# **Privacy Policy**

# I. Introduction

With the following information, we want to give you as a "data subject" an overview of the processing of your personal data by us and your rights under data protection laws.

Your personal data will always be processed in accordance with the General Data Protection Regulation (GDPR) and all applicable country-specific data protection regulations. We have implemented numerous technical and organizational measures to ensure the highest possible level of protection when processing your personal data.

# II. Scope

The following data protection information applies to the following website: <u>www.tomorrow.one</u> and all our other online presences (e.g. our social media pages).

# III. Controller

The controller within the GDPR is:

Tomorrow GmbH Neuer Pferdemarkt 23 20359 Hamburg Hamburg, Germany Email: <u>support@tomorrow.one</u> Website: <u>www.tomorrow.one</u>

# IV. Data protection officer

If you have any questions or suggestions regarding data protection issues, you can contact our data protection officer at any time:

> Niklas Hanitsch c/o secjur GmbH Steinhöft 9 20459 Hamburg Phone: +49 40 228 599 520 Email: dsb@secjur.com

# V. Technology

# 1. SSL/TLS encryption

To ensure the security of data processing and to protect the transmission of confidential content, we use SSL or TLS encryption. You can recognize the existence of an encrypted connection by the fact that the address line of the browser contains "https://" instead of "http://" and by the lock symbol in your browser line.

# 2. Data collection when visiting the website/storage of log files

When using our website for purely informational purposes, we only collect personal data that your browser sends to our server (server log files). Every time you access our website, a number of general data points and information are collected, which we store in the server log files.

# Purpose of the processing

- Correct delivery of the content of our website
- Optimization of our website content
- Guarantee of a permanent operability of our IT systems and technology of our website
- Static evaluation to improve the level of data protection and data security
- Provision of information to law enforcement authorities in the event of a cyber attack

# **Processed data**

- Usage and metadata (e.g. browser types and versions used, the operating system used by the accessing system, the website from which an accessing system accesses our website (so-called referrer), the sub-websites which are accessed via an accessing system on our website, the date and time of access to the website, a shortened Internet protocol address (anonymized IP address), the Internet service provider of the accessing system)

# Legal basis

- Legitimate interest (Art. 6 para. 1 Cl 1 lit. f GDPR). Our legitimate interest is the stability of our website, the provision of information to authorities in the event of a cyber attack, the improvement of the level of data protection and security and the correct presentation of content.

### Security measures

The server log files are anonymous data that are stored separately from all your other personal data.

# VI. Cookies

### 1. General information

We use cookies on our website. These are files that your browser automatically creates and that are stored on your IT system when you visit our website.

Information is stored in the cookie that, for each case, results from a connection with the specifically device used. However, this does not mean that we gain direct knowledge of your identity.

### 2. Technically necessary cookies

We use technically necessary cookies. These are cookies that are required for the operation and functions of our website.

# Purpose of the processing

- Offering our services
- Enabling the use of our website functions

# Legal basis

- Legitimate interest (Art. 6 para. 1 cl. 1 lit. f GDPR). Our legitimate interest is enabling the use of website information and the provision of our services.

# 3. Temporary cookies (also: session cookies)

Temporary cookies are deleted at the latest after a user has left an online service and closed their end device (e.g. browser or mobile application).

# 4. Technically unnecessary cookies

We also use cookies that are not technically necessary. These are cookies that are not technically essential for the operation of the website and the provision of specific page functions, but which make visiting the website more pleasant. However, this also includes cookies from third-party providers that can be used to analyze and track the browsing behavior of users.

# **Purpose of processing**

- Reach measurement and tracking
- Evaluation of visitor behavior
- Optimization of our offering

# Legal basis

- Consent (Art. 6 para. 1 cl. 1 lit. a GDPR).

# Right to withdraw consent

You can revoke your consent to the use of cookies at any time.

# VII. Transmission and disclosure of personal data

Within the scope of our activities, we transmit personal data to external parties (e.g. persons, companies or legally independent organizational units). You can find details on this in this privacy policy for the respective third-party providers.

# VIII. Data processing in third countries

We process personal data in third countries. These are countries outside the European Union (EU) and the European Economic Area (EEA).

Data is only processed in third countries where an adequate level of data protection exists in accordance of Art. 44-49 GDPR. Details on the specific level of data protection in the respective third country can be found below with the respective service providers under "Services used".

# IX. Registration/Creation of a user profile

1. Registration

Before you can open an account via our Tomorrow app, you must register on our website or in the app. Afterwards you can create a user profile.

# **Processed data**

- First name and surname
- E-mail address
- Nationality
- Country of your permanent residency
- Employment status
- Date of birth
- Place of birth
- Your gender
- The country in which you are taxable
- Whether you are taxable in the USA
- Tax identification number (optional)
- Invitation code
- Password

In addition, we process the following personal data during the registration process:

- Browser types and versions used
- Operating system used by the accessing system
- Website from which an accessing system reaches our website (so-called referrer)
- Sub-websites which are accessed via an accessing system on our website
- Date and time of access to the website
- IP address
- Internet service provider of the accessing system.

