

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
Analytics (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 content from external platforms : e. g. YouTube Video Widget	Art. 6 para. 1 (a) GDPR (user's <i>consent</i>)
Hosting and backend infrastructure: e. g. Microsoft Azure, Amazon Web Services, WPEngine, Cloudflare, DigiCert, iubenda	Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>)
Registration and Login : 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>)
Remarketing and Behavioural Targeting (marketing): e. g. LinkedIn Website Retargeting	Art. 6 para. 1 (a) GDPR (user's <i>consent</i>)

<p>Tag management (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>),</p> <p>with regard to all other functions: Art. 6 para. 1 (f) GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p>Management of user databases:</p> <p>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>),</p> <p>with regard to all other functions: Art. 6 para. 1 (f) GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p>Management of support and contact requests (helpdesk): e. g. with Freshdesk</p>	<p>Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>)</p>
<p>Direct marketing: 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>),</p> <p>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 Forms: e. g. contact or offer forms</p>	<p>Art. 6 para. 1 (b) GDPR (<i>performance of a contract</i>)</p>
<p>Photos and video recordings 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>),</p> <p>anonymously: Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (<i>legitimate interests pursued by Cortado Holding</i>)</p>
<p>Log data: 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
Amazon Web Services EMEA SARL , 38 Avenue John F. Kennedy, L-1855, Luxembourg	• Hosting of cloud services and other web services
Apple Distribution International Ltd. , Hollyhill Industrial Estate, Hollyhill, Cork, Ireland	Mobile Device Management for Cortado (MDM) and Apple Push Notification service (APNs) for ThinPrint Mobile Session Print
Avenue 81 Inc. d/b/a Leadpages , 251 N. 1st Avenue, Suite 200, Minneapolis, Minnesota 55401, USA	Optional newsletter service providing using <i>Drip</i>
Better Stack Inc. , 9450 SW Gemini Dr Beaverton, OR 97008-7105 USA	Infrastructure monitoring with Better Uptime
Bitly Inc. , DPT 5006, 601 W. 26th St., 3rd Floor, Suite 357, New York, New York 10010, USA	Web redirection (linking help articles on our support pages from a management console)
Bright Market LLC dba FastSpring , 801 Garden Street, Suite 201, Santa Barbara, California 93101, USA	Payment processing when using the online shop
Calendly LLC , 271 17TH St NW Ste 1000 Atlanta, GA 30363-6201, USA	Optional possibility for customers to book a meeting with Cortado support using a calendar
Chargebee Inc. , 340 S Lemon Ave #1537, Walnut, California 91789, USA	Payment processing when using the online shop
ClassMarker Pty Ltd. , Harris St, Pyrmont, Sydney, NSW, Australia	Optional cloud platform for testing (quiz maker)
Cloudflare Inc , 101 Townsend St San Francisco, California 94107-1934, USA	Proxy server for the cloud services (to defend against hacker attacks)
Deel Inc. , 650 2nd St, San Francisco, California 94107, USA	Use of the cloud service Deel for managing relationships with contractors
DigiCert Inc. , 2801 North Thanksgiving Way, Suite 500, Lehi, Utah 84043, USA	Provision of certificates (for encryption + electronic signatures)
Facebook Ireland Limited , 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland	Facebook Conversion Tracking and others
Freshworks Inc. , 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
G2.com Inc. , 100 S. Wacker Dr., Suite 600, Chicago, IL 60606, USA	Market research

GMO GlobalSign N/V , Diestsevest 14, 3000 Leuven, Belgium	Provision of certificates (for encryption)
Google Ireland Ltd , Gordon House, Barrow Street, Dublin 4, Ireland	Google Analytics/Ads, Google Cloud Platform, Google Tag Manager, YouTube, G Suite, Data Studio, Data Warehouse, Google registration/login and others
HCG Partners GmbH , Blegistrasse 17a, 6340 Baar, Switzerland	Customer acquisition using the cloud service quickmail.io
Inxmail GmbH , Wentzingerstraße 17, 79106 Freiburg, Germany	Newsletter mail provider
iubenda s.r.l. , Via Torino, 2 - 20123 Milan, Italy	Hosting of customer information, contracts and agreements
Leadinfo B.V. , Rivium Quadrant 141, 2909 LC Capelle aan den IJssel, The Netherlands	Web analytics
LinkedIn Corporation , 1000 West Maude Avenue, Sunnyvale, California 94085, USA	LinkedIn Website Retargeting, registration/login
Mailjet SAS , 13-13 bis, rue de l'Aubrac – 75012 Paris, France	E-mail provider for double-opt-in
Microsoft Corporation , One Microsoft Way, Redmond, Washington 98052, USA	<ul style="list-style-type: none"> • Hosting of cloud services such as Cortado (MDM), ezeep Blue and Cortado Enterprise Portal at the Microsoft Azure locations Germany West Central (Frankfurt/Main), West Europe Netherlands and North Europe Ireland • Registration/login and others
Momentive Europe UC , 2 Shelbourne Buildings, Second Floor, Shelbourne Road, Dublin 4, Ireland	Optional SurveyMonkey survey platform as a cloud service
PartnerStack Canada Inc. , 129 Spadina Ave, Unit 502, Toronto, Ontario, M5V 2L3, Canada	Cloud service for partner program administration
Rivery Technologies Ltd. , 11 Derech Menachem Begin, Ramat Gan, 5268104, Israel	Optional transfer of social media data to Google Data Warehouse
SalesViewer GmbH , Huestraße 30, 44787 Bochum, Germany	Web analytics
Semrush Inc. , 800 Boylston Street, Suite 2475, Boston, MA 02199, USA	Tools for search engine optimization (SEO), content marketing, competitive research, pay per click (PPC), social media marketing
Twitter International Company , One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland	Twitter Conversion Tracking
UserScape Inc. , 2600 South Rd Ste 44-175, Poughkeepsie, New York 12601, USA	Net Promoter Score (NPS) cloud service thermostat.io
Wix.com Ltd. , Nemał St. 40, 6350671 Tel Aviv, Israel	Online shop (for renting smartphones and tablets)
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 <i>Freshsales</i> and <i>Drip</i>

Provider and Processor

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