

Privacy policy Website

Last updated: 28th December 2022

Thank you for using retraced! Retraced GmbH ("retraced", "we" or "us") is committed to your privacy. This Privacy Policy ("Policy"), governs our collection, storage, sharing, and use of your data. This Policy is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). The Policy should be legible and understandable for the general public.

This Policy applies to information we collect when you use our website, our dashboard, our API, our hosted consumer communication for product stories, our webshop overlay consumer communication embedded into webshops and our mobile apps (collectively, the "Services") or when you otherwise interact with us.

§ 1 Definition

What is personal data? Personal data means any information concerning the personal or material circumstances of an identified or identifiable individual. These include for example your name, address, telephone number, date of birth or e-mail address. Information which we cannot link to your person (or only after an unreasonable amount of research because the personal data has been masked) is not regarded as personal data.

§ 2 Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

retraced GmbH, Kölner Straße 336a, 40227 Düsseldorf, Germany

contact@retraced.com

§ 3 Your rights

You have the following rights with respect to us regarding personal data relating to you:

- right to information,
- right to rectification or deletion,
- right to restriction of processing,
- right to object to processing,
- right to data portability.

You also have the right to complain to a data protection supervisory authority about the processing of your personal data in our company. The address of the data protection supervisory authority responsible for us is: State Commissioner for Data Protection and Freedom of Information, North Rhine-Westphalia, P.O. Box 200444, 40102 Düsseldorf, Germany, e-mail: poststelle@ldi.nrw.de.

§ 4 Processing of personal data when using our website

We collect the following information for the use of the website:

- e-mail address
- salutation
- first name, last name
- time of start and end of use
- scope of use

In addition, we collect the following information when you create an account with us and log in to us via your account:

- e-mail address
- title
- first name
- surname
- company name
- telephone number
- time of start and end of use
- extent of use
- password
- customer number

The processing of the aforementioned data is carried out

- to be able to identify you as user of retraced
- to correspond with you
- to issue invoices
- to process and execute payments and orders
- to process any liability claims and to assert any claims against you.

The data processing is carried out for the aforementioned purposes, for the implementation of pre-contractual measures as well as the fulfilment of the contract with you (legal basis is Art. 6 para. 1 p. 1 lit. b DS-GVO). In addition, our legitimate interests lie in achieving the aforementioned purposes (legal basis is Art. 6 para. 1 p. 1 lit. f DS-GVO).

You can use our website browser-based directly on your PC, tablet or smartphone.

When you visit or use the website, including all subpages, we collect the personal data described below to enable you to use the functions conveniently. If you wish to use our website, we collect the following data, which is technically necessary for us to offer you the functions of our website and to ensure the stability and security (legal basis is Art. 6 para. 1 p. 1 lit. f DS-GVO):

- IP address
- date and time of the request
- time zone difference to Greenwich Mean Time (GMT)

- content of the request (specific page)
- access status/HTTP status code
- amount of data transferred in each case
- website from which the request came
- browser
- operating system and its interface
- language and version of the browser software.

In addition to the aforementioned data, cookies are stored on your computer when you use our platform. Cookies are small text files that are stored on your hard disk assigned to the browser you are using and through which certain information flows to the body that sets the cookie (here: us). Cookies cannot execute programs or transmit viruses to your computer. They serve to make the website as a whole more user-friendly and effective.

Use of cookies:

This website uses the following types of cookies, the scope and functionality of which are explained below:

- Transient cookies
- Persistent cookies

Transient cookies are automatically deleted when you close the browser. These include, in particular, session cookies. These store a so-called session ID, with which various requests from your browser can be assigned to the joint session. This enables your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.

Persistent cookies are automatically deleted after a specified period of time, which may differ depending on the cookie. You can delete the cookies in the security settings of your browser at any time.

You can configure your browser settings according to your preferences and, for example, refuse to accept third-party cookies or all cookies. Please note that you may not be able to use all functions of this website.

Furthermore, we use HTML5 storage objects that are stored on your terminal device. These objects store the required data independently of the browser you are using and have no automatic expiry date. You can prevent the use of HTML5 storage objects by setting your browser to private mode. We also recommend that you regularly delete your cookies and browser history manually. In addition to the data mentioned above, cookies are stored on your computer when you use our website. Cookies are small text files that are stored in the device memory of your end device and assigned to the website you are using. Cookies enable the party setting the cookie (in this case: us) to obtain certain information. Cookies cannot execute

programs or transmit viruses to your mobile device. They serve to make the website as a whole more user-friendly and effective.

Unless expressly stated otherwise within the scope of this data protection declaration, the data stored by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is required for other and legally permissible purposes and it is required in accordance with Art. 18 DS-GVO, its processing will be restricted.

