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I. Who is plenigo GmbH and what does plenigo GmbH do?

plenigo GmbH, is a German technical service provider that offers providers of paid Internet content the use of the "plenigo" SaaS platform, the interfaces provided by plenigo and the associated services and functions. The software of plenigo GmbH is used for the technical processing of the contract between the provider and its customers. In doing so, plenigo GmbH processes personal data for the Customer within the meaning of Art. 4 No. 2 and Art. 28 GDPR on the basis of a commissioned processing agreement. The subject of the order results from the contract concluded between the Provider and plenigo GmbH.

II. What is the legal basis for data processing by plenigo GmbH?

plenigo GmbH is a German company and concludes its contracts on the basis of German law. In terms of data protection law, this means that the provisions

- the General Data Protection Regulation - GDPR -
- of the Federal Data Protection Act - BDSG -
- as well as the supplementary statutory provisions.

As a German company based in Bavaria, we are under the supervision of the data protection officers of the Federal Government and the State of Bavaria. If you would like more information in this regard or wish to exercise your right of complaint, please visit the website of the data protection officers: <https://www.datenschutz-bayern.de/> and <https://www.bfdi.bund.de/>. You will be helped there.

III. Which data does plenigo GmbH process?

Data is processed by plenigo GmbH when you visit our website and when we act as a processor.

A. Data when visiting the website

When you use our website plenigo.com, data is collected.

1. Data when visiting the website

When you use our website plenigo.com, data is collected.

1. When our website is launched, the Zoho software is automatically loaded in the background. This software is used when you make an appointment (see III. 1. d. below). When you start the plenigo website, Zoho is only informed of your IP address. This is technically necessary for the integration of the software. Zoho is of course subject to the European data protection regulations. In this respect, reference is made to the privacy policy of Zoho Corporation GmbH, Trinkausstr. 7, 40213 Düsseldorf, Germany, <https://www.zoho.com/de/privacy.html>.
2. If you visit the website for information purposes only, your personal data will only be recorded anonymously. For more details, please refer to the explanations below under IV.
3. Commercial customers who visit our website and wish to use our software on a trial basis must register. Thereby are recorded:
 - Salutation
 - First name of contact person
 - Last name of contact person
 - Company name
 - Country of the company headquarters
 - Email address of the contact person
4. When you schedule a demo appointment with us, we use Zoho scheduling software. In the process, the following data is collected from you and processed:
 - Name
 - Company name
 - E-mail address
 - Phone number

Of course, the data protection regulations are also observed. In this respect, reference is made to the privacy policy of the company Zoho:

<https://www.zoho.com/de/privacy.html>

B. Data during commissioned processing

If a company uses plenigo GmbH as an order processor, our software is used for technical order processing. We then process the data of our client.

In these cases, our client is the responsible party for data processing within the meaning of Art. 24 GDPR. This is your contractual partner, e.g. a publisher from whom you order paid content.

This responsible party within the meaning of Art. 24 GDPR concludes an order processing contract with us, which ensures that the provisions of the GDPR, the BDSG and the supplementary legal provisions are complied with. In addition, we naturally take measures ourselves to ensure that the statutory data protection provisions are complied with.

For more details, please refer to our general data protection information under IV. of the data protection information.

IV. Data protection information of plenigo GmbH

A. General data protection notice

The general data protection notice informs you about the regulations, procedures and your rights that generally apply to the processing of your data by plenigo GmbH.

We process your data in compliance with the regulations of the European and German data protection laws.

Your data will only be processed to the extent that and for as long as

- it is necessary for the fulfillment of a contract with you or for the implementation of pre-contractual measures that take place at your request (Art. 6 para. 1 b Data Protection Regulation - GDPR),
- or you have given your consent to the processing accordingly (Art. 6 para. 1 a GDPR),

- or the processing is necessary for the protection of legitimate interests of us or third parties, e.g. in the following cases: Assertion of claims, defense in legal disputes; detection and elimination of misuse; prevention and investigation of criminal acts; ensuring the secure IT operation of plenigo GmbH; Art. 6 para. 1 f GDPR,
- or due to legal requirements, e.g. storage of documents for commercial and tax purposes (Art. 6 para. 1 c GDPR),
- or in the public interest (Art. 6 para. 1 e GDPR).

plenigo GmbH will only use your e-mail address and telephone numbers to send you information in connection with our products and when providing our services.

According to § 7 para. 3 UWG you can object to the use of your e-mail address and telephone numbers for advertising purposes at any time

- by e-mail to support@plenigo.com
- or by telephone at +49 (0) 831 523 734 09
- or by mail to plenigo GmbH, Königstraße 4, 87435 Kempten, Germany.

