

# Privacy Policy

## NemoVote Online Voting Web Application

*Last Update: 31.08.2021*



### Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as " data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

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## Controller

Jannis Beger  
NemoContra GmbH  
Moerikestrasse 25  
71083 Herrenberg  
Germany

**Authorised Representatives:** Jannis Beger

**E-mail address:** [datenschutz@nemocontra.de](mailto:datenschutz@nemocontra.de)

**Legal Notice:** <https://nemovote.com/imprint>

## Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.



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71083 Herrenberg  
Germany  
Registergericht Stuttgart, HRB 764663

Geschäftsführer (CEO): Jannis Beger  
[www.nemocontra.de](http://www.nemocontra.de)  
[info@nemocontra.de](mailto:info@nemocontra.de)

## Categories of Processed Data

- Inventory data (e.g. names, addresses).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Location data (Data that indicates the location of the end device of an end user).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

## Categories of Data Subjects

- Employees (e.g. Employees, job applicants).
- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).

## Purposes of Processing

- Provision of our online services and usability.
- Conversion Tracking.
- Office and organisational procedures.
- Cross-Device Tracking (Device-independent processing of user data for marketing purposes).
- Direct marketing (e.g. by e-mail or postal).
- Feedback (e.g. collecting feedback via online form).
- Interest-based and behavioral marketing.
- contact requests and communication.
- Profiling (Creating user profiles).
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Contractual services and support.
- Managing and responding to inquiries.
- Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content).

## Legal Bases for the Processing

In the following we inform you about the legal basis of the General Data Protection Regulation (GDPR), on the basis of which we process personal data. Please note that, in addition to the regulations of the GDPR, the national data protection regulations may apply in your country or in our country of residence or domicile. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.
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**National data protection regulations in Germany:** In addition to the data protection regulations of the General Data Protection Regulation, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

## Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

**Masking of the IP address:** If it is possible for us or the storage of the IP address is not necessary, we shorten or have your IP address shortened. When the IP address is shortened, also known as "IP masking", the last octet, i.e. the last two numbers of an IP address, is deleted (the IP address in this context is an identifier individually assigned to an Internet connection by the online access provider). With the shortening of the IP address, the identification of a person on the basis of their IP address is to be prevented or made considerably more difficult.

**SSL encryption (https):** In order to protect your data transmitted via our online services in the best possible way, we use SSL encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

## Transmission and Disclosure of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, payment institutions within the context of payment transactions, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of your data.

## Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. NemoVote uses exclusively "**session cookies**", which are used to track the users logeg-in status. They may remain stored even after closing the browser. For example, the login status can be saved when the user visits a website again.

**Third party cookies:** They are not used within the NemoVote application.

**Retention period:** Unless we provide you with explicit information on the retention period of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the data is deleted with logout or with the closing of the cloud.

## Commercial Services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries.

We process this data in order to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of the contractual partners (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in on-line forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

In the case of data disclosed to us by the contractual partner within the context of an assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

**Customer Account:** Contractual partners can create a customer or user account. If the registration of a customer account is required, contractual partners will be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account.

If customers have terminated their customer account, their data will be deleted with regard to the customer account, subject to their retention is required for legal reasons. It is the responsibility of the customer to secure their data upon termination of the customer account.

**Software and Platform Services:** We process the data of our users, registered and any test users (hereinafter uniformly referred to as "users") in order to provide them with our contractual services and on the basis of legitimate interests to ensure the security of our offer and to develop it further. The required details are identified as such within the context of the conclusion of the agreement, order or comparable contract and include the details required for the provision of services and invoicing as well as contact information in order to be able to hold any further consultations.

- **Processed data types:** Inventory data (e.g. names), Contact data (e.g. e-mail), Contract data (e.g. contract object, duration, customer category), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Prospective customers, Business and contractual partners, Customers.

- **Purposes of Processing:** Contractual services and support, contact requests and communication, Office and organisational procedures, Managing and responding to inquiries, Security measures.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Provision of online services and web hosting

In order to provide our online services securely and efficiently, we use the services of one or more web hosting providers from whose servers (or servers they manage) the online services can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services, as well as security and technical maintenance services.

The data processed within the framework of the provision of the hosting services may include all information relating to the users of our online services that is collected in the course of use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online services to browsers, and all entries made within our online services or from websites.

**E-mail Sending and Hosting:** The web hosting services we use also include sending, receiving and storing e-mails. For these purposes, the addresses of the recipients and senders, as well as other information relating to the sending of e-mails (e.g. the providers involved) and the contents of the respective e-mails are processed. The above data may also be processed for SPAM detection purposes. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received (unless a so-called end-to-end encryption method is used). We can therefore accept no responsibility for the transmission path of e-mails between the sender and reception on our server.

**Collection of Access Data and Log Files:** We, ourselves or our web hosting provider, collect data on the basis of each access to the server (so-called server log files). Server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a general rule, IP addresses and the requesting provider.

The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal load balancing of the servers .

