



Data Privacy Statement of the Cortado Holding AG

This Data Privacy Statement applies to all products, services and websites distributed by Cortado Holding AG, Alt-Moabit 91b, 10559 Berlin, Germany (hereinafter referred to as "Cortado Holding"). Cortado Holding strongly emphasizes the protection of your personal data. Cortado Holding adheres to any and all applicable data protection provisions, including but not limited to the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG)

Data collected by the Cortado Holding websites and services

User data

The Cortado Holding websites (e.g. www.cortado-holding.com) contain a number of forms in which you must provide personal information if you use the corresponding service. In particular, this concerns contact, offer, download and support forms as well as newsletter subscriptions. The data to be provided may include: first and last name, company name and address, position, phone number and e-mail address. We may use your e-mail address for purposes of direct marketing (information on products, newsletters, etc.). The legal basis of such processing is the protection for the *purposes of legitimate interests* pursued by Cortado Holding (Article 6 para 1. (f) GDPR).

In general, any and all information that allows us to individually identify people are considered personal information. We always receive and transmit any and all personal data by way of encryption.

When using the customer portal *Cortado Enterprise Portal* you register by entering the following information on enterpriseportal.cortado.com: company name, your position in the company, salutation, first name, last name, your (company) e-mail address, the postal address of the company as well as a license key of the product you have purchased. As Cortado or ThinPrint partner, you may also enter the e-mail address of a contact person of your end customer. Optionally, you can also enter a phone number. The administrator of a customer account is able to add additional user accounts to the Cortado Enterprise Portal. In order to do so, he has to give the following information: first name, last name. (corporate) e-mail address and optionally the position in the company. Each user chooses his/her own password.

Usage data

On your visit to a Cortado Holding website, we send a **cookie**, e.g. a small electronic file consisting of a certain character string allowing us to identify your browser. Additional cookies are used for caching your user preferences. All Cortado Holding cookies are recognizable by the string **cortado-holding.com** or **cortado.com**, which can be found in the name of the cookie. However, you have the option to set your browser to refuse cookies or to ask you every time a cookie is sent. Please keep in mind, rejecting *all cookies* (or Cortado Holding's) would prevent you from logging into the *Cortado Enterprise Portal*.

Furthermore, Cortado Holding servers automatically record usage data that your browser sends when you visit a website. These so-called **log data** include your web request, IP address, browser type, browser language, date and time of a request and cookies. These log data allow to clearly distinguish your browser from other browsers. If required, log data is used by Cortado Holding only for purposes of evidence, error detection as well as for identifying and repelling hacker attacks. These data will be automatically deleted after 30 days. The legal basis of such processing is the protection of *purposes of legitimate interests* pursued by Cortado Holding (Art. 6 para. 1 (f) GDPR).

Third parties / Target group orientated ads

Cortado Holding uses the following third parties for analytical purposes and/or to place their own interest-based ads on the websites of these third-party providers:

- Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA (for analytics + ads)
- Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA (for ads)
- Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025, USA (for ads)

For ads, cookies (also referred to as tags, user action or tracking pixels) from the above mentioned third-party providers are placed in your web browser once you have logged in with your third-party account and looked at or clicked on an advertisement there. This allows Cortado Holding to track users' actions, the effectiveness of advertisements for statistical and market research purposes and to display ads regarding products or services that may interest you. All data collected this way is anonymous for Cortado Holding (usage data); in other words, Cortado Holding does not see the individual user's personal data (user data).

However, these usage data may be stored and processed by the respective third party. If you also log-in to your relevant third-party account using the same web browser, the pertinent third-party provider could connect your usage data with your local account – thus your user data – and use for their own promotional purposes. To prevent that from happening, you can either block the third-party cookies via browser settings or use two different web browsers on the same device – one for logging in to your Cortado Holding account and another one for logging in to the third-party provider account.

Cortado Holding only uses the collected personal data as indicated for the purposes they were actually intended for. Apart from that, the purposes include the provision of Cortado Holding's services and products for users and the development of new services and products.

To analyze the activities on its websites, Cortado Holding uses the functions of Google Analytics. To ensure anonymization of IP addresses, Google provides an extension to the Google Analytics Code. Integrating the code extension "anonymizelp". By using the code extension, the last 8 bit of the IP address will be deleted and therefore anonymized. This only permits a rough localization and is approved by the German data protection authorities. Cortado Holding anonymizes any and all IP addresses before their transmission to Google via Javascript with the code line "ga('set', 'anonymizelp', true);" or "_gaq.push(['_gat._anonymizelp']);" in your browser (see <https://support.google.com/analytics/answer/2763052?hl=en>).

