

## Legal bases for the Privacy Policy of Cortado Holding

### Legal bases of the processing in the EU General Data Protection Regulation (GDPR)

The provider or processor may only process personal data of users if one of the following applies (Article 6 paragraph 1 DSGVO):

- a) the data subject has given *consent* to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the *performance of a contract* to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a *legal obligation* to which the controller is subject;
- d) processing is necessary in order to protect the *vital interests of the data subject* or of another natural person;
- e) processing is necessary for the performance of a task carried out in the *public interest* or in the *exercise of official authority* vested in the controller;
- f) processing is necessary for the purposes of the *legitimate interests pursued by the controller* or by a third party

Specifically, the processing of personal data mentioned in the **Cortado Holding AG** Privacy Policies is based on the following of the above mentioned legal bases:

### Legal bases for the Privacy Policies of Cortado Holding in detail

Processing of personal data	Legal basis
<b>Analytics</b> (collection of data and their evaluation with regard to the behaviour of visitor): e. g. Google Analytics	Art. 6 para. 1 (a) GDPR (user's <i>consent</i> )
Display <b>content from external platforms</b> : e. g. YouTube Video Widget	Art. 6 para. 1 (a) GDPR (user's <i>consent</i> )
<b>Hosting</b> and <b>backend</b> infrastructure: e. g. Microsoft Azure, Amazon Web Services, WPEngine	Art. 6 para. 1 (b) GDPR ( <i>performance of a contract</i> )
<b>Registration</b> and <b>Login</b> : e. g. via social login at Google (Google OAuth), LinkedIn (LinkedIn OAuth) or Microsoft (OneDrive OAuth)	Art. 6 para. 1 (b) GDPR ( <i>performance of a contract</i> )
<b>Remarketing</b> and <b>Behavioural Targeting</b> (marketing): e. g. LinkedIn Website Retargeting	Art. 6 para. 1 (a) GDPR (user's <i>consent</i> )

<p><b>Tag management</b> (provision of scripts and others for the website):</p> <p>e. g. with Google Tag Manager</p>	<p>with regard to essential functions: Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>), with regard to all other functions: Art. 6 para. 1 (f) GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p>Management of <b>user databases</b>: e. g. with Freshsales</p>	<p>with regard to the provision of services requested by you: Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>),  with regard to all other functions: Art. 6 para. 1 (f) GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p>Management of <b>support and contact requests</b> (helpdesk): e. g. with Freshdesk</p>	<p>Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>)</p>
<p><b>Direct marketing</b>: e. g. information on products, newsletters</p>	<p>with regard to the provision of information requested by you: Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>),  with regard to all other marketing measures: Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p>further <b>Forms</b>: e. g. contact or offer forms</p>	<p>Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>)</p>
<p><b>Photos and video recordings</b> at customer or partner events, at trade fairs or conferences: for marketing purposes</p>	<p>by name: Art. 6 para. 1 (a) GDPR (<i>user's consent</i>), anonymously: Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p><b>Log data</b>: access data recorded by web servers for verification purposes, for troubleshooting and to identify and defend against hacker attacks</p>	<p>Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>

## Subprocessors of the Cortado Holding AG

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 EMEA SARL</b> , 38 Avenue John F. Kennedy, L-1855, Luxembourg	<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> (Teamplice 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>Apirise 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>G2.com Inc.</b> , 100 S. Wacker Dr., Suite 600, Chicago, IL 60606, USA	Market research
<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>Inxmail GmbH</b> , Wentzingerstraße 17, 79106 Freiburg, Germany	Newsletter mail provider
<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>PartnerStack Canada Inc.</b> , 129 Spadina Ave, Unit 502, Toronto, Ontario, M5V 2L3, Canada	Cloud service for partner program administration
<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

**The Rocket Science Group LLC**, 675  
Ponce de Leon Ave NE, Suite 5000,  
Atlanta, Georgia 30308, USA

Mailings using mailchimp

**Twitter International Company**, One  
Cumberland Place, Fenian Street,  
Dublin 2, D02 AX07, Ireland

Twitter Conversion Tracking

**WP Engine Inc.**, 504 Lavaca Street,  
Suite 1000, Austin, Texas 78701, USA

Hosting of Cortado Holding websites (providing web server platform)

**Zapier Inc.**, 548 Market St #62411,  
San Francisco, California 94104, USA

Connection of *Freshsales* and *Drip*

## Provider and Processor

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