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Privacy Notice

Thank you for your interest in neoshare. Protecting your personal data is very important to us. Below you will find information on how we handle your data collected through your use of neoshare. Your data will be processed in accordance with applicable data protection laws.

1. Controller within the Meaning of Data Protection Law

neoshare AG
Mommсенstraße 6
80805 Munich
dataprotection@neoshare.de
+49 89 262 010 020

2. Contact Details of the Data Protection Officer

PROLIANCE GmbH / www.datenschutzexperte.de
Data Protection Officer
Leopoldstr. 21
80802 Munich
datenschutzbeauftragter@datenschutzexperte.de

Please refrain from attaching sensitive information to your request, such as a copy of your identity document.

3. Data Protection Information for Visitors to the Website

3.1 Web Hosting

This website is hosted by an external service provider (host). Personal data collected on this website is stored on the host's servers. This may include, in particular, IP addresses, contact requests, metadata and communication data, website access data, and other data generated via a website.

We collect the data listed above in order to ensure a smooth connection to the website and the technically error-free provision of our services. Processing this data is strictly necessary in order to make the website available to you. The legal basis for processing is our legitimate interest in the correct presentation and functionality of our website pursuant to Art. 6(1) sentence 1 lit. f GDPR.

We have concluded a data processing agreement with the provider in accordance with Art. 28 GDPR, under which the provider is obliged to protect our customers' data and not disclose it to third parties.

3.1.1 Amazon Web Services (AWS)

We use the services of *Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Luxembourg* for hosting our websites.

Description of the data processing and purpose

Amazon Web Services (AWS) is a cloud infrastructure that we use to host and provide our websites. We use the service to make our website available to you.

Personal data collected on this website is stored on the host's servers. This may include, in particular, IP addresses, contact requests, metadata and communication data, website access data, log files, and other data generated via a website.

To the extent that technically necessary cookies or similar technologies are used or data is stored on or read from your device in connection with hosting, this is done solely insofar as it is required for the provision and security of the website.

We use AWS for the purpose of hosting and technically providing our website.

Legal basis for processing

To the extent that we use cookies or similar technologies in connection with integrating the service, or data is stored on or read from your device by the service, this is done pursuant to Section 25(2) TDDDG. Subsequent data processing is based on Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in technically providing our website and ensuring its secure operation.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipient:

Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Luxembourg.

Third-country processing

A transfer of your data to third countries is currently not intended in connection with the hosting of our websites.

Storage period

By using the service, data is transferred to the recipient named above and processed there for as long as this is necessary to achieve the stated purposes.

3.1.2 Cloudflare

To ensure that our website is protected against attacks, we use the *Cloudflare* service provided by *Cloudflare Germany GmbH*.

Description of the data processing and purpose

Cloudflare DDoS Protection is a service used to prevent or mitigate so-called distributed denial-of-service attacks (DDoS attacks), in which web servers are overloaded by a large number of simultaneous requests.

The service enables us to filter, in real time, requests originating from IP addresses used for such attacks or where there is a corresponding suspicion. This ensures the uninterrupted operation of our website. For this purpose, the IP address of the connection used to access our website is processed.

Legal basis for processing

If, in connection with the integration of the service, we use cookies or similar technologies, or if data is stored on or read from your device by the service, this is done pursuant to Section 25(2) TDDDGD. Subsequent data processing is based on Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in protecting our website efficiently against DDoS attacks.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipients:

- *Cloudflare Germany GmbH.*
- *Cloudflare Inc., 101 Townsend St, San Francisco, CA 94107, USA.*

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA), in particular in the USA, when the service is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. *Cloudflare Inc.* is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards.

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded where necessary. If these are not sufficient, additional technical, contractual, or organisational measures may be implemented.

Storage period

By using the service, data is transferred to the recipients named above and processed there for as long as this is necessary to achieve the stated purposes.

3.2 Usage Data and Server Log Files

Description of the data processing and purpose

When you access our website, it is technically necessary for data to be transmitted from your internet browser to our web server. The following data is logged during an ongoing connection for communication between your browser and our web server:

- date and time of the request,
- name of the requested file,
- page from which the file was requested,

- access status,
- web browser and operating system used,
- (full) IP address of the requesting computer, and
- volume of data transferred.

We collect the data listed above in order to ensure a smooth connection to the website and the technically error-free provision of our services. Processing this data is strictly necessary in order to make the website available to you. The log files are also used to evaluate system security and stability and for administrative purposes.

Legal basis for processing

The legal basis for processing this data is our legitimate interest in protecting and ensuring the functionality of our website pursuant to Art. 6(1) sentence 1 lit. f GDPR.

Storage period

For reasons of technical security, in particular to defend against attacks on our web server, we store this data for a short period of time. After no later than 7 days, the data is anonymised by shortening the IP address at domain level, so that it is no longer possible to establish a connection to an individual user.

In anonymised form, the data may also be processed for statistical purposes. This data is never stored together with other personal data of the user, matched with other data sets, or disclosed to third parties.

3.3 Data Processing in Connection with Cookies and Similar Technologies

3.3.1 Access to and Storage of Information in End Devices

Use of our website may involve access to information (e.g. IP address) or the storage of information (e.g. cookies) on your end devices. Such access or storage may be associated with further processing of personal data within the meaning of the GDPR.

Where such access to information or such storage of information is strictly necessary for the technically error-free provision of our services, this is carried out on the basis of Section 25(1) sentence 1, Section 25(2) no. 2 TDDDG.

Where such a process serves other purposes (e.g. the needs-based design of our website), it is carried out pursuant to Section 25(1) TDDDG only with your consent in accordance with Art. 6(1) lit. a GDPR. Consent may be revoked at any time with effect for the future. The provisions of the GDPR and the German Federal Data Protection Act (BDSG) apply to the processing of your personal data.

Further information on the processing of your personal data and the relevant legal bases in this context can be found in the following sections on the specific processing activities on our website.

3.3.2 Cookies and Similar Technologies

3.3.2.1 General Information

We use services on this website that employ cookies and similar technologies in order to store data in your browser and read data already stored there. This may include cookies, your browser's local storage, pixels, and so-called tags.

Cookies are small text files that can be stored on and read from your device.

A distinction is made between session cookies, which are deleted once you close your browser, and permanent cookies, which are stored for a specific period beyond the individual session.

In addition to cookies, we may use your browser's local storage to store and read data there. We may also integrate pixels into our websites. Pixels are small customised image files that are loaded when a page is displayed and can be used to track user activities.

Finally, we may use tags (markers) on our websites. Tags are small HTML or JavaScript code fragments or markers that enable services for website analysis or user tracking to distinguish or identify users and to track certain user activities.

Further details on the cookies and similar technologies we use can be found below in the descriptions of the cookie categories and in our consent-management banner, which is displayed when you visit our website. You can reopen the banner using the "Cookie Settings" link at the bottom of the website and change your settings.

Please note that without the use of certain cookies and similar technologies, our website may not be displayed correctly and some functions may no longer be technically available.

3.3.2.2 Category: Necessary Cookies

Services in this category may use cookies and similar technologies to store and read information on your device. We use these in order to:

- enable the display of the website and provide its basic functions, in particular page navigation,
- enable the giving and revocation of consent,
- protect our forms against abusive entries, and
- protect our website against cyberattacks and fraud attempts.

In some cases, the cookies and similar technologies used contain only information relating to certain settings and are not personally identifiable. We do not use them for the purpose of tracking your interactions, measurement and statistical evaluation, or advertising purposes.

The use of the services and the corresponding cookies and similar technologies in this category is based on Section 25(2) no. 1 and no. 2 TDDDG. Subsequent data processing is based on Art. 6(1) sentence 1 lit. f GDPR.

3.3.2.3 Category: User Preferences

Services in this category may use cookies and similar technologies to store and read information on your device. We use these in order to:

- make our websites appealing to you,
- enable the loading of content from third parties, and
- provide you with certain settings and additional website functions.

The use of the services and the corresponding cookies and similar technologies in this category is based on your consent pursuant to Section 25(1) TDDDG, to the extent that you have given your consent via the cookie banner. Subsequent data processing may be based on your consent pursuant to Art. 6(1) sentence 1 lit. a GDPR, for the initiation of pre-contractual measures pursuant to Art. 6(1) sentence 1 lit. b GDPR, or on the basis of our legitimate interest pursuant to Art. 6(1) sentence 1 lit. f GDPR in receiving and responding to your request.

3.3.2.4 Category: Analytical Cookies

Services in this category may use cookies and similar technologies to store and read information on your device. We use these in order to:

- count and distinguish you as an individual website visitor and create statistical analyses of your interactions with and use of our websites,
- design our websites according to user needs and adapt them to user interactions, and
- monitor the technical functionality of our website and enable troubleshooting.

For this purpose, pseudonymous identifiers consisting of numbers and letters are regularly stored by us and the services used in cookies on your device and read again when you revisit the website. In this way, users can be pseudonymously recognised, distinguished from one another, and their use of our websites can be statistically evaluated. As a rule, the natural person behind a pseudonym cannot be directly identified without additional information.

In addition, other technologies may be used to read identifiers from your device, for example in the context of so-called browser or device fingerprinting. In particular, characteristics of the browser you use, its configuration, your device, or your hardware may be processed in order to recognise you pseudonymously as a user. The use of the services and the corresponding cookies and similar technologies in this category is based on your consent pursuant to Section 25(1) TDDDG. Subsequent data processing is based on your consent pursuant to Art. 6(1) sentence 1 lit. a GDPR.

3.3.2.5 Category: Marketing Cookies

Services in this category may use cookies and similar technologies to store and read information on your device. We use these in order to:

- count and distinguish you as an individual website visitor and create statistical analyses of your interactions with and use of our websites,
- track your interactions with advertisements placed by us via third parties on other websites across various devices and websites (so-called conversion tracking),
- understand and evaluate your interactions with our website and subsequently use these as the basis for targeted advertising campaigns directed at you or a specific target group to which you belong within advertising networks (so-called retargeting and remarketing), and
- improve the effectiveness of our advertising measures and manage our advertising campaigns.

For this purpose, pseudonymous identifiers consisting of numbers and letters are regularly stored by us and the services used in cookies on your device and read again when you revisit the website. In addition, other technologies may be used to read identifiers from your device, for example in the context of so-called browser or device fingerprinting. In particular, characteristics of the browser you use, its configuration, your device, or your hardware may be processed in order to recognise you pseudonymously as a user.

Where applicable, the processed pseudonymous identifiers may also be merged by us or by the providers of the services used with other data. In addition, services used by us and their providers may exchange and compare identifiers (IDs) with one another and, in the event of a match, combine them and assign them to the same pseudonymous user (so-called ID matching / ID syncing). This makes it possible to recognise website visitors across devices, platforms, and advertising networks and to address them for advertising purposes.

If you identify yourself using clear data such as your name or email address, enter your own user data on our websites, or log in to social networks or online services of third-party providers that also provide us with corresponding services for tracking and advertising, pseudonymous identifiers may additionally be linked with your clear data or user data. In this way, we or the service providers may create and evaluate pseudonymous or non-pseudonymous user profiles and then use them for targeted advertising based on your interests.

The use of the services and the corresponding cookies and similar technologies in this category is based on your consent pursuant to Section 25(1) TDDDG. Subsequent data processing is based on your consent pursuant to Art. 6(1) sentence 1 lit. a GDPR.

3.4 Consent Management via the Cookiebot by Usercentrics Consent-Management Platform

We use a Cookiebot by Usercentrics consent-management banner on our website, with the help of which we manage your consents to the use of cookies and similar technologies.

Description of the data processing and purpose

We use the service to manage your consents to the use of cookies and similar technologies and the subsequent data processing associated with them.

If you give consent via our consent banner, the service processes the following data:

- the IP address of the connection you use,
- the description of the web browser and operating system used,
- the language used by your browser and operating system,
- the address of the website on which you give your consent,
- the date and time of consent,
- the country from which you submit your request,
- a pseudonym used to distinguish different users, and
- your consent status regarding the cookies and similar technologies or services used by us, which serves as proof of your consent.

In the course of data processing, cookies are used to store your consent status on your device, read it again when you revisit the page, and compare it.

In this way, we are able to verify your consent status on all subsequent and future visits to our websites and, in accordance with your decision on the use of cookies and other technologies, activate or deactivate them when the page is revisited.

The purpose and our legitimate interest lie in being able to use cookies and similar technologies on our websites in a data-protection-compliant manner and to enable you to revoke your consent easily.

Legal basis for processing

To the extent that we use cookies and similar technologies in connection with integrating the service, or data is stored on or read from your device by the service, this is done pursuant to Section 25(2) TDDDG. Subsequent data processing is based on Art. 6(1) sentence 1 lit. f GDPR.

Storage period

Your consent status is stored for a period of 12 months.

3.5 Tally

We integrate the “Tally” service on our websites for the provision of contact and lead forms.

Description of the data processing and purpose

“Tally” enables us to provide forms on our website for contacting us, submitting enquiries, and collecting prospect data. If you use such a form, the data you enter will be processed in order to receive, handle, and forward your request to the relevant internal departments or downstream systems.

This may include, in particular, your first name, last name, professional role, company, information about your interest in our products, and other information voluntarily provided by you.

Legal basis for processing

To the extent that cookies or similar technologies are used in connection with integrating the service, or data is stored on or read from your device, this is done on the basis of your consent pursuant to Section 25(1) TDDDG, provided that you have given such consent via our consent-management platform.

Subsequent processing of the data you enter into the form is carried out in order to handle your request or to take pre-contractual steps on the basis of Art. 6(1) sentence 1 lit. b GDPR or on the basis of Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in receiving and handling enquiries via our website efficiently.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipient:

Tally BV, Dok-Noord 4E, 9000 Ghent, Belgium.

Third-country processing

A transfer of your data to third countries is currently not intended in connection with the use of the service.

Storage period

By using the service, data is transferred to the recipient named above and processed there for as long as this is necessary to achieve the stated purposes. To the extent that we continue processing the data collected via forms in our own systems, the storage period depends on the specific purpose pursued and the information contained in this privacy notice.

3.6 Calendly

We integrate the “Calendly” service on our websites for the booking of consultation and demo appointments.

Description of the data processing and purpose

“Calendly” enables you to book consultation and demo appointments on our website based on available calendar slots. When you make a booking, the data you enter is processed in order to organise the appointment, create calendar entries, and send confirmations and reminders.

This may include, in particular, your first name, last name, email address, information about your company, and other information voluntarily provided by you in connection with booking the appointment.

Legal basis for processing

To the extent that cookies or similar technologies are used in connection with integrating the service, or data is stored on or read from your device, this is done on the basis of your consent pursuant to Section 25(1) TDDDG, provided that you have given such consent via our consent-management platform.

Subsequent processing of the data you enter in connection with booking an appointment is carried out for the implementation of pre-contractual measures or for handling your request on the basis of Art. 6(1) sentence 1 lit. b GDPR or on the basis of Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in enabling appointment bookings efficiently via our website.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipient:

Calendly LLC, BB&T Tower, 271 17th St NW, Atlanta, GA 30363, USA.

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA), in particular in the USA, when the service is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. Calendly LLC is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards. [Data Privacy Framework](#)

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded where necessary. If these are not sufficient, additional technical, contractual, or organisational measures may be implemented.

Storage period

By using the service, data is transferred to the recipient named above and processed there for as long as this is necessary to achieve the stated purposes. To the extent that we continue processing the data collected in connection with appointment bookings in our own systems, the storage period depends on the specific purpose pursued and the information contained in this privacy notice.

3.7 Google Fonts

Description of the data processing and purpose

Google Fonts enables us to use web fonts. When our website is accessed, the required Google Fonts are loaded by your web browser into your browser cache. This is necessary so that your browser can also display our texts in an improved visual presentation. If your browser does not support this function, a standard font from your computer will be used for display.

Since *Google Fonts* are provided by Google and are loaded from its servers when a page is called up, the technically required usage data for calling up the page is also transmitted. Google also receives your IP address, which is technically required in order to retrieve the content.

We use Google Fonts in order to optimise the presentation of our website and to make its design more user-friendly.

Legal basis for processing

The legal basis for integrating and using the service is your consent, provided that you have given it via our consent-management platform.

The use of cookies and similar technologies is based on Section 25(1) TDDDG. Subsequent data processing is based on Art. 6(1) sentence 1 lit. a GDPR.

Your consent is voluntary and may be revoked at any time with effect for the future. To exercise your right of revocation, please use the “Cookie Settings” link at the bottom of the website in order to reopen our consent banner and change your settings.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipients:

- *Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.*
- *Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.*

As a rule, we have no influence over any further data processing by the third-party provider. Further information on Google’s handling of personal data can be found at <https://policies.google.com/privacy?hl=en>.

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA), in particular in the USA, when the service is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. *Google LLC*

is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards.

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded where necessary. If these are not sufficient, additional technical, contractual, or organisational measures may be implemented.

Storage period

By integrating the service on our websites, data is transferred to the recipients named above and processed there for as long as this is necessary to achieve the stated purposes. No further storage of the data processed by the service and made available to us takes place in our own systems.

3.8 Google Analytics

On our website, we integrate the “Google Analytics” service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.

Within the European Union (EU) and the European Economic Area (EEA), “Google Analytics” is offered as a service by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, which supports us as a processor pursuant to Art. 28 GDPR.

Description of the data processing and purpose

“Google Analytics” creates usage profiles on the basis of pseudonyms (identifiers derived from cookies and device IDs as well as further data relating to the device used or so-called browser fingerprinting) and usage data (e.g. the name and address of website content requested by your browser, referral links, a description of the web browser and operating system used, and the IP address of the requesting device).

In addition, data relating to your interactions with our websites is collected and analysed, in particular data concerning the time of the visit, page views, page changes, dwell time, scroll depth, clicks on key elements, contact form submissions, clicks on meeting bookings, technical information on the device and browser used, device type (desktop, mobile device, or tablet), approximate geographic location, and the source of the website visit.

Cookies and similar technologies, in particular JavaScript, are used to store and read data on your device. Details of the cookies and similar technologies used can be found above under “Data Processing in Connection with Cookies and Similar Technologies”.

In this way, we are able to recognise returning visitors, count them as such, and statistically evaluate the use of our websites. We then use these findings to further develop the content, user guidance, technical functionality, and conversion processes of our website according to user needs.

Legal basis for processing

The legal basis for integrating and using the service is your consent, provided that you have given it via our Cookiebot by Usercentrics consent-management platform.

The use of cookies and similar technologies is based on Section 25(1) TDDDG. Subsequent data processing is based on Art. 6(1) sentence 1 lit. a GDPR.

Your consent is voluntary and may be revoked at any time with effect for the future. To exercise your right of revocation, please use the button at the bottom left of the website in order to change your settings in our consent-management platform.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipients:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.
- Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.
- Alphabet Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043, USA.

As a rule, we have no influence over any further data processing by the third-party provider. Further information on Google's handling of personal data can be found at <https://policies.google.com/privacy?hl=en>.

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA), in particular in the USA, when "Google Analytics" is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. *Google LLC* is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards.

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded where necessary. If these are not sufficient, additional technical, contractual, or organisational measures may be implemented.

Storage period

By integrating the service on our websites, data is transferred to the recipients named above and processed there for as long as this is necessary to achieve the stated purposes. No further storage of the data processed by the service and made available to us takes place in our own systems.

3.9 PostHog

On our website, we integrate the "PostHog" software. It is provided via *PostHog Cloud EU* on servers located in Frankfurt am Main, Germany.

Description of the data processing and purpose

We use “PostHog” to analyse and evaluate the use of our website. This may include, in particular, data on the time of the visit, page views, page changes, dwell time, scroll depth, clicks on key elements, contact form submissions, clicks on meeting bookings, technical information on the device and browser used, device type (desktop, mobile device, or tablet), approximate geographic location, and the source of the website visit.

We use these findings to evaluate the use of our website statistically, monitor its technical functionality, and further develop content, user guidance, and conversion processes according to user needs.

Legal basis for processing

The legal basis for integrating and using the service is your consent, provided that you have given it via our Cookiebot by Usercentrics consent-management platform.

The use of cookies and similar technologies is based on Section 25(1) TDDDG. Subsequent data processing is based on Art. 6(1) sentence 1 lit. a GDPR.

Your consent is voluntary and may be revoked at any time with effect for the future. To exercise your right of revocation, please use the button at the bottom left of the website in order to change your settings in our consent-management platform.

Recipients

As part of using the service, data collected via our websites is transferred to the following recipient:

PostHog, Inc., 2261 Market Street #4008, San Francisco, CA 94114, USA.

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA) when the service is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. PostHog, Inc. is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards.

<https://www.dataprivacyframework.gov/list>

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded where necessary. If these are not sufficient, additional technical, contractual, or organisational measures may be implemented.

Storage period

By integrating the service on our websites, data is transferred to the recipient named above and processed there for as long as this is necessary to achieve the stated purposes. No further

storage of the data processed by the service and made available to us takes place in our own systems.

3.10 HubSpot CRM

On our websites, we integrate the “HubSpot” service provided by HubSpot, Inc., 2 Canal Park, Cambridge, MA 02141, USA.

Within the European Union (EU) and the European Economic Area (EEA), the service is offered by HubSpot Ireland Limited, 1 Sir John Rogerson’s Quay, Dublin 2, Ireland.

Description of the data processing and purpose

The platform enables us to centrally manage prospect data and lead data collected via our website in connection with contact enquiries and demo bookings, in particular for the following purposes:

- managing prospect and lead data,
- storing and handling enquiries submitted via contact forms on our website, and
- processing data in connection with demo appointments booked via our website.

For this purpose, we process only the personal data you provide via contact forms on our website or in the context of demo bookings, such as salutation, first name, last name, contact details, information about your company, information about your interest in our products, and other information voluntarily provided by you. To the extent that data from contact forms or demo bookings is transferred into HubSpot, we use it to process enquiries, manage prospect and lead data, and organise further communication in connection with your enquiry or demo booking.

