

Privacy Policy Statement

A. Purpose of this Statement

cosee GmbH ("*cosee*") respects your right to data privacy. We are processing personal data in order to provide the services available on this website or as listed below. The purpose of this Privacy Policy Statement is to inform you how we process your personal data and which rights according to the current regulations of data protection apply to you.

To ensure that, we will provide you information about the manner, extent and purposes for the collection, use and processing of personal data by *cosee* relating to your use of *sgrol.io*. Moreover, we will provide information about how you can exercise your rights under the applicable data protection laws such as your right to obtain the rectification, erasure, or restriction of processing of your personal data processed by *cosee*.

B. Controller

The Controller responsible for the processing of personal data for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Germany or other Member states of the European Union and other provisions related to data protection at *sgrol.io* is:

cosee GmbH, represented by Mr. Patrick Wolf,
Mina-Rees-Straße 8,
64295 Darmstadt,
email: info@cosee.biz,
tel.: +49 6151 95744-0,
fax: +49 6151 95744-29 (hereinafter referred to as "*COSEE*").

C. Data Protection Officer

Contact details for the Data Protection Officer at *cosee* are as follows:

Sonja Jacinto
cosee GmbH
Mina-Rees-Str. 8
64295 Darmstadt
E-Mail: datenschutz@cosee.biz

D. Scope and General Principles

The provisions in this Privacy Policy Statement apply to all personal data processed by *Cosee* in order to provide you the services available on this website or as listed below. According to Art. 4 par. (1) GDPR data is considered "personal data" if it consists of any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, such as an IP address, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The collection and processing of personal data is limited to the extent necessary to ensure the functionality of the content of our website and our services. Generally, the collection and processing of personal data is conducted after the consent of the user. As an exception to the general rule, a prior consent to the processing of personal data is not sought in any such cases where

- (1) the prior consent of the user is technically impossible, or
- (2) the processing of personal data is permitted by provisions of the applicable data protection law.

E. Logfiles

1. Description of Data Processing

We use Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, United States to host our websites. You can find AWS's Privacy Policy Statement here: <https://aws.amazon.com/de/privacy/>.

Upon a visit to our website (*sgrol.io*) the following data is automatically collected, processed by our provider Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, United States and stored in logfiles on their servers in the European Union:

- IP address
- Date and time of the access request

- Edge Location
- Requested content
- Access status/HTTP status code
- amount of data sent
- prior website
- browser
- operating system and interface
- browser version and language settings

The data stored in logfiles in our servers contain IP addresses or other personal. This might occur in cases when link contains personal data (a link of a website from which the user requests *sgrol.io* or a link a user opens while accessing *sgrol.io*).

This data is stored separately from any other personal data of the user.

2. Purpose and Legal Basis

The temporary storing of the IP address by the computer systems of *Cosee* is necessary to provide access to the content of the website the user requests. Therefore, the IP address has to be stored during the duration of the current session.

The storing of data contained in the logfiles ensures the functionality of the website. Moreover, the data enables us to optimize our website and to assure security of our information technology systems.

We do not use the data for marketing purposes.

For these purposes we have a legitimate interest in processing the personal data to the abovementioned extent and therefore the processing is justified according to Art. 6 par. (1) lit. f GDPR. Any interests or fundamental rights and freedoms of the user that could override this interest are not apparent.

3. Data Erasure and Period of Storage

We will delete personal data or restrict further processing in cases where your personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed. Personal data collected and processed to enable the user to access the website is deleted after the user ended the respective session. The regular time period after we will delete logfiles is 7 days after the request.

4. Rights of Affected Users

Collection and Processing of the personal data is necessary to provide access to the content and to ensure its functionality. Therefore, the user has no right to object the processing of the data.

F. Cookies

1. Description of Data Processing

Our website uses cookies. Cookies are text files stored in the browser, i.e. on the computer system of a user. If a user accesses a website, cookies may be stored on his or her operating system. A cookie contains a distinctive string which allows identification of the browser that allows the identification of the browser at the next request of the website. Additionally, we use cookies to analyze the surfing behavior of our users.

