

# Privacy Statement

## TrustYou GmbH

This is the privacy statement of TrustYou GmbH, Steinerstraße 15, 81369 Munich, (hereinafter referred to as “TrustYou“ or “we“).

### The protection of your data is our main concern

We appreciate your interest in our company, our products and services, and we want you to feel safe in terms of personal data protection whenever you visit our Internet pages. We take the protection of your personal data very seriously. Consequently, we comply with all the relevant data protection regulations and constantly strive to optimize our data protection processes.

We would like you to be informed on what data we collect, when we collect them, what type of data we collect, to what purposes and how we use them. We have taken the technical and organizational measures that are meant to secure the observance of the regulations on the protection of personal data both by us and by our external service providers.

This Privacy Statement informs you on the processing of your personal data by TrustYou outside and in connection to the website [www.trustyouth.com](http://www.trustyouth.com).

### 1. Person in charge

The person in charge of the processing of your personal data is TrustYou GmbH, Steinerstraße 15, 81369 Munich. For further information see our imprint on [trustyouth.com](http://trustyouth.com).

### 2. Personal Data

Personal data represent information concerning an identified or identifiable natural person, such as your name, e-mail address, phone number, address or the IP address of your computer.

### 3. Website operation

We process your personal data in order to be able to provide you with the best possible customized offers and information and to make your visit on our website as insightful and gainful as possible. Unless otherwise set forth in the following provisions, the legal basis for such data processing is, in each case, Article 6(1)(f) GDPR (Legitimate interests, based on our interest to offer you the best possible attractive website).

### 4. Processed data

#### 4.1. Automatically collected data

In order to be able to display the most suitable information for you, we process the following data:

- Address of the page you have visited on our website
- Address of the website you have visited immediately before our website (the so-called “Referrer”)
- Date and time of your visit
- Features of your terminal, particularly the operating system, the browser used and the window size of your browser
- IP address of your terminal in the Internet
- Identification numbers that we store on your terminal. These identification numbers help us recognize your terminal on the website. Technically speaking, these identification numbers are stored in the so-called cookies or eTags.
- Device identifiers consisting of individual features of your terminal. These device identifiers also help us recognize your terminal on the website. Example of such device identifiers are:
  - “Ad-ID“ of the Apple operating system iOS
  - “Ad-ID“ of the Android operating system

The legal basis for such data processing is Article 6(1)(f) GDPR (Legitimate interests, based on our interest to provide you with a trouble-free website optimized for your terminal).

## 4.2. Data provided

Additionally, we process your personal data when, due to your interest in our products, you contact us via our website or otherwise and/or when you conclude agreements with us for the purchase of our products. Unless otherwise set forth in the following provisions, the legal basis for such data processing is, in each case, Article 6(1)(b) GDPR (Performance of contract).

## 5. Data processing purposes

### 5.1. User account for TrustYou products

In order to be able to receive our products, you must first register with us. You can do this in a comfortable and easy manner through our registration form under [www.trusty.com/contact-us?lang=de](http://www.trusty.com/contact-us?lang=de). Following the registration and the successful login, various information, services and products are made available to you. For the creation of the user account we require your first and last name, your e-mail address, as well as your phone number. Moreover, the users must provide the name of the company, payment details, as well as information regarding the registered office of the company.

You can, of course, terminate the agreement for the user account at any time and without giving reasons. The easiest way to do this is to send an informal e-mail to [service@trusty.com](mailto:service@trusty.com).

The legal basis for such data processing is, in each case, Article 6(1)(b) GDPR (Performance of contract for the provision of the user account) and Article 6(1)(f) GDPR (Legitimate interests, based on our interest to offer you information, services and products), respectively.

### 5.2. Contact via the contact form and e-mail

If you send us inquiries via the contact form or e-mail, we process the information provided therein, including the contact details you have provided for the processing of the inquiry.

Such data are also stored with us for possible further inquiries. The legal basis for this is Article 6(1)(b) GDPR (Performance of contract - the processing of the user's data is necessary for the performance of the contract regarding the reply to inquiries and/or concerns) and Article 6(1)(f) GDPR (Legitimate interests - based on our interest to process inquiries of our website's users).

### 5.3. E-mail newsletters & further e-mail campaigns

We provide all our website users and/or customers and interested parties with an e-mail newsletter and/or further e-mail campaigns. In order to subscribe, the user can register for the web offer with his/her e-mail address. Subsequently, the user receives an activation link at the provided e-mail address, a link that the user must click on, in order to complete the subscription. This way, the user consents to the receipt of an e-mail newsletter and/or further e-mail campaigns (double-opt-in procedure).

