

Privacy Policy

Status: 26.01.2023

1. Introduction

This Privacy Policy (together with our Terms and Conditions and any other documents referred to in it) describes the type of information that we collect from you (“you/your”) through the use of our services („Services“), or the use of our website www.securitee.tech (“Website“), how that information may be used or disclosed by us and the safeguards we use to protect it.

Our Website and Services may contain links to third-party websites that are not covered by this Privacy Policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

We have created this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it. By using or accessing our Website or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy. This Privacy Policy may change from time to time and your continued use of the Website or the Services is deemed to be acceptance of such changes, so please check periodically for updates.

This Privacy Policy was last updated on [12.10.2022] to add new provisions to the policy applicable regarding GDPR. Please check back regularly to keep informed of updates to this Privacy Policy. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using our Website immediately.

If you have any comments on this Privacy Policy, please email them to info@securitee.tech.

2. Who we are

2.1 Here are the details that the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, known as General Data Protection Regulation (GDPR) says we have to give you as a ‘data controller‘:

- Our Website address is www.securitee.tech
- Our company name is [Securitee UG (haftungsbeschränkt)]
- Our registered address is [c/o WeWork, Kemperplatz 1, DE-10785 Berlin]
- Our nominated representative is Christian Junger and he can be contacted at info@securitee.tech.

2.2 We respect your right to privacy and will only process personal information about or provided by you in accordance with the Data Protection Legislation which for the

purposes of this Privacy Policy shall mean: the General Data Protection Regulation (EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, and any successor legislation to the GDPR or the Data Protection Act 1998 and other applicable privacy laws.

3. What we may collect

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier. When you email, phone, live chat or otherwise, we may collect information such as your first name, last name, email address and phone number.
- Contact Data includes billing address, invoicing address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments and other details of our Services you have purchased from us.
- Profile Data includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses.
- Interaction Data includes any information that you might provide to any discussion forums on the Website.
- Third Parties and Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or through the Services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our Website. We are also working closely with third parties (including, for example, business partners, suppliers, sub-contractors, advertising networks, analytics providers, and search information providers) and may receive information about you from them.

3.3 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

3.4 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3.5 Under GDPR, we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following bases applies:

- a) You have given consent to the processing of your personal data for one or more specific purposes
- b) Processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract
- c) Processing is necessary for compliance with a legal obligation to which we are subject
- d) Processing is necessary to protect the vital interests of you 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 us or by a third party such as our financial payments, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child

3.6 If we receive personal information in the course of providing our Services to you from another data subject, we expect you to have complete responsibility for ensuring that the contents of this Privacy Policy are brought to their attention, and you have obtained their consent in the process.

3.7 In some instances, it may be appropriate for us to combine your information with other information that we may be holding about you, such as combining your name with your geographic location or your browsing or purchasing history.

4. How we may collect and use your data

4.1 We (or third-party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information by way of different methods to collect data from and about you including through direct interactions. You may give us your information by filling in forms via our Website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- a) Present Website content
- b) Use any of our Services
- c) Create an account on our Website for our customer portal
- d) Subscribe to our Services or publications
- e) Request marketing to be sent to you
- f) Enter a competition, promotion or survey
- g) Give us some feedback.

4.2 In addition to the above, we may use the information in the following ways:

- a) To personalize your Website experience and to allow us to deliver the type of content and product offerings in which you are most interested
- b) To administer a contest, promotion, survey or other site feature

- c) If you have opted-in to receive our email newsletter, we may send you periodic emails. If you would no longer like to receive promotional email from us, please refer to the “How can you opt-out, remove or modify information you have provided to us?” section below. If you have not opted-in to receive email newsletters, you will not receive these emails. Visitors who register or participate in other site features such as marketing programs and ‘members-only’-content will be given a choice whether they would like to be on our email list and receive email communications from us
- d) Present Website content effectively to you
- e) Provide information, and services that you request, or (with your consent) which we think may interest you
- f) Carry out our contracts with you
- g) Provide the relevant Services to you
- h) Communicate our charges to you.

4.3 If you are already our customer, we will only contact you electronically about things similar to what was previously sold to you.

4.4 If you are a new customer, you will only be contacted if you agree to it.

4.5 We may keep a record of those links which are used the most to enable us to provide the most helpful information, but we agree to keep such information confidential, and you will not be identified from this information.

4.6 In addition, if you don't want us to use your personal data for any of the other reasons set out in this section in 5, you can let us know at any time by contacting us at info@securitee.tech, and we will delete your data from our systems. However, you acknowledge this will limit our ability to provide the best possible products and services to you.