Data collected in this way will be anonymized by technical measures making an allocation of the data to the requesting user impossible.

This data is stored separately from any other personal data of the user.

2. Purpose and Legal Basis

The purpose of processing the cookies is to improve the quality of our website. By the use of cookies, we learn how our website is used and therefore we are able to optimize our content continuously. The cookies created and processed are necessary for the use of Google Analytics.

For these purposes we have a legitimate interest in processing the personal data to the above-mentioned extent and therefore the processing is justified according to Art. 6 par. (1) lit. f GDPR. Any interests or fundamental rights and freedoms of the user that could override this interest are not apparent.

3. Data Erasure and Period of Storage, Rights of Affected Users

Cookies are saved on the computer system of the user which sends the cookies to our servers. Therefore, full control of the usage of cookies is in the user. You can change the settings of your browser to disable cookies. Moreover, already generated and stored cookies can be deleted, which can be executed automatically by your computer system. By disabling cookies, you may not be able to make full use of all the functions of this website.

F. Google Analytics

1. Description of Data Processing

Our website uses Google Analytics, a web analysis service of *Google Inc.* („*Google*“). Google Analytics uses so-called “cookies”. Cookies are text files placed on the computer of a user that allows *Google* to analyze the use of the website by the user. The use includes the “Universal Analytics” operating mode.

Usually, all data generated by the cookie will be sent to a Google server in the USA. However, as IP anonymization is activated on this website, your IP address will be shortened and thereby anonymized within the Member States of the European Union or other states which are contracting parties to the Agreement on the European Economic Area (EEA) prior transmission to the USA. Only in exceptional cases will the full IP address be sent to the USA and shortened afterwards. In behalf of *Cosee*, *Google* will process the so-collected data to analyze your use of this website to create a report about your surfing behavior for *Cosee* and to provide further services related to the use of *Cosee*'s website or its services. Google will store data processed to provide these services to *Cosee* separately from any other personal data of the user.

Via an info banner, we inform our users about the use of cookies for purposes of analyzing surfing behavior and provide a link to this Data Privacy Statement. Within the Data Privacy Statement, we indicate how users may prevent the browser from accepting new cookies.

Please visit following websites to find out more about the Terms of Service of Google Analytics and *Google*'s data privacy policy:

- Google Analytics Terms of Service: <https://www.google.com/analytics/terms/us.html>;
- Data Google Analytics Data Privacy Policies: <https://support.google.com/analytics/answer/6004245?hl=en>.

2. Purpose and Legal Basis

The purpose of processing the cookies is to improve the quality of our website. By the use of cookies, we learn how our website is used and therefore we are able to optimize our content continuously. The data created and processed is necessary for the use of Google Analytics. To minimize processing of personal data we take measures to anonymize data prior transmission to the USA.

For these purposes, we have a legitimate interest in processing the personal data to the above-mentioned extent and therefore the processing is justified according to Art. 6 par. (1) lit. f GDPR. The lawfulness of data processing by Google and the transmission of data to the USA is based on the EU-US Privacy Shield and a “Contract for Processing of Personal Data on Behalf of Controller” between *cosee* and *Google* in accordance with Art. 28 par. (3) GDPR. Any interests or fundamental rights and freedoms of the user that could override our interest are not apparent.

3. Data Erasure and Retention Period

Data saved in Cookies are collected on the computer system of the user which sends the cookies to our servers. Therefore, full control of the use of cookies is in the user. You can change the settings of your browser to disable

cookies. Moreover, already generated and stored cookies can be deleted, which can be executed automatically by your computer system. By disabling cookies, you may not be able to make full use of all the functions of this website.

Transmitted data will be deleted after the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed. After data that has been generated by Google Analytics has reached the retention period of 26 months it is automatically deleted.

4. Rights of Affected Users

You can change the settings of your browser to disable cookies, however, please note that by disabling cookies, you may not be able to make full use of all the functions of this website.

Google also provides users with the ability to prevent their data from being used by Google Analytics in the future. To opt out download and install the Google Analytics Opt-out Browser Add-on for your web browser.