### Legal basis

 Performance of a contract or implementation of pre-contractual measures (Art. 6 Para. 1 Cl. 1 letter b. GDPR)

### 2. Confirmation email

If you register with your email address to open an account in the Tomorrow App, we will send you an email to the address you have provided including a confirmation link (double opt-in procedure). By opening this link, you confirm that you are the owner of the email address provided and that no unauthorized person is misusing your e-mail address.

### **Processed data**

- Time of sending our confirmation email
- Time the confirmation link was opened
- Your IP address

### Legal basis

- Contract fulfilment and implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b. GDPR)

### 3. SendGrid

We use SendGrid to send the confirmation emails.

# Provider

SendGrid Inc, 1801 California Street, 1801 California St, Denver

Parent company: Twilio Inc, 101 Spear St FL 5, San Francisco, California 94105-1580

# Data protection outside the EU/EEA

- The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. SendGrid is certified under the EU-U.S. Data Privacy Framework.

- Security measures: Further security measures of SendGrid can be found here:

Further SendGrid security measures.

# Data protection information from SendGrid

Further information can be found in SendGrid's privacy policy.

# 4. Registration via CHECK24

We offer the possibility to register with us via CHECK24. For this, you can enter your personal data at CHECK24. These are necessary for the registration at Tomorrow. Afterwards CHECK24 sends us this data and your date of birth, which you entered when creating your CHECK24 account. We will send you a confirmation e-mail where you have to create a password and enter your date of birth for security reasons. We process your personal data to facilitate the registration process for you. We also process your date of birth to verify your identity.

# Provider

CHECK24 Vergleichsportal Karten & Konten GmbH, Erika-Mann-Str. 62-66, 80636 Munich, Germany

# Legal basis

- Contract fulfilment and implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b. GDPR)

- Legitimate interest (Art. 6 para. 1 cl. 1 lit. f GDPR). The legitimate interest lies in facilitating the registration process.

# Data protection information from CHECK24

Further information on data processing can be found in Check24's privacy policy.

# X. Tomorrow Community Forum

# 1. Registration as a user

You have the option to register for our Tomorrow Community Forum on our website, by providing personal data. The Tomorrow Community is a forum on our website that is

generally open to the public and in which one or more people can post articles or write down thoughts in so-called forum posts. The posts can usually be commented on by third parties.

Processed data

- E-mail address
- User name
- Password (optional)
- First name and surname (optional)

By registering to the Tomorrow Community forum the IP address assigned by your internet service provider (ISP), the date and time of registration will also be saved. This data is stored to prevent misuse of our services and, if necessary, to enable us to solve criminal offences. Respectively, the storage of this data is necessary for our security. As a matter of principle, this data will not be passed on to third parties unless there is a legal obligation to do so or the passing on of the data serves criminal prosecution.

# Legal basis

- Contract fulfilment or implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b GDPR)

- Legitimate interest (Art. 6 para. 1 cl. 1 lit. f GDPR). The legitimate interest lies in the prevention or prosecution of misuse or criminal offences.

# 2. Comment function

In the Tomorrow community forum, we offer you the opportunity to leave individual comments on individual blog posts.

### Processed data

- Content data (e.g. the content of the comment)
- Usage data (e.g. websites visited, time of access)
- Meta and communication data (e.g. IP address).

### **Purpose of processing**

- Traceability, if submitted comments violate third party rights or illegal content has been posted

### Legal basis

- Legitimate interest (Art. 6 para. 1 cl. 1 lit. f GDPR). The legitimate interest is the traceability of legal violations and/or criminal offences.

# XI. Tomorrow Merch Shop

We offer you the possibility to buy sustainable products in our Tomorrow Merch Shop. When you use our store or place an order, we process personal data about you.

# 1. Use of Shopify

We use the Shopify shop system to host and visually display our merch shop. If we collect personal data from you as part of the ordering process, this data may be transferred to Shopify in individual cases. Additionally, we use Shopify Order Printer for the accounting and

logistical organization of orders. This enables us to automatically create invoices, receipts, shipping labels and other business documents.

# Provider

Shopify International Limited, Victoria Buildings, 2nd Floor, 1-2 Haddington Road, Dublin 4, D04 XN32, Ireland

# Legal basis

- Contract fulfilment or implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b GDPR)

# Data protection information from Shopify

Further information on data processing can be found in <u>Shopify's privacy policy</u>.

# 2. Payment provider

When shopping in our merch store, you can use various payment options. It is possible that the respective payment service provider used by us transmits your personal data to credit agencies to perform an identity and credit check. Please also note the terms and conditions and privacy policy of the respective payment service provider

# a) Google Pay

We offer you the option of paying with Google Pay.

# Provider

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

### **Processed data**

- Card, authentication and transaction data (e.g. date, time, amount of the transaction)
- Data on the security of payment transactions
- Name, address
- Address details
- Telephone number

### Purpose of the processing

- To enable contactless and simplified payment methods
- To reduce the risk of fraud and misuse

### Legal basis

- Contract fulfilment or implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b GDPR)

- Legitimate interests: (Art. 6 para. 1 cl. 1 lit. f GDPR). Our legitimate interest lies in reducing the risk of fraud and abuse.

