

## **Privacy policy**

#### (Version 1.0, Date: 21.09.2020)

Thank you for your interest in our online presence. The protection of your personal data is very important to us. Therefore we would like to inform you here about data protection and the handling of personal data on our website https://sendbon.com or our mobile app.

#### Please read this privacy policy carefully and carefully.

This data protection declaration applies to the collection, processing and use of personal data within the scope of your visit to our internet platform https://sendbon.com (hereinafter referred to as website) and our mobile app (hereinafter referred to as app).

This privacy policy applies to you both as a user of the website and as a user of the Apps . We recommend that you also read our General Terms and Conditions ("Terms and Conditions"). You can find them at https://sendbon.com/assets/legal/en/gtc.pdf.

## 1. Service provider and responsible body

Service provider and responsible for both the website and the app is NOUVOTEC UG (haftungsbeschränkt), Schellingstr. 109a D-80798 Munich.

NOUVOTEC UG (haftungsbeschränkt) ("SENDBON") observes all applicable data protection laws and is furthermore endeavoring to continuously improve data protection. You can save and print this declaration via your browser. Should you have any questions, complaints or suggestions regarding data protection, please contact our data protection officer. You will find the contact details at the end of this data protection declaration.

## 2. The subject of data protection

The subject of data protection is personal data in accordance with Article 4 No. 1 of the EU Data Protection Regulation (DS-GVO). This is individual information about personal or factual circumstances of a specific or identifiable natural person. This includes all information which allows an inference to be drawn about an identified or identifiable person, such as his or her name, address or contact details (e.g. telephone number, postal and email address). IP addresses are also personal data in this sense.

## 3. Use of data for specific purposes

We observe the principle of the purpose-related use of personal data and collect, process and store your personal data only for the purposes for which you have informed us or released them.

Your personal data will not be passed on to third parties without your express consent, unless this is necessary for the provision of the service or the execution of the contract. Also, the transmission to state institutions and authorities entitled to receive information is only carried out within the scope of the legal obligations to provide information or if we are obliged to provide information by a court decision.

In our company we attach great importance to data protection. All our employees and the service companies commissioned by us have been obligated by us to maintain secrecy and to comply with data protection regulations.



## 4. Processing of personal data

SENDBON generally processes personal data only to the extent permitted or ordered by the DS-GVO or another legal provision or if you as a user or visitor to our website and apps have consented to this, Art. 6 para. 1 p. 1 lit. a, .or if the collection of this data is necessary for the fulfilment of a contract with you, Art. 6 para. 1 p. 1 lit. b.

As a user of our website or apps, the following data is processed by you:

Contact details such as first name, surname, address, name of organisation/company, telephone/mobile phone number, e-mail address.

Within the scope of order processing, gender, name, contact information such as e-mail address and telephone number, date of birth, address and country of residence are processed by our customers. SENDBON does not collect and store payment data.

This information is used to create an individual profile or user account for better and safer execution of the services offered.

In addition, a postal address and a brief description of the company as well as the name and industry sector are stored by our business partners. Payment data is also only collected here.

In addition to the creation of a user account, the data of our partners is also used to show references of satisfied customers on the SENDBON website, to inform about changes and marketing messages and to prevent fraud.

The collection of this profile data serves to implement the original function of the SENDBON website. The justification arises from Art. 6 para. 1 sentence 1 lit. a and b DSGVO.

## 5. Data collection and use for the provision and use of the website and apps

SENDBON collects and uses personal data in connection with the provision of the Website and Apps only to the extent permitted by the DS-GVO or another legal provision or with the user's consent.

When you call up our website https://sendbon.com or https://nouvotec.com, the browser used on your end device automatically sends information to the server of our website. This information is temporarily stored in a so-called log file.

The following information is recorded without your intervention and stored until it is automatically deleted:

- IP address of the requesting computer,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which the access takes place (referrer URL),
- the browser used and, if applicable, the operating system of your computer and the name of your access provider.