B. You have the following rights:

1. request information on the categories of data processed,
2. the purposes of processing, any recipients of the data, the planned storage period (Art. 15 GDPR),
3. to demand the correction or completion of incorrect or incomplete data (Art. 16 GDPR),
4. to revoke a given consent at any time with effect for the future (Art. 7 para. 3 GDPR),
5. object to data processing that is to be carried out on the basis of a legitimate interest for reasons arising from your particular situation (Art. 21 (1) GDPR),
6. in certain cases, within the framework of Art 17 GDPR, to demand the deletion of data - in particular insofar as the data is no longer required for the intended purpose or is being processed unlawfully, or you have revoked your consent in accordance with section 3 above or declared an objection in accordance with section 4 above,
7. under certain conditions, to demand the restriction of data, insofar as deletion is not possible or the obligation to delete is disputed (Art. 18 GDPR),
8. to data portability, i.e. you can receive your data that you have provided to us in a common machine-readable format such as CSV and, if necessary, transfer it to others (Art. 20 GDPR),

9. complain to the competent supervisory authority about data processing (Federal Commissioner for Data Protection and Freedom of Information; Bavarian State Commissioner for Data Protection).

C. Protection of your data:

1. Privacy policy for the use of the website plenigo.com

This data protection information applies in addition to the general information IV A, B (see above).

The data that is collected during the use of our website is only used by plenigo GmbH.

Responsible for this data is

plenigo GmbH
Königstr. 4
87435 Kempten, Germany

legally represented by the managing director(s).

The name and address of the legal representatives of plenigo GmbH can be found on our website at <https://www.plenigo.com/impressum/>. Thus, plenigo GmbH is responsible for the protection of your data collected during the use of our website.

A transfer to third parties for commercial, statistical or evaluation purposes does not take place. However, due to legal regulations, we may be obliged to provide information to authorities or courts in individual cases.

Your data will generally be processed in Germany and in other European countries. If, in exceptional cases, your data is also processed in countries outside the European Union (i.e. in so-called third countries), this is done if you have expressly consented to this or if it is necessary for our provision of services to you or if it is provided for by law (Art. 49 GDPR). In addition, your data will only be processed in third countries if certain measures ensure that an adequate level of data protection exists (e.g. adequacy decision of the EU Commission or so-called suitable guarantees, Art. 44ff. GDPR).

We collect your data in the following way when you use the website of plenigo GmbH:

When you visit our websites, the web server temporarily records the domain name or IP address of your computer, the client's file request (file name and URL), the http response code and the website from which you visit us. The logged data is used exclusively for data security purposes, in particular to defend against attempted attacks on our web server (Art. 6 para. 1 f GDPR). They are neither used for the creation of individual user profiles nor passed on to third parties. We reserve the right to statistically evaluate anonymized data records.

Your usage behavior is evaluated anonymously for error analysis and to improve our website. If IP addresses are collected, they are immediately anonymized. The evaluation results are stored anonymously in a database. An allocation of these data to persons does not take place at any time.

We analyze your usage behavior anonymously or pseudonymously so that you can find the products that interest you and so that we can design our websites in a user-friendly manner. Within the framework of the legal regulations, we, or companies commissioned by us within the framework of order data processing, create user profiles. It is not possible to draw any direct conclusions about you.

Below we provide general information about the different purposes and techniques.

Purposes of use (Art. 6 para. 1 f GDPR)

- **Market research / reach measurement**

The aim of reach measurement is to statistically determine the intensity of use and the number of users of a website and to obtain comparable values for all connected offers. At no time are individual users identified. Their identity always remains protected.

- **Profiles for the demand-oriented design of the web portal**

In order to be able to continuously improve the web pages, we create so-called clickstream analyses. The clickstream corresponds to your movement path on the web pages. The analysis of the movement paths gives us information about the usage behavior on our websites. This allows us to identify possible structural errors in the web pages and thus improve the web pages so that they can be optimized to meet your needs. At no time are individual users identified.

Techniques

- Cookies

Cookies are small text files that are stored on your computer. This allows us to recognize when you visit websites repeatedly from the same computer. Session cookies are cookies that are only stored on your computer for the duration of an Internet session.

The plenigo website avoids the use of cookies wherever possible. However, we cannot completely do without cookies, otherwise the website would not function. For example, you would otherwise not be able to see and read a cookie warning. We only use cookies that are absolutely necessary for the functioning and for the safe and intended use of the website, so-called necessary and functional cookies.

