



# Privacy Policy

## Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

Last Update: 27. April 2021

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io

I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600

UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX

Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263

Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



## Controller

REMOTLY GmbH

Oderberger Str. 44

10435 Berlin

Germany

Phone: +49 711 674 945 78

Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich.

E-mail address: [support@remotly.io](mailto:support@remotly.io).

Legal Notice: <https://www.remotly.io/en/legal-notice>

## Contact information of the data protection officer

Herbert Wolf

Beratung für Datenschutz und Organisation

Erdbeerweg 22

70619 Stuttgart

Germany

[datenschutz@remotly.de](mailto:datenschutz@remotly.de)

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)

I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600

UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX

Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263

Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

## Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

### Categories of Processed Data

- Inventory data (e.g. names, addresses).
- Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

### Special Categories of Data

- Data revealing racial or ethnic origin.

### Categories of Data Subjects

- Employees (e.g. Employees, job applicants).
- Job applicants.
- Business and contractual partners.
- Prospective customers.



- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).

## Purposes of Processing

- Provision of our online services and usability.
- Conversion tracking (Measurement of the effectiveness of marketing activities).
- Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- Office and organisational procedures.
- Direct marketing (e.g. by e-mail or postal).
- Feedback (e.g. collecting feedback via online form).
- Marketing.
- Contact requests and communication.
- Profiles with user-related information (Creating user profiles).
- Remarketing.
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Polls and Questionnaires (e.g. surveys with input options, multiple choice questions).
- Provision of contractual services and customer support.
- Managing and responding to inquiries.

## Legal Bases for the Processing

In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - 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.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.
- **Job application process as a pre-contractual or contractual relationship (Article 9 (2)(b) GDPR)** - If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, their processing shall be carried out in accordance with Article 9 (2)(b) GDPR , in the case of the protection of vital interests of applicants or other persons on the basis of Article 9 (2)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (2)(d) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (2)(a) GDPR.

## National data protection regulations in Germany

In addition to the data protection regulations of the General Data Protection Regulation, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



automated individual decision-making, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

## Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

## Transmission of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of your data.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

## Data Processing in Third Countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third party services or disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements. Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en)).

## Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his visit within an online service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term "cookies" also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

**The following types and functions of cookies are distinguished:**

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed his browser.
- **Permanent cookies:** Permanent cookies remain stored even after closing the browser. For example, the login status can be saved or preferred content can be displayed directly when the

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io

I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600

UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX

Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263

Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

user visits a website again. The interests of users who are used for range measurement or marketing purposes can also be stored in such a cookie.

- **First-Party-Cookies:** First-Party-Cookies are set by ourselves.
- **Third party cookies:** Third party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential) cookies:** Cookies can be necessary for the operation of a website (e.g. to save logins or other user inputs or for security reasons).
- **Statistics, marketing and personalisation cookies:** Cookies are also generally used to measure a website's reach and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) are stored on individual websites in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This procedure is also referred to as "tracking", i.e. tracking the potential interests of users. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or in the context of obtaining consent.

## Information on legal basis

The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this applies and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies will be processed on the basis of our legitimate interests (e.g. in a business operation of our online service and its improvement) or, if the use of cookies is necessary to fulfill our contractual obligations.

## Retention period

Unless we provide you with explicit information on the retention period of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the retention period can be as long as two years.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

## General information on Withdrawal of consent and objection (Opt-Out)

Respective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as "opt-out"). You can initially explain your objection using the settings of your browser, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online services). An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via the websites <https://www.aboutads.info/choices/> and <https://www.youronlinechoices.com>. In addition, you can receive further information on objections in the context of the information on the used service providers and cookies.

## Processing Cookie Data on the Basis of Consent

We use a cookie management solution in which users' consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) in order to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



## Services and service providers being used

**Cookiebot:** Cookie-Consent Manager; Service provider: Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark; Website: <https://www.cookiebot.com>; Privacy Policy:

<https://www.cookiebot.com/en/privacy-policy/>; Stored data (on the server of the service provider): The IP number of the user in anonymous form (the last three digits are set to 0), date and time of the consent, user agent of the user's browser, the URL from which the consent was sent, An anonymous, random and encrypted key value; the consent status of the user.

## Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries. We process this data in order to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of data subjects concerned (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part of this privacy policy. Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally. We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving (e.g., as a rule 10 years for tax purposes). In the case of data disclosed to us by the contractual partner within the context of an assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

## Coaching

We process the data of our clients and interested parties and other clients or contractual partners (uniformly referred to as "clients") in order to provide them with our services. The data processed, the type, scope and purpose of their processing and the necessity of their processing are determined by the underlying contractual and client relationship. Within the scope of our services, we may also process special categories of data, here in particular information on the health of clients, possibly with reference to their sexual life or sexual orientation and data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs. To this end, we obtain the express consent of clients where necessary and process the special categories of data otherwise for the purposes of health care, if the data is public or with another legal permission. Insofar as it is necessary for the fulfilment of our contractual obligations, the protection of vital interests or by law, or with the clients's consent, we disclose or transfer the clients's data to third parties or agents, such as public authorities, accounting offices and in the field of IT, office or comparable services, in compliance with professional regulations.

## Consulting

We process the data of our clients, clients as well as interested parties and other clients or contractual partners (uniformly referred to as "clients") in order to provide them with our consulting services. The data processed, the type, scope and purpose of the processing and the necessity of its processing are determined by the underlying contractual and client relationship. Insofar as it is necessary for the fulfilment of our contract, for the protection of vital interests or by law, or with the consent of the client, we disclose or transfer the client's data to third parties or agents, such as authorities, courts, subcontractors or in the field of IT, office or comparable services, taking into account the professional requirements.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

- **Processed data types:** Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contact data (e.g. e-mail, telephone numbers), Contract data (e.g. contract object, duration, customer category).
- **Special categories of personal data:** Health Data (Article 9 (1) GDPR), Data related to sexual preferences, sex life, and/or sexual orientation (Article 9 (1) GDPR), Religious or philosophical beliefs (Article 9 (1) GDPR), Data revealing racial or ethnic origin.
- **Data subjects:** Prospective customers, Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Provision of online services and web hosting

In order to provide our online services securely and efficiently, we use the services of one or more web hosting providers from whose servers (or servers they manage) the online services can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services, as well as security and technical maintenance services. The data processed within the framework of the provision of the hosting services may include all information relating to the users of our online services that is collected in the course of use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online services to browsers, and all entries made within our online services or from websites.

## Collection of Access Data and Log Files

We, ourselves or our web hosting provider, collect data on the basis of each access to the server (so-called server log files). Server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access,

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a general rule, IP addresses and the requesting provider. The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal load balancing of the servers.

- **Processed data types:** Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

**United Domains:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); Service provider: united-domains AG, Gautinger Straße 10, 82319 Starnberg, Germany; Website: <https://www.united-domains.de>; Privacy Policy: <https://www.united-domains.de/unternehmen/datenschutz/>.

## Contacting us

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested activities. The response to contact enquiries within the framework of contractual or pre-contractual relationships is made in order to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise on the basis of the legitimate interests in responding to the enquiries.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Freshdesk:** Management of contact requests and communication; Service provider: Freshworks, Inc., 2950 S.Delaware Street, Suite 201, San Mateo, CA 94403, USA; Website: <https://www.freshworks.com>; Privacy Policy: <https://www.freshworks.com/privacy/>.
- **Salesforce:** Management of contact requests and communication; Service provider: salesforce.com Germany GmbH, Erika-Mann-Str. 31, 80636 München, Germany, parent company: Salesforce.com, inc. Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA; Website: <https://www.salesforce.com>; Privacy Policy: <https://www.salesforce.com/company/privacy/>.