- **Processed data types:** Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used:



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- **Heroku:** Webhosting und infrastrukturelle Dienstleistungen Dienstanbieter: Heroku, Inc., The Landmark @ 1 Market St., Suite 300, San Francisco, CA 94105, USA ("Heroku"), als Tochtergesellschaft der Salesforce.com Inc., The Landmark @ One Market St., Suite 300 San Francisco, California 94105, USA („Salesforce“); Datenschutzerklärung: <https://www.salesforce.com/company/privacy/>; Privacy Shield (Gewährleistung Datenschutzniveau bei Verarbeitung von Daten in den USA): <https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active>.
- **MongoDB:** Webhosting und infrastrukturelle Dienstleistungen Dienstanbieter: DBN MongoDB, Inc., 229 W. 43rd Street, 5th Floor, New York, NY 10036. Datenschutzerklärung: <https://www.mongodb.com/legal/privacy-policy>
- **Netcup:** Webhosting und infrastrukturelle Dienstleistungen Dienstanbieter: netcup GmbH Daimlerstraße 25, 76185 Karlsruhe; Amtsgericht Mannheim HRB 705547, Datenschutzerklärung: <https://www.netcup.de/kontakt/datenschutzerklaerung.php>
- **Mailjet:** Email-Dienstleistungen; Mailjet GmbH, Alt-Moabit 2, 10557 Berlin, Deutschland. Handelsregister: AG Berlin-Charlottenburg, HRB 156505. Datenschutzerklärung: <https://www.mailjet.de/privacy-policy/>

## Special Notes on Applications (Apps)

We process the data of the users of our application to the extent necessary to provide the users with the application and its functionalities, to monitor its security and to develop it further. Furthermore, we may contact users in compliance with the statutory provisions if communication is necessary for the purposes of administration or use of the application. In addition, we refer to the data protection information in this privacy policy with regard to the processing of user data.

**Legal basis:** The processing of data necessary for the provision of the functionalities of the application serves to fulfil contractual obligations. This also applies if the provision of the functions requires user authorisation (e.g. release of device functions). If the processing of data is not necessary for the provision of the functionalities of the application, but serves the security of the application or our business interests (e.g. collection of data for the purpose of optimising the application or security purposes), it is carried out on the basis of our legitimate interests. If users are expressly requested to give their consent to the processing of their data, the data covered by the consent is processed on the basis of the consent.

**Commercial use:** We process the data of the users of our application, registered and any test users (hereinafter uniformly referred to as "users") in order to provide them with our contractual services and on the basis of legitimate interests to ensure the security of our application and to develop it further. The required details are identified as such within the scope of the conclusion of a contract for the use of the application, the conclusion of an order, an order or a comparable contract and may include the details required for the provision of services and any invoicing as well as contact information in order to be able to hold any consultations.

- **Processed data types:** Inventory data (e.g. names), Meta/communication data (e.g. device information, IP addresses), Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contractual services and support.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Registration, Login and User Account

Users can create a user account. Within the scope of registration, the required mandatory information is communicated to the users and processed for the purposes of providing the user account on the basis of contractual fulfilment of obligations. The processed data includes in particular the login information (name, password and an e-mail address). The data entered during registration will be used for the purposes of using the user account and its purpose.

Users may be informed by e-mail of information relevant to their user account, such as technical changes. If users have terminated their user account, their data will be deleted with regard to the user account, subject to a statutory retention obligation. It is the responsibility of the users to secure their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract.

Within the scope of using our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the user's protection against misuse and other unauthorized use. This data will not be passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

- **Processed data types:** Inventory data (e.g. names), Contact data (e.g. e-mail), Content data (e.g. text input, photographs), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contractual services and support, Security measures, Managing and responding to inquiries.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Contacting us

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested activities.

The response to contact enquiries within the framework of contractual or pre-contractual relationships is made in order to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise on the basis of the legitimate interests in responding to the enquiries.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** contact requests and communication.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Communication via Messenger

We use messenger services for communication purposes and therefore ask you to observe the following information regarding the functionality of the messenger services, encryption, use of the metadata of the communication and your objection options.

You can also contact us by alternative means, e.g. telephone or e-mail. Please use the contact options provided to you or use the contact options provided within our online services.

In the case of encryption of content (i.e. the content of your message and attachments), we point out that the communication content (i.e. the content of the message and attachments) is encrypted end-to-end. This means that the content of the messages is not visible, not even by the messenger service providers themselves. You should always use a current version of the messenger service with activated encryption, so that the encryption of the message contents is guaranteed.

However, we would like to point out to our communication partners that although messenger service providers do not see the content, they can find out that and when communication partners communicate with us and process technical information on the communication partner's device used and, depending on the settings of their device, also location information (so-called metadata).

