to store and read information on your terminal device. We use them

- to be able to count and distinguish you as an individual website visitor and to produce statistical analyses of your interactions with and your use of our websites,
- to be able to track your interactions with advertisements placed by us via third-party providers on other websites across different terminal devices and websites (so-called conversion tracking),
- to be able to trace and analyse your interactions with our website and then use them as the basis for targeted advertising campaigns in advertising networks aimed at you or at a specific target group to which you belong (so-called retargeting and remarketing),
- to improve the effectiveness of our advertising measures and to manage our advertising campaigns.

For this purpose, individual pseudonymous identifiers (recognition features) consisting of numbers and letters are regularly stored for us and the services in cookies on your terminal device when you visit another website or our website and read again when you visit that website again or visit a new website.

Other technologies may also regularly be used to read recognition features from your terminal device, e.g. in the case of so-called browser or device fingerprinting, in which data on characteristics of the browser you use (e.g. type and version of the browser) and its configuration (e.g. preferred language) or on characteristics of your terminal device (e.g. manufacturer and model of your mobile phone, operating system) or of the hardware you use (e.g. screen resolution) is used to recognise you pseudonymously as a distinct user.

The pseudonymous recognition features processed may also be combined with other data by us or by the providers of the services used.

For example, the services we use and their providers may also exchange and compare recognition features (IDs) with one another in order to combine the features in the event of a match and assign them to the same pseudonymous user (so-called ID matching/ID syncing). This enables website visitors to be recognised and addressed with advertising across devices, platforms and advertising networks.

If you identify yourself with your plain data, such as your name or e-mail address, or enter your own user data on our websites, or log in to social networks or online services of third-party providers that also provide us with corresponding tracking and advertising services, pseudonymous recognition features may additionally be linked to your plain data or user data.

In this way, we or the providers of the services can create and analyse comprehensive pseudonymous or non-pseudonymous user profiles in order to then use them for targeted advertising based on your interests.

The services and the corresponding cookies and similar technologies in this category are used on the basis of your consent pursuant to § 25(1) TDDDG. Any subsequent processing is carried out on the basis of your consent pursuant to Article 6(1)(a) GDPR.

4.3. Consent management via the Cookiebot consent management platform

On our websites and in our application (app.pricenxt.com), we use the Cookiebot consent management platform of Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark. Your

decision applies jointly to the website and the application and, for this purpose, is additionally stored in a separate cookie on the pricenxt.com domain.

Description and purpose of the processing

We use the service to manage your consent to the use of cookies and similar technologies and to the subsequent processing.

If you give consent via the banner of our consent management platform, the service processes the following data:

- the IP address of the requesting computer,
- the description of the web browser and operating system used,
- the address of the website from which your consent was sent
- the date and time of consent,
- a pseudonymous and encrypted consent key (consent ID).
- your consent status, which serves as evidence of your consent.

This data is logged on the provider's servers. As part of the processing, cookies are used to store your consent status on your terminal device and to read and compare it when you access the page again.

In this way, we are able to check your consent status on all subsequent and future visits to our websites and, in accordance with your decision on the use of cookies and other technologies, to activate or deactivate them when you access the page again.

The purpose of the processing and our legitimate interest are to be able to centrally control the cookies and similar technologies and the services integrated into our website and to offer you a simple way of giving and withdrawing your declarations of consent, in order to fulfil our legal obligations to obtain consent and our accountability obligation pursuant to Article 5(2) GDPR.

Legal basis for the processing

Where we use cookies and similar technologies in the course of integrating the service, or where data is stored on or read from your terminal device by the service, this is done pursuant to § 25(2) no. 2 TDDDG. Any subsequent processing is carried out on the basis of Article 6(1)(f) GDPR.

Recipients

As part of the processing, your data is transferred to the following recipients:

- Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark.

Processing in third countries

As part of this processing, your data is not transferred to a third country outside the EU/EEA.

Retention period

As a result of the integration of the service on our websites, data is transferred to the recipients named above and stored there for a period of 12 months. The data is then deleted unless statutory retention obligations prevent this.

4.4. HubSpot

On our websites we integrate the “HubSpot” platform of HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

In the European Union (EU) and the European Economic Area (EEA), the service is offered by certain national subsidiaries depending on the customer’s place of business. In Germany, the service is offered by HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin.

Description and purpose of the processing

The platform enables us to carry out

- the management of prospect and customer data,
- the answering and documentation of enquiries to our customer service,
- the answering of your enquiries via our chat function,
- the analysis and evaluation of interactions with our websites,
- the creation, analysis and evaluation of interactions with our social media presences, as well as making contact and handling communication via social media,
- the implementation and analysis of e-mail marketing campaigns, and
- the creation, enrichment and evaluation of profiles of potential prospects.

with the aim of acquiring new prospects for our products and services, addressing acquired prospects and existing customers with targeted advertising, and optimising our marketing strategy, in particular in online and e-mail marketing, through evaluations and analyses.

Cookies and similar technologies, in particular JavaScript, may be used to store and read data on your device. Further details can be found above under “Processing in connection with cookies and similar technologies”.

We use “HubSpot” to manage prospect and customer data.

For this purpose, we process personal data provided by you via forms and the chat on our websites (salutation, first name, last name, contact details such as e-mail address and telephone number and, where applicable, data on your company, such as position, industry and company size), information on which of our products you are interested in, and other information that you voluntarily provide to us. In addition, we also use the platform to manage our customer contacts, including the aforementioned data of our contact persons at customers.

The purpose of the processing and our legitimate interest lie in managing the contact details of potential prospects and customers effectively and also using them for the further processing enabled by the platform.

We use “HubSpot” to answer and document enquiries to our customer service

When answering your enquiry to our customer service by e-mail or telephone, we process personal data provided by you (salutation, first name, last name, contact details such as e-mail address and telephone number and, where applicable, data on your company), information on your request, and other information that you voluntarily provide to us. The processing takes place in order to handle your enquiry and to document how it was dealt with, in particular so that we can access the previous status in the event of further enquiries on the same or similar topics.