### Data protection outside the EU/EEA

The European Commission has issued an adequacy decision pursuant to Art. 45 para. 3 GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Google is certified under the EU-U.S. Data Privacy Framework.

### Data protection information from Google

Further information on data processing can be found in <u>Google's privacy policy</u> and here: <u>Further information on Google pay</u>.

# b) Apple Pay

### Provider

Apple Distribution International Limited, Hollyhill Industrial Estate, Hollyhill, Cork, Ireland

### Processed data

Apple does not store any original credit, debit or prepaid cards added to Apple Pay or any transaction data that could be used to identify you personally. Furthermore, Apple only stores part of the actual card and device account number and a card description.

# Purpose of the processing

- Enabling a contactless and simplified payment method
- Reducing the risk of fraud and misuse

# Legal basis

- Contract fulfilment or implementation of pre-contractual measures: (Art. 6 para. 1 cl. 1 lit. b GDPR)

- Legitimate interests: (Art. 6 para. 1 cl. 1 lit. f GDPR). The legitimate interest lies in enabling a simplified payment method and reducing the risk of fraud and abuse.

# Data protection information from Apple

Further information can be found in <u>Apple's privacy policy</u>.

# c) Shopify Payments

We use the payment service provider Shopify Payments. If you choose a payment method offered by the payment service provider Shopify Payments, the payment will be processed by the technical service provider Stripe.

### Provider

Shopify International Limited, Victoria Buildings, 2nd Floor, 1-2 Haddington Road, Dublin 4, D04 XN32, Ireland

### **Processed data**

- Information from the specific order process and information about your order (name, address, account number, sort code, credit card number, invoice amount, currency and transaction number)

### Legal basis

- Contract fulfilment and implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b. GDPR)

# Privacy policy of Shopify and Stripe

Further information on data processing can be found in the <u>Shopify</u> and <u>Stripe privacy</u> <u>policies</u>.

# 2. Shipment of the ordered goods

The delivery of our merchandise is carried out by the providers DHL or Eindruck24.

# 3.1 DHL

DHL Paket GmbH, Sträßchensweg 10, 53113 Bonn (DHL).

# **Processed data**

- Name, address
- Address
- Email address

# Legal basis

- Contract fulfilment and implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b. GDPR)

# Data protection information from DHL

Further information on data protection can be found in <u>DHL's privacy policy</u>.

# 3.2 Eindruck24

Eindruck24, owner: Christian Werner, Eimsbütteler Straße 34, 22769 Hamburg, Germany

### **Processed data**

- Your name
- Address details

### Legal basis

- Contract fulfilment and implementation of pre-contractual measures (Art. 6 para. 1 cl. 1 lit. b. GDPR)

### Data protection information from Eindruck24

Further information on data protection can be found in the privacy policy of Eindruck24.

# XII. Contact

### 1. General information

We offer you different ways to contact us (e.g. by email, chat or telephone).

# **Processed data**

- Inventory data (e.g. first and last name, address)
- Contact information (e.g. e-mail address, telephone number)
- Meta and communication data (e.g. IP address)
- Content data (e.g. entered text content, photographs, videos, documents)

# Purpose of the processing

- answering contact requests

- communication

### Legal basis

- Performance of a contract or implementation of pre-contractual measures (Art. 6 Para. 1 Cl. 1 letter b. GDPR) if your request is based on pre-contractual measures or on an existing contract with us.
- Legitimate interest (Art. 6 Para. 1 Cl. 1 letter f GDPR). If your inquiry is independent of contractual or pre-contractual measures, our legitimate interests constitute the legal basis. The legitimate interest corresponds to the above-mentioned purposes.

# 2. Google Workspace

For sending and receiving e-mails, we use e-mail accounts located on Google servers.

### Provider

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

### Data protection information from Google

Further information can be found in <u>Google's privacy policy</u>.

### 3. Freshchat

We use Freshchat to communicate with you via live chat. This enables us to provide you with effective and direct customer communication.

#### Provider

Freshworks Inc, 2950 S. Delaware Street, Suite 201, San Mateo CA 94403, USA.

### Data protection outside the EU/EEA

The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Freshworks is not certified under the EU-U.S. Data Privacy Framework. To ensure an adequate level of data protection from the recipient of your personal data, we have concluded standard contractual clauses of the European Commission for the protection of personal data in accordance with Art. 46 para. 1, 2 lit. c GDPR.

### Data protection information from Freshworks

Further information can be found in Freshworks' privacy policy.

### 4. Ultimate.ai

We use a chat- bot to communicate with you. A chat-bot is software that answers your questions and informs you about news. The chat-bot tries to find suitable answers for your questions.

### Provider

Ultimate.ai GmbH, Ritterstraße 12-14, 10969 Berlin, Germany

#### Privacy policy of Ultimate.ai

Further information can be found in the privacy policy of ultimate.ai.

# XIII. Application

# 1. General information

We offer you the opportunity to apply for vacancies and send us your application online.