We process the data mentioned above for the following purposes:

- Ensure a smooth connection of the website,
- Guarantee a comfortable use of our website,
- Evaluation of system security and stability and
- for other administrative purposes.

The legal basis for the data processing is Art. 6 para. 1 sentence 1 lit. b and f DSGVO. Our legitimate interest follows from the above listed purposes for data collection. Under no circumstances do we use the collected data for the purpose of



drawing conclusions about your person.

For security reasons and to optimize your user experience, we ask you to verify your profile and provide your mobile phone number. We want to make sure that you are not a robot. We also want to avoid fake profiles that are misused for malicious acts and cyber criminality that endanger the SENDBON network and affect others.

Furthermore, we use cookies and analysis services when you visit our website. You will find more detailed explanations on this under points 7 and 8 of this data protection declaration.

#### 6. scope and purpose of data collection and use for other purposes

In addition to the uses of your personal data listed under nos. 4 and 5 of this declaration, your data may be used under certain conditions which are explained in more detail below:

#### A. Transmission of your data within the company

In order to be able to offer our services quickly and reliably, the following data will be processed by you within the company:

Contact information such as first name, surname, address, name and branch of the organization/company, description of the company, telephone/mobile number, e-mail address, city and country where you live and payment information (e.g. name of the bank, IBAN) from our business partners.

#### B. Transmission of your data to third parties

Insofar as necessary, we pass on personal data to companies that we use in connection with data processing, so-called contract processors, in compliance with data protection requirements.

SENDBON transfers personal data to the following external service providers:

Email notifications are provided by Google Ireland Limited, Gordon House, Barrow Street Dublin 4, Ireland.

Both SENDBON and all service providers ensure compliance with data protection regulations.

Furthermore, your personal data will not be transferred to third parties for purposes other than those listed below.

We only pass on your personal data to third parties if:

- you have given your express consent in accordance with Art. 6 para. 1 sentence 1 letter a DSGVO,
- the disclosure pursuant to Art. 6 para. 1 sentence 1 letter f DSGVO is necessary for the assertion, exercise or defense of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,
- in the event if there is a legal obligation to pass on the data pursuant to Art. 6 para. 1 sentence 1 lit. c DSGVO, and
- this is legally permissible and required under Art. 6 para. 1 sentence 1 lit. b DSGVO for the processing of contractual relationships with you.

# C. Transmission of your data to recipients in states outside the European Union and the European Economic Area

SENDBON works with a cloud service provider that enables us to host our infrastructures only within the EU. We store all our data with a cloud service provider within the EU.

We do not sell personal data to third parties.



However, we reserve the right to disclose information about you if we are required to do so by law or if we are requested to do so by authorities or prosecuting bodies (e.g. police or public prosecutor's office).

## 7. Use of cookies/social media/plugins

SENDBON uses cookies on its website. These are small files that are automatically created by your browser and stored on your end device (laptop, tablet, smartphone or similar) when you visit our website. Cookies do not cause any damage to your terminal device, do not contain viruses, Trojans or other malware.

Information is stored in the cookie, which results in each case in connection with the specifically used terminal device. This does not mean, however, that we obtain direct knowledge of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted when you leave our site.

In addition, we also use temporary cookies, which are stored on your end device for a certain fixed period of time, to improve user-friendliness. If you visit our site again in order to use our services, we will automatically recognize that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to record the use of our website statistically and to evaluate it for the purpose of optimizing our offer for you (see point 5). These cookies enable us to automatically recognize that you have already been with us when you visit our site again. These cookies are automatically deleted after a defined time.

The data processed by cookies is required for the purposes mentioned above in order to safeguard our legitimate interests and those of third parties in accordance with Art. 6 Paragraph 1 S. 1 lit. f DSGVO.

Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or so that a message always appears before a new cookie is created. However, disabling cookies completely may mean that you will not be able to use all the features of our website.

## 7.1 Avoidance of cookies/general right of objection

Regardless of the type of cookie used, you always have the choice to decide whether to accept cookies or not. You can set your browser to notify you when you receive cookies or you can always exercise your existing legal right to object to the use of cookies by rejecting cookies in your browser settings. Please refer to the help function of your Internet browser for details. This does not affect the possibility - insofar as it is described in more detail below - of separately objecting to the use of certain cookies.

If you do not accept cookies, you may not be able to use the full range of website features.

The following types of cookies are used on our websites:

#### A. Google Analytics

SENDBON uses Google Analytics, a web analysis tool of Google Inc, USA ("Google"), to collect information on how visitors use the website.

We use this information to compile reports and improve our site.

Cookies collect this information in anonymous form, including the number of visitors to the site, where those visitors came from, and the page they visited. For more information about Google's privacy policy, please visit



http://www.google.com/intl/en/policies/.

#### B. Google Conversion Tracking with Adwords

SENDBON uses Google Conversion Tracking with Adwords on its website. When you click on a SENDBON Google ad, a cookie is stored on your device.

These cookies are only stored temporarily for a certain time and do not contain any personal data. It is not possible to identify a person.

If you visit the SENDBON website and the cookie has not yet been deleted, Google and we will be able to track that an ad has been clicked and that our SENDBON website has been visited. Different cookies are always generated. Therefore, the cookies cannot be tracked further. The information thus obtained is used exclusively for statistical purposes. This allows us to know the total number of users who have clicked on an ad and then been linked to our SENDBON website. We use Google Conversion Tracking with Adwords on the basis of legitimate interest in accordance with Art. 6 Paragraph 1 f) DS-GVO. You can find Google's privacy policy at https://www.google.de/policies/privacy/. If you do not wish to use Google Conversion Tracking with Adwords, you can deactivate it at https://support.google.com/ads/answer/2662922?hl=de.

#### C. Google Tag Manager

We use the Google Tag Manager on our website SENDBON. This tool facilitates the implementation of Google Analytics and other services and is not used to create personalized profiles of users of the SENDBON website. For the purpose of troubleshooting, the IP address is processed in this context. We use the Google Tag Manager on the basis of a legitimate interest in accordance with Art. 6 para. 1 f) DS-GVO.

#### D. LinkedIn Insight tag

On the SENDBON Website, we use so-called Conversion Tracking with LinkedIn Insight Tag, a tool from LinkedIn Corporation, USA. This enables us to statistically record the use of our SENDBON website in order to optimise it.

Conversion tracking involves a cookie being placed on your device by LinkedIn when you visit our SENDBON website by clicking on a LinkedIn ad.

Conversion tracking is used to generate statistics and not to identify you personally.

We only want to know which LinkedIn ads or interactions with LinkedIn users bring them to our SENDBON website. This enables us to better control the placement of e.g. banner ads and to place them specifically on certain websites on the Internet.

Further information can be found at https://www.linkedin.com/help/linkedin/answer/65521.

We only use the LinkedIn Insight tag with your express consent in accordance with Art. 6 Para. 1 a) DS-GVO. LinkedIn is certified according to Privacy Shield:

https://www.privacyshield.gov/participant?id=a2zt000000L0UZAA0&status=Active.

You can prevent the storage of cookies by means of an appropriate browser setting. Please note that in this case you may only be able to use our website to a limited extent. The following data is processed in this context:

URL, referrer, IP address, device and browser properties (user agent) and timestamp. All data is encrypted.

#### E. Integration of social media/third party providers

On some pages of our website we use links to the social network Facebook, Twitter and Instagram. When you visit



this website, no data is transferred from your browser to this network. By clicking on the appropriate buttons, you can access the network and share the contents of our offers.

We share aggregated information, including your personal information such as your gender, geodata, IP address, user, advertisement and device identification (which never identifies you by name), and other aggregated information with third parties for the purposes of market analysis, demographic profiling and to provide targeted advertising for or analyze the performance of other products and services, if and to the extent that you have consented to the processing of your personal information for such purposes.

We may hire advertisers to serve targeted ads when you use the app or website. These companies may place cookies and use information about your visits to these or other apps and websites to show you advertisements for services and products that may be of interest to you.

When you use the App, third parties (such as Facebook) may collect information about your device (such as device recognition) to show you more relevant advertising in our App. In your device's privacy settings, you have the option to prevent or restrict sharing of device discovery with advertisers and to control how device discovery is used.

If you consent, we may share your information with subcontractors, service providers and other carefully selected third parties to improve our services, such as payment processing, for you. We guarantee that these third parties must adhere to strict privacy and confidentiality policies in accordance with this policy.

In the event of a structural change or change of ownership due to a merger, acquisition by another company, restructuring or sale of the company or parts of the company or its affiliates, or in the event of insolvency, it may be necessary to disclose your personal information.

## 8. information, correction, deletion or blocking of data

As the responsible party, you can request information from SENDBON at any time about the data stored about you, the purpose of the storage and its origin.

In addition, there are rights to the correction, blocking and deletion of your personal data in accordance with the statutory provisions.

Please send any relevant requests by e-mail to: privacy@sendbon.com

In detail, you have the following rights:

to request information about your personal data processed by us in accordance with Art. 15 DSGVO In particular, you may request information on the purposes of processing, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right of rectification, cancellation, restriction of processing or opposition, the existence of a right of appeal, the origin of your data, if not collected by us, as well as the existence of automated decision making including profiling and, if applicable, meaningful information on the details of such data;

Members in certain jurisdictions may, in accordance with applicable law, exercise their right to access their personal information by requesting a copy of the information held by us (the first copy per request is free of charge. A small fee will be charged for each additional copy). Please send such a request in writing to privacy@sendbon.com.



- in accordance with Art. 16 DSGVO, to demand the correction of incorrect or incomplete personal data stored by us without delay;
- in accordance with Art. 17 DSGVO to demand the deletion of your personal data stored with us, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;
- pursuant to Art. 18 DSGVO, to demand the restriction of the processing of your personal data, if the accuracy of the data is disputed by you, if the processing is unlawful but you refuse to delete it and we no longer require the data, but you require it for the assertion, exercise or defence of legal claims or if you have lodged an objection to the processing pursuant to Art. 21 DSGVO
- in accordance with Art. 20 DSGVO to receive your personal data that you have provided us with in a structured, common and machine-readable format or to request that it be transferred to another responsible party
- in accordance with Art. 7 Para. 3 DSGVO to revoke your once given consent to us at any time. As a result, we may no longer continue to process the data which was based on this consent in the future and
- complain to a supervisory authority pursuant to Art. 77 DSGVO. As a rule, you can turn to the supervisory authority of your usual place of residence or workplace or to our office.

## 9. Right of objection

If your personal data are processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 letter f DSGVO, you have the right to object to the processing of your personal data in accordance with Art. 21 DSGVO if there are reasons for doing so arising from your particular situation or if the objection is directed against direct marketing. In the latter case, you have a general right of objection, which will be implemented by us without indicating any special situation.

If you wish to make use of your right of revocation or objection, an email is sufficient. Please address any relevant concerns by e-mail to: privacy@sendbon.com

## 10. Operational data protection officer

For general questions, complaints or suggestions regarding SENDBON's data protection, please contact us by email: privacy@sendbon.com

## 11. Topicality and amendment of this data protection declaration

This data protection declaration is currently valid and has the status of September 2020. Due to the further development of our website, apps and offers above or due to changed legal or official requirements it may become necessary to change this data protection declaration. You can access and print out the current data protection declaration at any time on the website at https://sendbon.com/legal/en/privacy-policy-cookies.pdf.