The following cookies are used:

- CookieLawInfo-Checkbox

These cookies control the cookie warning you are reading.

- Session Cookies

Session cookies are only applied when a customer logs into the software that our company offers.

The session cookie identifies the customer.

Without these cookies, the website would not function. It is therefore not possible to deactivate these cookies. This is a lawful data processing according to Art. 6 para. 1 f GDPR.

You have the option of setting your browser so that these cookies are not stored in the first place, or so that the cookies are deleted at the end of your Internet session.

Please note, however, that in this case you may not be able to use all the functions of our websites.

Information on browser settings can be found at:

<https://www.sicherdigital.de/sicher-surfen#sicher-surfen-browser-einstellungen> . You can read more information about cookies and the individual providers on the websites www.meine-cookies.org or www.youronlinechoices.com.

If you have any further questions regarding data protection at plenigo GmbH, please contact our data protection officer via eMail to datenschutz@plenigo.com.

2. Data protection during commissioned processing

a. Notices for customers of the processor

Notes for customers of the processor

First of all, the general notes (see above) apply. In addition, the following should be noted.

plenigo GmbH is a service provider that processes data on behalf of other companies. We are commissioned by these companies with the processing of data within the legally provided scope of Art. 28 GDPR (service providers, vicarious agents).

In the case of commissioned processing, the person responsible for data processing within the meaning of Art.24 GDPR is our client. This is your contractual partner, e.g. a publisher from whom you order paid content.

If a customer of a contractual partner contacts plenigo GmbH with an inquiry or complaint within the scope of his contractual relationship with his contractual partner, we will forward the inquiry to the relevant competent contractual partner.

Within the framework of the statutory provisions and the data processing contract concluded with the individual companies in each case, we are also responsible for protecting your data.

Your data will only be processed within the contractually regulated and legally prescribed framework. Data will not be passed on to third parties for commercial, statistical or evaluation purposes. However, due to legal regulations we are obliged in individual cases to provide information to authorities (e.g.: tax office) or courts.

Your data will generally be processed in Germany and in other European countries. If, in exceptional cases, your data is also processed in countries outside the European Union (i.e. in so-called third countries), this is done if you have expressly consented to this or if it is necessary for our provision of services to you or if it is

provided for by law (Art. 49 GDPR). In addition, your data will only be processed in third countries if certain measures ensure that an adequate level of data protection exists (e.g. adequacy decision of the EU Commission or so-called suitable guarantees, Art. 44ff. GDPR).

Data protection in the relationship between plenigo GmbH and the customer when using our products is governed, in addition to the statutory provisions, by the data processing contract concluded with the customer in each individual case.

If you have any further questions about data protection at plenigo GmbH, please contact our data protection officer via eMail to datenschutz@plenigo.com.

b. Information for the processor

The above information applies.

Supplementary information on data protection, in particular on the purpose of use, processing, deletion, etc., you will receive with the data processing contracts concluded in each individual case Art. 28 GDPR.

V. Processing of personal data when using social networks in connection with plenigo

plenigo uses the social networks Facebook, Twitter, Instagram, YouTube, LinkedIn and Xing.

plenigo thereby processes data of the persons who interact with plenigo. Here, a temporary data storage by a service provider is necessary. The storage takes place on a server, which has its location in the European Union and includes: Profile and account name as well as picture, content of the request, number of followers and profiles the profile follows, as well as latest tweets.

The processing of data on the basis of Article 6 paragraph 1 lit. a, b GDPR.

In addition, we expressly draw attention to the fact that the services store the data of their users (for example, personal information, IP address, etc.) in accordance

with their data usage guidelines and use it for business purposes. plenigo has no influence on the data collection and its further use by the social networks. Thus, there is no knowledge of the extent to which, where and for how long the data is stored, to what extent the networks comply with existing deletion obligations, what evaluations and links are made with the data and to whom the data is passed on.

Due to the fact that some of the companies are providers outside the European Union with a European branch only in Ireland, they are not bound by European and German data protection regulations according to their own reading. This concerns, for example, your rights to information, blocking or deletion of data or the possibility to object to the use of usage data for advertising purposes.

A. Facebook page of plenigo GmbH

1. Fan page operator

plenigo GmbH
Königstr. 4
87435 Kempten
Email: info@plenigo.com

2. Fan page details

For information, plenigo uses the technical platform and services of the

Facebook Ireland Ltd.
4 Grand Canal Square Grand Canal Harbour
Dublin 2, Ireland

You use the Facebook page and its functions on your own responsibility. This applies in particular to the use of the interactive functions (for example, commenting, sharing, rating).