- Link to Google Analytics Opt-out Add-on: <https://tools.google.com/dlpage/gaoptout?hl=en>

You can avoid being tracked by Google Analytics by clicking “Disable Google Analytics” in our Privacy Popup.

G. Email contact

1. Description of Data Processing

On our website we offer you to contact us by email. In that case, we will retain the content of the mail and your email address. We use Webcontrol (www.webcontrol.de) and Mailgun (www.mailgun.com / Mailgun Technologies, Inc./535 Mission St./San Francisco, CA 94105 in the USA) as service provider for the e-mail service. Mailgun is used to emails to our users automatically. Furthermore, Mailgun is used to forward emails addressed to sgrol.io to Webcontrol. The data is used exclusively for the processing of the conversation. You can find Mailgun’s Privacy Policy Statement here: <https://www.privacyshield.gov/participant?id=a2zt0000000PCbmAAG&status=Active>.

2. Purpose and Legal Basis

The purpose of processing your email address and the content of your email(s) is to facilitate communication with you.

For this purpose, we have a legitimate interest in processing the personal data to the above-mentioned extent and therefore the processing is justified according to Art. 6 par. (1) lit. f GDPR. Any interests or fundamental rights and freedoms of the user that could override our interest are not apparent.

In cases where the user requests performance under a contract with *cosee* to which the user is party (support), Art. 6 par.(1) lit. b. GDPR applies and therefore, processing of the personal data of the user is justified.

3. Data Erasure and Retention Period

The data will be stored temporarily at Mailgun to ensure a successful forwarding. After forwarding a mail all data will be removed from Mailgun servers. Mailgun does not use any data for Marketing or other purposes.

The data remain stored at Webcontrol until expiry of the period of 10 years according to German commercial law. If the data is no longer required for the purpose of the conversation, the data will be deleted from local devices and be kept on the server at Webcontrol until the expiration of the retention period.

4. Rights of Affected Users

You may object at any time to processing of your personal data. To object contact us via email (info@cosee.biz). In such a case we will delete all personal data relating to this communication and the communication is terminated.

I. Newsletter

1. Description of Data Processing

On our website we offer you a free newsletter subscription. By clicking the “Subscribe” button, the email address provided, the IP address of the requesting computer, and date and time of registration will be submitted to our newsletter service provider, *Rocket Science Group*, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA.

Your data will be stored and processed on MailChimp servers in the USA. Distribution of our newsletter is facilitated by “MailChimp”, a service of *Rocket Science Group*.

Subsequently, MailChimp will send a confirmation email to the provided email address. To finish the subscription process, please execute the link provided in the confirmation email in your web browser to confirm your subscription.

MailChimp processes the abovementioned data for distributing newsletters and analyzing the use of the newsletters by recipients. Moreover, MailChimp processes these data for optimizing their services, e.g. for technical optimization of the distribution or depiction of newsletters, or for economic purposes, especially to determine the state of residence of the recipients. MailChimp will not use personal data to send emails not authorized by *Cosee* and will not disclose personal data to third parties.

Please visit following website to find out more about MailChimp’s privacy policy:

- <https://mailchimp.com/legal/privacy/>

2. Purpose and Legal Basis

The purpose of processing your email address and the content of your email(s) is to facilitate the distribution of our newsletter. The distribution is carried out on the basis of the subscription of the user on www.sgrol.io. Collection and processing of any further data associated with the registration process is for purposes of preventing misuse of our services or the provided email address.

The collecting and processing of personal data to the above-mentioned extent is based on the consent of the user and therefore lawful according to Art. 6 par. (1) lit. a GDPR.

The justification for data processing by MailChimp and the transmission of data to their servers in the USA is based on the EU-US Privacy Shield and a “Contract for Processing of Personal Data on Behalf of Controller” between *cosee* and *Rocket Science Group* in accordance with Art. 28 par. (3) GDPR.

3. Data Erasure and Retention Period, Rights of Affected Users

We will delete personal data in cases where your personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed. Personal data collected and processed to distribute newsletters will be deleted if the user unsubscribes from the newsletter.