## Communication via Messenger

We use messenger services for communication purposes and therefore ask you to observe the following information regarding the functionality of the messenger services, encryption, use of the metadata of the communication and your objection options. You can also contact us by alternative means, e.g. telephone or e-mail. Please use the contact options provided to you or use the contact options provided within our online services. In the case of encryption of content (i.e. the content of your message and attachments), we point out that the communication content (i.e. the content of the message and attachments) is encrypted end-to-end. This means that the content of the messages is not visible, not even by the

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



messenger service providers themselves. You should always use a current version of the messenger service with activated encryption, so that the encryption of the message contents is guaranteed. However, we would like to point out to our communication partners that although messenger service providers do not see the content, they can find out that and when communication partners communicate with us and process technical information on the communication partner's device used and, depending on the settings of their device, also location information (so-called metadata).

## Information on Legal basis

If we ask communication partners for permission before communicating with them via messenger services, the legal basis of our processing of their data is their consent. Otherwise, if we do not request consent and you contact us, for example, voluntarily, we use messenger services in our dealings with our contractual partners and as part of the contract initiation process as a contractual measure and in the case of other interested parties and communication partners on the basis of our legitimate interests in fast and efficient communication and meeting the needs of our communication partners for communication via messenger services. We would also like to point out that we do not transmit the contact data provided to us to the messenger service providers for the first time without your consent.

## Withdrawal, objection and deletion

You can withdraw your consent or object to communication with us via messenger services at any time. In the case of communication via messenger services, we delete the messages in accordance with our general data retention policy (i.e. as described above after the end of contractual relationships, archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information provided by the communication partners, if no reference to a previous conversation is to be expected and there are no legal obligations to store the messages to prevent their deletion.

## Reservation of reference to other means of communication

Finally, we would like to point out that we reserve the right, for reasons of your safety, not to answer inquiries about messenger services. This is the case if, for example, internal contractual matters require

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



special secrecy or if an answer via the messenger services does not meet the formal requirements. In such cases we refer you to more appropriate communication channels.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Slack:** Slack Messenger ohne end-to-end encryption; Service provider: Slack Technologies, Inc., 500 Howard Street, San Francisco, CA 94105, USA; Website: <https://slack.com/>; Privacy Policy: <https://slack.com/intl/en-de/legal>.

## Video Conferences, Online Meetings, Webinars and Screen-Sharing

We use platforms and applications of other providers (hereinafter referred to as "Conference Platforms") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings (hereinafter collectively referred to as "Conference"). When using the Conference Platforms and their services, we comply with the legal requirements.

### Data processed by Conference Platforms

In the course of participation in a Conference, the Data of the participants listed below are processed. The scope of the processing depends, on the one hand, on which data is requested in the context of a

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



specific Conference (e.g., provision of access data or clear names) and which optional information is provided by the participants. In addition to processing for the purpose of conducting the conference, participants' Data may also be processed by the Conference Platforms for security purposes or service optimization. The processed Data includes personal information (first name, last name), contact information (e-mail address, telephone number), access data (access codes or passwords), profile pictures, information on professional position/function, the IP address of the internet access, information on the participants' end devices, their operating system, the browser and its technical and linguistic settings, information on the content-related communication processes, i.e. entries in chats and audio and video data, as well as the use of other available functions (e.g. surveys). The content of communications is encrypted to the extent technically provided by the conference providers. If participants are registered as users with the Conference Platforms, then further data may be processed in accordance with the agreement with the respective Conference Provider.

## Logging and recording

If text entries, participation results (e.g. from surveys) as well as video or audio recordings are recorded, this will be transparently communicated to the participants in advance and they will be asked - if necessary - for their consent.

