Privacy Policy for JENTIS Customers

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We are very pleased to have you as our Customer. We have designed our services, in particular the JENTIS Software as a Service solution, with the protection of our users' data in mind. In this Privacy Policy, we outline how we handle personal data related to the users of the JENTIS Software and the representatives of our B2B customers.

1. Identity and contact details of the data controller

Jentis GmbH (hereinafter "JENTIS", "we", "us") processes the personal data provided by our customers and users of the JENTIS software as part of the contractual relationship with JENTIS. In this context, JENTIS acts as a data controller within the meaning of the General Data Protection Regulation (GDPR).

Here are our details:
Jentis GmbH, