

## DATA PRIVACY INFORMATION FOR CONTRACTUAL PARTNERS OF EVE LIVE SUBTITLING

Dear contracting party,

in accordance with the provisions of Art. 13 of the General Data Protection Regulation (GDPR), we hereby inform you about the processing of your personal data and the rights of the data subject in this regard. Which data is processed in detail and in which way it is used depends largely on the services requested or agreed upon. A detailed list of the data categories of the services and the services used can be found in **Annex 1** of this information. In order to ensure that you are fully informed about the processing of your personal data within the framework of the fulfilment of a contract or the implementation of pre-contractual measures, please take note of the following information.

### 1. CONTROLLER IN THE SENSE OF THE GDPR

PAGES Media GmbH  
Stefan-George-Ring 19  
81929 Munich

Represented by: Thomas Niedermayr

### 2. CONTACT DETAILS OF OUR DATA PROTECTION OFFICER

jmh datenschutzberatung  
Jörg Hermann, DPO  
c/o Werk1  
Atelierstr. 29  
81671 Munich  
e-mail: [info@jmh-datenschutz.de](mailto:info@jmh-datenschutz.de)

### 3. PURPOSES AND LEGAL BASIS OF THE DATA PROCESSING

We process your personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Bundesdatenschutzgesetz (BDSG), insofar as these are necessary for the establishment, execution and fulfilment of a contract and for the implementation of pre-contractual measures. Insofar as personal data are required for the initiation or execution of a contractual relationship or in the context of the implementation of pre-contractual measures, processing is lawful in accordance with Art. 6 para. 1 lit. b GDPR.

If you give us your consent to process personal data for specific purposes (e.g. transfer to third parties, evaluation for marketing purposes or advertising by e-mail), the lawfulness of this processing is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR. A given consent can be revoked at any time with effect for the future (see section 9 of this data protection information).

If necessary and legally permissible, we process your data beyond the actual contractual purposes to fulfil legal obligations in accordance with Art. 6 Para. 1 lit. c GDPR. In addition, processing may be carried out to protect the legitimate interests of us or third parties and to defend and assert legal claims in accordance with Art. 6 Para. 1 lit. f GDPR. If necessary, we will inform you separately, indicating the legitimate interest, insofar as this is required by law.

### 4. CATEGORIES OF PERSONAL DATA

We process data which are connected with the contract justification or the pre-contractual measures. This can be general data about your person or persons in your company (name, address, contact data, etc.) as well as any other data that you provide to us in the context of the establishment of the contract.

In addition, we process data that is generated during the subtitling and translation of voice recordings in the context of the execution of our contract. These can be names of persons as well as other data handlers that are mentioned during the lecture.

A detailed list of the categories of data processed can be found in **Annex 1** of this privacy statement.

## 5. SOURCES OF THE DATA

We process personal data that we receive from you in the course of establishing contact or a contractual relationship or in the course of pre-contractual measures. We also process data obtained during the execution of contracts - subtitling and translation of voice recordings.

## 6. RECIPIENT OF THE DATA

Within our company, we only pass on your personal data to those areas and persons who need this data 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 permitted by the purposes and legal basis set out in Section 3 of this Privacy Policy.

Your personal data will be processed on our behalf on the basis of commissioned processing contracts in accordance with Art. 28 GDPR. In these cases, we ensure that personal data is processed in accordance with the provisions of the GDPR. The categories of recipients in this case are ISPs and providers of customer management systems and software. A list of recipients is provided in **Annex 1** of this privacy statement.

Otherwise, data will only be passed on to recipients outside the company to the extent permitted or required by law, the transfer is necessary for processing and thus for the fulfilment of the contract or, at your request, for the implementation of pre-contractual measures, we have your consent or we are authorised to provide information. Under these conditions, recipients are personal data:

- External tax consultant
- Public bodies and institutions (e.g. public prosecutor's office, police, supervisory authorities, tax office) if there is a legal or official obligation,

## 7. TRANSFER TO A THIRD COUNTRY

Personal data will only be transferred to countries outside the EEA (European Economic Area) or to an international organisation if this is necessary for the processing and thus the fulfilment of the contract or, at your request, for the implementation of pre-contractual measures, if the transfer is required by law or if you have given us your consent. A list of recipients in third countries is provided in **Annex 1** of this privacy statement.

## 8. DURATION OF DATA STORAGE

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 execution of a contract.

If the contractual partner deletes an event from his customer account, all data related to this event will be permanently deleted. This includes all specific sentences and vocabulary books for which the event was created. This does not apply to data that must be stored due to legal regulations.

If the contractual partner deletes his customer account, all data of the contractual partner will be permanently deleted. This also includes all specific sentences and vocabulary books for which customers have been created. This does not apply to data that must be stored due to legal regulations.

In addition, we are subject to various storage and documentation obligations arising from the German Commercial Code (HGB) and the German Fiscal Code (AO). The periods of retention or documentation prescribed there are two to ten years.

Finally, the storage period also depends on the statutory limitation periods, which, for example, according to §§ 195 ff. of the German Civil Code (BGB), are usually three years, but in certain cases can be up to thirty years.