### **Processed data**

- Inventory data (e.g. first and last name, address)
- Contact data (e.g. email address, telephone number)
- Application data (e.g. cover letter, CV, certificates and other supporting documents)

# Purpose of the processing

- Carrying out the application process and finding suitable applicants

# Legal basis

- Contract fulfilment and implementation of pre-contractual measures and to establish an employment relationship (Art. 6 para. 1 sentence 1 lit. b, Art. 88 para. 1 GDPR in conjunction with § 26 para. 1 BDSG).

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR). If we obtain your consent (e.g. for inclusion in our applicant pool), this constitutes the legal basis for data processing. You will receive separate information on this in advance.

### Storage period

If an employment relationship is established after completion of the application process, the personal data provided may be processed further. Otherwise, we generally store the data for six months. The data will then be deleted or disposed of in accordance with data protection regulations. Longer storage is possible if we include you in our applicant pool with your consent.

# 2. Personio

We use Personio to carry out our application process effectively.

### Provider

Personio SE & Co KG, Seidlstr. 3, 80335 Munich, Germany

### Data protection information from Personio

Further information can be found in Personio's privacy policy.

# **XIV. Newsletter**

# 1. General information

We offer the opportunity to subscribe to our newsletter. We use this to inform customers and business partners about our offering in regular intervals. Basically, we only need your email

address to register to our newsletter. In addition, we may ask you to enter your name or other details during the registration process to personalize the newsletter.

### **Double opt-in procedure**

After registering to the newsletter, we will send a confirmation e-mail to the e-mail address you entered for the first time for the newsletter mailing, using a double opt-in procedure. This confirmation e-mail is used to check whether you, as the owner of the e-mail address, have authorized the receipt of the newsletter. The registration to the newsletter is logged so that we can fulfil our legal obligations to provide evidence.

# **Newsletter tracking**

Our newsletters contain so-called tracking pixels. This is a miniature graphic that is embedded in e-mails. This allows us to track, for example, whether and when an e-mail was opened by you and which links in the e-mail were accessed by you. This enables us to statistically analyze the success or failure of online marketing campaigns. The personal data collected by the tracking pixels is stored and evaluated by us to optimize the newsletter dispatch and to better adapt the content of future newsletters to your interests.

# **Processed data**

- Inventory data (e.g. first and last name, address, gender)
- Contact data (e.g. e-mail address)
- Usage data (e.g. visits to websites, time of access)
- Metadata and communication data (e.g. device information, IP address, date and time of registration)

### Purpose of the data processing

- Newsletter dispatch: realization of marketing measures
- Double opt-in procedure: Fulfilment of our legal obligations to provide evidence
- Newsletter tracking: Display of personalized advertising, market research, performance measurement

### Legal basis

- Newsletter subscription: Consent (Art. 6 para. 1 sentence 1 lit. a GDPR)
- Double opt-in procedure: Legal obligation (Art. 6 para. 1 sentence 1 lit. c GDPR)

- Sending newsletters to existing customers: Legitimate interest (Art. 6 para. 1 sentence 1 lit. f GDPR). The legitimate interest lies in the implementation of marketing measures and newsletter tracking to measure success and personalization.

- Newsletter tracking: Consent (Art. 6 para. 1 sentence 1 lit. a GDPR)

# **Cancellation and objection options**

You may cancel your subscription to our newsletter at any time and revoke your consent for data processing for the purposes of sending the newsletter or newsletter tracking at any time. If we process your personal data on the basis of legitimate interests, you can object to the data processing at any time. There is a corresponding opt-out link in every newsletter. It is

also possible to unsubscribe from the newsletter at any time on our website or you can inform us via our customer support. Unsubscribing from the newsletter is automatically interpreted as cancellation.

# 2. Google Workspace

To send and receive e-mails, we use e-mail accounts that are located on Google servers (Google Workspace).

# Provider

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

# Data protection information from Google

Further information on data processing can be found in <u>Google's privacy policy</u>.

# 3. Mailchimp

We use Mailchimp to send newsletters.

# Provider

The Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA

Parent company: Intuit Corp, 675 Ponce De Leon Avenue, Northeast, Suite 5000

Atlanta, GA 30308, USA

# Data protection outside the EU/EEA

The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Mailchimp is certified under the EU-U.S. Data Privacy Framework.

Further security measures: Mailchimp has implemented additional security measures. You can access these <u>here</u>. Mailchimp also publishes an <u>annual transparency report</u>.

# Data protection information from Mailchimp

Further information on data processing can be found in Mailchimp's privacy policy.

# XV. Social networks (social media)

# 1. General information

We maintain a presence on social networks to communicate with you and inform you about our services. If you visit one of our social media pages, the provider of the respective social media platform and we are jointly responsible for processing personal data, based on Art. 26 GDPR.

We would like to point out that your data may be processed outside the European Union or the European Economic Area. User data is often processed in social networks for advertising purposes or to analyze user behavior by the providers, without us being able to influence this. In addition, the providers often create user profiles to place user-based advertising within and outside of the social network, accordingly. Cookies are often used for this purpose or - if you are logged in - the usage behavior is assigned directly to your own member profile of social networks. As we do not have access to the databases of the respective providers, we would like to point out that it is best to assert your rights directly with the respective provider. However, if you need help, you are welcome to contact us.