## Data protection measures of the participants

Please refer to the data privacy information of the Conference Platforms for details on the processing of your data and select the optimum security and data privacy settings for you within the framework of the settings of the conference platforms. Furthermore, please ensure data and privacy protection in the background of your recording for the duration of a Conference (e.g., by notifying roommates, locking doors, and using the background masking function, if technically possible). Links to the conference rooms as well as access data, should not be passed on to unauthorized third parties.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



## Notes on legal bases

Insofar as, in addition to the Conference Platforms, we also process users' data and ask users for their consent to use contents from the Conferences or certain functions (e.g. consent to a recording of Conferences), the legal basis of the processing is this consent. Furthermore, our processing may be necessary for the fulfillment of our contractual obligations (e.g. in participant lists, in the case of reprocessing of Conference results, etc.). Otherwise, user data is processed on the basis of our legitimate interests in efficient and secure communication with our communication partners.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Zoom:** Video Conferencing, Web Conferencing and Webinars; Service provider: Zoom Video Communications, Inc., 55 Almaden Blvd., Suite 600, San Jose, CA 95113, USA; Website: <https://zoom.us>; Privacy Policy: <https://zoom.us/docs/de-de/privacy-and-legal.html>; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): <https://zoom.us/docs/de-de/privacy-and-legal.html> (referred to as Global DPA).
- **Miro:** Online-Whiteboard Software; Service provider: miro inc. 201 Spear Street, Suite 1100, San Francisco, CA 94105; Website: <https://www.miro.com>; Privacy Policy: <https://miro.com/legal/privacy-policy/>; Standard Contractual Clauses (Safeguarding the level of

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



data protection when processing data in third countries):

<https://miro.com/static/legal/Miro-Data-Processing-Addendum.pdf>

## Job Application Process

The application process requires applicants to provide us with the data necessary for their assessment and selection. The information required can be found in the job description or, in the case of online forms, in the information contained therein. In principle, the required information includes personal information such as name, address, a contact option and proof of the qualifications required for a particular employment. Upon request, we will be happy to provide you with additional information. If made available, applicants can submit their applications via an online form. The data will be transmitted to us encrypted according to the state of the art. Applicants can also send us their applications by e-mail. Please note, however, that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received. We can therefore accept no responsibility for the transmission path of the application between the sender and the reception on our server. For the purposes of searching for applicants, submitting applications and selecting applicants, we may make use of the applicant management and recruitment software, platforms and services of third-party providers in compliance with legal requirements. Applicants are welcome to contact us about how to submit their application or send it to us by regular mail.

## Processing of special categories of data

If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can exercise his/her rights arising from labour law and social security and social protection law and fulfil his/her duties in this regard, their processing shall be carried out in accordance with Article 9 (1)(b) GDPR, in the case of the protection of vital interests of applicants or other persons pursuant to Article 9 (1)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)

I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600

UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX

Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263

Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (1)(h) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (1)(a) GDPR.

## Ereasure of data

In the event of a successful application, the data provided by the applicants may be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicants' data will also be deleted if an application is withdrawn, to which applicants are entitled at any time. Subject to a justified revocation by the applicant, the deletion will take place at the latest after the expiry of a period of six months, so that we can answer any follow-up questions regarding the application and comply with our duty of proof under the regulations on equal treatment of applicants. Invoices for any reimbursement of travel expenses are archived in accordance with tax regulations.

## Admission to a talent pool

Admission to an talent pool, if offered, is based on consent. Applicants are informed that their consent to be included in the talent pool is voluntary, has no influence on the current application process and that they can revoke their consent at any time for the future.

- **Processed data types:** Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- **Data subjects:** Job applicants.
- **Purposes of Processing:** Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- **Legal Basis:** Job application process as a pre-contractual or contractual relationship (Article 9 (2)(b) GDPR).

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

## Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the following purposes: document storage and administration, calendar management, e-mail delivery, spreadsheets and presentations, exchange of documents, content and information with specific recipients or publication of websites, forms or other content and information, as well as chats and participation in audio and video conferences.

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

## Information on legal basis

If we ask for permission to use cloud services, the legal basis for processing data is consent.

Furthermore, their use can be a component of our (pre)contractual services, provided that the use of cloud services has been agreed in this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient and secure administrative and collaboration processes).

