

PRIVACY POLICY *Effective Date: October 22, 2024*

This privacy policy explains how we process personal data when you use the web platform (hereinafter referred to as "Platform") and websites of ReDem.

1. Controller and Contact Information

The controller responsible for data processing is:

ReDem GmbH

Hafenstraße 47-51

4020 Linz, Austria

FN 530708 d

For questions and concerns regarding data protection, you can reach us and our Data Protection Officer at:

Email: office@redem.io

2. Personal Data

Personal data refers to all information related to an identified or identifiable natural person (the "data subject"). A person is identifiable if they can be directly or indirectly identified, for example, by identifiers such as name, address, or email address.

The following categories of personal data are collected:

- **Personal Identification Data:** First and last name, company name, user IDs, profile URLs, profile pictures, website URLs, social media platform reviews, comments.
- **Contact Information:** Email addresses, postal addresses, phone numbers.
- **Financial Data:** Bank details, invoicing information, VAT identification number (UID).
- **Platform Usage Data:** Uploaded content and data, survey data, interactions with the platform.
- **Technical Data:** IP addresses, browser types, visited web pages and duration, platform usage log data.

If you do not provide this personal data, we may not be able to deliver our services or address your inquiries.

3. Purposes of Processing and Legal Basis

We process your personal data for the following purposes and based on the legal grounds outlined below:

a) Pre-contractual Measures (Art. 6(1)(b) GDPR)

- To respond to inquiries or provide information about our services.

b) Contract Fulfillment (Art. 6(1)(b) GDPR)

We process your personal data to fulfill the contract you have with us, including:

- **Operating and providing the Platform:** Creating and managing user accounts, offering features for analyzing and optimizing surveys.

- **Providing support services:** Responding to support requests and offering technical assistance.
- **Billing and payments:** Managing payment information, processing transactions, issuing invoices.

c) Legal Obligations (Art. 6(1)(c) GDPR)

We process your personal data to comply with legal obligations, such as:

- Maintaining proper accounting records.
- Submitting reports to tax authorities.
- Responding to governmental or judicial requests, including disclosing data to law enforcement.

d) Legitimate Interests (Art. 6(1)(f) GDPR)

We process your data based on legitimate interests, provided your rights do not override them. These interests include:

- **Preventing misuse:** Protecting our systems from unauthorized access or misuse.
- **Error detection and resolution:** Analyzing errors to ensure platform functionality.
- **Service improvement:** Analyzing user behavior to optimize the platform and develop new features.
- **Customer feedback collection:** Improving customer satisfaction and enhancing services.
- **Interdepartmental collaboration:** Facilitating efficient teamwork to deliver services.
- **B2B Newsletter:** Sending newsletters about services, product updates, and industry developments. You can unsubscribe anytime via the link in the newsletter or by emailing office@redem.io.
- **Website functionality and improvement:** Protecting the website from misuse and analyzing usage with Google Analytics. Google Analytics uses cookies to analyze website usage, with data often sent to servers in the USA. We use the "anonymizeIP" code to anonymize IP addresses within the EU/EEA. You can opt out of Google Analytics via browser settings or this [opt-out link](#).

e) Processing Applicant Data

When you apply to ReDem, we process personal data you provide, such as name, contact details, resume, professional qualifications, and other relevant documents. Data will only be used to evaluate your application. If you are not shortlisted, your data will be deleted six months after the application process, unless you agree to longer retention.

4. Recipients

To fulfill the above processing purposes, it may be necessary to disclose your personal data to third parties.

In some cases, personal data may be transferred to countries outside the European Union (EU) or European Economic Area (EEA). We ensure an adequate level of data protection in such cases, for

example, through the implementation of standard contractual clauses in accordance with Art. 46(2)(c) GDPR.

The data will be transmitted to the following recipients:

Recipient	Purpose	Legal Basis for Transfer	Location of Data Processing	Basis for Transfer to a Third Country
Amazon Web Services (AWS)	IT infrastructure and data storage	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	Frankfurt, Germany	No third-country transfer
Atlassian Corporation plc	Improvement of workflows, promotion of collaboration, increase in productivity	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	London, United Kingdom	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures
Brevo (Sendinblue GmbH)	Creation of email, SMS, and chat campaigns; managing leads, customer relationships, and marketing automation	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	Berlin, Germany	No third-country transfer
Dr. Sebastian Berger	Business consulting	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional consulting services for business development	Krems, Austria	No third-country transfer
Google Cloud EMEA Limited	Collaboration, communication, email, document	Legitimate interests (Art. 6(1)(f) GDPR): Use of	USA, with data stored in the EU	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures; see: https://cloud.google.com/terms/data-processing-addendum/