Further information on the processing of your data on social networks and the possibility of exercising your right of objection or cancellation (opt-out) is listed below.

#### Processed data

- Inventory data (e.g. first and last name, address, age, gender)
- Content data (e.g. texts, photographs, videos)
- Usage data (e.g. visits to websites, time of access)
- Metadata (e.g. device information, IP address)

#### Purpose of the processing

- Contemporary way of user communication
- Provision of information about own services
- Tracking, remarketing, affiliate tracking

#### Legal basis

- Legitimate interest (Art. 6 para. 1 sentence 1 lit. f GDPR). The legitimate interest lies in the provision of information about our services as well as remarketing, tracking and affiliate tracking.

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR). If you, as a user of the respective social media, must consent to data processing, the legal basis is your consent.

### 2. Facebook

#### Provider

Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland

#### Joint responsibility

As a fan page operator, Meta provides us with so-called "Facebook Insights" for Facebook. These are various statistics that provide us with information about how our Facebook fan page is used. To compile these statistics, data provided by you (including personal data) is processed by Meta and us as joint controllers within the meaning of Art. 26 (1) GDPR. We have entered into an agreement with Meta in accordance with Art. 26 GDPR, the content of which you can read here.

### Legal basis and purposes of Facebook processing

Information on the legal basis and purposes of Facebook's processing can be found here.

### Data protection information

Further information on data processing can be found in <u>Meta's privacy policy</u>.

Further security measures: Meta has implemented additional security measures. You can access these <u>here</u>.

# 3. Instagram

# Provider

Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland

# Shared responsibility

- Meta provides the following Instagram insights
  - $\circ$  Statistics and data that provide information about how our content is consumed

# Data protection information

Further information on data processing can be found in Meta's privacy policy.

Further security measures: Meta has implemented additional security measures. You can access these <u>here</u>.

# **Opt-out and advertising settings**

You can find an opt-out and Instagram's advertising settings here.

# 4. LinkedIn

# Provider

LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland

### Shared responsibility

- LinkedIn provides insights
- Statistics and data that provide information about how our content is consumed

# Data protection information from LinkedIn

Further information on data processing can be found in LinkedIn's privacy policy.

# 5. TikTok

TikTok Technology Limited, Earlsfort Terrace, Dublin, D02 T380, Ireland

### Shared responsibility

- TikTok provides insights
- Statistics and data that provide information about how our content is consumed

### Data protection information

Further information on data processing can be found in <u>TikTok's privacy policy</u>.

# 6. Pinterest

### Provider

Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland

# Data protection information

Further information on data processing can be found in **<u>Pinterest's privacy policy</u>**.

# 7. Vimeo video

We integrate elements of the Vimeo video portal on our website to optimize our online offering.

# Provider

Vimeo, LLC, 555 West 18th Street, New York, New York 10011, USA.

### **Processed data**

- Usage data (e.g. websites visited, time of access)
- Meta and communication data (e.g. IP address)

# Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit a GDPR)

# Data protection outside the EU and the EEA

The European Commission has adopted an adequacy decision pursuant to Art. 45 para. 3

GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Vimeo is not certified under the EU-U.S. Data Privacy Framework. To ensure an adequate level of data protection at the recipient of your personal data, we have concluded standard contractual clauses of the European Commission for the protection of personal data in accordance with Art. 46 para. 1, 2 lit. c GDPR.

### Data protection information

Further information on data processing and an opt-out option can be found in <u>Vimeo's</u> <u>privacy policy</u>.

### **Use of Google Analytics**

The Google Analytics tracking tool is automatically integrated into videos from Vimeo that are embedded on our website. You can find more information under point XVIII, section 2.

# XVI. Surveys with SurveyMonkey

We conduct surveys on our website with the help of SurveyMonkey. To do so we use cookies.

### Provider

SurveyMonkey Europe UC, 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland.

### Processed data

- Content data (your answers as part of the survey)
- Meta and communication data (e.g. IP address).

# Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

# Data protection information

Further information on data processing can be found in <u>SurveyMonkey's privacy policy</u>.

# XVII. Web analysis, optimization and marketing services

### 1. General information

We carry out web analyses to evaluate visits to our online presences. In doing so, we are able to process your interests, certain behaviors or demographic data. This enables us to analyze how you use our online offering, its content and functions. User profiles can be created as part of the web analysis. Cookies are often used for this purpose. We also process data for marketing purposes.

# 2. Google Analytics

Google Analytics is a tracking tool that, among other things, allows us to analyze the origin of visitors and the time they spent on e.g. our website. This enables us to optimize our online offering and improve advertising campaigns.

### Provider

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

### **Processed data**

- App updates, browser information, click path, date and time of visit, device information, downloads, Flash version, location information, IP address, JavaScript support, pages visited, purchase activity, referrer URL, usage data, widget interactions

### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

### Opt-out cookie

You can prevent the collection of your personal data by Google Analytics by deactivating performance cookies via the cookie layer. You can access the cookie layer via the "Cookie settings" link in the footer of our website. This sets an opt-out cookie that prevents the future collection of your data when visiting our website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you must set the opt-out cookie again. In addition, you can prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on. Furthermore, you may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do so you may not be able to use the full functionality of this website.