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Employees (e.g. Employees, job applicants), Prospective customers, Communication partner (Recipients of e-mails, letters, etc.).

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io

I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600

UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX

Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263

Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



- **Purposes of Processing:** Office and organisational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Google Cloud Services:** Cloud storage services; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://cloud.google.com/>; Privacy Policy: <https://www.google.com/policies/privacy>, Security information: <https://cloud.google.com/security/privacy>.

## Newsletter and Electronic Communications

We send newsletters, e-mails and other electronic communications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us. In order to subscribe to our newsletters, it is generally sufficient to enter your e-mail address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

### Double opt-in procedure

The registration to our newsletter takes place in general in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external e-mail addresses.

The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

## Deletion and restriction of processing

We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the e-mail address solely for this purpose in a blocklist.

## Information on legal bases

The sending of the newsletter is based on the consent of the recipients or, if consent is not required, on the basis of our legitimate interests in direct marketing. Insofar as we engage a service provider for sending e-mails, this is done on the basis of our legitimate interests. The registration procedure is recorded on the basis of our legitimate interests for the purpose of demonstrating that it has been conducted in accordance with the law.

Contents: Information about us, our services, promotions and offers.

## Measurement of opening rates and click rates

The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file, which is retrieved from our server when the newsletter is opened or, if we use a mailing service provider, from its server. Within the scope of this retrieval, technical information such as information about the browser and your system, as well as your IP address and time of retrieval are first collected. This information is used for the technical improvement of our newsletter on the basis of technical data or target groups and their reading behaviour on the basis of their retrieval points (which can be determined with the help of the IP address) or access times. This analysis also includes determining whether newsletters are opened, when they are opened and which links are clicked. This information is assigned to the individual newsletter recipients and stored in their profiles until the profiles are deleted. The evaluations serve us much more to recognize the

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The measurement of opening rates and click rates as well as the storage of the measurement results in the profiles of the users and their further processing are based on the consent of the users.

A separate objection to the performance measurement is unfortunately not possible, in this case the entire newsletter subscription must be cancelled or objected to. In this case, the stored profile information will be deleted.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Meta/communication data (e.g. device information, IP addresses), Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

## Services and service providers being used

- **Mailchimp:** Email marketing platform; Service provider: "Mailchimp" - Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA; Website: <https://mailchimp.com>; Privacy Policy: <https://mailchimp.com/legal/privacy/>.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

## Surveys and Questionnaires

The surveys and questionnaires ("surveys") carried out by us are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical execution of the survey (e.g. processing the IP address to display the survey in the user's browser or to enable a resumption of the survey with the aid of a temporary cookie (session cookie)) or participants have consented.

### Information on legal basis

If we ask the participants for their consent to the processing of their data, this is the legal basis for the processing, otherwise the processing of the participants' data is based on our legitimate interests in conducting an objective survey.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Direct marketing (e.g. by e-mail or postal), Feedback (e.g. collecting feedback via online form), Polls and Questionnaires (e.g. surveys with input options, multiple choice questions).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used

- **Typeform:** Creation of forms and surveys and management of participant contributions; Service provider: TYPEFORM SL, Carrer Bac de Roda, 163, local, 08018 - Barcelona, Spain; Website: <https://www.typeform.com/>; Privacy Policy: <https://admin.typeform.com/to/dwk6gt/>.



## Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components. For these purposes, so-called user profiles can be created and stored in a file (so-called "cookie") or similar procedures in which the relevant user information for the aforementioned analyses is stored. This information may include, for example, content viewed, web pages visited and elements and technical data used there, such as the browser used, computer system used and information on times of use. If users have consented to the collection of their location data, these may also be processed, depending on the provider. The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



## Information on legal basis

If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors), Profiles with user-related information (Creating user profiles).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Google Analytics:** web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>.

## Plugins and embedded functions and content

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be graphics, videos or city maps (hereinafter uniformly referred to as "Content").