§ 5 Subscription to our newsletters

On the website of the retraced GmbH, users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The enterprise's newsletter may only be received by you if (1) you have a valid e-mail address and (2) you register for the newsletter shipping. A confirmation email will be sent to the e-mail address registered by you for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation email is used to prove whether the owner of the e-mail address is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by you at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of you at a later date, and it therefore serves the aim of the legal protection of the controller.

When subscribing to the newsletter, you grant us the permission to inform you about the most current news, services, events and special offers in your area of interest at irregular intervals. You can unsubscribe at any time via a link in the bottom of the newsletter

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by email, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by you at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the

website of retraced, or to communicate this to retraced in a different way.

Legal base is the expressly consent of you according to Art. 6 para. 1 lit. a DS-GVO.

§ 6 Services from HubSpot

On our website, we use the services of HubSpot to track your activities on our website and to be able to improve our offer. In addition, we use the service of HubSpot for sending newsletters via e-mail.

You can deactivate the collection and use of location data in your settings at browser, operating system or device level. However, we would like to point out that in this case you may not be able to use all functions of this website to their full extent.

Information of the third-party provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA;

HubSpot has submitted to the EU standard contractual clauses. The data protection provisions of HubSpot are available at: <https://legal.hubspot.com/de/privacy-policy>.

§ 7 Newsletter Tracking

The newsletter of the retraced GmbH contains so-called tracking pixels by Hubspot. A tracking pixel is a miniature graphic embedded in such emails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the retraced GmbH may see if and when an email was opened by you, and which links in the email were called up by data subjects.

§ 8 Contact possibility via the website

The website of the retraced GmbH contains the possibility to electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If you contact retraced by e-mail or via a contact form, the personal data transmitted by you are automatically stored. Such personal data transmitted on a voluntary basis by you are stored for the purpose of processing or contacting you.

According to Art. 6 para. 1 lit. a DS-GVO, legal base for the processing of personal data is your expressly consent.

§ 9 Comments function in the blog/news section on the website

retraced offers users the possibility to leave individual comments on articles and individual blog contributions in the news section, which is on the website of retraced.

If you leave a comment on the blog published on this website, the comments made by you are also stored and published, as well as

information on the date of the commentary and on the user's (pseudonym) chosen by you. In addition, the IP address assigned by the Internet service provider (ISP) to you is also logged. This storage of the IP address takes place for security reasons, and in case you violate the rights of third parties, or post illegal content through a given comment. The storage of these personal data is, therefore, in the own interest of the data controller, so that he can exculpate in the event of an infringement. This collected personal data will not be passed to third parties, unless such a transfer is required by law or serves the aim of the defense of the data controller.

retraced shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you, or for the establishment, exercise or defence of legal claims.

§ 10 Use of links to social media platforms

Our website currently contains a link to the following social media websites: Instagram, Facebook and LinkedIn. When you visit our site, in principle no personal data is passed on to the operator of the social media website. You can recognize the link to the social media website by the mark on the box above its initial letter or logo. We open up the possibility for you to go directly to our corresponding social media website via this link. We recommend that you log out regularly after using a social network, but especially before activating the link, as this will help you to avoid an assignment to your profile with the social media website.

If you visit one of the linked social media websites, we have no influence on the data collected and data processing procedures, nor are we aware of the full extent of the data collection, the purposes of the processing or the storage periods. We also have no information on the deletion of the collected data by the social media provider.

The operating company of Facebook for people outside of the United States and Canada is Meta Platforms Ireland Ltd, 4 Grand Canal Square, Dublin 2, Ireland. For people, who live in the United States or Canada, the operating company of Facebook is Meta, 1 Hacker Way, Menlo Park, CA 94025 United States.

An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugin-s/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by you.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing

and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of you. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by you. to eliminate a data transmission to Facebook. Facebook transfer your data to third countries. In doing so, Facebook ensures that the third countries are countries that offer an adequate level of data protection according to the adequacy decisions of the European Commission. In addition, Meta has submitted to the EU standard contractual clauses.

The operating company of Instagram for people outside of the United States and Canada is Meta Platforms Ireland Ltd, 4 Grand Canal Square, Dublin 2, Ireland. For people, who live in the United States or Canada, the operating company of Instagram is Meta, 1 Hacker Way, Menlo Park, CA 94025 United States.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, United States. For privacy matters outside of the United States, LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

Further information about the LinkedIn plugin may be accessed under <https://developer.linkedin.com/plugins>. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by you..

LinkedIn provides under <https://www.linkedin.com/psettings/guest-controls> the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

LinkedIn also transfers data to the US and therefore have submitted to the EU-standard contract clauses.

§ 11 Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at contact@retraced.com.