Finally, you can stop Google using your data for marketing purposes: Settings.

#### IP address anonymization

We have anonymized your IP address.

# Data protection information

Further information can be found in Google's privacy policy.

# 3. Google Tag Manager

Google Tag Manager allows us to manage website tags and integrate services into our online offering. The Google Tag Manager itself does not enable the creation of user profiles.

# Provider

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

# Legal basis

- Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR). The legitimate interest lies in the improvement of our offer and improved marketing.

### Data protection information

Further information on data processing can be found in Google's privacy policy.

# 4. Google Ads

We use Google Ads. Google Ads enables us to place ads in Google's advertising network and present them to users who have a potential interest in the ads. The ads are primarily based on the search results when using Google services. The conversion of the ads is also measured. We only receive the total number of users who clicked on the ad and were redirected to a website that is tagged with a "conversion tracking tag". We do not receive any information that allows us to identify users.

### Provider

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

### **Processed data**

- Ads viewed, cookie ID, date and time of visit, device information, geographic location, IP address, search terms, ads displayed, customer ID, impressions, online identifiers, browser information

### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

# Google advertising settings

You have the option to object to interest-based advertising from Google at any time: object.

### Data protection information

Further information on data processing can be found in Google's privacy policy.

# 5. Meta pixel

The meta pixel is an analysis tool that we use to measure the effectiveness of our advertising measures by analyzing the actions of website visitors. The pixel is always triggered when a certain action (so-called event) is performed and subsequently records this action.

We use the standard version of meta pixel. Only the usage behavior of the respective web addressee is evaluated and only the related usage data is processed.

# Provider

Meta Platforms Ireland Ltd, Merrion Road, Dublin 4, D04 X2K5, Ireland

# **Processed data**

- Viewed ads, browser information, viewed content, device information, geographical location, HTTP header, interactions with ads, services and products, IP address, clicked elements, marketing information, non-confidential user-defined data, visited pages, pixel ID, referrer URL, success of marketing campaigns, usage data, user behavior, meta cookie information, meta user ID, usage/click behavior

# Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

# Data protection information

Further information on data processing can be found in Facebook's privacy policy.

# Cancellation option: Opt-out.

# 6. TikTok Pixel

We use the TikTok pixel. The TikTok pixel is an analysis tool that we use to measure the effectiveness of our advertising measures by analyzing the actions of website visitors. The pixel is always triggered when a certain action (so-called event) is carried out and then records this.

### Provider

TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland

### **Processed data**

- IP address, device information, name, information about the operating system, time zone, usage data

### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR)

### Data protection information

Further information on data processing can be found in <u>TikTok's privacy policy</u>.

# 7. Snap pixel

The snap pixel is an analysis tool that we use to measure the effectiveness of our advertising measures by analyzing the actions of website visitors. The pixel is always triggered when a certain action (so-called event) is performed and subsequently records this.

# Provider

Snap Inc, 3000 31st Street, Santa Monica, CA 90405, USA

# **Processed data**

- Meta and usage data (e.g. the IP address)

### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

# Data protection outside the EU and the EEA

The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Snap is certified under the EU-U.S. Data Privacy Framework.

### Data protection information

Further information on data processing can be found in <u>Snap's privacy policy</u>.

# 8. Pinterest tag

We use the Pinterest tag. This is an analysis tool that allows us to track visitors to our website and their actions after they have seen one of our Pinterest ads. This enables us to measure the effectiveness of our Pinterest ads.

### Provider

Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland

### Processed data

 Ads viewed, click path, ads clicked, cookie information, crash data, date and time of visit, device identifier, device information, device operating system, geographic location, IP address, settings, search terms, third-party information, websites visited, browser settings

### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

### **Data protection information from Pinterest**

Further information on data processing can be found in Pinterest's privacy policy.

# Cancellation option: Opt-Out.

### 9. Adjust

We use the web SDK from Adjust. By using Adjust, we can track installations, sessions and events that occur on our website. This allows us to track campaigns from the first call of an ad via a landing page to specific events. In combination with Adjust's mobile SDK, crossdevice tracking is also possible.

### Provider

# Adjust GmbH, Saarbrücker Str. 37A, 10405 Berlin, Germany

### **Processed data**

- Device information (device number), hashed IP address, mobile identifiers such as the advertising ID for iOS (IDFA), Google Advertising ID or similar mobile identifiers, installation and first opening of an app on the mobile device, interaction within an app (e.g. in-app purchases, registration), information about which ads you have seen or clicked on,
- Additionally, for the Unbotify / Fraud product: sensor data including touch events, counting text changes, accelerometer, gyroscope, battery, light sensor, hardware specifications of the device and operating system version.

#### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR).

### Data protection information from Adjust

Further information can be found in Adjust's privacy policy.

#### 10. Braze

We use the services of Braze for purposes such as newsletter marketing and push notifications. This enables us to optimize our marketing measures.