The purpose of the processing and our legitimate interest lie in dealing with your requests effectively and being able to document the measures we take to fulfil your request in a traceable manner.

We use "HubSpot" to handle communication via the chat function on our website in order to answer your enquiries.

When answering your enquiry, we process personal data provided by you (salutation, first name, last name, contact details such as e-mail address and telephone number and, where applicable, data on your company), information on which of our products you are interested in, and other information that you voluntarily provide to us.

The purpose of the processing and our legitimate interest lie in being able to answer your enquiry via the chat function effectively.

We use "HubSpot" to analyse and evaluate website visits.

We observe and analyse the behaviour of website visitors and their use of our websites. In this way, we are able to recognise returning visitors pseudonymously and count them as such. We process data on how a visitor reached our websites (e.g. via web search, direct page access, social media pages, referrals from other websites and, where applicable, via marketing e-mails or other advertising campaigns), how many visits took place, how long a visit lasted and how many individual pages were accessed.

In addition, we also process further data on your interactions and your behaviour on our website (e.g. filling in forms, use of our chat, downloading documents, playing media, etc.).

The purpose of the processing is to compile statistics in order to make our web presence more attractive, to optimise the effectiveness of our marketing measures and to manage our advertising strategy.

We use "HubSpot" to analyse and evaluate interactions with our social media presences

We publish posts on our social media presences, such as LinkedIn, via HubSpot and analyse visitors' interactions (e.g. sharing or liking posts).

The purpose of the processing is to compile statistics in order to make our social media presences more attractive, to optimise the effectiveness of our marketing measures and to manage our advertising strategy.

We use "HubSpot" to make contact and handle communication via the social media platform

When answering your enquiry via social media, we process personal data provided by you (salutation, first name, last name, contact details such as e-mail address and telephone number and, where applicable, data on your company), information on which of our products you are interested in, and other information that you voluntarily provide to us.

The purpose of the processing and our legitimate interest lie in being able to answer your enquiry via the social media channel effectively.

We use "HubSpot" to prepare and carry out e-mail marketing and, where applicable, for e-mail tracking.

Where you give us separate consent on our website, we additionally use your e-mail address to contact you via marketing e-mails and, by way of direct marketing, to inform you, in line with your interests, about our products and services, current events, promotions and events, and offers.

The purpose of the processing is to address you or your company with personalised advertising by e-mail or via our e-mail newsletter and to inform you about our own products, goods, services, events and offers or about those of cooperation partners.

If you also give us separate consent, you permit us to process data on whether you have received our marketing e-mails and whether you have opened them, which e-mail client software you use, to what extent you have interacted with the content, in particular which links you have clicked, and to what extent you have read or skimmed our e-mails. We use this data to compile statistics in order to make our marketing e-mails more attractive, to optimise the effectiveness of our marketing measures and to manage our advertising strategy.

The purpose of the processing is to compile statistics in order to make our marketing e-mails more attractive, to optimise the effectiveness of our marketing measures and to manage our advertising strategy.

After your e-mail address has been submitted via a form or via the chat on our website, you will receive an e-mail from us with a link asking you to confirm your e-mail address and thereby subscribe to receive advertising e-mails.

The purpose of the processing is to ensure that only authorised persons subscribe to receive our advertising e-mails.

We also manage which types of e-mails you would like to receive from us in HubSpot (subscription preferences). You can change these preferences at any time via the link in every e-mail or unsubscribe completely.

We use "HubSpot" to create, enrich and evaluate prospect profiles.

We combine the data processed by means of the platform in a personalised profile, enrich it where applicable with data from further sources, evaluate it in the profile by means of score values and carry out analyses in order to infer which of our products and services, current events, promotions and events, and offers you are interested in, which customer segment you can be assigned to, and how likely it is that your interest in our products and services would lead to the formation of a contract.

The evaluation serves exclusively to prioritise our communication with you and to tailor it to your interests. No decision based solely on automated processing within the meaning of Article 22 GDPR that produces legal effects concerning you or similarly significantly affects you takes place.

For this purpose, we process the following data:

- on your person (salutation, first name, last name, contact details such as e-mail address and telephone number and, where applicable, data on your company, such as position, industry and company size),
- on your use, your interactions and your behaviour on our website (e.g. page views, filling in forms, use of our chat, downloading documents, playing media, etc.),
- on your use of our marketing e-mails (receipt and opening, e-mail client software used, click data, read rate),
- on your interactions with our social media presences.

The purpose of the processing is to optimise our marketing measures and to manage our advertising strategy so that we can address you with advertising that is as targeted as possible.

Legal bases for the processing

Management of prospect and customer data

The legal basis for using the platform to manage prospect and customer data is Article 6(1)(f) GDPR.

Answering and documenting enquiries to our customer service by telephone and e-mail

Where we use HubSpot to answer and document enquiries to our customer service by e-mail or telephone, the legal bases for the processing for answering and documenting enquiries to our customer service are Article 6(1)(b) GDPR or Article 6(1)(f) GDPR.

Answering enquiries via the chat function

The legal bases for the processing in connection with answering general enquiries via our chat function are Article 6(1)(f) GDPR and Article 6(1)(a) GDPR where you voluntarily provide us with information in the correspondence.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent with regard to the processing of data voluntarily provided in the correspondence, please contact datenschutz@ki.de.

Where your enquiry is aimed at the formation of a contract with you or your company, or where it is an enquiry to our customer service, the legal bases for the processing are Article 6(1)(b) GDPR or Article 6(1)(f) GDPR.

Analysis and evaluation of website visits

The legal basis for integrating and using the platform on our websites to analyse and evaluate interactions with the website is your consent, where you have given it via our consent management platform.

Cookies and similar technologies are used on the basis of § 25(1) of the German Telecommunications Digital Services Data Protection Act (TDDDG). The subsequent processing is based on Article 6(1)(a) GDPR.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent, please use the "Manage cookies" link at the bottom of every page to reopen the consent management platform and change your settings.

Analysis and evaluation of interactions with our social media profiles

The legal basis for analysing and evaluating interactions with our social media presences is your consent under Article 6(1)(a) GDPR, where you have given it via the social media provider.

