



## 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 website [www.cortado-holding.com](http://www.cortado-holding.com) contains a contact form in which you must provide personal information if you want to use the corresponding service. The data to be provided may include: name, e-mail address, mail subject and text. When using the customer portal *Cortado Enterprise Portal* you register by entering the following information on [enterpriseportal.cortado.com](http://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. Personal data you made available is used to fulfill the service contract Cortado Holding concluded with you. The legal basis of such processing is the *necessity for the performance of the contract* (Article 6 para. 1 (b) GDPR).

We may use your e-mail address for purposes of direct marketing (information on products, newsletters, etc.). The recipients of the data are listed in Appendix 1 to this Data Privacy Statement. The legal basis of such processing is the protection for the *purposes of legitimate interests* pursued by Cortado Holding (Article 6 para 1. (f) in conjunction with recital 47 and 50 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.

#### *Usage data*

On your visit to a Cortado Holding **website**, these send **cookies**, e.g. small electronic files consisting of a certain character string allowing us to identify your browser (for more information see [www.cortado-holding.com/cookies](http://www.cortado-holding.com/cookies)). 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 relevant cookie container. The legal basis for the processing of essential or technically necessary cookies is the *necessity for the performance of the contract* (Art. 6 para. 1 (b) GDPR) by Cortado Holding. For all other cookies, we will ask you *to give your consent* (Art. 6 para. 1 (a) GDPR), or – if you refuse to give your consent– we will refrain from using such cookies.

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. Here, the legal basis is to protect the *legitimate interests* pursued by Cortado Holding (Art. 6 para. 1 (f) in conjunction with recital 47 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 (see Appendix 1): Facebook, Google, LinkedIn, Twitter.

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 "anonymizeIp". 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', 'anonymizeIp', true);" or "\_gaq.push(['\_gat.\_anonymizeIp']);" in your browser (see <https://support.google.com/analytics/answer/2763052?hl=en>).

## **Data collected by Cortado Holding**

Cortado Holding offers sale, consulting and support of its services. For this purpose, personal data is stored in a customer database of Freshworks Inc. (Appendix 1). The legal basis of the procedure is the protection of *legitimate interests* pursued by Cortado Holding (Article 6 para.1 (f) in conjunction with recital 47 GDPR).

At customer or partner events, at trade fairs or conferences, photographs are taken or occasionally videos are recorded for marketing purposes. The persons depicted will not be named without their consent. Here, the legal basis of processing the mentioned data is the protection of *legitimate interests* pursued by Cortado Holding (Article 6 para. 1 (f) in conjunction with recitals 47 and 50 GDPR).

## **Processing for a purpose other than that for which the personal data have been collected / Objection**

Personal data that you have provided to us, for example by filling in a registration, contact, application, download or support form or a newsletter subscription, may occasionally be used for another purpose that is compatible with the original one (e.g. for a newsletter about the product you are using or another Cortado Holding product). In any case, the requirements of Article 6 para. 4 GDPR will be complied with. The legal basis for such procedure is also the protection of *legitimate interests* pursued by Cortado Holding (Article 6 para. 1 (f) and para. 4 in conjunction with Recital 47 GDPR).

You are at all times entitled to refuse to provide personal information or to object processing of 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 object to the further processing of your personal data (Art. 21 GDPR) or demand its erasure (Art. 17 GDPR), Cortado Holding

shall delete said data immediately; in the case of pending obligations arising from an existing contractual relationship between you and Cortado Holding upon termination of this contractual relationship or, if applicable, after a statutory retention period has expired.

### **Transfer of personal data to third parties**

In addition to the purposes outlined above for *analytics* and *interest-based ads*, Cortado Holding is providing personal data to the cloud service providers listed in Appendix 1. The legal basis of such processing is the protection of *purposes of legitimate interests* pursued by Cortado Holding (Article 6 para. 1 (f) in conjunction with recital 47 and 50 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 sent 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. (for more information see Appendix 1 to this Data Privacy Statement). 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](mailto: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 Processing 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 Processing 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 Processing Agreement along with an 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](mailto: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, August 2020



## Appendix 1: Subprocessors

The following companies process personal data on behalf of Cortado Holding:

