

PRIVACY INFORMATION FOR EVE LIVE SUBTITLING CONTRACTUAL PARTNERS

Dear Contractual Partner,

In accordance with the provisions of Article 13 of the General Data Protection Regulation (GDPR), we hereby inform you about the processing of your personal data as well as your rights under data protection law in this regard. Which data is processed in detail and how it is used depends largely on the requested or agreed services. You will find a detailed list of the data categories and the services used in **Annex 1** of this information. To ensure that you are fully informed about the processing of your personal data in the context of the performance of a contract or the implementation of pre-contractual measures, please take note of the following information.

1. RESPONSIBLE WITHIN THE MEANING OF DATA PROTECTION LAW

PAGES Media GmbH
Stefan-George-Ring 19
81929 Munich

Represented by: Maximilian Krause

2. CONTACT DETAILS OF OUR DATA PROTECTION OFFICER

jmh datenschutzberatung
Jörg Hermann, external DPO
Freibadstr. 30
81543 Munich
E-mail: info@jmh-datenschutz.de

3. PURPOSES AND LEGAL BASES OF PROCESSING

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

If you give us express consent to process personal data for specific purposes (e.g. forwarding to third parties, evaluation for marketing purposes or advertising by e-mail), this processing is lawful on the basis of your consent pursuant to Art. 6 (1) a GDPR. Consent given can be revoked at any time with effect for the future (see section 9 of this data privacy information).

If necessary and legally permissible, we process your data beyond the actual contractual purposes for the fulfilment of legal obligations pursuant to Art. 6 (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 (1) f GDPR. If necessary, we will inform you separately, stating the legitimate interest, insofar as this is required by law.

4. CATEGORIES OF PERSONAL DATA

We process data that is related to the establishment of the contract or the pre-contractual measures. This is general data about you or persons in your company (name, address, contact details, etc.) and, if applicable, further data that you provide to us in the context of establishing the contract.

We also process data that arises during the subtitling and translation of voice recordings as part of the performance of our contract. This may include names of persons as well as other data mentioned during the lecture.

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

5. SOURCES OF THE DATA

We process personal data that we receive from you while contacting you or establishing a contractual relationship or in the course of pre-contractual measures. We also process data received during the performance of the contract - the subtitling and translation of voice recordings.

6. RECIPIENT OF THE DATA

We only pass on your personal data within our company to those areas and persons who need this data to fulfil contractual and legal obligations or to implement our legitimate interest.

Your personal data is processed on our behalf based on data processing agreements pursuant to Art. 28 GDPR. In these cases, we ensure that the processing of personal data is carried out in accordance with the provisions of the GDPR. You can find a list of recipients in **Annex 1** of this data privacy information.

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

- 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. TRANSMISSION TO A THIRD COUNTRY

There is no transfer of personal data to countries outside the EEA (European Economic Area) or to an international organisation.

8. DURATION OF DATA STORAGE

As far as 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 contracting party deletes an event from its customer account, all data related to this event will be permanently deleted. This also includes all specific sentences and vocabulary books created for the event. This does not apply to data that must be retained due to legal requirements.

If the contracting party deletes its customer account, all the contracting party's data will be permanently deleted. This also includes all specific sentences and vocabulary books created for the client. This does not apply to data that must be retained due to legal requirements.

In addition, we are subject to various storage and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the German Fiscal Code (AO). The periods prescribed there for storage and documentation are two to ten years.

Finally, the storage period also depends on the statutory limitation periods, which, for example, according to §§ 195 et seq. 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 to information under Article 15 of the GDPR, the right to rectification under Article 16 of the GDPR, the right to erasure under Article 17 of the GDPR, the right to restriction of processing under Article 18 of the GDPR, the right to notification under Article 19 of the GDPR and the right to data portability under Article 20 of the GDPR.

In addition, you have the right to lodge a complaint with a data protection supervisory authority pursuant to Art. 77 GDPR if you are of the opinion that the processing of your personal data is not lawful. 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 that took place before the revocation is not affected. Please also note that we may need to retain certain data for a certain period 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 for the protection of legitimate interests pursuant to Art. 6 (1) lit. f GDPR, you have the right pursuant to Art. 21 GDPR to object to the processing

of this data at any time for reasons arising from your particular situation. We will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for the processing. These must override your interests, rights and freedoms, or the processing must serve the assertion, exercise or defence of legal claims.

In individual cases, we process your personal data to carry out direct advertising. You have the right to object to processing for the purpose of such advertising at any time. This also applies to profiling, insofar as it is connected with this direct advertising. If you object to processing for the purpose of direct advertising, we will no longer process your personal data for these purposes.

To protect your rights, you can contact us using the contact details provided in section 1.

10. NECESSITY OF THE PROVISION OF PERSONAL DATA

The provision of personal data for the decision on the conclusion of a contract, the fulfilment of a contract or for the implementation of pre-contractual measures is voluntary. However, we can only decide in the context of contractual measures if you provide such personal data that is required for the conclusion of the contract, the fulfilment of the contract or pre-contractual measures.

11. DATA SECURITY AND CONFIDENTIALITY

PAGES Media GmbH is obliged for an unlimited period and beyond the end of this contract to treat the personal data obtained within the framework of the present contractual relationship as confidential and to observe the relevant rules on the protection of secrets.

PAGES Media GmbH undertakes to familiarise its employees with the relevant data protection provisions and rules for the protection of secrets and to oblige them to maintain secrecy before they commence their activities for the contracting partner.

12. AUTOMATED DECISION MAKING

For the establishment, fulfilment, or implementation of the business relationship as well as for pre-contractual measures, we generally do not use fully automated decision-making in accordance with Art. 22 GDPR. Should we use these procedures in individual cases, we will inform you separately or obtain your consent if this is required by law.

ANNEX 1: SERVICES, CATEGORIES OF DATA AND RECIPIENTS

Service	Processed data category	Category of affected persons	Receiver	Data transfer to a third country
EVE platform	<ul style="list-style-type: none"> ○ E-mail address ○ Profile picture ○ User name ○ Number of booked time ○ Number of time spent ○ Settings ○ Names, details and settings of the events ○ Password hash of the event ○ Voice recordings of the events ○ Converted text of the events ○ Names, details and settings of the dictionaries ○ Accounting data 	<ul style="list-style-type: none"> ○ Customers ○ Event participants 	Microsoft	No (server location: Amsterdam)
Microsoft Cognitive Services	<ul style="list-style-type: none"> ○ Voice recording ○ Converted text ○ Contents of the dictionaries 	<ul style="list-style-type: none"> ○ Customers 	Microsoft	No (server location: Amsterdam)
Auth0 Authentication	<ul style="list-style-type: none"> ○ E-mail ○ Password ○ Booked time ○ User name ○ Browser and operating system ○ First filing date ○ Login history ○ Personal settings 	<ul style="list-style-type: none"> ○ Customers 	Auth0 Inc.	No (Server location: Europe)
Woocommerce	<ul style="list-style-type: none"> ○ Payment data ○ Bank details ○ Name ○ Contact details 	<ul style="list-style-type: none"> ○ Customers of the webshop 	United Domains Teamleader GmbH	No
Team Leader	<ul style="list-style-type: none"> ○ Payment data ○ Bank details ○ Name ○ Contact details 	<ul style="list-style-type: none"> ○ Customers 	Teamleader GmbH	No