Your consent is voluntary and you can withdraw it at any time with effect for the future. You can find out how to withdraw your consent in the privacy policy of the respective social media provider. In addition, with regard to the data processed exclusively by us, you can exercise your right to object by contacting datenschutz@ki.de.

Making contact and handling communication via the social media platform

The legal basis for making contact and handling communication via social media is your consent under Article 6(1)(a) GDPR, where you have given it via the social media provider. The legal bases for

handling enquiries via our social media presences are Article 6(1)(f) GDPR and Article 6(1)(a) GDPR where you voluntarily provide us with information in the correspondence.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent with regard to the processing of data voluntarily provided in the correspondence, please contact datenschutz@ki.de.

Preparation and implementation of e-mail marketing and, where applicable, e-mail tracking

The legal basis for processing your data in connection with e-mail marketing and e-mail tracking is likewise your consent, which is obtained separately, e.g. in forms.

Here too, any use of cookies and similar technologies takes place on the basis of § 25(1) TDDDG. The subsequent processing is based on Article 6(1)(a) GDPR.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent with regard to the processing in connection with e-mail marketing and e-mail tracking, please use the unsubscribe link in our marketing e-mails or contact datenschutz@ki.de.

Creation and evaluation of prospect profiles

The legal basis for processing your data in connection with creating and evaluating prospect profiles is likewise your consent, which is obtained separately, e.g. in forms.

Here too, any use of cookies and similar technologies takes place on the basis of § 25(1) TDDDG. The subsequent processing is based on Article 6(1)(a) GDPR.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent with regard to the creation and evaluation of prospect profiles, please use the "Manage cookies" link at the bottom of every page or contact datenschutz@ki.de.

Recipients

As part of the processing, your data is transferred to the following recipients:

- *HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin, Germany,*
- *HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.*

Processing in third countries

Your data is transferred to recipients in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission with regard to companies certified under the EU-U.S. Data Privacy Framework. *HubSpot Inc.* is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

Management of prospect and customer data

We process the data collected to manage prospect and customer data for as long as our company is active in advertising on the market, but no longer than 24 months after the last interaction in the case of prospects, and for the duration of the business relationship plus 3 years in the case of customers.

Answering and documenting enquiries to our customer service

We process the data collected to answer and document enquiries to our customer service for as long as a business relationship exists between you or the company for which you work and us, but no longer than 3 years after the end of the business relationship.

Answering enquiries via the chat function

We process the data collected for handling via the chat function on our website for a period of 24 months.

Analysis and evaluation of website visits

We process the data collected to analyse and evaluate interactions with our websites for a period of 13 months.

Analysis and evaluation of interactions with our social media profiles

We process the data collected to analyse and evaluate interactions with our social media presences for a period of 13 months.

Making contact and handling communication via the social media platform

We process the data collected to make contact and handle communication via the social media platform for a period of 24 months.

Preparation and implementation of e-mail marketing and, where applicable, e-mail tracking

We process the data collected to prepare and carry out e-mail marketing and, where applicable, for e-mail tracking until you unsubscribe or withdraw your consent; data for e-mail tracking for a period of 13 months.

Creation and evaluation of prospect profiles

We process the data collected to create, enrich and evaluate prospect profiles for as long as our company is active in advertising on the market, but no longer than 24 months after the last interaction.

Deletion

We then delete your data from our operational systems, unless further processing is permitted for another purpose stated in this privacy policy and on a corresponding legal basis.

4.5. Google Analytics

On our websites we integrate the "Google Analytics" service of *Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA*.

In the European Union (EU) and the European Economic Area (EEA), the service is offered by *Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland*.

Description and purpose of the processing

"Google Analytics" creates usage profiles on the basis of pseudonyms (recognition features from cookie and device IDs and further data on the device used, or the so-called browser fingerprint) and usage data (e.g. name and address of the website content requested by your browser, referral links, description of the web browser and operating system used, and the IP address of the requesting device).

In addition,

- demographic data (such as continent, country, region, city, age group, gender, language and interests of the users)
- data on your interactions with search engines or other websites collected by Google (such as on search engine queries that can be assigned to your Google account, on the origin of your visit to our site, i.e. whether it resulted, e.g., from a click on a paid advertisement in a search engine, search terms used or, where applicable, the history of websites you have visited)
- information on which website you came from to reach our website,
- information on your device (such as category, manufacturer and model) and its configuration (e.g. language settings, screen resolution),
- information about your interests, insofar as these are collected by Google in the course of your internet use,
- information on your interactions with our advertisements or campaigns, e.g. that a specific action on our website can be traced back to a click on a particular advertisement),
- data on your interactions with our websites, on past visits to our website, subpages accessed, data on the times of visits and session duration, button clicks, scroll depth, reading depth, as well as the use of filters, searches, forms and other input and login options, links clicked to external websites/files, data on products and services viewed or purchased by you on our websites, and
- data on your interactions with social media networks (such as sharing content)

are collected and analysed.

In this way, Google is able to recognise website visitors and the devices they use pseudonymously, count them as such and assign them to certain demographic target groups, prospect groups or customer segments.

Visitors who have their own user account on *Google platforms* can also be identified by *Google* across devices as visitors to our websites.

Cookies and similar technologies, in particular JavaScript, are used to store and read data on your device. Further details can be found above under "*Processing in connection with cookies and similar technologies*".

From the information processed, *Google* compiles aggregated statistics for us, from which we can see what the users of our websites are interested in and how many users have interacted with our websites and in what way.

We only receive aggregated statistics (aggregated data) from *Google*, from which we, as a user of the Google advertising services, cannot draw any conclusions about individual persons.

We then use these insights to place target-group-oriented online advertising and marketing campaigns in advertising networks, in particular in Google advertising services.

The purpose of the processing is to be able to evaluate and analyse the origin as well as the preferences and interests of visitors to our websites in order to subsequently optimise our online advertising measures on the basis of these insights and to deliver advertisements precisely to the relevant target groups.

Legal basis for the processing

The legal basis for integrating and using the service is your consent, where you have given it via our consent management platform.