Name and address of Subprocessor	Description of performance
<b>Cortado Mobile Solutions GmbH</b> , Alt-Moabit 91 a, 10559 Berlin, Germany (subsidiary company)	Company's business activities, like: <ul style="list-style-type: none"><li>• provision of cloud services such as <i>Cortado MDM</i> and <i>Teamplice</i></li><li>• services such as customer support, consulting and marketing</li></ul>
<b>ThinPrint GmbH</b> , Alt-Moabit 91 a, 10559 Berlin, Germany (subsidiary company)	Company's business activities, like: <ul style="list-style-type: none"><li>• provision of cloud services <i>ezeep</i>, <i>ThinPrint Cloud Printer</i> and <i>ThinPrint Mobile Session Print</i></li><li>• services such as customer support, consulting and marketing</li></ul>
<b>Cortado Inc.</b> , 3858 Walnut St #130, Denver, Colorado 80205, USA (subsidiary company)	Services for Cortado Holding (such as sales, consulting and customer support)
<b>Cortado Pty Ltd.</b> , Level 12, Plaza Building, Australia Square, 95 Pitt Street, NSW 2000 Sydney, Australia (subsidiary company)	Services for Cortado Holding (such as sales, consulting and customer support)
<b>Cortado Unipessoal Lda</b> , Rua Padre Américo, nº 14B, 1º, Escritório 1, 1600-548, Carmide, Lisbon, Portugal (subsidiary company)	Services for Cortado Holding (such as development, sales, consulting and customer support)
<b>Amazon Web Services Inc.</b> , 410 Terry Avenue North, Seattle, Washington 98109-5210, USA	<ul style="list-style-type: none"><li>• Hosting of cloud services such as <i>Teamplice</i> and <i>Identity Server</i> at the AWS site <i>Frankfurt/M.</i> (<i>Teamplice</i> video file conversion at the AWS site <i>Europe Ireland</i>)</li><li>• Hosting of cloud services such as <i>ezeep</i>, <i>ThinPrint Cloud Printer</i>, <i>ThinPrint Notification Server</i> at the AWS site <i>US East (N. Virginia)</i></li></ul>
<b>Apprise Inc.</b> , 3500 S. Dupont Highway, Dover, Delaware 19901, USA	Interface to the API of the payment service provider Chargebee as a cloud service
<b>Apple Distribution International Ltd.</b> , Hollyhill Industrial Estate, Hollyhill, Cork, Ireland	Apple Push Notification service (APNs)
<b>Avenue 81 Inc. d/b/a Leadpages</b> , 251 N. 1st Avenue, Suite 200, Minneapolis, Minnesota 55401, USA	Newsletter service providing using <i>Drip</i>
<b>Bright Market LLC dba FastSpring</b> , 801 Garden Street, Suite 201, Santa Barbara, California 93101, USA	Payment processing when using the online shop
<b>Chargebee Inc.</b> , 340 S Lemon Ave #1537, Walnut, California 91789, USA	Payment processing when using the online shop
<b>ClassMarker Pty Ltd.</b> , Harris St, Pyrmont, Sydney, NSW, Australia	Cloud platform for testing (quiz maker)
<b>Facebook Ireland Limited</b> , 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland	Facebook Conversion Tracking and others



<b>Freshworks Inc.</b> , 1250 Bayhill Drive, Suite 315, San Bruno, California 94066, USA	Use of cloud services <i>Freshdesk</i> for support and consulting, <i>Freshsales</i> for Customer-Relationship-Management and <i>Freshchat</i> as a chat platform
<b>Google Ireland Ltd</b> , Gordon House, Barrow Street, Dublin 4, Ireland	Google Analytics, Google Tag Manager, YouTube, registration/login and others
<b>HCG Partners GmbH</b> , Blegistrasse 17a, 6340 Baar, Switzerland	Customer acquisition using the cloud service quickmail.io
<b>iubenda s.r.l.</b> , Via Torino, 2 - 20123 Milan, Italy	Hosting of customer information, contracts and agreements
<b>LinkedIn Corporation</b> , 1000 West Maude Avenue, Sunnyvale, California 94085, USA	LinkedIn Website Retargeting, registration/login
<b>LogMeIn Inc.</b> , 333 Summer Street, Boston, Massachusetts 02210, USA	Cloud services GoToMeeting and GoToWebinar
<b>Mailjet SAS</b> , 13-13 bis, rue de l'Aubrac – 75012 Paris, France	E-mail provider for double-opt-in
<b>Microsoft Corporation</b> , One Microsoft Way, Redmond, Washington 98052, USA	<ul style="list-style-type: none"><li>• Hosting of cloud services such as <i>Cortado MDM</i> and <i>Cortado Enterprise Portal</i> at the Microsoft Azure site <i>West Europe Netherlands</i></li><li>• Hosting of the <i>ezeep for Azure</i> cloud service at the Microsoft Azure site <i>North Europe Ireland</i></li><li>• Registration/login and others</li></ul>
<b>Recurly Inc.</b> , 400 Alabama St, Suite 202, San Francisco, California 94110, USA	Payment processing as a cloud service
<b>StackPath LLC</b> , 2021 McKinney Avenue, Suite 1100, Dallas, Texas 75201, USA	Content delivery network (for acceleration of web pages)
<b>Stripe Payments Europe Ltd.</b> , The One Building, 1 Grand Canal Street, Lower Dublin 2, Ireland	Payment processing as a cloud service
<b>SurveyMonkey Europe UC</b> , 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland	Survey platform as a cloud service
<b>The Rocket Science Group LLC</b> , 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA	Mailings using mailchimp
<b>Thinkific Labs Inc.</b> , 369 Terminal Ave, Vancouver, British Columbia, V6A 4C4, Canada	Training platform as a cloud service
<b>Twitter International Company</b> , One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland	Twitter Conversion Tracking
<b>WP Engine Inc.</b> , 504 Lavaca Street, Suite 1000, Austin, Texas 78701, USA	Hosting of Cortado Holding websites (providing web server platform)
<b>Zapier Inc.</b> , 548 Market St #62411, San Francisco, California 94104, USA	Connection of <i>Freshsales</i> and <i>Drip</i>