Legal bases for processing

The legal basis for processing your data in HubSpot is Art. 6(1) sentence 1 lit. b GDPR to the extent that processing is necessary for taking pre-contractual measures or handling your enquiry. Otherwise, processing is based on Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in efficiently managing prospect and lead data arising from contact enquiries and demo bookings and in handling enquiries and communication processes in a structured manner.

Recipients

- HubSpot Ireland Limited, 1 Sir John Rogerson’s Quay, Dublin 2, Ireland.
- HubSpot, Inc., 2 Canal Park, Cambridge, MA 02141, USA.

Further information on the provider’s handling of personal data can be found at <https://legal.hubspot.com/de/privacy-policy>.

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA), in particular in the USA, when the service is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. HubSpot,

Inc. is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards.

Storage period

Unless stated otherwise, we store your data to the extent necessary for as long as this is required to achieve the above purposes. We then delete your data unless processing remains permissible or mandatory for us on the basis of another legal basis.

4. Data Protection Information for Users of the neoshare Platform

4.1 Hosting

neoshare is hosted by an external service provider (host). Personal data collected on this platform is stored on the host's servers. This may include, in particular, IP addresses, contact requests, metadata and communication data, website access data, and other data generated via this platform.

We collect the data listed above in order to ensure a smooth connection to the platform and the technically error-free provision of our services. Processing this data is strictly necessary in order to make neoshare available to you. The legal basis for processing is our legitimate interest in the correct presentation and functionality of neoshare pursuant to Art. 6(1) sentence 1 lit. f GDPR.

We have concluded a data processing agreement with the provider in accordance with Art. 28 GDPR, under which the provider is obliged to protect our customers' data and not disclose it to third parties.

Recipients

As part of the data processing, your data may be transferred or disclosed to the following recipient acting as processor:

Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Luxembourg.

4.2 Usage Data and Server Log Files

When you access our platform, it is technically necessary for data to be transmitted from your internet browser to our web server. The following data is logged during an ongoing connection for communication between your browser and our web server:

- date and time of the request,
- name of the requested files and accessed endpoints,
- page from which the file was requested,
- access status,
- web browser and operating system used,
- (full) IP address of the requesting computer, and
- volume of data transferred.

We collect the data listed above in order to ensure a smooth connection to the platform and the technically error-free provision of our services. Processing this data is strictly necessary in order to make neoshare available to you. The log files are also used to evaluate system security and stability as well as for administrative purposes. The legal basis for processing is our legitimate interest in protecting and ensuring the functionality of our platform pursuant to Art. 6(1) sentence 1 lit. f GDPR.

For reasons of technical security, in particular to defend against attacks on our web server, we store this data for a short period of time. After no later than 7 days, the data is anonymised by shortening the IP address at domain level, so that it is no longer possible to establish a connection to an individual user. In anonymised form, the data may also be processed for statistical purposes.

4.3 Data Processing in Connection with Cookies and Similar Technologies

4.3.1 Access to and Storage of Information in End Devices

Use of our platform may involve access to information (e.g. IP address) or the storage of information (e.g. cookies) on your end devices. Such access or storage may be associated with further processing of personal data within the meaning of the GDPR.

Where such access to information or such storage of information is strictly necessary for the technically error-free provision of our services, this is carried out on the basis of Section 25(1) sentence 1, Section 25(2) no. 2 TDDDG.

Where such a process serves other purposes (e.g. the needs-based design of our platform), it is carried out pursuant to Section 25(1) TDDDG only with your consent in accordance with Art. 6(1) lit. a GDPR. Consent may be revoked at any time with effect for the future. The provisions of the GDPR and the German Federal Data Protection Act (BDSG) apply to the processing of your personal data.

Further information on the processing of your personal data and the relevant legal bases in this context can be found in the following sections on the specific processing activities on neoshare.

4.3.2 Cookies and Similar Technologies

We use services on this platform that employ cookies and similar technologies in order to store data in your browser and read data already stored there. This may include cookies, your browser's local storage, and so-called tags.

Cookies are small text files that can be stored on and read from your device.

A distinction is made between session cookies, which are deleted once you close your browser, and permanent cookies, which are stored for a specific period beyond the individual session.

In addition to cookies, we may use your browser's local storage to store and read data there.

Finally, we may use tags (markers) on our platform. Tags are small HTML or JavaScript code fragments or markers that enable services for platform analysis or user tracking to distinguish or identify users and to track certain user activities.

4.3.3 PostHog

On our platform, we integrate the “PostHog” software. It is provided via *PostHog Cloud EU* on servers located in Frankfurt am Main, Germany.

Description of the data processing and purpose

We use “PostHog” to analyse and evaluate interactions of platform users with our platform. Analysis takes place after login.

The software creates usage profiles on the basis of pseudonyms (identifiers derived from cookies and device IDs as well as further data relating to the device used or so-called browser fingerprinting) and usage data (e.g. the name and address of website content requested by your browser, referral links, a description of the web browser and operating system used, and the IP address of the requesting device).

In addition, demographic data (such as continent, country, region, and city) and data relating to your interactions with our platform are collected and analysed. This may include, in particular, data concerning the time of the visit, button clicks, scroll depth, reading depth, use of filter and search functions, content accessed, and the frequency of use of individual features.

In this way, we are able to recognise returning users, count them as such, and evaluate the use of our platform. We then use these findings to make our platform more user-friendly and to further develop it continuously.

Legal basis for processing

The legal basis for this processing is your consent pursuant to Art. 6(1) sentence 1 lit. a GDPR. Your consent is voluntary and may be revoked at any time with effect for the future. Revocation does not affect the lawfulness of the processing carried out up to that point. To exercise your right of revocation, please go to the platform’s account settings.

Recipients

As part of using the service, data collected via our platform may be transferred to the following recipient:

PostHog, Inc., 2261 Market Street #4008, San Francisco, CA 94114, USA.

Third-country processing

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA) when the service is used.

For data transfers to the USA, an adequacy decision of the EU Commission exists pursuant to Art. 45(1) GDPR for companies certified under the EU-U.S. Data Privacy Framework. PostHog, Inc. is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards.

<https://www.dataprivacyframework.gov/list>

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded where necessary. If these are not sufficient, additional technical, contractual, or organisational measures may be implemented.

Storage period

By integrating the service on our platform, data is processed for as long as this is necessary to achieve the stated purposes, but for no longer than two years.

4.4 Collection of User and Participant Feedback in Product Development

Description of the data processing and purpose

If your company or organisation participates in product-development programmes, we may give you the opportunity to take part in user interviews, usability tests, online workshops, and product demonstrations, as well as to test new features and options of our platform.

If you participate in user interviews, usability tests, online workshops, product demonstrations, or tests of new features and options, we process, in particular, the following personal data:

- data required to conduct online workshops or product demonstrations (first name, last name, email address, IP address, and other usage data in connection with the use of *Microsoft Teams*),
- data required to conduct user interviews and usability tests (e.g. information about the type of company or organisation, information about the user's role within the company or organisation, data on use of the platform, information on use and assessment of new features and options, information entered into free-text fields, and, where applicable, audio and video recordings of the session, provided that you have given your consent via a separate form).

Legal bases for processing

The legal basis for processing your data for the conduct of user interviews and usability tests and for creating audio and video recordings of the sessions is generally your consent pursuant to Art. 6(1) sentence 1 lit. a GDPR.

Otherwise, we base the processing of data for the conduct and evaluation of user interviews, usability tests, online workshops, product demonstrations, and the evaluation of recordings on Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in further developing our products and services in line with market requirements and in better understanding the needs of our customers and users.

Recipients

As part of the processing, your data is transferred to the following recipients:

- *Microsoft Ireland Operations, Ltd, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland.*
- *neoshare Bulgaria Ltd.*

Third-country processing

A transfer of your data to third countries or international organisations is not intended.

Storage period

We store your data only for as long as this is necessary to achieve the above purposes, in particular for implementing your feedback in our product. We then delete your data unless further processing remains permissible on the basis of another legal basis or is mandatory for us.

5. Data Protection Information for Customers and Other Contractual or Business Partners as well as Prospects

5.1 Establishment, Performance and Fulfilment of Contracts and the Implementation of Pre-Contractual Measures in General

Description of the data processing and purpose

We process your personal data to the extent that this is necessary for the establishment, performance, and fulfilment of a contract and for the implementation of pre-contractual measures.

We process only such data as is related to the establishment of a contractual relationship or to pre-contractual measures. This may include general information relating to you or to persons within your company (name, address, contact details, etc.) as well as, where applicable, further data that you provide to us in the context of entering into the contract.

Legal basis for processing

Where personal data is required for the initiation or performance of a contractual relationship or in the context of pre-contractual measures, processing is lawful pursuant to Art. 6(1) sentence 1 lit. b GDPR.

Sources

We process personal data that we receive from you in the context of making contact, entering into a contractual relationship, or taking pre-contractual measures by post, telephone, or email, via forms on our website, or via one of our social-media profiles.

Recipients

Within our company, we disclose your personal data only to those departments and persons who need this data in order to fulfil contractual and legal obligations or to implement our legitimate interests.

We may transfer your personal data to companies affiliated with us to the extent that this is permissible within the framework of the purposes and legal bases set out in this privacy notice.

Your personal data may be processed on our behalf on the basis of data processing agreements pursuant to Art. 28 GDPR. In such cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR. In this case, the categories of recipients are providers of internet services and providers of customer-management systems and software.

Otherwise, personal data is disclosed to recipients outside the company only if this is permitted or required by law, if the disclosure is necessary for the performance of the contract or, at your request, for taking pre-contractual measures, if we have your consent, or if we are authorised to provide information.

Under these conditions, recipients of personal data may include, for example:

- external tax advisers,
- public authorities and institutions (e.g. public prosecutors, police, supervisory authorities, tax offices) where a legal or official obligation exists,
- recipients to whom disclosure is directly necessary for the establishment or performance of the contract, and
- other data recipients, to the extent that you have given us your consent for the data transfer.

Storage period

Where necessary, we process and store your personal data for the duration of our business relationship or for the fulfilment of contractual purposes. This also includes the initiation and performance of a contract. In addition, we are subject to various retention and documentation obligations arising, among other things, from the German Commercial Code (HGB) and the German Fiscal Code (AO). The retention and documentation periods specified there range from two to ten years. Finally, the storage period is also determined by the statutory limitation periods, which, according to Sections 195 et seq. of the German Civil Code (BGB), are generally three years, but in certain cases may be up to thirty years.

Necessity of providing personal data

The provision of personal data for the purpose of deciding on the conclusion of a contract, performing the contract, or taking pre-contractual measures is voluntary. However, we can make a decision in connection with contractual measures only if you provide such personal data as is necessary for the conclusion of the contract, its performance, or pre-contractual measures.

For the management of customer and prospect data, we use “Salesforce” provided by *Salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany*.

Description of the data processing and purpose

The software enables us to manage customer and prospect data. This concerns data relating to existing or potential customers, business partners, or the relevant contact persons whom we address for advertising purposes.

Legal basis for processing

The legal basis for data management is Art. 6(1) sentence 1 lit. f GDPR or Art. 6(1) sentence 1 lit. a GDPR, depending on which of these legal bases we rely on for the respective advertising approach by email, telephone, or post. Further information in this regard can be found in this section of the privacy notice.

Recipients

As part of the data processing, your data is transferred to the following recipients:

- *Salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany.*
- *ContractHero GmbH, Parkstraße 89a, 13086 Berlin, Germany.*

Storage period

We store your data for as long as this is necessary to achieve the above purpose or for as long as you have not objected to the data processing. We then delete your data unless further processing remains permissible on the basis of another legal basis or is mandatory for us.

5.2 Data Processing for Advertising Purposes

We process your personal data in order to contact you by email for the purpose of direct advertising and to evaluate prospect data, conduct market research, and carry out customer satisfaction surveys.

5.2.1 Telephone Advertising Measures

Description of the data processing and purpose

If you are a business contact, we process your business telephone number. If you are a consumer, we process your private telephone number for the purpose of contacting you or your company by telephone in a personalised manner and informing you about our products, goods, services, and offers.

Legal basis for processing

With respect to business contacts, the legal basis for processing is Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in promoting the sale of our products, goods, and services by means of direct advertising.

Since we both comply with the requirements of the exception set out in Section 7(3) UWG and, in order to achieve the purpose, process only personal data that is related to your professional activity, no overriding interests of yours opposing our interest in the data processing are apparent, provided that you have not already objected to the processing.

You may object to the data processing at any time with effect for the future, without incurring any costs other than transmission costs according to the basic tariffs. To exercise your right to object, please contact dataprotection@neoshare.de.

Recipients

As part of the data processing, your data is transferred to the following recipient:

Salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany.

Storage period

We store your data for as long as this is necessary to achieve the above purpose or for as long as you have not objected to the data processing. We then delete your data unless further processing remains permissible on the basis of another legal basis or is mandatory for us.

5.2.2 Email Advertising

5.2.2.1 Advertising to Existing Customers

Description of the data processing and purpose

We process your personal data (salutation, first name, last name, business email address), which we have received in connection with the conclusion of a contract, for the purpose and in our legitimate interest of sending you or your company personalised direct advertising as an existing customer for similar products, goods, and services that are related to the previous contract.

Legal basis for processing

The legal basis for this processing is Art. 6(1) sentence 1 lit. f GDPR. Since we both comply with the requirements of the exception set out in Section 7(3) UWG and, in order to achieve the purpose, process only personal data that is related to your professional activity, no overriding interests of yours opposing our interest in the data processing are apparent, provided that you have not already objected to the processing.

You may object to the data processing at any time with effect for the future, without incurring any costs other than transmission costs according to the basic tariffs. To exercise your right to object, please use the unsubscribe link in our advertising emails or contact dataprotection@neoshare.de.

Recipients

- *Mailjet GmbH, Rankestraße 21, 10789 Berlin, Germany,*
- *Salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany.*
- *HubSpot Ireland Limited, 1 Sir John Rogerson's Quay, Dublin 2, Ireland.*

Storage period

We store your data for as long as this is necessary to achieve the above purpose or for as long as you have not objected to the data processing. We then delete your data unless further processing remains permissible on the basis of another legal basis or is mandatory for us.

5.2.2.2 Consent to Receive Advertising Emails and the Newsletter, Newsletter Tracking

Description of the data processing and purpose

In addition, we process your personal data (salutation, first name, last name, business email address) for the purpose of contacting you or your company by personalised email or through our email newsletter and informing you about our products, goods, services, offers, events, and functions only if you have given us your separate express consent to do so.

If you give us your consent, you also allow us to process data as to whether you have received our marketing emails and opened them, the extent to which you have interacted with the content, in particular which links you have clicked, and the extent to which you have read or skimmed our emails (newsletter tracking).