Cookies and similar technologies are used on the basis of § 25(1) TDDDG. The subsequent processing is based on Article 6(1)(a) GDPR.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent, please use the "Manage cookies" link at the bottom of every page to reopen the consent management platform and change your settings.

Recipients

When the services are used, the data collected via our websites is transferred to the following recipients:

- *Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland,*
- *Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.*

Further information on the handling of personal data by the provider of the service can be found at <https://policies.google.com/privacy?hl=de>.

Processing in third countries

Your data is transferred to recipients in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission with regard to companies certified under the EU-U.S. Data Privacy Framework. Google LLC is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

As a result of the integration of the service on our websites, data is transferred to the recipients named above and stored there for a period of 14 months. The data processed by the service and made available to us is not stored in our own systems beyond this.

4.6. Google advertising services and functions: Google Ads, Google Ads Conversion Tracking, Google AdSense, Google Ads Remarketing, Google Marketing Platform (formerly Google DoubleClick)

On our websites we integrate advertising services and functions of *Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.*

In the European Union (EU) and the European Economic Area (EEA), the services are offered by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Description and purpose of the processing

We use Google advertising services and functions such as *Google Ads, Google Ads Conversion Tracking, Google Ads Remarketing, Google AdSense* and the *Google Marketing Platform* in order to place and manage target-group-oriented advertisements for our products and services via Google's advertising network and to measure how successful these advertisements are.

Cookies and similar technologies, in particular JavaScript, are used to store and read data on your device. Further details can be found above under "*Processing in connection with cookies and similar technologies*".

The use of these technologies enables *Google* to recognise website visitors and the devices they use pseudonymously. Visitors who have their own user account on *Google platforms* can also be identified by Google across devices as visitors to our websites.

If you click on an advertisement placed for us via Google, cookies for conversion tracking are set by the website or app of other providers. These are read again when you access our site. In the process, data from the originating website or app is processed on which search terms (keywords) you may have entered in a search engine, which advertisement or groups of advertisements you clicked on, and which of our online marketing campaigns the advertisement was assigned to.

We then collect data on our websites on how you used our website and how you interacted with the website content, e.g. which subpages were accessed, which content was clicked on or retrieved, or which forms or dialogues you used. The conversion of an advertisement into a specific action by the website visitor on a website is referred to as a conversion.

When "*Google Analytics*" is used at the same time, we can evaluate your actions on our websites even more precisely with the data collected through it

From the information processed, Google compiles aggregated statistics for us as part of "*Google Ads Conversion Tracking*" in "*Google Ads*" and in the "*Google Marketing Platform*", from which we can see how many users have responded to our advertisements and in what way. We only receive aggregated statistics (aggregated data) from Google, from which we, as a user of the Google advertising services, cannot draw any conclusions about individual persons.

On the basis of the statistics, we can optimise the effectiveness of our online advertising and manage our advertising strategy via the Google advertising services.

Google Ads Remarketing then enables us to place interest-based and target-group-based advertisements during your further use of the internet or apps, based on the websites and content you visited with us, how you used them and which actions (conversions) you carried out on our websites.

The purpose of the processing is to be able to place and manage target-group-oriented advertisements for our products and services via Google's advertising network, and to be able to measure how successful these advertisements are.

Legal basis for the processing

The legal basis for integrating and using the respective service is your consent, where you have given it via our consent management platform.

Cookies and similar technologies are used on the basis of § 25(1) TDDDGD. The subsequent processing is based on Article 6(1)(a) GDPR.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent, please use the "Manage cookies" link at the bottom of every page to reopen the consent management platform and change your settings.

Recipients

When the services are used, the data collected via our websites is transferred to the following recipients:

- *Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland,*
- *Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.*

Further information on the handling of personal data by the provider of the service can be found at <https://policies.google.com/privacy?hl=de>.

Processing in third countries

Your data is transferred to recipients in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission with regard to companies certified under the EU-U.S. Data Privacy Framework. Google LLC is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

As a result of the integration of the service on our websites, data is transferred to the recipients named above and processed there for as long as is necessary to achieve the stated purposes. The data processed by the service and made available to us is not stored in our own systems beyond this.

4.7. Google Tag Manager

On our websites, we integrate the "Google Tag Manager" service of Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.

In the European Union (EU) and the European Economic Area (EEA), the service is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Description and purpose of the processing

"*Google Tag Manager*" is a tag management system (TMS) that enables us to integrate and manage further website content in JavaScript or HTML code.

In particular, it allows so-called tags to be integrated into and managed on our website. Tags are small code fragments or markers (web beacons, tracking pixels or similar markers) by means of which website analysis or user tracking services are able to distinguish or identify users.

The analysis of website visits or the user tracking is not carried out by "*Google Tag Manager*" but by the services used for these purposes, such as "*Google Analytics*" or other third-party solutions. Rather, "*Google Tag Manager*" merely serves to integrate and manage on our websites the markers required for the analysis or tracking.

As "*Google Tag Manager*" is provided by Google and loaded from its servers when a page is accessed, the usage data technically required to access the page is also transmitted in the process. To this extent, Google also receives your IP address, which is technically required to retrieve the content.

The purpose of the processing is to be able to integrate further services and content into our websites in a simple and efficient manner by using Google Tag Manager.

Legal basis for the processing

The legal basis for integrating and using the service is your consent, provided you have given it via our consent management platform.

Cookies and similar technologies are used on the basis of § 25(1) of the German Telecommunications Digital Services Data Protection Act (TDDDG). The subsequent processing is based on Article 6(1)(a) GDPR.

Your consent is voluntary and you can withdraw it at any time with effect for the future. To withdraw your consent, please use the "Manage cookies" link at the bottom of every page to open the consent management platform again and change your settings.

Recipients

When the service is used, the data collected via our websites is transferred to the following recipients:

- *Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland,*
- *Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.*

Further information on how the provider of the service handles personal data can be found at <https://policies.google.com/privacy?hl=de>.