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

## Information on legal basis

If we ask users for their consent (e.g. in the context of a so-called "cookie banner consent"), the legal basis for processing is this consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. We refer you to the note on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability, Provision of contractual services and customer support.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Google Fonts:** We integrate the fonts ("Google Fonts") of the provider Google, whereby the data of the users are used solely for purposes of the representation of the fonts in the browser of the users. The integration takes place on the basis of our legitimate interests in a technically secure, maintenance-free and efficient use of fonts, their uniform presentation and consideration of

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



possible licensing restrictions for their integration. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://fonts.google.com/>; Privacy Policy: <https://policies.google.com/privacy>.

- **reCAPTCHA:** We integrate the "reCAPTCHA" function to be able to recognise whether entries (e.g. in online forms) are made by humans and not by automatically operating machines (so-called "bots"). The data processed may include IP addresses, information on operating systems, devices or browsers used, language settings, location, mouse movements, keystrokes, time spent on websites, previously visited websites, interactions with ReCaptcha on other websites, possibly cookies and results of manual recognition processes (e.g. answering questions asked or selecting objects in images). Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://www.google.com/recaptcha/>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

## Management, Organization and Utilities

We use services, platforms and software from other providers (hereinafter referred to as "third-party providers") for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include in particular master data and contact data of users, data on processes, contracts, other processes and their contents. If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



notices of the respective third party providers.

## Information on legal basis

If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services), Prospective customers.
- **Purposes of Processing:** Contact requests and communication, Web Analytics (e.g. access statistics, recognition of returning visitors), Remarketing, Conversion tracking (Measurement of the effectiveness of marketing activities), Marketing, Profiles with user-related information (Creating user profiles).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used

- **Salesforce Sales Cloud / Salesforce Service Cloud:** Salesforce Cloud provides sales automation and service software; Service provider: salesforce.com Germany GmbH, Erika-Mann-Str. 31, 80636 München, Germany, parent company: Salesforce.com, inc. Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA; Website: <https://www.salesforce.com>; Privacy Policy: <https://www.salesforce.com/company/privacy/>.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: [support@remotly.io](mailto:support@remotly.io)  
I: [www.remotly.de](http://www.remotly.de) | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



## Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose). If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

In the context of our information on data processing, we may provide users with further information on the deletion and retention of data that is specific to the respective processing operation.

## Changes and Updates to the Privacy Policy

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification. If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

## Rights of Data Subjects

As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich



infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

## Supervisory authority

Berliner Beauftragte für Datenschutz und Informationsfreiheit  
Friedrichstr. 219  
10969 Berlin  
Germany  
Phone: +49 30 13889-0  
E-Mail: mailbox@datenschutz-berlin.de

## Terminology and Definitions

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the

**REMOTLY GmbH** | Oderberger Str. 44 | 10435 Berlin | Germany | T: +49 711 674 945 78 | E: support@remotly.io  
I: www.remotly.de | Baden-Wuerttembergische Bank, IBAN: DE69 6005 0101 0405 3112 77, BIC: SOLADEST600  
UniCredit Bank-HypoVereinsbank, IBAN: DE15 2073 0034 4000 2411 08, BIC: HYVEDEMMXXX  
Registered office: Berlin | Commercial Register: AG Charlottenburg, HRB 215818 B | VAT: DE329307263  
Authorised Representatives: Dr. Jörn Apel, Nicolas Ermrich

target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).

- **IP Masking:** IP masking is a method by which the last octet, i.e. the last two numbers of an IP address, are deleted so that the IP address alone can no longer be used to uniquely identify a person. IP masking is therefore a means of pseudonymising processing methods, particularly in online marketing.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); 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 or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Remarketing:** Remarketing" or "retargeting" is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website in order to remind the user of these products on other websites, e.g. in advertisements.
- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This allows them, for example, to optimize the content of the website to better meet the needs of their visitors. For purposes of web analytics, pseudonymous cookies and web beacons are frequently used in order to recognise returning visitors and thus obtain more precise analyses of the use of an online service.