

PRIVACY POLICY

Contents

3	1. Introduction
3	1.1. Contact details
3	1.2. Scope of data processing, processing purposes, and legal bases
3	1.3. Data processing outside the EEA
3	1.4. Storage duration
4	1.5. Rights of data subjects
4	1.6. Obligation to provide data
4	1.7. No automatic decision-making in individual cases
4	1.8. Making contact
4	1.9. Customer surveys
5	2. Newsletter
5	3. Data processing on our website
5	3.1. Informative use of our website
6	3.2. Web hosting and provision of the website
6	3.3. Contact form
6	3.4. Vacant positions
7	3.5. Booking of appointments
7	3.6. Technically necessary cookies
7	3.7. Third parties
7	3.7.1. Hotjar
7	3.7.2. Weglot
7	3.7.3. Google Tag Manager
8	3.7.4. Google Analytics
8	4. Data processing on social media platforms
8	4.1. Facebook
9	4.2. Instagram
9	4.3. LinkedIn
9	5. Changes to this privacy policy
9	6. Questions and comments

1. Introduction

In the following, we provide information about the collection of personal data when using our website up2.money our profiles in social media.

Personal data is any data that can be related to a specific natural person, such as their name or IP address.

1.1. Contact details

The controller within the meaning of Art. 4 para. 7 EU General Data Protection Regulation (GDPR) is Up2 Money UAB, Laisves pr. 60, Vilnius, Lithuania, LT-05120, email: hello@up2.money.

Our data protection officer can be reached via e-mail: complaints@up2.money.

1.2. Scope of data processing, processing purposes, and legal bases

We detail the scope of data processing, processing purposes, and legal bases below. In principle, the following come into consideration as the legal basis for data processing:

- Art. 6 para. 1 s. 1 it. a GDPR serves as our legal basis for processing operations for which we obtain consent.
- Art. 6 para. 1 s. 1 lit. b GDPR is the legal basis insofar as the processing of personal data is necessary for the performance of a contract, e.g. if a site visitor purchases a product from us or we perform a service for him. This legal basis also applies to processing that is necessary for pre-contractual measures, such as in the case of inquiries about our products or services.
- Art. 6 para. 1 s. 1 lit. c GDPR applies if we fulfill a legal obligation by processing personal data, as may be the case, for example, in tax law.
- Art. 6 para. 1 s. 1 lit. f GDPR serves as the legal basis when we can rely on legitimate interests to process personal data, e.g. for cookies that are necessary for the technical operation of our website.

1.3. Data processing outside the EEA

Insofar as we transfer data to service providers or other third parties outside the EEA, the security of the data during the transfer is guaranteed by adequacy decisions of the EU Commission, insofar as they exist (e.g. for Great Britain, Canada, and Israel) (Art. 45 para. 3 GDPR).

If no adequacy decision exists (e.g. for the USA), the legal basis for the data transfer is usually, i.e. unless we indicate otherwise, standard contractual clauses. These are a set of rules adopted by the EU Commission and are part of the contract with the respective third party. According to Art. 46 para. 2 lit. b GDPR, they ensure the security of the data transfer. Many of the providers have given contractual guarantees that go beyond the standard contractual clauses to protect the data. These include for example, guarantees regarding the encryption of data or regarding an obligation on the part of the third party to notify data subjects if law enforcement agencies wish to access the respective data.

1.4. Storage duration

Unless expressly stated in this privacy policy, the data stored by us will be deleted as soon as they are no longer required for their intended purpose, and no legal obligations to retain data conflict with the deletion. If the data are not deleted because they are required for other and legally permissible purposes, their processing is restricted, i.e. the data are blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

1.5. Rights of data subjects

Data subjects have the following rights against us with regard to their personal data:

- Right of access,
- Right to correction or deletion,
- Right to limit processing,
- Right to object to the processing,
- Right to data transferability,
- Right to revoke a given consent at any time.

1.6. Obligation to provide data

Within the scope of the business or other relationship, customers, prospective customers or third parties need to provide us with personal data that is necessary for the establishment, execution, and termination of a business or other relationship or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude the contract or to provide a service or will no longer be able to perform an existing contract or other relationship.

Mandatory data are marked as such.

1.7. No automatic decision-making in individual cases

As a matter of principle, we do not use a fully automated decision-making process in accordance with article 22 of GDPR to establish and implement the business or other relationships. Should we use these procedures in individual cases, we will inform you of this separately if this is required by law.

1.8. Making contact

When contacting us, e.g. by e-mail, the data provided to us (e.g. names and e-mail addresses) will be stored by us in order to answer questions. The legal basis for the processing is our legitimate interest (Art. 6 para. 1 s. 1 lit. f GDPR) to answer inquiries directed to us. We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are legal retention obligations.

1.9. Customer surveys

From time to time, we conduct customer surveys to get to know our customers and their wishes better. In doing so, we collect the data requested in each case. It is our legitimate interest to get to know our customers and their wishes better so that the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit f GDPR. We delete the data when the results of the surveys have been evaluated.

2. Newsletter

We reserve the right to inform customers who have already used services from us from time to time by e-mail or other means electronically about our offers, if they have not objected to this. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest is to conduct direct advertising (recital 47 GDPR). Customers can object to the use of their e-mail address for advertising purposes at any time without incurring additional costs, for example via the link at the end of each e-mail or by sending an e-mail to our above-mentioned e-mail address.

Based on the consent of the recipients (Art. 6 para. 1 s. 1 lit. a GDPR), we also measure the opening and click-through rate of our newsletters to understand what is relevant for our audience.

We send newsletters with the tool mailchimp.com of the provider The Rocket Science Group LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA (privacy policy: <https://www.intuit.com/privacy/statement/>). The provider processes content, usage, meta/communication data, and contact data in the process in the EU.

3. Data processing on our website

3.1. Informative use of our website

During the informative use of the website, i.e. when site visitors do not separately transmit information to us, we collect the personal data that the browser transmits to our server in order to ensure the stability and security of our website. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

These data are:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software
- This data is also stored in log files. They are deleted when their storage is no longer necessary, at the latest after 14 days.

3.2. Web hosting and provision of the website

Our website is hosted by Godaddy. The provider is GoDaddy Netherlands B.V., 's-Gravelandseweg 696, 3119 RG Schiedam, Netherlands. In doing so, the provider processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data, in the EU. Further information can be found in the provider's privacy policy at <https://www.godaddy.com/de-de/legal/agreements/privacy-policy>.

It is our legitimate interest to provide a website, so the legal basis of the described data processing is Art. 6 para. 1 s. 1 lit. f GDPR.

Legal basis of the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

3.3. Contact form

When contacting us via the contact form on our website, we store the data requested there and the content of the message. The legal basis for the processing is our legitimate interest in answering inquiries directed to us. The legal basis for the processing is therefore Art. 6 para. 1 s. 1 lit. f GDPR. We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are legal retention obligations.

3.4. Vacant positions

We publish positions that are vacant in our company on our website, on pages linked to the website or on third-party websites.

The processing of the data provided as part of the application is carried out for the purpose of implementing the application process. Insofar as this is necessary for our decision to establish an employment relationship, the legal basis is Art. 88 para. GDPR in conjunction with Sec. 26 para. 1 of the German Data Protection Act (Bundesdatenschutzgesetz). We have marked the data required to carry out the application process accordingly or refer to them. If applicants do not provide this data, we cannot process the application.

Further data is voluntary and not required for an application. If applicants provide further information, the basis is their consent (Art. 6 para. 1 s. 1 lit. a GDPR).

We ask applicants to refrain from providing information on political opinions, religious beliefs and similarly sensitive data in their CV and cover letter. They are not required for an application. If applicants nevertheless provide such information, we cannot prevent their processing as part of the processing of the resume or cover letter. Their processing is then also based on the consent of the applicants (Art. 9 para. 2 lit. a GDPR).

Finally, we process the applicants' data for further application procedures if they have given us their consent to do so. In this case, the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR.

We pass on the applicants' data to the responsible employees in the HR department, to our data processors in the area of recruiting and to the employees otherwise involved in the application process.

If we enter into an employment relationship with the applicant following the application process, we delete the data only after the employment relationship has ended. Otherwise, we delete the data no later than six months after rejecting an applicant.

If applicants have given us their consent to use their data for further application procedures as well, we will not delete their data until one year after receiving the application.

