

Zentral – Privacy Policy

Date: April 2024

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1 General

- 1.1 The following provisions (“**Privacy Policy**”) determine how Zentral Pro Services GmbH, Eggerstedtstr. 28, 22765 Hamburg, Germany (“**Controller**”) handles your personal data with regard to the website <https://www.zentral.com/>.
- 1.2 Detailed information about the handling of your data is provided below in this Privacy Policy. If you have any questions or comments, please contact us via the contact information provided in section 10 below.
- 1.3 Zentral Pro Services GmbH is the data controller with regard to all data processed as described in the following. Detailed information about the handling of your data is provided below in the policy under section 5 (“Recipients of personal data”).

2 Website

- 2.1 The following provisions of this section 2 do only apply to the use of the website.

2.2 Use of the Website

- 2.2.1 When the website is accessed, for technical reasons, the following data will automatically be transmitted to the Controller:
 - IP address
 - Date and time
 - Accessing device and browser
 - Operating system running on the accessing device
 - A notification of whether access was successful
- 2.2.2 The foregoing data will be processed to technically enable you to use the website. Additionally, the data may be evaluated for statistical purposes and to improve the service

offered in an anonymous form. Such data is processed on the legal basis of legitimate interest (Art. 6 (1) f GDPR).

3 Enquiry

3.1 When contacting us via our contact form, we may collect the following data: email, your full name or your company name. We will use your data for the purpose of replying to your enquiry and to address your requests.

3.2 The foregoing data is processed on the legal basis of the performance of a contract (Art. 6 (1) b GDPR) or for legitimate interest of processing (Art. 6 (1) f GDPR).

4 Email Marketing

4.1 Controller may provide information on special offers and discount promotions from time to time via email. In the marketing emails, you will be provided with information on the Controller, its products and current offers and surveys, provided that you have registered for it.

4.2 When agreeing to the reception of marketing emails, the following data will be processed:

- Name
- Email address
- Country of residence
- Subscription type

4.3 The foregoing data is used by Controller in order to provide marketing emails which suit your possible interests (e.g. information on Controller, its products and current offers and surveys).

4.4 You can unsubscribe from marketing emails at any time, either by de-registering from this service on our website or by clicking on the unsubscribe link at the end of each marketing email.

4.5 The data outlined in this section is processed on the legal basis of consent (Art. 6 (1) a GDPR).

5 Recipients of Personal Data

5.1 When providing services to you, we may share personal data with persons acting on our behalf or otherwise involved in the transaction, including:

- Service providers with whom personal data is being shared
- Other business partners who provide services to us, such as
 - o IT hosting providers
 - o Communication service providers
 - o Marketing service providers

5.2 The recipients of personal data listed above may be located outside of the European Economic Area. Where necessary and unless the country to which data is being transferred has been determined by the European Commission as a country with adequate level of protection, we require such recipients to comply with data protection measures such as standard contractual clauses, the offer of appropriate guarantees according to the guidelines of the European Commission.

5.3 **Data sharing with law enforcement authorities**

5.3.1 We might be obliged to transfer personal data to law enforcement authorities within the meaning of Art. 6 (1) c GDPR.

5.3.2 Controller reserves the right to share information relevant for the purpose of prevention and prosecution of criminal acts in case we observe any illegal behaviour relating to usage of the website that serves our legitimate interest to protect our business and other users.

6 **Your Rights**

6.1 **Right of Access (Art. 15 GDPR)**

You have the right to request confirmation as to whether Controller processes your personal data and where that is the case, that Controller provides you with access to, and information on the data stored by Controller with regard to your person or your pseudonym.

6.2 **Right to Rectification (Art. 16 GDPR)**

You have a right in respect of the correction of data in case your personal data collected is inaccurate.

6.3 **Right to Erasure (Art 17 GDPR)**

You have the right to request erasure of personal data without undue delay under certain circumstances. Such circumstances may be e.g. if your personal data is no longer necessary for the purposes for which it was collected or if you withdraw consent on which our processing is based according to Art. 6 (1) a GDPR and where there is no other legal ground for processing.

6.4 **Right to Restriction on Processing (Art. 18 GDPR)**

You have the right to obtain a restriction of processing under certain circumstances. Such circumstance may be e.g. when you think that your personal data is not accurate or if we do not need the personal data for the original purpose of the processing but you need us to keep such data for the establishment, exercise or defence of legal claims.

6.5 **Right to Data Portability (Art. 20 GDPR)**

Under certain circumstances, you have the right to receive your personal data you have provided us with, in a structured, commonly used and machine-readable format and you

have the right to transmit that information to another controller without hindrance or ask us to do so.

6.6 Right to Objection to Processing (Art. 21 GDPR)

You have the right to object to the processing of your personal data under certain circumstances, in particular if we process your personal data on the legal basis of legitimate interests (Art. 6 (1) f GDPR) or if we use your personal data for marketing purposes.

6.7 Right to Withdraw Consent

6.7.1 Where we process your personal data on the basis of consent you gave us within the meaning of Art. 6 (1) a GDPR, you have a right to withdraw that consent at any time. Please note that withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

6.7.2 For specific instructions on how to withdraw consent, please do also see section 4.4 concerning how to unsubscribe from marketing emails.

6.8 How to Exercise Your Data Protection Rights

For questions about the collection, processing or use of your personal data, the disclosure, correction, blocking or deletion of data or objection to a particular processing of data, data portability please contact us via the contact information provided below in section 10.

6.9 Right to lodge a complaint

6.9.1 You have the right to lodge a complaint with a supervisory authority, in particular in the member state of your habitual residence.

6.9.2 If you are not satisfied with any aspect of data processing of your personal data by Controller, we would like to understand and discuss it with you and learn how can we improve the situation. Please feel free to contact us through the contact information provided below in section 10. Nonetheless, you may submit a complaint to the local data protection supervisory authority.

7 Data Security

As Controller we have implemented appropriate technical and organisational measures to prevent accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

8 Retention and Deletion of Data by Controller

8.1 We store your personal data for as long as necessary or permitted to provide our services to you, to enable you to use our website, to comply with applicable laws (including those regarding document retention), to resolve disputes with any parties and otherwise as necessary or permitted to allow us to conduct our business. As a consequence, we

delete personal data as soon as it is no longer necessary or permitted for the aforementioned purposes.

- 8.2 In case the processing is based on consent and you withdraw your consent, we will delete or anonymize your personal data without undue delay after the withdrawal, unless there is a legal basis to retain the data.
- 8.3 If we store personal data for the only purpose of compliance with laws on document retention, we will store this personal data in archive mode. This means that the access to this personal data is strictly limited to those persons who might need access in order to comply with the aforementioned laws.
- 8.4 The criteria we use to determine the periods for retaining your personal data include the retention requirements under applicable laws, regulations and our operational requirements, such as account maintenance, enabling customer relationship management and responding to legal claims, complaints and regulatory and law enforcement requests. If you have a question about a specific retention period for certain types of personal data we process, please contact us through the contact information provided below in section 10.

9 Status of the Privacy Policy

This Privacy Policy was drafted in April 2024. We reserve the right to amend the notice from time to time in case there are any changes to data processing.

10 Contact Information

You may contact us at

Zentral Pro Services GmbH,
Eggerstedtstr. 28,
22765 Hamburg,
Germany
Email: info@zentral.com