#### Provider

Braze, Inc, 330 W 34th St 18th floor, New York, NY 10001, USA

#### **Processed data**

- Communication data (e.g. e-mail address)
- Interaction data
- Metadata (e.g. push tokens or the IP address)

#### Legal basis

- Legitimate interests (Art. 6 para. 1 sentence 1 lit. f GDPR). The legitimate interest lies in newsletter marketing and the optimization of our marketing measures.

### Data protection outside the EU/EEA

- The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Braze is certified under the EU-U.S. Data Privacy Framework.

- In addition, Braze publishes a transparency report: Braze Transparency Report.

### Data protection information

Further information can be found in <u>Braze's privacy policy</u>.

# 11. Spotify Pixel

The Spotify Pixel helps us to measure the success of our advertising activities on Spotify.

# Provider

Spotify AB, Regeringsgatan 19, SE-111 53 Stockholm, Sweden

# **Processed data**

- Interaction data

# Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR)

- Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR). The legitimate interests lies in measuring our advertisements activities on Spotify.

# Data protection information

You can find more information about Spotify's data processing in Spotify's privacy policy.

# XX. Meta Custom Audiences and Google Audience Manager

We transmit your encrypted e-mail address to Meta and/or Google. We can then compare this with the e-mail addresses stored there and thus exclude Tomorrow customers from our advertising measures.

# Provider

Meta Platforms Facebook Ireland Ltd, Merrion Road, Dublin 4, D04 X2K5, Ireland

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

### **Processed data**

- Email address

### Legal basis

 Legitimate interest (Art. 6 para. 1 sentence 1 lit. f GDPR). Our legitimate interest lies in the exclusion of multiple applications.

# Data protection information

Further information on data processing can be found in <u>Facebook's privacy policy</u> and <u>Google's privacy policy</u>.

# XXI. Affiliate service provider

FinanceAds is an affiliate service provider. As part of the cooperation with us, financeAds stores cookies on end devices of users who visit our online presence. This enables us to pay advertising network partners a lead or sale commission when a successful registration or

contract is brokered. Only users who have been referred to our website by an affiliate partner from the financeAds network are recorded.

# **Provider:**

financeAds GmbH & Co. KG, Karlstraße 9, 90403 Nuremberg, Germany

### **Processed data**

- Marketing reference ID

### Purpose of the processing

- Affiliate tracking
- Offering user-friendly services
- Optimization of our services

### Legal basis

- Consent (Art. 6 para. 1 sentence 1 lit. a GDPR)
- Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR). The legitimate interests consist of optimizing our services and increasing their user-friendliness.

### Data protection information

You can find further information in financeAds' privacy policy.

# XXII. Music services and podcasts

We provide you with audio content to listen to or download with the help of service providers. Our provider Podigee processes your personal data to enable podcast downloads and playbacks and to determine statistical data such as call-up figures. This data is anonymized or pseudonymized before being stored in Podigee's database, unless it is required for the provision of the podcasts.

### Provider

Podigee GmbH, Schlesische Straße 20, 10997 Berlin, Germany

### **Processed data**

- Usage data (e.g. websites visited, interest in content, time of access)
- Meta and communication data (e.g. IP address)

### Purpose of the processing

- Provision of audio content
- Reach measurement and visitor analysis

### Legal basis

Consent (Art. 6 para. 1 sentence 1 lit. a GDPR). If we obtain your consent, this constitutes our legal basis for data processing

Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR). If the data processing is not based on consent, our legitimate interest constitutes the legal basis for the data processing. The legitimate interest lies in the provision of audio content and its reach measurement.

# Data protection information from Podigee

You can find more information in Podigee's privacy policy.

# XXIII. Cloud service provider

# 1. General information

We use cloud services that are accessible via the Internet and run on servers of the respective providers both for hosting various services and as a backup for your registration data.

# 2. Amazon Web Services (AWS)

### Provider

Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg

### **Processed data**

- All registration data (see IX. Registration/ Creating a user profile/ Inventory data)

### Purpose of the processing

 Storage of a back-up of the registration data to prevent data loss, ensure availability and recoverability of the data

#### Legal basis

- Art. 6 para. 1 sentence 1 lit. f. GDPR. The legitimate interests lies in the availability and recoverability of the data as well as backing up the data to prevent data loss.

### Data protection outside the EU/EEA

When you visit our website, personal data is processed on the servers of AWS in Frankfurt. However, personal data may also be transmitted to the parent company of AWS in the USA. The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework.Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Amazon is certified under the EU-U.S. Data Privacy Framework.

### Data protection information from Amazon

Further information can be found in <u>Amazon's privacy policy</u>.

### Further information on data processing Amazon.

#### 3. CDN

### **General information**

Our website uses a CDN. This is a network of high-performance servers that cache content at various locations around the world. A CDN helps us to provide content in the shortest possible time and to relieve the web host by distributing the data traffic.

### Provider

Amazon Web Services Inc, 410 Terry Avenue North, Seattle, WA 98109-5210, USA

# Processed data

- Usage data (e.g. websites visited, time of access)
- Meta and communication data (e.g. IP address)
- Content data (e.g. entered text content, photographs, videos)

### Purpose of data processing

- Provision of content within the shortest possible time
- Relief of the web host by distributing the data traffic

### Legal basis

 Legitimate interest (Art. 6 para. 1 sentence 1 lit. f GDPR). The legitimate interest arises from our need for a technically flawless and fast presentation of our website and the relief of our IT infrastructure.