Processing in third countries

Your data is transferred to recipients in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission in respect of companies certified under the EU-U.S. Data Privacy Framework. *Google LLC* is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

By integrating the service on our websites, data is transferred to the recipients named above and processed there for as long as this is necessary to achieve the stated purposes. The data processed by the service and made available to us is not stored in our own systems beyond this.

4.8. Contact form and general enquiries by e-mail

Description and purpose of the processing

If you send us enquiries via the contact form or by e-mail, the information you provide in the enquiry form or your e-mail, including the personal data you provide there, is stored by us for the purpose of processing the enquiry and in case of follow-up questions.

We use various forms on our website, e.g. for contact enquiries or to provide you with content for download or access to content. The information required for the respective request (e.g. e-mail address, name or company) is marked as mandatory in the form; all other information is voluntary. We never pass on this data without your consent.

We make certain content, such as white papers or market reports, available to you free of charge if, in return, you consent to receiving information by e-mail. We expressly point this out in the respective form. The legal basis is your consent pursuant to Article 6(1)(a) GDPR and § 7(2) no. 2 of the German

Act against Unfair Competition (UWG). You can withdraw your consent at any time with effect for the future; content already provided remains unaffected. Details on e-mail marketing can be found under "HubSpot".

Legal basis for the processing

The legal basis for processing your data is your and our legitimate interest in responding to your request pursuant to Article 6(1)(f) GDPR and, where applicable, Article 6(1)(b) GDPR if your enquiry is aimed at the formation of a contract.

Recipients

As part of the processing, your data is transferred to the following categories of recipients or recipients that we use as part of the processing to achieve the stated purposes:

- software service providers that provide us with solutions for internal and external communication, for creating and editing documents and for managing data sets,
- IT support and administration service providers.

These are in particular the following recipients:

- HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA
- HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin, Germany

Processing in third countries

Your data is transferred to HubSpot, Inc. in third countries. For data transfers to the USA, there is an adequacy decision of the European Commission in respect of companies certified under the EU-U.S. Data Privacy Framework. HubSpot, Inc. is certified under the EU-U.S. Data Privacy Framework.

Further information on this and related links can be found above in the section "*General information on data transfers to third countries*".

Retention period

Your data is erased once your enquiry has been fully dealt with, as soon as no further queries are to be expected and provided that no statutory retention obligations prevent this.

4.9. Our company page on LinkedIn

We maintain a company page on the social network LinkedIn of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland ("LinkedIn").

Description and purpose of the processing

We use the page to provide information about our company and our products and to get in touch with prospective customers and customers. When you visit or interact with our page, e.g. by liking, commenting on or sharing posts or by sending us a message, LinkedIn processes your data. From this data, LinkedIn compiles aggregated statistics for us on the use of our page ("Page Analytics"), e.g. on reach, interactions and visitor characteristics such as industry, position, company size or region. We do not receive data on individual visitors. The publication of posts and the evaluation of interactions via HubSpot are described in the section "HubSpot".

We are joint controllers with LinkedIn for the compilation of these statistics (Article 26 GDPR). In the agreement concluded for this purpose, LinkedIn assumes primary responsibility, in particular for fulfilling your data subject rights and for the security of the processing: <https://legal.linkedin.com/pages-joint-controller-addendum>. You can exercise your rights both against LinkedIn and against us; where necessary, we forward requests addressed to us to LinkedIn.

Legal basis for the processing

The legal basis is Article 6(1)(f) GDPR. Our legitimate interest lies in modern corporate communication and in evaluating the reach of our page. Where LinkedIn sets cookies or reads information from your terminal device, LinkedIn itself obtains your consent for this.

Recipients

- LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland,
- LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA.

Processing in third countries

LinkedIn also transfers data to LinkedIn Corporation in the USA. The transfer takes place on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We process messages that you send us via LinkedIn for as long as is necessary to deal with your request. How long LinkedIn stores data is governed by LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>.

4.10. Callback service with AI telephone assistant

Prospective customers and customers can request a callback from us. The callback is carried out by an AI-supported telephone assistant of the telli service of telli technologies GmbH, Knaackstraße 78, 10435 Berlin, Germany.

Description and purpose of the processing

The assistant answers questions about our products and offers, helps with the formation of a contract via self-service and, for further requests, arranges an appointment with our sales team. At the beginning of the call, it informs you that you are speaking to an AI system. We only call back at your request; we do not make advertising calls with the assistant. In doing so, we process in particular:

- contact details, e.g. name and telephone number and, where applicable, e-mail address and company,
- information on your request, e.g. your role, your needs, the desired number of users, your preferred language and your preferred callback time slot,
- call content: your speech is processed in real time during the call and converted into a transcript and a summary,
- call data, e.g. telephone number, time and duration of the call,
- where applicable, an agreed follow-up appointment with our sales team.

We do not store audio recordings of the calls. Neither speaker identification nor an analysis of your mood takes place. telli does not use the data to train AI models.

Legal basis for the processing

The legal basis is Article 6(1)(f) GDPR. Our legitimate interest lies in dealing with your callback request. Where your request is aimed at the formation of a contract with you, the legal basis is Article 6(1)(b) GDPR.

Recipients

telli technologies GmbH, Knaackstraße 78, 10435 Berlin, Germany, as processor. For telephony, speech recognition, speech output and the generation of answers, telli uses further service providers that process the data on servers in the EU. Results of the call, such as an agreed appointment, are transferred to our CRM system (see "HubSpot").

Processing in third countries

The data relating to the calls is processed in the EU. Individual service providers of telli belong to groups of companies based in the USA; where data is transferred to the USA in individual cases, this takes place on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission.

Retention period

We delete transcripts and summaries no later than 30 days after the call. Information transferred to our CRM system is stored in accordance with the periods stated under "HubSpot".

5. DATA PROTECTION INFORMATION FOR THE USE OF OUR SAAS APPLICATION PRICENXT

We provide our customers with the web-based application pricenxt (app.pricenxt.com) for market and price information in the plastics and raw materials sector. In connection with the operation of the application, we process personal data in two different roles, which we distinguish from each other below.