Legal basis for processing

The legal basis for this processing is your consent pursuant to Art. 6(1) sentence 1 lit. a GDPR. Your consent is voluntary and may be revoked at any time with effect for the future. Revocation does not affect the lawfulness of the processing carried out up to that point. To exercise your right of revocation, please use the unsubscribe link in our advertising emails or in the newsletter, or contact dataprotection@neoshare.de.

Recipients

- *Mailjet GmbH, Rankestraße 21, 10789 Berlin, Germany.*
- *Salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany.*

Storage period

We store your data for as long as this is necessary to achieve the above purpose or for as long as you have not objected to the data processing. We then delete your data unless further processing remains permissible on the basis of another legal basis or is mandatory for us.

5.2.3 Statistical Evaluation and Analysis of Customer and Prospect Data, Market Research and Customer Satisfaction Surveys

We process data collected from you as a prospect, for example via forms on our website, as well as data collected from you, where applicable, as a customer or as an employee of a customer in the context of pre-contractual measures or contract performance, in order to determine which of our products and services are of interest to prospects and customers, how we may be able to improve them, and how we can optimise our advertising measures. In order to address prospects more specifically for advertising purposes, we create so-called target groups from the data. Where applicable, information you provide in customer satisfaction surveys conducted by us is also incorporated into the analysis and evaluation.

For this purpose, we may collect information and data relating to:

- your company (e.g. size, industry),
- your position within the company,
- your country,
- your fields of interest or product categories, and
- the referral source, i.e. information about how you became aware of our company.

Legal basis for processing

The legal basis for processing your data is Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interests lie in further developing our products and services in line with market requirements, better understanding the needs and interests of our customers and potential customers, and enabling target-group-oriented direct advertising on this basis.

Recipients

As part of the data processing, your data is transferred to the following recipient:

Salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich, Germany.

6. Data Protection Information for Applicants

6.1 Data Processing in the Application Process

Description of the data processing and purpose

We process your personal data to the extent that this is necessary for deciding on the establishment of an employment relationship with us. Applications may reach us in particular via the upload function of our career portal, via online forms, by post, by email, and via job portals and professional networks chosen by you.

We process only such data as is related to your application. This may include general information about your person (name, address, contact details, etc.), information about your professional qualifications and school education, information about professional training, as well as, where applicable, other data that you provide to us in connection with your application.

If an employment relationship is established between you and us, we may continue to process the personal data we have already received from you for purposes of the employment relationship, to the extent that this is necessary for carrying out or terminating the employment relationship or for exercising or fulfilling the rights and obligations arising from a law, collective agreement, works agreement, or service agreement.

For the collection and management of applicant data via online forms, we use the HR and applicant-management software *Personio* provided by *Personio GmbH, Rundfunkplatz 4, 80335 Munich, Germany*. If you submit your application data to us via the application form on our website, the data entered in the input form is transmitted to Personio and stored there. Processing by Personio takes place solely for the purpose of handling your application.

As part of your application, the following data in particular may be processed: surname, first name, telephone number, place of residence or address, email address, salary expectations and start date, as well as CV, references, cover letter, and other uploaded attachments.

Legal basis for processing

The legal basis is Art. 88 GDPR in conjunction with Section 26(1) BDSG or Art. 6(1) sentence 1 lit. b GDPR for purposes of the employment relationship if this is necessary for the decision on the establishment of an employment relationship.

If you give us your express consent to process personal data for specific purposes, the lawfulness of this processing is based on your consent pursuant to Section 26(2) BDSG and Art. 6(1) sentence 1 lit. a GDPR. Any consent given may be revoked at any time with effect for the future.

The legal basis for further processing for the purpose of carrying out or terminating the employment relationship is Art. 88 GDPR in conjunction with Section 26(1) BDSG or Art. 6(1) sentence 1 lit. b GDPR.

Source

We process personal data that we receive from you in the context of your application via the upload function of our career portal, via online forms, by post, or by email, or that you submit to us via job portals and professional networks chosen by you.

Recipients

Within our company, we disclose your personal data only to those departments and persons who need this data in order to fulfil contractual and legal obligations or to implement our legitimate interests.

We may transfer your personal data to companies affiliated with us to the extent that this is permissible within the framework of the purposes and legal bases set out in this privacy notice.

Your personal data may be processed on our behalf on the basis of data processing agreements pursuant to Art. 28 GDPR. In such cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR.

In this case, the categories of recipients are providers of internet services and providers of applicant-management systems and software.

As part of the data processing, your data is transferred in particular to the following recipient:

Personio GmbH, Rundfunkplatz 4, 80335 Munich, Germany.

Otherwise, personal data is disclosed to recipients outside the company only to the extent that legal provisions permit or require this, disclosure is necessary to fulfil legal obligations, or your consent has been obtained.

Third-country processing

A transfer to a third country is not intended.

Storage period

We store your personal data for as long as this is necessary for the decision on your application. Your personal data or application documents will be deleted no later than six months after the application process has ended (e.g. notification of the rejection decision), unless longer storage is legally required or permissible. We also store your personal data only to the extent that this is necessary by law or, in an individual case, for the assertion, exercise, or defence of legal claims for the duration of a legal dispute. If you have consented to longer storage of your personal data, we will store it in accordance with your declaration of consent. If, following the application process, an employment, training, or internship relationship is established, your data will, to the extent necessary and permissible, initially continue to be stored and then transferred to the personnel file. Where applicable, you may receive an invitation after the application process to join our talent pool. This enables us to consider you in the future when selecting applicants for suitable vacancies. If we have your corresponding consent, we will store your application data in our talent pool in accordance with your consent or any future consents.

Necessity of providing personal data

Providing your personal data in the context of application processes is voluntary. However, we can decide on the establishment of an employment relationship or enter into an employment relationship with you only if you provide such personal data as is necessary to carry out the application process.

7. Data Protection Information for Visitors to Our Social-Media Profiles

Below you will find information on how your data is handled when collected through your use of our social-media profiles on social networks and platforms.

7.1 Social-Media Profiles

We maintain profiles, presences, pages, or fan pages on the following social-media platforms:

LinkedIn: [neoshare AG | LinkedIn](#)

kununu: <https://www.kununu.com/de/neoshare>

7.2 Different Responsibilities and Roles

Depending on the extent to which the platform operators and we as the page operator are involved in the processing of your personal data, the respective responsibility or role differs.

We may either be jointly responsible together with the platform operator, or the platform operator may be solely responsible.

7.3 Joint Controllership with Platform Operators

In certain cases, joint controllership may exist between us and the respective platform operators.

7.3.1 Joint Controllers

Joint controllership exists between us and the following platform operator:

LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Plaza, Gardner House 4, 5, 6, Dublin 2, Ireland

For the processing of your personal data in connection with your visit to the profile, page, or fan page on these platforms, we as the operator of the relevant page are jointly responsible together with the respective platform operators where the platform operators provide aggregated information on visitors to our profiles, pages, or fan pages (e.g. so-called “Insights” or “Analytics”).

In the case of joint controllership, we have entered into agreements with the platform operators pursuant to Art. 26 GDPR on joint controllership in the processing of your personal data (e.g. Page Controller Addendum or Joint Controller Addendum).