At any time, you may unsubscribe from the newsletter. An unsubscribe link will be provided in each newsletter distributed. The unsubscribe link will also provide a possibility for you to withdraw your consent for the purpose of newsletter distribution.

J. Vimeo

1. Description of Data Processing

We use Vimeo components on our site. Vimeo is a service of *Vimeo LCC*, 555 West 18th Street, New York, New York 10011, USA. Whenever you visit our website, which is equipped with such a component, this component causes the browser you are using to download a corresponding display of the *Vimeo* component. When you visit our site and are at the same time logged into *Vimeo*, *Vimeo* recognizes by means of the information collected by the component, which specific page you are visiting and assigns this information to your personal account at *Vimeo*. If, for example, you click on the “Play” button or make comments, this information will be conveyed to your personal user account at *Vimeo* and stored there. In addition, the information that you have visited our site will be passed on to *Vimeo*. This is done regardless of whether you click on the component/comment or not.

If you want to prevent this transmission and storage of data by Vimeo about you and your behavior on our website, you must log out of Vimeo before you visit our site. *Vimeo*’s Privacy Policy provides more detailed information concerning this, in particular regarding the collection and use of data by *Vimeo*: <https://vimeo.com/privacy>.

2. Purpose and Legal Basis

The purpose of processing your personal data is to facilitate Video-on-Demand services on our website.

For this purpose, we have a legitimate interest in processing the personal data to the above-mentioned extent and therefore the processing is justified according to Art. 6 par. (1) lit. f GDPR. Any interests or fundamental rights and freedoms of the user that could override our interest are not apparent

The justification for data processing by Vimeo and the transmission of data to their servers in the USA is based on the EU-US Privacy Shield and a "Contract for Processing of Personal Data on Behalf of Controller" between *cosee* and *Vimeo* in accordance with Art. 28 par. (3) GDPR.

3. Data Erasure and Retention Period

We will delete personal data in cases where your personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.

4. Rights of Affected Users

If you want to prevent this transmission and storage of data by Vimeo about you and your behavior on our website, you must log out of Vimeo before you visit our site. For further information on data processing and *Vimeo's* privacy statement or if you wish to request the blocking or deletion of your personal data please visit <https://vimeo.com/privacy>.

K. sgrol.io Test Access

1. Description of Data Processing

On our website we offer you test access to our service *sgrol.io*. In order to obtain access, please state your email address in the provided box. After indicating and submitting your email by clicking the "Get Started!" button, we will lead you to our service *sgrol.io*. Your email address submitted will be stored and serves as a user ID for the respective session. Please find further information in the Data Privacy Statement of our service *sgrol.io*.

2. Purpose and Legal Basis

The purpose of processing your personal data is to identify the user and to facilitate a test access to our service *sgrol.io*.

Therefore, processing of your personal data to the above-mentioned extent is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract and therefore is justified according to Art. 6 par. (1) lit. b GDPR.

3. Data Erasure and Retention Period

We will delete personal data in cases where your personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.

4. Rights of Affected Users

You may object at any time to processing of your personal data. To object contact us via email (info@cosee.biz). In such a case we will delete all personal data relating to this purpose and the test access is terminated.

L. Rights of the User

In cases where we process your personal data, you are entitled to exercise the following rights and to obtain from *Cosee* information about the processing of your personal data as defined below:

1. Right of Access

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:

- a. the purposes of the processing;
- b. the categories of personal data concerned;

- c. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f. the right to lodge a complaint with a supervisory authority;
- g. where the personal data are not collected from the data subject, any available information as to their source;
- h. the existence of automated decision-making, including profiling, referred to in Art. 22 par. (1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- i. In cases where personal data are transferred to a third country or to an international organisation, you have the right to be informed of the appropriate safeguards pursuant to Art. 46 GDPR relating to the transfer.