5.1. Allocation of responsibilities

The application is organised in workspaces. A workspace is a work and data area that a customer (company) sets up and to which further users can be invited.

- Processing on behalf of the customer (Article 28 GDPR): For the data within a workspace – in particular memberships, roles and permissions, invitations and the content created or uploaded by users – we act as the customer's processor. Details can be found in clause 5.2.
- Processing under our own responsibility (Article 4(7) GDPR): We are the controller ourselves for your personal user account and login, contract handling and billing, logging and securing the application, error monitoring, service e-mails, support, backups and product analytics. Details can be found in clause 5.3.

We do not use Google Analytics, Google Ads or HubSpot's website tracking in the application.

5.2. Processing on behalf of the customer (processing as a processor)

Where we process personal data within a workspace, the customer for whom the workspace was set up is the controller within the meaning of Article 4(7) GDPR. We process this data exclusively in accordance with the customer's instructions and on the basis of the Data Processing Agreement, which applies separately to each workspace.

If you use the application as an employee of a customer or as an invited person and wish to exercise your rights in relation to this data, please contact the respective customer. We forward requests that reach us directly to the customer.

Description and purpose of the processing

On behalf of the customer, we process in particular:

- membership and permission data: role, invitation status, assigned seat,
- name and e-mail address of invited persons, including the sending of the invitation e-mail,
- content created by users, e.g. notes, dashboard configurations and individually compiled price series,
- the customer's own price data, optionally uploaded by the customer,
- results of AI-supported functions for evaluating workspace content, e.g. reports, summaries and analyses,
- personal data of third parties that may be contained in this content, e.g. names of business contacts.

The processing serves to provide the customer with the application, to enable collaboration within the workspace and to store, display and share the content in accordance with the customer's specifications.

Legal basis for the processing

The legal basis results from the relationship between the customer as controller and the data subjects, generally Article 6(1)(b) or (f) GDPR. You can obtain further information from the respective customer. Our activities are based on the Data Processing Agreement pursuant to Article 28(3) GDPR.

Recipients

To provide the service, we use sub-processors with whom we have concluded contracts pursuant to Article 28(4) GDPR. The current overview, including address, activity, place of processing and basis for transfer, forms part of the Data Processing Agreement. These are currently:

- Supabase Pte. Ltd., Singapore (database, file storage and server-side functions; processing in the EU, Frankfurt am Main),
- Vercel Inc., 440 N Barranca Ave #4133, Covina, CA 91723, USA (hosting of the application),
- Lettermint B.V., Zwolle, the Netherlands (sending of e-mails from the workspace, e.g. invitations),
- Functional Software, Inc. (Sentry), San Francisco, USA (error monitoring; EU data region),
- Acronis International GmbH, Schaffhausen, Switzerland (backups; EU data region),
- Wasabi Technologies, LLC, Boston, USA (storage for backups; EU storage region),

- Anthropic Ireland, Limited, Dublin, Ireland (provision of the AI language model for the AI-supported functions; no training with your data; onward transfer to Anthropic, PBC in the USA on the basis of standard contractual clauses).

Processing in third countries

Some sub-processors are based outside the EU/EEA (USA, Singapore, Switzerland). The data is generally stored in the EU; however, access from third countries, e.g. for support and administration, cannot be ruled out. Transfers take place on the basis of the European Commission's adequacy decision for Switzerland, the EU-U.S. Data Privacy Framework or standard contractual clauses adopted by the European Commission (Article 46(2)(c) GDPR). Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We process the data for as long as the respective workspace exists. The termination of a paid subscription does not end the workspace as long as it is continued as a Free Workspace. After the workspace has ended, the customer can request the return of the content within 30 days; the data is then deleted. Data remains in backups until the expiry of the rolling retention period of no more than two years; until then, its processing is restricted.

5.3. Processing under our own responsibility

Kunststoff Information GmbH is itself the controller for the following processing operations.

5.3.1. User account and login

Description and purpose of the processing

To use the application, you create a personal user account with which you can access one or more workspaces. You log in using a one-time code or login link that we send to your e-mail address. In doing so, we process:

- name, business e-mail address and, where applicable, telephone number,
- times of login and logout, IP address and failed login attempts,
- session information.

The purpose is to give you access to the application, to manage your user account and to prevent unauthorised access.

Providing your name and business e-mail address is necessary to set up the user account. Without this information, we cannot give you access to the application.

Legal basis for the processing

The legal basis is Article 6(1)(b) GDPR or, where you use the application on behalf of a customer, Article 6(1)(f) GDPR. Our legitimate interest lies in providing the application securely to the persons authorised by the customer. Logins are logged on the basis of Article 6(1)(f) GDPR; our legitimate interest lies in the security of the application.

Recipients

Supabase Pte. Ltd. (authentication; processing in the EU), HubSpot Germany GmbH and Lettermint B.V. (sending of login e-mails).

Processing in third countries

Where recipients are based in the USA, data is transferred on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We store account data for as long as your user account exists and delete it 30 days after the user account has been deleted. We store login logs for 90 days.

5.3.2. Contract administration and billing

Description and purpose of the processing

For the formation and administration of paid subscriptions, we process the contact and billing data of the customer and its contact persons (e.g. name, e-mail address, billing address, VAT identification number), contract and payment data and information on booked seats. We provide invoices electronically via a download link.

Providing this data is necessary for taking out a paid subscription. Without it, we cannot conclude the contract or invoice it.

Legal basis for the processing

The legal basis is Article 6(1)(b) GDPR; where you act on behalf of a customer, Article 6(1)(f) GDPR. For compliance with retention obligations, the legal basis is Article 6(1)(c) GDPR in conjunction with § 147 of the German Fiscal Code (AO) and § 257 of the German Commercial Code (HGB).

Recipients

Payment service providers, CRM service providers, hosting service providers for the billing infrastructure including an upstream proxy service, providers of accounting software and our tax adviser.

Processing in third countries

Where recipients are based in the USA, data is transferred on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We store contract data for the term of the contract plus 3 years. We retain invoices and records relevant for accounting for up to 10 years (§ 147 AO, § 257 HGB).