These agreements specify which data-processing operations are the responsibility of us or of the respective platform operator. You can view these agreements via the following links:

LinkedIn: <https://legal.linkedin.com/pages-joint-controller-addendum>

Further information on data processing by the platform operators can be found in their privacy policies:

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

7.3.2 Contacting the Data Protection Officers of the Platform Operators

You can contact the platform operators’ data protection officers here:

LinkedIn: To contact LinkedIn’s data protection officer, you can use the contact form available at: <https://www.linkedin.com/help/linkedin/ask/TSO-DPO>

7.3.3 Data Processing under Joint Controllership

7.3.3.1 Access to and Storage of Information in End Devices

When you access our profiles on the above-mentioned platforms, cookies and similar technologies are used by the platform operator on your device in order to store data on your device or read data from it. Such access or storage may be associated with further processing of personal data within the meaning of the GDPR.

Where such access to information or such storage of information is strictly necessary for the technically error-free provision of the services, this is carried out on the basis of Section 25(1) sentence 1, Section 25(2) no. 2 TDDDG. Subsequent data processing may be based on Art. 6(1) sentence 1 lit. f GDPR.

Where such a process serves other purposes (e.g. the needs-based design of our social-media profiles), it is carried out pursuant to Section 25(1) TDDDG only with your consent in accordance with Art. 6(1) lit. a GDPR. Consent may be revoked at any time with effect for the future. The provisions of the GDPR and the German Federal Data Protection Act (BDSG) apply to the processing of your personal data.

Further information on the use of cookies and similar technologies and the corresponding legal bases can be found in the respective privacy policy of the platform operator. Links to the respective privacy policies can be found above. If you have further questions in this regard, please contact the operator of the respective social-media platform directly.

7.3.3.2 Data Processing for Advertising and Market Research Purposes

As a rule, personal data is processed on our social-media profiles primarily for the platform operator's market-research and advertising purposes. To the extent that data is collected directly on our social-media profile, we participate in the platform operator's data processing and are therefore jointly responsible with that operator to this extent.

Cookies and similar technologies are used in the course of data processing, enabling the platform operator to recognise you when you visit a social-media profile. In addition, a comprehensive evaluation of your interactions on the platform (clicks, comments, and likes) as well as of the information you provide to the platform operator, such as your profile data and your profile picture or profile name, takes place for members of the social-media platform. In particular, demographic information (age, gender, country, industry, profession, etc.) may also be processed from your own member profile.

Usage profiles can be created on the basis of the data collected. These are then used by the platform operator to place advertisements inside and outside the platform that presumably correspond to your interests.

Although we do not have direct access to the data processed by the platform operator, we also benefit from this data processing by placing corresponding advertisements inside or outside the platforms on the basis of target groups identified by the platform operator.

The legal basis for processing your personal data in this context is your consent given to the platform operator pursuant to Art. 6(1) lit. a GDPR.

Please note that we have no influence over the collection of data and the further processing carried out under the platform operators' responsibility. Consequently, we cannot provide information on the extent, location, and duration of storage of the data by the platform operator.

Further information in this regard can be found in the respective provider's privacy information.

7.3.3.3 Data Processing in the Context of "Insights" or "Analytics"

In addition, your data is processed under joint controllership in connection with so-called "Page Insights" or "Page Analytics".

“Page Insights” or “Page Analytics” are analysis functions provided by the platform operator by means of which profile data provided by you, in particular demographic data, as well as data relating to your interactions with our profile, are collected jointly by the platform operator and by us.

The platform operator then analyses this data and provides us with aggregated data from which we can determine which demographic target group has visited our profile and how our profile has been used by that target group.

We also have no direct access to the data processed by the platform operator in this context. It is made available to us only in aggregated form. This means that we cannot identify individual visitors or their interactions on the basis of the aggregated data.

We subsequently use this aggregated data to align our social-media profile with the target group and to optimise it generally with regard to the aforementioned advertising purposes (increasing the reach and visibility of our profile and evaluating the success of marketing campaigns).

The legal basis for processing your personal data in this context is your consent given to the platform operator pursuant to Art. 6(1) lit. a GDPR.

Please note that we have no influence over the collection of data and the further processing carried out under the platform operators’ responsibility. Consequently, we cannot provide information on the extent, location, and duration of storage of the data by the platform operator.

Further information in this regard can be found in the respective provider’s privacy information.

7.3.3.4 Data Processing Based on Consent

Where you are asked by the respective platform operators to give consent to processing for a specific joint purpose, the legal basis for processing is Art. 6(1) lit. a and Art. 7 GDPR. Any consent given may be revoked at any time with effect for the future.

Recipients and third-country processing

Where we pass personal data on to the operators of social-media platforms, the latter are recipients of the data within the meaning of Art. 4 no. 9 GDPR.

LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Plaza, Gardner House 4, 5, 6, Dublin 2, Ireland

LinkedIn Corp., 1000 W. Maude Ave, Sunnyvale, CA 94085, USA

Your data may also be processed in countries outside the European Union (EU) and the European Economic Area (EEA), in particular in the USA, when you visit our social-media profiles.

For data transfers to the USA, an adequacy decision of the EU Commission pursuant to Art. 45(1) GDPR exists for companies certified under the EU-U.S. Data Privacy Framework, which can be viewed at: [Data protection adequacy for non-EU countries](#).

LinkedIn Corp. is certified under the EU-U.S. Data Privacy Framework and is therefore committed to complying with appropriate data protection standards. This can be viewed at: [Participant Search \(dataprivacyframework.gov\)](#)

Where your data is transferred to other third countries for which no adequacy decision exists, it cannot be ruled out that public authorities in those countries may access your data for security and surveillance purposes without you being informed or having effective legal remedies available.

To ensure an adequate level of data protection, standard contractual clauses of the European Commission pursuant to Art. 46(2)(c) GDPR are concluded in respect of transfers of your data to third countries. These obligate the data recipient to process the data in accordance with the European level of protection.

If the standard contractual clauses are not sufficient to ensure the level of protection, additional technical, contractual, and organisational measures are implemented to safeguard the data transfer. In addition, these supplementary measures are reviewed and assessed on a regular basis to ensure that they continue to provide an adequate level of protection or, if necessary, that further supplementary measures are implemented.

7.3.4 Exercising Your Rights in Cases of Joint Controllershship

Your rights as a data subject of the processing

If, as a visitor to the page, you wish to exercise your rights (access, rectification, erasure, restriction, data portability, complaint to the supervisory authority, objection, or withdrawal of consent), you may contact either the platform operator or us.

LinkedIn: Through the LinkedIn settings you can restrict the visibility of your LinkedIn account (also) vis-à-vis us. Further information on exercising your rights can be found in LinkedIn's privacy policy at: <https://www.linkedin.com/legal/privacy-policy>

7.4 Responsibility of the Platform Operators

Where your personal data is processed by one of the social-media platform operators listed below, such processing takes place under the sole responsibility of the platform operator within the meaning of Art. 4 no. 7 GDPR.

kununu: New Work SE, Am Strandkai 1, 20457 Hamburg, Germany

We have no influence over data processing by the platform operators. For further information, please review the privacy policy of the respective platform operator:

kununu: <https://privacy.xing.com/de/datenschutzerklaerung>

If you wish to exercise your data-subject rights, please note that these can be exercised most effectively vis-à-vis the respective providers. Only they have access to the data collected about you. Should you nevertheless require assistance, please feel free to contact us at any time.

7.5 Our Own Responsibility

We are solely responsible for the following data-processing operations carried out via our social-media profiles.

7.5.1 Data Processing through Operation of the Social-Media Profile

When you visit or interact with our social-media profile, we process personal data relating to you.

This may include information that you actively provide (comments, likes, and information publicly made available by you, such as your profile picture or your profile name). Depending on the provider and your settings on the provider's platform, it may also be possible for us to be informed who has accessed our profile within the platform.