4.7 In some cases, the collection of personal data may be a statutory or contractual requirement, and we will be limited in the products and services that we can provide you if you do not provide your personal data in these cases.

4.8 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- a) Where we need to perform the contract that we are about to enter into or have entered into with you
- b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- c) Where we need to comply with a legal or regulatory obligation

4.9 Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to our marketing communications or sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at info@securitee.tech, and we will either delete your data from our systems or move your data to our “unsubscribe list”. However, you acknowledge this will limit our ability to provide the best possible services to you.

4.10 As already indicated above, with your permission and/or when permitted by law, we may also use your data for marketing purposes. This may lead us to contacting you by email and/or telephone with information, news and offers regarding our Services. We agree that we will not do anything that we have not agreed to under this Privacy Policy, and we will not send you any unsolicited marketing or spam. We will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.

5. Cookies

The table below provides a detailed list of the cookies used on our application as part of our Services. Please note that this table may be updated from time to time to provide you with the latest information.

Cookie-Name	Category	Duration	Sensitivity	ID	Description
_ga	Analytics	2 years	non-necessary	_ga	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.
_ga_Z3VSCPX33K	Analytics	2 years	non-necessary	_ga_Z3VSCPX33K	This cookie is installed by Google Analytics.
cookielawinfo-check-box-advertisement	Necessary	1 year	non-necessary	cookielawinfo-check-box-advertisement	et by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Advertisement" category.
viewed_cookie_policy	Necessary	11 months	necessary	viewed_cookie_policy	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies.

					It does not store any personal data.
cook-ielawinfo-check-box-necessary	Necessary	11 months	necessary	Ccook-ielawinfo-check-box-necessary	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".
cook-ielawinfo-check-box-functional	Necessary	11 months	necessary	cook-ielawinfo-check-box-functional	The cookie is set by GDPR cookie consent to record the user consent for the cookies in the category "Functional".
cook-ielawinfo-check-box-performance	Necessary	11 months	necessary	cook-ielawinfo-check-box-performance	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Performance".
cook-ielawinfo-check-box-analytics	Necessary	11 months	necessary	cook-ielawinfo-check-box-analytics	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Analytics".
cook-ielawinfo-check-box-others	Necessary	11 months	necessary	cook-ielawinfo-check-box-others	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Other".

6. Disclosing your information

We are allowed to disclose your information in the following cases:

- a) If we want to sell our business, or our company, we can disclose it to the potential buyer
- b) We can disclose it to other businesses in our group
- c) We can disclose it if we have a legal obligation to do so, or in order to protect other people's property, safety or rights
- d) We can exchange information with others to protect against fraud or credit risks

7. Your rights

7.1 When you submit information via our Website, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data, including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided above in this Privacy Policy.

7.2 Under the GDPR, you have the right to:

- Request access to, deletion of, or correction of, your personal data held by us at no cost to you
- Request that your personal data be transferred to another person (data portability)
- Be informed of what data processing is taking place
- Restrict processing
- To object to processing of your personal data
- Complain to a supervisory authority

7.3 You also have rights with respect to automated decision-making and profiling as set out in section 11 below.

7.4 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

7.5 To enforce any of the foregoing rights or if you have any other questions about our Website or this Privacy Policy, please contact us at info@securitee.tech.

8. Links to other sites

Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our Website. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

9. Changes

If we change our Privacy Policy, we will post the changes on our Website. If we decide to do so, we may also email you.

10. Your consent

By using our Website and by way of acknowledgment, you consent to our Privacy Policy.

11. Dispute resolution

11.1 The Parties will use their best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it.

11.2 If any such dispute cannot be settled amicably through ordinary negotiations between the parties, or either or both is or are unwilling to engage in this process, either party may propose to the other in writing that structured negotiations be entered into with the assistance of a fully accredited mediator before resorting to litigation.

11.3 All negotiations connected with the relevant dispute(s) will be conducted in confidence and without prejudice to the rights of the parties in any further proceedings.

11.4 If the parties agree on a resolution of the dispute at mediation, the agreement shall be reduced to writing and, once signed by the duly authorized representatives of both parties, shall be final and binding on them.

11.5 If the parties fail to resolve the dispute(s) within 60 days (or such longer term as may be agreed between the parties) of the mediator being appointed, or if either party withdraws from the mediation procedure, then either party may exercise any right to seek a remedy through arbitration by an arbitrator.

11.6 Any dispute shall not affect the parties' ongoing obligations under this Privacy Policy.