5.3.3. Logging and security of the application

Description and purpose of the processing

The use of the application is logged automatically (clause 10.2 of the GTC). In doing so, we process in particular the IP address, time, functions accessed and the identifier of the user account. We use this data to ensure the technical operation and security of the application, to check access

authorisations, to monitor compliance with the agreed scope of use and to detect and prevent abusive use or use in breach of contract, such as automated retrieval.

If the log data shows irregularities, an employee reviews the matter before we block access. No decision based solely on automated processing within the meaning of Article 22 GDPR takes place.

Legal basis for the processing

The legal basis is Article 6(1)(f) GDPR. Our legitimate interest lies in the secure operation of the application and in protecting our content against abusive use.

Recipients

Hosting service providers (Vercel Inc., Supabase Pte. Ltd.).

Processing in third countries

Where recipients are based in the USA, data is transferred on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We store log data for 90 days. Where there are specific indications of abuse or attacks, we store it for longer, insofar as this is necessary for investigating them and for pursuing legal claims.

5.3.4. Error and performance monitoring

Description and purpose of the processing

In order to detect and fix technical errors, we transmit technical information to our error monitoring service when errors occur. This includes error messages, information on the browser and operating system, the page accessed, a pseudonymous user identifier and, where applicable, the IP address. Where technically possible, we remove personal data from error messages before transmission.

To monitor the technical operation of our server services, in particular the billing infrastructure, we also use the observability software SigNoz. We operate SigNoz ourselves on our own servers in Germany; no data is transferred to the manufacturer of the software. In this context, technical log data (e.g. time, function accessed, error messages) is processed; where technically possible, we remove personal data before storage.

Legal basis for the processing

The legal basis is Article 6(1)(f) GDPR. Our legitimate interest lies in stable and error-free operation of the application.

Recipients

Functional Software, Inc. (Sentry), 45 Fremont Street, 8th Floor, San Francisco, CA 94105, USA; storage in the EU data region. The servers for SigNoz are operated by Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany.

Processing in third countries

Where recipients are based in the USA, data is transferred on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

The data is deleted after 90 days.

5.3.5. Service e-mails

Description and purpose of the processing

We send you e-mails that form part of the use of the application, such as login e-mails, price alerts you have set up and notices about your user account. We log the sending of these e-mails in our CRM system HubSpot so that we can trace which messages you have received and answer any queries about them. We do not analyse opens or clicks in this context.

We only send you notices on further use of the application, e.g. on steps you have started, insofar as this is permitted under § 7(3) of the German Act against Unfair Competition (UWG). You can object to this at any time via the unsubscribe link in each of these e-mails without incurring any costs other than the transmission costs at the basic rates.

Legal basis for the processing

The legal basis for login e-mails and price alerts is Article 6(1)(b) GDPR or Article 6(1)(f) GDPR. For logging the sending and for notices on further use, the legal basis is Article 6(1)(f) GDPR; our legitimate interest lies in customer support and in advertising our own similar services.

Recipients

HubSpot Germany GmbH, Am Postbahnhof 17, 10243 Berlin (with HubSpot, Inc., USA), and Lettermint B.V., Willemsvaart 16B, 8019 AB Zwolle, the Netherlands.

Processing in third countries

Where recipients are based in the USA, data is transferred on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We store logs of e-mails sent for the duration of the business relationship, but no longer than 24 months after the last interaction.

5.3.6. Support

Description and purpose of the processing

If you contact our support with questions about the application, we process the information you provide, e.g. name, e-mail address and the content of your enquiry including any attached screenshots, in order to handle your request.

Legal basis for the processing

The legal basis is Article 6(1)(b) GDPR or, where you act on behalf of a customer, Article 6(1)(f) GDPR. Our legitimate interest lies in handling your enquiry.

Recipients

HubSpot Germany GmbH (with HubSpot, Inc., USA) and Microsoft Ireland Operations Limited (Microsoft 365, in particular Exchange Online for handling e-mails).

Processing in third countries

Where recipients are based in the USA, data is transferred on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

We store support enquiries for the duration of the business relationship, but no longer than 3 years after it ends.

5.3.7. Backups

Description and purpose of the processing

To protect against data loss, we regularly create encrypted backups of the application database. These also contain the data of your user account.

Legal basis for the processing

The legal basis is Article 6(1)(f) GDPR in conjunction with Article 32 GDPR. Our legitimate interest lies in the availability and recoverability of the application.

Recipients

Acronis International GmbH, Rheinweg 9, 8200 Schaffhausen, Switzerland (EU data region), and Wasabi Technologies, LLC, 75 Arlington Street, Suite 810, Boston, MA 02116, USA (EU storage region).

Processing in third countries

An adequacy decision of the European Commission exists for Switzerland. For Wasabi, any transfer to the USA takes place on the basis of standard contractual clauses adopted by the European Commission.

Retention period

Backups are overwritten on a rolling basis after no more than two years.

5.3.8. PostHog Analytics

In our application, we use the analytics service PostHog of PostHog Inc., 2261 Market Street #4008, San Francisco, CA 94114, USA. We use PostHog Cloud EU; the data is stored on servers in the EU (Frankfurt am Main).

Description and purpose of the processing

PostHog is a product analytics tool with which we analyse how the application is used, which functions are accessed and how users move through the application, in order to design the application

according to need, detect technical errors and improve usability. Cookies and similar technologies are used for this purpose, and the following data is regularly processed:

- pseudonymous user or device identifier,
- IP address,
- areas of the application accessed and functions used,
- interaction and click data as well as times of use,
- technical information on the browser, operating system and device.

Where we use session recordings, inputs and content are masked. PostHog is only loaded after you have given your consent via our consent banner.

Legal basis for the processing

The legal basis is your consent pursuant to § 25(1) of the German Telecommunications Digital Services Data Protection Act (TDDDG) and Article 6(1)(a) GDPR. Your consent is voluntary and you can withdraw it at any time with effect for the future in our application under "Settings".

Recipients

PostHog Inc., 2261 Market Street #4008, San Francisco, CA 94114, USA.