3.5. Booking of appointments

Site visitors can book appointments with us on our website. For this purpose, we process meta data or communication data in addition to the data entered. We have a legitimate interest in offering interested parties a user-friendly option for making appointments. Therefore, the legal basis for data processing is Art. 6 para. 1 s. 1 lit. f GDPR. Insofar as we use a third-party tool for the agreement, the information on this can be found under "Third parties".

3.6. Technically necessary cookies

Our website sets cookies. Cookies are small text files that are stored in the web browser on the end device of a site visitor. Cookies help to make the offer more user-friendly, effective and secure. Insofar as these cookies are necessary for the operation of our website or its functions (hereinafter "Technically Necessary Cookies"), the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing customers and other site visitors with a functional website.

3.7. Third parties

3.7.1. Hotjar

We use Hotjar for analytics. The provider is Hotjar Ltd., Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's, STJ 3141, Malta. The provider processes usage data (e.g. web pages visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://www.hotjar.com/legal/policies/privacy/>.

3.7.2. Weglot

We use Weglot for translations. The provider is Weglot, 138, rue Pierre Joigneaux in BOIS-COLOMBES (92270), France. The provider processes meta/communication data (e.g. device information, IP addresses) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://weglot.com/de/privacy/>.

3.7.3. Google Tag Manager

We use Google Tag Manager for analytics and for advertisement. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The provider processes usage data (e.g. web pages visited, interest in content, access times) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

We delete the data when the purpose for which it was collected no longer applies. Further information is available in the provider's privacy policy at <https://policies.google.com/privacy?hl=en-US>.

3.7.4. Google Analytics

We use Google Analytics for analytics. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Dublin, Ireland. The provider processes usage data (e.g. web pages visited, interest in content, access times) and meta/communication data (e.g. device information, IP addresses) in the USA.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. a GDPR. The processing is based on consent. Data subjects may revoke their consent at any time by contacting us, for example, using the contact details provided in our privacy policy. The revocation does not affect the lawfulness of the processing until the revocation.

The legal basis for the transfer to a country outside the EEA are standard contractual clauses. The security of the data transferred to the third country (i.e. a country outside the EEA) is guaranteed by standard data protection clauses (Art. 46 para. 2 lit. c GDPR) adopted by the EU Commission in accordance with the examination procedure under Art. 93 para. 2 of the GDPR, which we have agreed to with the provider.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://policies.google.com/privacy?hl=en-US>.

4. Data processing on social media platforms

We are represented in social media networks in order to present our organization and our services there. The operators of these networks regularly process their users' data for advertising purposes. Among other things, they create user profiles from their online behavior, which are used, for example, to show advertising on the pages of the networks and elsewhere on the Internet that corresponds to the interests of the users. To this end, the operators of the networks store information on user behavior in cookies on the users' computers. Furthermore, it cannot be ruled out that the operators merge this information with other data. Users can obtain further information and instructions on how to object to processing by the site operators in the data protection declarations of the respective operators listed below. It is also possible that the operators or their servers are located in non-EU countries, so that they process data there. This may result in risks for users, e.g. because it is more difficult to enforce their rights or because government agencies access the data.

If users of the networks contact us via our profiles, we process the data provided to us in order to respond to the inquiries. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

4.1. Facebook

We maintain a profile on Facebook. The operator is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://www.facebook.com/policy.php>. A possibility to object to data processing arises via settings for advertisements: <https://www.facebook.com/settings?tab=ads>.

We are joint controllers for processing the data of visitors to our profile on the basis of an agreement within the meaning of Art. 26 GDPR with Facebook. Facebook explains exactly what data is processed at https://www.facebook.com/legal/terms/information_about_page_insights_data. Data subjects can exercise their rights both against us and against Facebook. However, according to our agreement with Facebook, we are obliged to forward requests to Facebook. Data subjects will therefore receive a faster response if they contact Facebook directly.

4.2. Instagram

We maintain a profile on Instagram. The operator is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://help.instagram.com/519522125107875>.

4.3. LinkedIn

We maintain a profile on LinkedIn. The operator is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland. The privacy policy is available here: https://https://www.linkedin.com/legal/privacy-policy?_l=de_DE. One way to object to data processing is via the settings for advertisements: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

5. Changes to this privacy policy

We reserve the right to change this privacy policy with effect for the future. A current version is always available here.

6. Questions and comments

If you have any questions or comments regarding this privacy policy, please feel free to contact us using the contact information provided above.