	processing, and file storage	professional IT infrastructure		
Google LLC	Analysis of user behavior on our website	Consent (§ 165(3) TKG 2021, Art. 6(1)(a) GDPR): Analysis of user behavior to improve our web presence	USA	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures and explicit consent via cookie banner (Art. 49(1)(a) GDPR)
Hetzner Online GmbH	Use of professional IT infrastructure	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	Gunzenhausen, Germany, data stored in Germany	No third-country transfer
HubSpot, Inc.	Marketing (e.g., re-identification of users for the purpose of personalized advertising); organization management	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	Cambridge, USA	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures and explicit cookie consent
Insighture Pty Ltd.	Product development and technical support	Performance of a contract (Art. 6(1)(f) GDPR)	Australia, data stored in the EU	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures
Kickscale GmbH	Optimization of sales processes through data-driven insights and task automation	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	Vienna, Austria, data stored in the EU	No third-country transfer
LinkedIn Ireland Unlimited	Display of profile content on the website	Consent (§ 165(3) TKG 2021, Art. 6(1)(a))	EU (Ireland) and transfer to US affiliates	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures and

	for advertising purposes; user identification for targeted advertising	GDPR): Analysis of user behavior to improve our web presence		explicit consent via cookie banner (Art. 49(1)(a) GDPR)
Microsoft Azure	IT infrastructure	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT infrastructure	Redmond, Washington, USA	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures
OpenAI LLC	Conducting quality checks using GPT-4 for categorizing and evaluating responses	Performance of a contract (Art. 6(1)(f) GDPR)	San Francisco, USA	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures*
Raml und Partner Steuerberatung GmbH	Tax consulting	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional consulting services in tax and regulatory matters	Linz, Austria	No third-country transfer
Rechtsanwaltskanzlei Bisset	Legal consulting	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional consulting services in legal matters	Mannersdorf am Leithagebirge, Austria	No third-country transfer
sevdesk GmbH	Management of accounting tasks	Legitimate interests (Art. 6(1)(f) GDPR): Use of professional IT	Offenburg, Germany	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures

		infrastruct ure		
Truendo Technologies GmbH	Privacy- compliant design of websites and apps	Performan ce of a contract and legitimate interests (Art. 6(1)(f) GDPR): Use of professiona l IT infrastruct ure	Vienna, Austria	Standard contractual clauses (Art. 46(2)(c) GDPR) with supplementary measures

*** Appropriate Supplementary Measures to Ensure the Protection of Personal Data in Light of the CJEU Decision on Schrems II for OpenAI LLC:**

- Open-ended responses are transmitted individually to the sub-processor, each tagged with a fully anonymized ID. The sub-processor receives only individual responses per API call and never the complete survey.
- The processor interacts with the sub-processor as the sole user. The sub-processor never learns the origin of the transmitted data.
- Data sent by the processor via the API is stored by the sub-processor for a maximum of 30 days and is then fully and irreversibly deleted. The data is not used for training AI models.

If there is a legal obligation, we also transmit personal data to public authorities and institutions, such as law enforcement agencies and courts.

5. Automated Decision-Making per Art. 22 GDPR

We do not employ automated decision-making within the meaning of Art. 22 GDPR that produces legal effects or similarly significant impacts on you.

6. Data Retention Period

We store your personal data only for as long as is necessary to fulfill the respective purposes. Retention periods are determined by legal storage requirements, particularly under tax and commercial law (e.g., 7 years in accordance with § 212 UGB). In individual cases, data may be stored longer for the duration of ongoing court or administrative proceedings.

7. Data Subject Rights

As a data subject, you have the following rights:

- **Right of Access (Art. 15 GDPR):** You have the right to request information about whether and which personal data we process about you.
- **Right to Rectification (Art. 16 GDPR):** You have the right to request the correction or completion of inaccurate personal data.
- **Right to Erasure (Art. 17 GDPR):** You can request the deletion of your personal data unless statutory retention obligations apply.

- **Right to Restrict Processing (Art. 18 GDPR):** You can request that we limit the processing of your personal data.
- **Right to Object (Art. 21 GDPR):** You have the right to object to the processing of your personal data, particularly if based on legitimate interests.
- **Right to Data Portability (Art. 20 GDPR):** You have the right to request the transfer of your personal data in a structured, commonly used, and machine-readable format.

To exercise any of these rights, please contact us at: **office@redem.io**.

You also have the right to file a complaint with the relevant supervisory authority if you believe that the processing of your data violates the GDPR.

8. Changes to the Privacy Policy

We reserve the right to amend this privacy policy as needed, for example, due to technological developments or legal changes. The current version will be published on our website.