Processing in third countries

The data is stored in the EU. Where, in individual cases, data is transferred to PostHog Inc. in the USA, this takes place on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission.

Retention period

We store event data for 12 months and session recordings for 30 days, in each case no longer than until you withdraw your consent.

6. DATA PROTECTION INFORMATION FOR OTHER PROCESSING

6.1. Compliance with other legal obligations

Description and purpose of the processing

We process personal data where this is necessary for compliance with a legal obligation. The scope of the data to be processed results from the legal obligation with which we have to comply.

Legal basis for the processing

In these cases, the legal basis for processing your data is Article 6(1)(c) GDPR in conjunction with the respective legal provision that imposes such an obligation on us.

These may, for example, be provisions of the German Fiscal Code (AO), e.g. § 147 AO, the German Commercial Code (HGB), e.g. § 257 HGB, or the German Code of Criminal Procedure (StPO).

Recipients

As part of the processing, your data is transferred to the following categories of recipients or to recipients that we use as part of the processing to achieve the stated purposes:

- tax advisers,
- auditors,
- tax or investigating authorities,
- lawyers,
- experts,
- courts,
- software service providers that provide us with archiving solutions,
- software service providers that provide us with solutions for internal and external communication, for creating and editing documents and for managing data sets,
- IT support and administration service providers.

Processing in third countries

As part of this processing, your data is not transferred to a third country outside the EU/EEA.

Retention period

We store your data to the extent necessary for as long as this is necessary to achieve the aforementioned purpose. The retention period results from the special statutory provisions that oblige us to retain or process data for a period of up to 10 years, with the specific start of the retention periods resulting from the respective special statute.

We then delete your data, unless further processing, where applicable also in other systems, is permitted on another legal basis.

6.2. Exercise or defence of legal claims

Description and purpose of the processing

In addition, in individual cases we process your data for the purpose and in the interest of asserting legal claims, for example to enforce our receivables arising from unpaid invoices, where your data is relevant to a legal dispute.

In addition, in individual cases we process your data for the purpose and in the interest of defending against legal claims asserted against us, for example where claims for performance, damages or injunctive relief are asserted, where your data is relevant to a legal dispute.

Legal basis for the processing

The legal basis for processing your data is Article 6(1)(f) GDPR.

Recipients

As part of the processing, your data is transferred to the following categories of recipients or to recipients that we use as part of the processing to achieve the stated purposes:

- tax advisers,
- auditors,
- tax or investigating authorities,
- lawyers,
- experts,

- courts,
- debt collection agencies and credit agencies,
- software service providers that provide us with solutions for internal and external communication, for creating and editing documents and for managing data sets,
- IT support and administration service providers.

Processing in third countries

As part of this processing, your data is not transferred to a third country outside the EU/EEA.

Retention period

In individual cases, we store your data to the extent necessary for as long as this is necessary to achieve the aforementioned purpose. We then delete your data, unless further processing, where applicable also in other systems, is permitted on another legal basis or mandatory for us (e.g. where statutory retention obligations exist).

6.3. Use of AI assistants

Description and purpose of the processing

For internal activities, such as preparing information, handling enquiries and analyses in sales, customer support and administration, we use AI assistants: ChatGPT from OpenAI and Claude from Anthropic. Personal data may be processed in this context, in particular contact, company, contract and billing data as well as the content of enquiries. For this purpose, the systems in some cases access our CRM system and our payment service provider.

We only use business accounts for which the providers act as processors and do not use the data to train their AI models. We do not process content that customers store in workspaces of our application pricenxt with these systems.

Legal basis for the processing

The legal basis is Article 6(1)(f) GDPR. Our legitimate interest lies in efficient customer support and administration.

Recipients

- OpenAI OpCo, LLC, San Francisco, USA,
- Anthropic Ireland, Limited, Dublin, Ireland.

Processing in third countries

The providers also process data in the USA. The transfer takes place on the basis of the EU-U.S. Data Privacy Framework or of standard contractual clauses adopted by the European Commission. Further information can be found above in the section "General information on data transfers to third countries".

Retention period

The conversations are stored until we delete them. We delete them as soon as they are no longer necessary for the respective purpose; the providers then remove deleted conversations from their systems within 30 days.

7. YOUR RIGHTS

Below you will find information on the data subject rights that the applicable data protection law grants you vis-à-vis the controller with regard to the processing of your personal data:

The right of access pursuant to Article 15 GDPR to your personal data processed by us. In particular, you can request information about the purposes of the processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the envisaged retention period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the source of your data if it was not collected by us, and the existence of automated decision-making, including profiling, and, where applicable, meaningful information about its details.

The right pursuant to Article 16 GDPR to obtain without undue delay the rectification of inaccurate personal data or the completion of your personal data stored by us.

The right pursuant to Article 17 GDPR to obtain the erasure of your personal data stored by us, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims.

The right pursuant to Article 18 GDPR to obtain restriction of processing of your personal data where you contest the accuracy of the data, the processing is unlawful but you oppose its erasure, we no longer need the data but you require it for the establishment, exercise or defence of legal claims, or you have objected to the processing pursuant to Article 21 GDPR.

The right pursuant to Article 20 GDPR to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request its transmission to another controller.

The right pursuant to Article 77 GDPR to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of the federal state of our registered office stated above or, where applicable, that of your habitual residence or place of work.

The right to withdraw consent given pursuant to Article 7(3) GDPR: You have the right to withdraw consent to the processing of data once given at any time with effect for the future. In the event of withdrawal, we will erase the data concerned without undue delay, unless further processing can be based on a legal basis for processing without consent. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to object

Where your personal data is processed by us on the basis of legitimate interests pursuant to Article 6(1)(f) GDPR, you have the right pursuant to Article 21 GDPR to object to the processing of your personal data on grounds relating to your particular situation. Where the objection is directed against the processing of personal data for direct marketing purposes, you have a general right to object without the need to specify a particular situation.

If you wish to withdraw your consent or exercise your right to object, please use the contact details given above under "Controller".

8. STATUS OF THIS PRIVACY POLICY

This privacy policy was last amended on 12 October 2026.