**Information on Legal basis:** If we ask communication partners for permission before communicating with them via messenger services, the legal basis of our processing of their data is their consent. Otherwise, if we do not request consent and you contact us, for example, voluntarily, we use messenger services in our dealings with our contractual partners and as part of the contract initiation process as a contractual measure and in the case of other interested parties and communication partners on the basis of our legitimate interests in fast and efficient communication and meeting the needs of our communication partners for communication via messenger services. We would also like to point out that we do not transmit the contact data provided to us to the messenger service providers for the first time without your consent.

**Withdrawal, objection and deletion:** You can withdraw your consent or object to communication with us via messenger services at any time. In the case of communication via messenger services, we delete the messages in accordance with our general data retention policy (i.e. as described above after the end of contractual relationships, archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information provided by the communication partners, if no reference to a previous conversation is to be expected and there are no legal obligations to store the messages to prevent their deletion.

**Reservation of reference to other means of communication:** Finally, we would like to point out that we reserve the right, for reasons of your safety, not to answer inquiries about messenger services. This is the case if, for example, internal contractual matters require special secrecy or if an answer via the messenger services does not meet the formal requirements. In such cases we refer you to more appropriate communication channels.

- **Processed data types:** Contact data (e.g. e-mail), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** contact requests and communication, Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Facebook-Messenger:** Facebook-Messenger with end-to-end encryption (the end-to-end Facebook Messenger encryption requires activation, unless enabled by default); Service provider: <https://www.facebook.com>, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>; Opt-Out: <https://www.facebook.com/settings?tab=ads>.
- **Microsoft Teams:** Microsoft Teams - Messenger; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://products.office.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000KzNaAAK&status=Active>.
- **WhatsApp:** WhatsApp Messenger with end-to-end encryption; Service provider: WhatsApp Inc. WhatsApp Legal 1601 Willow Road Menlo Park, California 94025, USA; Website: <https://www.whatsapp.com/>; Privacy Policy: <https://www.whatsapp.com/legal>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000TSnwAAG&status=Active>.

## Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the following purposes: document storage and administration, calendar management, e-mail delivery, spreadsheets and presentations, exchange of documents, content and information with specific recipients or publication of websites, forms or other content and information, as well as chats and participation in audio and video conferences.

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

**Information on legal basis** - If we ask for permission to use cloud services, the legal basis for processing data is consent. Furthermore, their use can be a component of our (pre)contractual services, provided that the use of cloud services has been agreed in this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient and secure administrative and collaboration processes).

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Employees (e.g. Employees, job applicants), Prospective customers, Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Office and organisational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:

- **Microsoft Cloud Services:** Cloud Services; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://microsoft.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000KzNaAAK&status=Active>.

## Newsletter and Broadcast Communication

We send newsletters, e-mails and other electronic communications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

In order to subscribe to our newsletters, it is generally sufficient to enter your e-mail address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

**Double opt-in procedure:** The registration to our newsletter takes place in general in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external e-mail addresses.

The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

**Deletion and restriction of processing:** We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the e-mail address solely for this purpose in a blacklist.

**Information on legal bases:** The sending of the newsletter is based on the consent of the recipients or, if consent is not required, on the basis of our legitimate interests in direct marketing. Insofar as we engage a service provider for sending e-mails, this is done on the basis of our legitimate interests. The registration procedure is recorded on the basis of our legitimate interests for the purpose of demonstrating that it has been conducted in accordance with the law.

**Contents:** Information about us, our services, promotions and offers.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

## Commercial communication by E-Mail, Postal Mail, Fax or Telephone

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After withdrawal or objection, we may store the data required to prove consent for up to three years on the basis of our legitimate interests before we delete them. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is affirmed.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Surveys and Questionnaires

The surveys and questionnaires ("surveys") carried out by us are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical execution of the survey (e.g. processing the IP address to display the survey in the user's browser or to enable a resumption of the survey with the aid of a temporary cookie (session cookie)) or participants have consented.

**Information on legal basis:** If we ask the participants for their consent to the processing of their data, this is the legal basis for the processing, otherwise the processing of the participants' data is based on our legitimate interests in conducting an objective survey.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** contact requests and communication, Direct marketing (e.g. by e-mail or postal), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:



Mörikestr. 25  
71083 Herrenberg  
Germany  
Registergericht Stuttgart, HRB 764663

Geschäftsführer (CEO): Jannis Beger  
www.nemocontra.de  
info@nemocontra.de

- **Google Forms:** Google-Cloud Forms; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://firebase.google.com>; Privacy Policy: <https://policies.google.com/privacy>; Privacy Shield (Safeguarding the level of data protection when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>; Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

## Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose).

If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

Further information on the erasure of personal data can also be found in the individual data protection notices of this privacy policy.

## Changes and Updates to the Privacy Policy

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

## NemoVote Website/Online-Shop

The webpage [www.nemovote.com](http://www.nemovote.com) offers information content, contact options and possibility to order NemoVote services. Its use is governed by a separate Privacy Policy which is available on the web page itself.



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## Rights of Data Subjects

As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 18 and 21 of the GDPR:

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR , including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** You also have the right, under the conditions laid down by law, to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.