3. Legal basis for data processing

The legal basis for the processing of data after interaction with the content of the Facebook fan page of plenigo GmbH by the users is Art. 6 para. 1 lit. a, b GDPR if the users have given their consent.

4. Data processing purposes

The operation of the Facebook page of plenigo GmbH is necessary for

- the external presentation of plenigo GmbH
- the information of the public about the activities of the plenigo GmbH
- the presentation of the application possibilities of the plenigo software
- as well as the contact care with customers.

The related processing of your data when visiting the site is done for this purpose.

5. Processing of personal data by Facebook

When you visit this Facebook page, Facebook records, among other things, your IP address and other information that is present on your PC in the form of cookies. This information is used to provide plenigo GmbH, as the operator of the Facebook pages, with anonymized statistical information about the use of the Facebook page.

Facebook provides more information on this at the following link:

<http://de-de.facebook.com/help/pages/insights>

The data collected about you in this context is processed by Facebook Ltd. and may be transferred to countries outside the European Union. Facebook describes which information it receives and how it is used in its data usage guidelines. There you will also find information on how to contact Facebook and on the settings options for advertisements.

The data use policy is available at the following link:

<http://de-de.facebook.com/about/privacy>

When you access a Facebook page, the IP address assigned to your end device is transmitted to Facebook. According to Facebook, this IP address is anonymized. Facebook also stores information about its users' end devices (for example, as part of the "login notification" function); this may allow Facebook to assign IP addresses to individual users.

If you are currently logged in to Facebook as a user, a cookie with your Facebook ID is stored on your end device. This enables Facebook to track that you have visited this page and how you have used it. This also applies to all other Facebook pages. Via Facebook buttons embedded in websites, it is possible for Facebook to record

your visits to these website pages and assign them to your Facebook profile. Based on this data, content or advertising can be offered tailored to you.

If you want to avoid this, you should log out of Facebook or deactivate the "stay logged in" function, delete the cookies present on your device and close and restart your browser. In this way, Facebook information that can directly identify you will be deleted. This will allow you to use the Facebook fan page without revealing your Facebook identifier. When you access interactive features of the page (Like, Comment, Share, Message, etc.), a Facebook login screen will appear. After any login, you will again be recognizable to Facebook as a user.

For information on how to manage or delete information about you, visit the following Facebook support pages: <https://de-de.facebook.com/about/privacy>.

According to its own information, Facebook stores data until it is no longer needed to provide the services and Facebook products or until the user's respective account is deleted, whichever comes first. This depends on the circumstances of the individual case, in particular the type of data, why it is collected and processed, and the relevant legal or operational storage needs.

For more information on the storage of data, see:
<https://de-de.facebook.com/about/privacy>

6. Facebook Page Insights

Facebook processes a number of personal data of page visitors in its so-called page insights for its own purposes. The processing takes place regardless of whether page visitors are registered with Facebook or not and whether page visitors are members of the Facebook network. Users who access the Facebook pages without being registered or logged in to Facebook also have the option of influencing the scope of data processing by means of a cookie banner set by Facebook.

For more information about Facebook cookies, see:
<https://www.facebook.com/policies/cookies/>

Page Insights are aggregate statistics created based on certain "events" logged by Facebook servers when people interact with Pages and their associated content. Page operators themselves do not have access to the personal data processed as part of "events," but only to the aggregated, anonymized Page Insights.

For more information, see:

https://www.facebook.com/legal/terms/page_controller_addendum

7. Rights of the person concerned

If personal data of users are processed, they have the right of access, rectification, objection, portability and deletion of the data in accordance with the EU General Data Protection Regulation. Facebook Ireland has undertaken, pursuant to the Page Insights Supplement, to respond to requests from data subjects in accordance with Facebook's obligations under the Page Insights Supplement (available at https://www.facebook.com/legal/terms/page_controller_addendum).

Requests from users regarding data processing when visiting a Facebook fan page are forwarded by us to Facebook in accordance with the Insights page supplement.

Users can find out more about their data protection rights at the following link:

<https://de-de.facebook.com/about/privacy>).

B. Twitter

You can also find plenigo on Twitter. Thus, plenigo uses the technical platform and services of the

Twitter Inc.

1355 Market Street Suite 900

San Francisco, CA 94103, USA

You use the Twitter short message service offered here and its functions on your own responsibility. This applies in particular to the use of the interactive functions (e.g. sharing, rating).

The data collected about you when using the service is processed by Twitter Inc. and may be transferred to countries outside the European Union. This data includes your IP address, the application you are using, information about the terminal device you are using (including device ID and application ID), information about visited websites, your location and your mobile provider. This data is assigned to the data of your Twitter account or your Twitter profile.