The legal basis for processing personal data when operating our social-media profile is Art. 6(1) sentence 1 lit. f GDPR.

Our legitimate interest lies in addressing visitors for advertising purposes and in providing an effective means of communication and interaction with our company on the social-media platform.

7.5.2 Data Processing When Contacting Us

We ourselves collect personal data when you contact us, for example via a contact form or through a messenger function of the respective platform.

Which data is collected depends on the information you provide and the contact data that you disclose or make available. This data is stored for the purpose of processing your request and in case follow-up questions arise.

The legal basis for processing the data is our legitimate interest in responding to your request pursuant to Art. 6(1) sentence 1 lit. f GDPR.

Your data will be deleted after your request has been finally processed, provided that there are no statutory retention obligations to the contrary. We assume that final processing has taken place if it can be inferred from the circumstances that the matter in question has been conclusively clarified.

7.5.3 Data Processing for the Performance of a Contract

If your contact via a social network or another platform is aimed at concluding a contract with us for the delivery of goods or the provision of services, we process your data for the fulfilment of the contract or for taking pre-contractual measures or for providing the requested services.

In this case, the legal basis for processing your data is Art. 6(1) sentence 1 lit. b GDPR.

Your data will be deleted when it is no longer required for the performance of the contract or when it is clear that the pre-contractual measures will not lead to a contract corresponding to the purpose of the contact.

Please note, however, that even after a contract has been concluded, it may be necessary to store personal data of our contractual partners in order to comply with contractual or statutory obligations.

7.5.4 Data Processing Based on Consent

Where we ask you to give consent to processing for a specific purpose, the legal basis for the processing is Art. 6(1) sentence 1 lit. a and Art. 7 GDPR. Any consent given may be revoked at any time with effect for the future.

8. Additional Data Processing Activities

8.1 Documentation of Compliance with Data Protection Requirements

Description of the data processing and purpose

Where you submit a declaration of consent to us, we process your personal data concerning the circumstances and time of the submission (where applicable signature, email address, telephone or fax number, or IP address) in order to be able to demonstrate, within the scope of the accountability obligation incumbent upon us under Art. 5(2) GDPR, that you consented to the relevant data processing.

Where you exercise your data-subject rights under the GDPR vis-à-vis us, we also process your personal data in order to be able to demonstrate, within the scope of the accountability obligation under Art. 5(2) GDPR, that we have complied with the GDPR when handling your request.

Where, in the course of implementing your data-subject rights, we implement a withdrawal of consent to advertising or an objection to direct advertising, we may process your data in a so-called advertising suppression list in order to ensure permanently that you no longer receive advertising.

Legal basis for processing

In each case, processing is based on Art. 6(1) sentence 1 lit. c GDPR or Art. 6(1) sentence 1 lit. f GDPR. Our legitimate interest lies in being able to document compliance with the requirements of the GDPR within the scope of our accountability obligations and, in relation to the marketing suppression list, in permanently implementing your data-subject rights.

Recipients

In addition, it may happen that we forward your personal data in connection with your request to our external data protection officer, who supports us in complying with the GDPR.

Storage period

We store your data for as long as this is necessary to achieve the above purpose. Data relating to a declaration of consent is generally stored until the expiry of 3 years from the end of the year in which we last made use of that consent. Data that we process in connection with the implementation of data-subject rights is generally stored for a period of 3 years from the end of the year in which you exercised your data-subject right. Data contained in the advertising suppression list is processed for as long as we are commercially active as a company.

We then delete your data unless processing, including in other systems where applicable, remains permissible on the basis of another legal basis or is mandatory for us.

8.2 Assertion or Defence of Legal Claims

Description of the data processing and purpose

In individual cases, we also process your data for the purpose and in the interest of asserting legal claims, for example in order to enforce our claims arising from unpaid invoices, where your data is relevant to a legal dispute.

In addition, in individual cases we process your data for the purpose and in the interest of defending against legal claims asserted against us, for example where claims arising from liability for defects are asserted, provided that your data is relevant to a legal dispute.

Legal basis for processing

The legal basis for processing your data is Art. 6(1) sentence 1 lit. f GDPR.

Recipients

Where necessary, your data is transferred to tax advisers, auditors, tax or investigative authorities, lawyers, experts, or courts.

Storage period

In individual cases, we store your data to the extent necessary for as long as this is required to achieve the above purpose. We then delete your data unless processing, including in other systems where applicable, remains permissible on the basis of another legal basis or is mandatory for us.

8.3 Fulfilment of Other Legal Obligations

Description of the data processing and purpose

We process personal data where this is necessary for the fulfilment of a legal obligation. The scope of the data to be processed follows from the legal obligation with which we must comply.

Legal basis for processing

In these cases, the legal basis for processing your data is Art. 6(1) sentence 1 lit. c GDPR in conjunction with the respective legal provision imposing such an obligation on us.

These may include, for example, provisions of the German Fiscal Code (AO), e.g. Section 147 AO, the German Commercial Code (HGB), e.g. Section 257 HGB, or the German Code of Criminal Procedure (StPO).

Recipients

Where necessary, your data is transferred to tax advisers, auditors, tax or investigative authorities, lawyers, experts, or courts.

Storage period

We store your data to the extent necessary for as long as this is required to achieve the above purpose. The storage period results from the special statutory provisions that oblige us to retain or process data for up to 10 years, whereby the specific start of the retention periods follows from the respective special statutory provision.

We then delete your data unless processing, including in other systems where applicable, remains permissible on the basis of another legal basis.

9. Your Rights

Below you will find information on the rights that applicable data protection law grants you vis-à-vis the controller with regard to the processing of your personal data:

The right, pursuant to Art. 15 GDPR, to request information about your personal data processed by us. In particular, you may request information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data where it was not collected by us, and the existence of automated decision-making including profiling and, where applicable, meaningful information on its details.

The right, pursuant to Art. 16 GDPR, to request without undue delay the rectification of inaccurate personal data stored by us or the completion of incomplete personal data.

The right, pursuant to Art. 17 GDPR, to request the erasure of your personal data stored by us, unless processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise, or defence of legal claims.

The right, pursuant to Art. 18 GDPR, to request restriction of processing of your personal data where you contest the accuracy of the data, the processing is unlawful, but you oppose its erasure and we no longer need the data, while you require it for the establishment, exercise, or defence of legal claims, or you have objected to processing pursuant to Art. 21 GDPR.

The right, pursuant to Art. 20 GDPR, to receive your personal data that you have provided to us in a structured, commonly used, and machine-readable format or to request transmission to another controller.

The right, pursuant to Art. 77 GDPR, to lodge a complaint with a supervisory authority. As a rule, you may contact the supervisory authority of the federal state of our registered office stated above or, where applicable, that of your habitual residence or workplace.

The right to withdraw consents granted pursuant to Art. 7(3) GDPR: You have the right to withdraw any consent once given to the processing of data at any time with effect for the future. In the event of withdrawal, we will delete the data concerned without undue delay unless further processing can be based on a legal basis permitting processing without consent. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of the consent before its withdrawal.

Right to object

Where your personal data is processed by us on the basis of legitimate interests pursuant to Art. 6(1) sentence 1 lit. f GDPR, you have the right, pursuant to Art. 21 GDPR, to object to the processing of your personal data on grounds relating to your particular situation. Where the objection is directed against the processing of personal data for the purpose of direct advertising, you have a general right to object without the need to specify a particular situation.

If you wish to exercise your right of withdrawal or objection, simply send an email to dataprotection@neoshare.de.