2. Right to rectification

You have the right to obtain without undue delay the rectification of inaccurate personal data concerning you. You have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure ('right to be forgotten')

a. Erasure of personal data

You have the right to obtain the erasure of personal data concerning you without undue delay and Cosee shall have the obligation to erase your personal data without undue delay where one of the following grounds applies:

- aa. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- bb. the data subject withdraws consent on which the processing is based according to lit. (a) of Art. 6 par. (1) lit. a GDPR or Art. 9 par. (2) lit. a GDPR and where there is no other legal ground for the processing;
- cc. the data subject objects to the processing pursuant to Art. 21 par. (1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21 par. (2) GDPR;
- dd. the personal data have been unlawfully processed;
- ee. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- ff. the personal data have been collected in relation to the offer of information society services referred to in Art. 8 par. (1) GDPR.

b. Obligation to inform 3rd parties

Where Cosee has made the personal data public and is obliged pursuant to par. a. to erase the personal data, Cosee, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the user has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

c. Exceptions

Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- aa. for exercising the right of freedom of expression and information;
- bb. for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- cc. for reasons of public interest in the area of public health in accordance with lit. (h) and (i) of Art. 9 par. (2) GDPR as well as Art. 9 par. (3) GDPR;
- dd. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89 par. (1) GDPR in so far as the right referred to in par. 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- ee. for the establishment, exercise or defence of legal claims.

4. Right to restriction of processing

The user shall have the right to obtain restriction of processing where one of the following applies:

- a. the accuracy of the personal data is contested by the user, for a period enabling Cosee to verify the accuracy of the personal data;

- b. the processing is unlawful and the user opposes the erasure of the personal data and requests the restriction of their use instead;
- c. *Cosee* no longer needs the personal data for the purposes of the processing, but they are required by the user for the establishment, exercise or defense of legal claims;
- d. the user has objected to processing pursuant to Art. 21 par. (1) GDPR pending the verification whether the legitimate grounds of *Cosee* override those of the user.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the user's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A user who has obtained restriction of processing shall be informed by *Cosee* before the restriction of processing is lifted.

5. Recipients of Personal Data

Cofee shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

Cosee shall inform the user about those recipients if the user requests it.

6. Right to Data Portability

The user shall have the right to receive the personal data concerning the user, which the user has provided to *Cosee*, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from *Cosee*, where:

- a) the processing is based on consent pursuant to lit. (a) of Art. 6 par. (1) GDPR or lit. (a) of Art. 9 par. (2) GDPR or on a contract pursuant to lit. (b) of Art. 6 par. (1) GDPR; and
- b) the processing is carried out by automated means.

In exercising the user's right to data portability, the user shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise of the right to data portability shall be without prejudice to Art. 17 GDPR. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in *Cosee*. The right to data portability shall not adversely affect the rights and freedoms of others.

7. Right to object

a. The user shall have the right to object, on grounds relating to the user's particular situation, at any time to processing of personal data concerning the user which is based on lit. (e) or (f) of Art. 6 par. (1) GDPR, including profiling based on those provisions. *Cosee* shall no longer process the personal data unless *Cosee* demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the user or for the establishment, exercise or defense of legal claims.

b. Where personal data are processed for direct marketing purposes, the user shall have the right to object at any time to processing of personal data concerning the user for such marketing, which includes profiling to the extent that it is related to such direct marketing.

c. Where the user objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

d. At the latest at the time of the first communication with the user, the right referred to in paragraphs a. and b. shall be explicitly brought to the attention of the user and shall be presented clearly and separately from any other information.

e. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the user may exercise user's right to object by automated means using technical specifications.

8. Right to Withdraw

The user shall have the right to withdraw user's consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9. Right to lodge a complaint with a supervisory authority

a. Without prejudice to any other administrative or judicial remedy, every user shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of the user's habitual residence, place of work or place of the alleged infringement if the user considers that the processing of personal data relating to the user infringes this Regulation.

b. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

To exercise one of the abovementioned rights or in case you have further questions relating to data privacy or to this Data Privacy Statement, feel free to contact:

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Mina-Rees-Str. 8
64295 Darmstadt
E-Mail: datenschutz@cosee.biz