Your approval for the collection of personal data / Revocation

If you register for a specific service – for example Cortado Enterprise Portal –, we ask for your personal data (see above). If such data shall be used for a purpose other than originally indicated, we request your consent for us doing so by checking an applicable box on the website. However, you may refuse to give your prior consent. Without your express prior consent, we will not use your personal information for other purposes than indicated and in connection with the respective services or products. The legal basis of processing the mentioned data lies in the data subject has given his/her *consent* to the processing (Art. 6 para.1 (a) GDPR).

You are at all times entitled to refuse to provide personal information or to revoke provided personal data. Please be aware though that in such case Cortado Holding might not be able to offer you all available services. If you revoke personal data, which is required for processing valid contractual relations between you and Cortado Holding, we will delete any personal data promptly after termination of the contractual relations.

Transfer of personal data to third parties

In addition to the purposes outlined above for *analytics* and *interest-based ads*, Cortado Holding is providing the users' e-mail address to the newsletter service provider *Avenue 81 Inc. d/b/a Leadpages* (251 N. 1st Avenue, Suite 200, Minneapolis, MN 55401, USA). Furthermore, Cortado Holding uses various platforms from the cloud service provider Freshworks



(1250 Bayhill Drive, Suite 315, Sa Bruno, CA 94066, USA), such as Freshdesk for support and consulting and Freshsales for customer relationship management (customer database). The legal basis of such processing is the protection of *purposes of legitimate interests* pursued by Cortado Holding (Article 6 para. 1 (f) GDPR).

Cortado Holding web pages and cloud services include a number of social media buttons such as Twitter, Facebook, and LinkedIn. Data will only be send to the respective third-party provider if you explicitly click on the relevant button. By doing so, your browser establishes a direct connection to a web server of the respective social network. As a result, the social network receives the information that you have accessed one of our corresponding website. If you are logged in to the social network at the same time and with the same browser you visit our website, the social network can assign your website visit to your account. Again, we recommend using two different web browsers on the same device to use our websites and services on the one hand, and to log in to the social network on the other, should you wish to exclude the use of your usage data for advertising purposes.

Without your consent, Cortado Holding will only transfer or disclose your personal data upon presentation of a search warrant, judicial order, judicial decree or another form of lawful cases regulated by law. In such cases, the legal basis lies in the *compliance with a legal obligation* (Art. 6 para.1 (c) GDPR).

Data security

Cortado Holding uses adequate security measures to prevent unauthorized access or change, transfer or deletion of personal information. Such measures include, but are not limited to, internal review of our data collection practices, data storage and processing as well as technical and organizational security measures to prevent access to the systems we use to store such sensitive data.

Cortado Holding websites are hosted at WP Engine Inc., 504 Lavaca Street, Suite 1000, Austin, Texas 78701, USA. WP Engine only provides the web server platform. The management of the data including the encryption, however, lies exclusively with Cortado Holding. For further information on data privacy and compliance at WP Engine, please visit <https://wpengine.com/legal/privacy/>.

Access to such data is internally limited to such members of staff who for the operation, development, and improvement of our services and products require knowledge of such data. Such members of staff are required to adhere to special confidentiality requirements. If such members of staff, however, breach the secrecy requirements, they have to face consequences under labor law and/or criminal prosecution.

Enforcement

Cortado Holding regularly checks compliance with this Data Privacy Statement. If you have any questions, comments, requests for information, rectification, processing restrictions, portability or erasure of data, please feel free to contact our duly appointed Data Protection Officer at dataprotection@cortado.com. **You have the right to object to the processing of your personal data or to revoke your consent at any time.** In addition, you have the right to complain to the relevant recourse authority.

Offer to conclude a Data Protection Agreement

In your capacity as a business customer, on your instructions and within the framework of the service provision personal data is collected, processed and/or used by Cortado Holding. According to Art. 28 of the GDPR the contracting authority – i. e. you – is responsible for complying with the data protection rules. You can fulfill this obligation by concluding a Data Protection Agreement with Cortado Holding, which meets the legal requirements of the GDPR. Upon request Cortado Holding will be happy to provide you with a draft of a Data Protection Agreement along with a Data Processing Addendum describing our technical and organizational security measures to protect personal data. Once provided to you, you



only have to check and sign these documents. If you have any concerns, inquiries or if you need further information or assistance, we are happy to assist you at dataprotection@cortado.com.

Alterations and amendments

Please note that this Data Privacy Statement may be altered and/or amended from time to time. Without your express consent, though, we will not restrain your rights under the current Data Privacy Statement. Amendments and/or alterations concerning the Data Privacy Statement will be announced by Cortado Holding on the websites. Earlier versions of the Data Privacy Statement will be filed and will be available for reference upon your request.

Berlin, November 2018