The consent to receive the e-mail newsletter and/or further e-mail campaigns can be revoked at any time, without giving reasons. The easiest way to do this is to click on the "Unsubscribe" link, which can be found in every e-mail. The legal basis for such data processing is Article 6(1)(a) GDPR in conjunction with your consent.

### 5.4. Entering into agreements

Insofar as we enter into agreements with our customers and service providers, for service provision purposes, we process the personal data of the persons authorized to sign the agreements and of the customers' and service providers' contact persons. The legal basis for such data processing is Article 6(1)(b) GDPR (Performance of contract) and Article 6(1)(f) GDPR (Legitimate interests, based on our interest to provide our customers and service providers with relevant information).

### 5.5. Applicant data

Applicants are given the possibility to apply for advertised jobs via our website or LinkedIn. In this respect, we process the applicants' personal data (first and last name, e-mail address, phone number, curriculum vitae (CV), cover letter, salary expectations, availability, previous employer, possibly certificates, recommendations, etc.) exclusively in order to decide on the establishment of an employment relationship, and, if so, in order to perform and terminate such a relationship. The legal basis for such data processing is Article 88 GDPR in conjunction with Article 26(1) BDSG (German Federal Data Protection Act).

We erase the applicant's data within 6 months the latest as it becomes obvious that no employment relationship is justified. This does not apply if the applicant has consented that we store the data for a longer period and in order to receive other job offers from TrustYou during this period, if necessary. The applicant can revoke such consent at any time, by means of an informal e-mail to [hr@trustyou.com](mailto:hr@trustyou.com). In this case, the data are immediately erased.

## 5.6.Data transfer

Your personal data will only be transferred to third parties by us if this is necessary to fulfil the contract, if we or the third party have a legitimate interest in the transfer or if you have consented to the transfer. If data is transferred to third parties on the basis of a legitimate interest, this is explained in these data protection provisions.

In addition, personal data may be transferred to third parties insofar as we are obliged to do so by law or by enforceable official or court order.

If we disclose personal data to third parties or contract processors based in non-EEA countries, we will ensure that the recipient either has an adequate level of data protection (e.g. based on an EU Commission adequacy decision for the country in question or the agreement of so-called EU standard contractual clauses of the European Union with the recipient) or has obtained sufficient consent from our users prior to disclosure.

## 6. Tracking tools for website analysis

### 6.1. General information

We want to design our web pages as optimal as possible. Therefore, we use so-called tracking tools in order to technically improve our web offers. The tracking tools allow us to measure the usage of our web offers. With the help of the tracking tools we collect the following information, in particular:

- The links on which the online users click on other websites, in order to reach [www.trustyou.com](http://www.trustyou.com).
- Which of our pages are searched for, when, how often and in which sequence?
- What is the information that the users of our website search for?
- What links and/or offers do the users of our website click on?

Based on such information we prepare statistics that help us understand the following questions:

- Which pages are particularly attractive to the users of our website?
- Which articles are our users interested in, the most?
- Which offers should we make to our users?

For these purposes, we mainly use the automatically collected data listed under Section 4.1. The data are stored only under a pseudonym. The legal basis for this is your consent within the meaning of Article 6(1)(a) GDPR, as well as Article 6(1)(f) GDPR (Legitimate interests, based on our interest to adapt the website to our users' interests and needs, to the best possible extent).

### 6.2.Google Analytics

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses the so-called "cookies", text files that are stored on your computer and enable an analysis of the website usage through you. The information generated by the cookies regarding your use of this website is usually transferred and stored on a server of Google in the USA. If the IP anonymisation is activated on this website, Google will condense your IP address beforehand, within the member states of the European Union or other States party to the Agreement on the European Economic Area. The whole IP address is transferred and stored on a server of Google in the USA only in exceptional cases. On behalf of the operator of this website, Google uses such information in order to assess your use of the website, to prepare reports on the website activity and to provide the website operator with further services related to the website and Internet usage.

The IP address communicated by your browser within the framework of Google Analytics is not merged with other data of Google.