## 9. YOUR RIGHTS

Every data subject has the right of access under Art. 15 GDPR, the right of rectification under Art. 16 GDPR, the right to erasure under Art. 17 GDPR, the right to restriction of processing under Art. 18 GDPR, the right of notification under Art. 19 GDPR and the right to data portability under Art. 20 GDPR.

In addition, you have the right of appeal to a data protection supervisory authority in accordance with Art. 77 GDPR if you believe that your personal data is not being processed lawfully. The right of appeal is without prejudice to any other administrative or judicial remedy.

If the processing of data is based on your consent, you are entitled to revoke your consent to the use of your personal data at any time in accordance with Art. 7 GDPR. Please note that the revocation is only effective for the future. Processing operations that took place before the revocation are not affected. Please also note that we may need to retain certain data for a certain period of time in order to comply with legal requirements (see section 8 of this data protection information).

#### **Right of objection**

**Insofar as the processing of your personal data is carried out in accordance with Art. 6 para. 1 lit. f GDPR to safeguard legitimate interests, you have the right, pursuant to Art. 21 GDPR, to object to the processing of such data at any time for reasons arising from your particular situation. We then no longer process these personal data unless we can prove compelling reasons for processing worthy of protection. These must outweigh your interests, rights and freedoms, or the processing must serve to assert, exercise or defend legal claims.**

**In individual cases, we process your personal data in order to carry out direct advertising. You have the right to object at any time to the processing for the purpose of such advertising. This also applies to profiling, insofar as it is related to this direct mail. If you object to processing for the purpose of direct marketing, we will not process your personal data further for these purposes.**

In order to protect your rights, you can contact us using the contact details given in point 1.

#### **10. NECESSITY OF THE PROVISION OF PERSONAL DATA**

The provision of personal data for the decision to conclude a contract, for the performance of a contract or for the implementation of pre-contractual measures is voluntary. However, we can only make a decision within the framework of contractual measures if you provide such personal data as are necessary for the conclusion of the contract, the fulfilment of the contract or pre-contractual measures.

#### **11. DATA CONFIDENTIALITY**

PAGES Media GmbH shall be obliged to treat personal data obtained within the scope of this contractual relationship confidentially and to observe the relevant secrecy protection rules for an unlimited period of time and beyond the end of this contract.

PAGES Media GmbH undertakes to familiarize its employees with the relevant data protection regulations and secrecy protection rules and to oblige them to maintain secrecy before they begin their work for the contracting party.

#### **12. AUTOMATED DECISION MAKING**

As a matter of principle, we do not use any fully automated decision making pursuant to Art. 22 GDPR to establish, fulfil or implement the business relationship or for pre-contractual measures. Should we use these procedures in individual cases, we will inform you separately or obtain your consent, provided this is required by law.

## ANNEX 1: SERVICES, CATEGORIES OF DATA AND RECIPIENTS

Service	Processed category of data	Category of persons concerned	Recipients	Data transfer to a third country
EVE Platform	<ul style="list-style-type: none"> <li>○ E-mail address</li> <li>○ Profile picture</li> <li>○ Username</li> <li>○ Number of booked time</li> <li>○ Number of elapsed time</li> <li>○ Settings</li> <li>○ Names, details and settings of events</li> <li>○ Password hash of the event</li> <li>○ Voice recordings of the events</li> <li>○ Converted text of the events</li> <li>○ Names, details and settings of the dictionaries</li> <li>○ Accounting data</li> </ul>	<ul style="list-style-type: none"> <li>○ Customers</li> <li>○ Event participants</li> </ul>	Microsoft	No (Server located in Amsterdam)
<a href="#">Microsoft Cognitive Services</a>	<ul style="list-style-type: none"> <li>○ Voice recording</li> <li>○ Converted text</li> <li>○ Content of the dictionaries</li> </ul>	<ul style="list-style-type: none"> <li>○ Customers</li> </ul>	Microsoft	No (Server located in Amsterdam)
<a href="#">Auth0 Authentication</a>	<ul style="list-style-type: none"> <li>○ E-mail</li> <li>○ Password</li> <li>○ Booked time</li> <li>○ Username</li> <li>○ Browser and operating system</li> <li>○ First date of application</li> <li>○ Login history</li> <li>○ Personal settings</li> </ul>	<ul style="list-style-type: none"> <li>○ Customers</li> </ul>	Auth0 Inc.	No (Server located in Europe)
<a href="#">Woocommerce</a>	<ul style="list-style-type: none"> <li>○ Payment details</li> <li>○ Bank details</li> <li>○ Name</li> <li>○ Contact details</li> </ul>	<ul style="list-style-type: none"> <li>○ Customers of the webshop</li> </ul>	United Domains Teamleader GmbH	No
<a href="#">Teamleader</a>	<ul style="list-style-type: none"> <li>○ Payment details</li> <li>○ Bank details</li> <li>○ Name</li> <li>○ Contact details</li> </ul>	<ul style="list-style-type: none"> <li>○ Customers</li> </ul>	Teamleader GmbH	No