# Data protection outside the EU/EEA

The European Commission has issued an adequacy decision pursuant to Art. 45 (3) GDPR for the EU-U.S. Data Privacy Framework. Based on this decision, transmitting data to organizations based in the USA that are certified accordingly, is permitted. Amazon is certified under the EU-U.S. Data Privacy Framework.

# Data protection information from Amazon

You can find more information in <u>Amazon's privacy policy</u>.

### Further information on data processing Amazon.

### 4. Snowflake

### **General information**

We use Snowflake as a cloud-based data platform to carry out pseudonymised descriptive analyses and evaluations at an aggregated level and to merge data sources. No analyses are carried out at individual customer level.

### Provider

Snowflake Computing Netherlands B.V., FOZ Building, Gustav Mahlerlaan 300-314 1082 ME Amsterdam, Netherlands

### Processed data

- Pseudonymised registration data (see IX. Registration/ Creating a user profile/ Inventory data)
- - Pseudoymised usage data (e.g. websites visited, time of transactions)
- - Meta and communication data (e.g. timing of push-notifications)

### Purpose of the data processing

- - Determination of company key figures
- - Evaluation of measures and optimization of business processes

### Legal basis

- Legitimate interest (Art. 6 para. 1 sentence 1 lit. f GDPR). The legitimate interest arises from our interest in optimising our business processes, evaluating measures taken and determining key company figures.

# Data protection information from Snowflake

Further information can be found in Snowflake 's privacy policy.

# XXIV. Website creation

# **General information**

We also use Contentful for our website. Contentful is a content management system (CMS) hosted in the cloud (AWS). All content and documents displayed on the website are stored in the CMS. When you access the website, the system also accesses the Contentful server, but Contentful does not store any user data in the log file.

# Provider

Contentful GmbH, Ritterstraße 12 - 14, 10969 Berlin, Germany

# Legal basis

- Legitimate interest (Art. 6 para. 1 sentence 1 lit. f GDPR). The legitimate interest arises from our need to optimise the presentation of our online offering for our users.

# Data protection information from Contentful

Further information can be found in Contentful's privacy policy.

# XXV. Does "profiling" take place?

No profiling takes place in the context of the use of the website.

# XXVI. Your rights as a data subject

# 1. Information (Art. 15 GDPR)

You have the right to receive free information from us at any time about the personal data stored about you and a copy of this data in accordance with the statutory provisions.

# 2. Rectification (Art. 16 GDPR)

You have the right to request the rectification of inaccurate personal data concerning you. You also have the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

# 3. Erasure (Art. 17 GDPR)

You have the right to demand that we delete personal data concerning you immediately if one of the reasons provided for by law applies and as long as the processing or storage is not necessary.

# 4. Right to restriction of processing (Art. 18 GDPR)

You have the right to demand that we restrict processing if one of the legal requirements is met.

# 5. Right to Data portability (Art. 20 GDPR)

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller without hindrance from us to whom the personal data has been provided, given that the processing is based on consent pursuant to Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR or on a contract pursuant to Art. 6 para. 1 lit. b GDPR and the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. In addition, when exercising your right to data portability pursuant to Art. 20 para. 1 GDPR, you have the right to obtain that the personal data is transferred directly from one controller to another controller, as long as this is technically feasible and given that this does not adversely affect the rights and freedoms of other persons.

# 6. Right to object (Art. 21 GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6(1)(e) (data processing in the public interest) or (f) (data processing on the basis of a balancing of interests) of the GDPR. This also applies to profiling based on these provisions within the meaning of Art. 4 No. 4 GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims. In individual cases, we process personal data for direct marketing purposes. You can object to the processing of your personal data for the purpose of such advertising at any time. This also applies to profiling insofar as it is associated with such direct advertising. If you object to the processing for direct marketing purposes, we will no longer process the personal data for these purposes.

You also have the right to object, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out by us for scientific or historical research purposes or for statistical purposes in accordance with Article 89(1) GDPR, unless such processing is necessary for the performance of a task carried out in the public interest. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you are free to exercise your right to object by automated means using technical specifications.

# 7. Withdrawal of a data protection consent

You have the right to withdraw your consent to the processing of personal data at any time with effect for the future.

# 8. Complaint to a supervisory authority

You have the right to complain to a supervisory authority responsible for data protection about our processing of personal data.

# XXVII. Storage period of personal data

We only process and store your personal data for as long as required for the purpose of storage or as stipulated by law. If the storage purpose no longer applies or if a prescribed storage period expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions. The criterion for the duration of the storage of personal data is the respective statutory retention period. Once this period has expired, the corresponding data is routinely deleted, provided it is no longer required for the fulfilment or initiation of a contract.

# XXVIII. Actuality and changes of the data protection policy

We reserve the right to amend or supplement this data protection notice as required. We will publish the changes here. You should therefore visit this page regularly to keep yourself informed about the current status of the privacy policy.