You can prevent the storage of the cookies through a corresponding setting of your browser software; however, please note that, in this case, you might not be able to use all the functions of this website to a full extent. Additionally, you can prevent the recording with Google of the data generated through the cookie and related to your use of the website (including the IP address), as well as the processing of such data by

Google, by downloading and installing the browser plugin available under the following link: [tools.google.com/dlpage/gaoptout?hl=de](https://tools.google.com/dlpage/gaoptout?hl=de).

This website used Google Analytics with the extension "\_anonymizeIp()". This way, the IP addresses are further processed in their condensed form, thus ruling out a possible identification of the user. If the data collected about you imply any person-related references, such data are immediately excluded and the personal data are promptly erased.

We use Google Analytics in order to be able to analyze and to constantly improve the use of our website. The obtained statistics help us improve our offer and make it more interesting for you as a user.

The processing of your data within the framework of Google Analytics occurs for the safeguarding of the legitimate interests of TrustYou.

Information to third-party providers: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. User conditions: [www.google.com/analytics/terms/de.html](https://www.google.com/analytics/terms/de.html), Data protection overview: [www.google.com/intl/de/analytics/learn/privacy.html](https://www.google.com/intl/de/analytics/learn/privacy.html), as well as the privacy statement: [www.google.de/intl/de/policies/privacy](https://www.google.de/intl/de/policies/privacy).

#### Objection to data recording

You can prevent the recording with and transfer to Google of the data related to your use of the website (including the IP address), as well as the processing of such data by Google, by downloading and installing the browser plugin available under the following link: [tools.google.com/dlpage/gaoptout?hl=de](https://tools.google.com/dlpage/gaoptout?hl=de).

#### 6.3. Google Adwords / Remarketing

Additionally, we use the remarketing function in Google AdWords of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as "Google"). The Remarketing feature allows TrustYou to present the website users with advertisements of other websites within the Google Ad Network (i.e., on Google itself, the so-called "Google Ads" or other websites), based on their interests. For this, the application analyzes our users' interaction with our website, focusing on the offers that the users have shown interest in, so as to be able to display targeted advertisements for them on other websites that the users visit subsequently. In doing so, Google saves cookies in the browsers of the users who visit certain Google services or websites within the Google display network. This cookie records the user's visits. This number serves the clear identification of a web browser on a certain computer and not the identification of a person, and thus no personal data are stored. The user may prevent the cookie by means of a setting in his/her browser software. Additionally, the user can disable the use of cookies by Google, by following the link [www.google.com/settings/ads/plugin](https://www.google.com/settings/ads/plugin) and installing the plug-in provided there. Further information regarding Google Adwords, as well as the Privacy Statement of Google can be viewed under: [www.google.com/privacy/ads](https://www.google.com/privacy/ads).

#### Commissioned data processing

We have concluded a commissioned data processing agreement with Google, endorsed by the German data protection authorities.

#### 6.4. Google Adwords / Conversion Tracking

Additionally, we also use the Conversion Tracking of Google AdWords of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as "Google"). When you click on a Google ad, a Conversion Tracking cookie is set on your computer. These cookies expire after 30 days, collect no personal data and therefore do not serve the personal identification. When you visit certain Internet pages of our website and the cookie has not expired, yet, Google and we can know that you have clicked on the ad and have been redirected to this page. Each Google AdWords client receives another cookie. This way, the cookies cannot be tracked across the websites of AdWords clients. The information gathered with the help of the Conversion cookies is used to prepare conversion statistics for the Adwords clients that have opted for Conversion Tracking. The Adwords clients find out the total number of users that have clicked on their ad and have been redirected to a page provided with a conversion tracking tag. However, they do not receive any information capable of personally identifying the users. The user may prevent the cookie by means of a setting in his/her browser software. Additionally, the user can disable the use of cookies by Google, by following the link [www.google.com/settings/ads/plugin](https://www.google.com/settings/ads/plugin) and installing the plug-in provided there. Further information regarding Google Adwords, as well as the Privacy Statement of Google can be viewed under: [www.google.com/privacy/ads](https://www.google.com/privacy/ads).

## Commissioned data processing

We have concluded a commissioned data processing agreement with Google, endorsed by the German data protection authorities.

### 6.5. Google Tag Manager

For transparency reasons, we point out that we use the Google Tag Manager. The Google Tag Manager does not collect any personal data. The Tag Manager facilitates the integration and management of our tags. Tags are small code elements that serve, among other things, the measurement of traffic and visitor behavior, the determination of the effect of online advertising and social media, the remarketing and setting up of target groups and the testing and optimization of websites. We use the Tag Manager for the Google services Google Analytics and GA Audience. If you have chosen a deactivation, such deactivation is considered by the Google Tag Manager. For further information regarding the Google Tag Manager see: [www.google.com/intl/de/tagmanager/use-policy.html](http://www.google.com/intl/de/tagmanager/use-policy.html).