We have no influence on the type and scope of the data processed by Twitter, the type of processing and use or the transfer of this data to third parties. Information about what data is processed by Twitter and for what purposes can be found in

- the privacy policy of Twitter <https://twitter.com/de/privacy>
- as well as about the possibility to view your own data at Twitter
- <https://help.twitter.com/de/managing-your-account/accessing-your-twitter-data>.

Furthermore, you have the option to request information via the Twitter privacy form or the archive requests:

<https://help.twitter.com/de/forms/privacy>

<https://help.twitter.com/de/managing-your-account/how-to-download-your-twitter-archive>

You have options for restricting the processing of your data in the general settings of your Twitter account and under the item "Privacy and security". In addition, you can restrict Twitter's access to contact and calendar data, photos, location data, etc. on mobile devices (smartphones, tablet computers) in the settings options there. However, this depends on the operating system used. More information on these points is available on the corresponding Twitter support pages.

Twitter buttons or widgets integrated into websites and the use of cookies enable Twitter to record your visits to these websites and assign them to your Twitter profile. Based on this data, content or advertising can be offered tailored to you. Information on this and on the available setting options can be found on the following Twitter support pages:

<https://help.twitter.com/de/using-twitter/tailored-suggestions>

<https://help.twitter.com/de/rules-and-policies/twitter-cookies>

C. Instagram

Information about which data is processed by Instagram and for which purposes can be found in Instagram's privacy policy.

https://help.instagram.com/519522125107875/?helpref=uf_share

D. LinkedIn

Information about which data is processed by LinkedIn and for which purposes can be found in LinkedIn's privacy policy.

https://de.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy

E. Xing

Information about which data is processed by Xing and for which purposes can be found in Xing's privacy policy.

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

F. YouTube

Information about which data is processed by YouTube and for which purposes can be found in the privacy policy of YouTube or Google.

<https://policies.google.com/privacy?hl=de>

VI. Processing of personal data in the context of an application to plenigo

plenigo is responsible for processing your personal data in the context of an application procedure. You can also reach our data protection officer there.

In this respect, the statements made above under I. - IV. apply.

In order to be able to make selection decisions in the application process, plenigo collects information from applicants on their personal details, professional

background, training, professional and personal qualifications and, if applicable, information on any severe disabilities or equal treatment.

The certificates, resumes, cover letters and other documents sent as part of the application process contain personal data within the meaning of Art. 4 No. 1 GDPR. This personal data is processed by us exclusively and only to the extent necessary for the purpose of establishing an employment relationship (Art. 88 (1) GDPR in conjunction with Section 26 (1) and (3) BDSG).

At plenigo, only those employees who are entrusted with carrying out the selection process will have access to your personal data. Your personal data will not be disclosed to persons or bodies outside plenigo. Furthermore, no data will be transferred to a country outside the European Union.

We do not use any automated decision-making processes as part of the application process.

If the application process leads to your employment, your documents will become part of your personnel file insofar as they are required for the implementation of the employment relationship. Transferred data that is not required for the implementation of the employment relationship will be deleted immediately after completion of the application process.

If no employment relationship is established with you, the data you have provided will be deleted immediately after the application process has been completed. We will return your application documents sent by mail to you.

If you withdraw your application, we will delete your data immediately and return your documents to you.

To the extent that we process your personal data, you have the following rights against plenigo:

- Right to information,
 - Right to rectification,
 - Right to restriction of processing,
 - right to erasure,
 - right to lodge a complaint with a supervisory authority.
-

VII. Processing of personal data during videoconferences

Telephone and video conferences are regularly held at plenigo using Google Meet via the Internet.

For technical reasons, the transmission is temporarily stored by the service provider. At the end of the meeting, the recording is automatically deleted, unless the meeting organizer has activated a recording beforehand. plenigo does not use this function in the default settings and announces a recording in advance in individual cases.

Data provided by you in advance (e.g. telephone number, email address) will be processed and stored for the purpose of inviting you to the telephone or video conference and for the traceability of the meeting.

We would like to point out that the processing of personal data is based on Article 6 (1) a, b GDPR.

There is a corresponding order processing agreement with Google in accordance with Art. 28 GDPR. You can find more information about the handling of personal data there in Google's privacy policy:

<https://policies.google.com/privacy>

You have the following rights vis-à-vis plenigo regarding the personal data concerning you:

- Right to information,
- Right to rectification,
- Right to restriction of processing,
- right to erasure,
- right to lodge a complaint with a supervisory authority.