### 6.6. Doubleclick by Google

We also use the Doubleclick by Google. Doubleclick by Google is a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). With Doubleclick by Google we display ads that are relevant to you. You see these ads on our website and on the websites of other providers that also work together with Google. In your browser for Google, our website saves a so-called "cookie" with a pseudonym identification number (ID). With the help of the cookie ID, Google recognizes your browser when you visit our website (or other websites, the providers of which also use the Doubleclick by Google). This way, Google tries to gather the following information:

- Which web pages have you visited?
- Which ads of Google have been displayed to you during the visit?
- Which of these ads have you clicked on?

Based on such information, Google selects the ads that you will be displayed by Google. You can manage the display of such ads by Google [here](http://www.google.com/settings/ads) ([www.google.com/settings/ads](http://www.google.com/settings/ads)). You can find further information regarding the advertising through Google [here](http://www.google.com/policies/technologies/ads) ([www.google.com/policies/technologies/ads](http://www.google.com/policies/technologies/ads)). You can find further information on data protection with Google [here](http://www.google.com/intl/de/policies/privacy) ([www.google.com/intl/de/policies/privacy](http://www.google.com/intl/de/policies/privacy)).

Google operates its servers in the USA, i.e. in a third country outside the EU. The DoubleClick service of Google transfers your data to these servers. There is currently no decision of the EU Commission that the USA generally provides an adequate level of protection. However, Google refers to Standard Contractual Clauses which provide adequate and proper guarantees. You can find further information in this respect [here](https://privacy.google.com/businesses/compliance/#!#gdpr) (<https://privacy.google.com/businesses/compliance/#!#gdpr>).

The legal basis for the integration of Doubleclick by Google, as described in this section, is Article 6(1)(f) GDPR (Legitimate interests, based on our interest to market the website for advertising purposes). Google collects and processes the data accrued within such framework under its own responsibility.

### 6.7. Marketo Munchkin

This cookie is set by Marketo. It enables a website to track the visitors' behavior on the websites on which the cookie is installed, and to link a visitor with the recipient of an e-mail marketing campaign, in order to measure the efficiency of the campaign. The referrer (if any), the current URL and, if applicable, the destination URL is sent for each activity. The tracking occurs anonymously until a user identifies him/herself by submitting a form. The legal basis for the integration of Marketo Munchkin, as described in this section, is Article 6(1)(f) GDPR (Legitimate interests, based on our interest to determine the efficiency of marketing campaigns).

## 7. Use of external service providers

For the operation of our website, we entrust external service providers with the processing of data (e.g. for the storage of data in data centers). If necessary, such service providers process personal data, as well. We select and monitor the service providers carefully. They process the data exclusively according to our instructions, based on proper agreements for commissioned data processing.

## 8. Storage period

We keep personal data only as long as this is necessary for the fulfillment of the purposes herein and/or for the retention periods stipulated by law. The data that you provide within the meaning of Section 4.2 are therefore erased not later than the expiry of the possible commercial and fiscal retention periods, after 6 years. Automatically collected data within the meaning of Section 4.1 are erased or anonymized after 14 months, at the latest.

## 9. Your rights

You have the following rights with regard to your personal data:

- Right to access personal data
- Right to object
- Right to rectification or erasure
- Right to restriction of processing
- Right to data portability

Please use the information under Contact to assert your rights. Please make sure that we can uniquely identify you.

You can also object to the processing of your personal data for advertising purposes at any time ("Advertising Objection"). Please note that for organisational reasons there may be an overlap between your revocation and the use of your data within the framework of an ongoing campaign.

You also have the right to file a complaint with a data protection authority. You can contact the data protection authority responsible for your place of residence or federal state or the data protection authority responsible for us. This is:

Bavarian State Office for Data Protection Supervision (BayLDA)  
Promenade 27  
D-91522 Ansbach, Germany  
poststelle@lda.bayern.de

## 10. Inquiries

For general inquiries or suggestions with regard to data protection please do not hesitate to contact our data protection officer directly:

TrustYou Datenschutzbeauftragter  
Steinerstraße 15  
81369 München  
E-Mail: dataprotection@trustyou.com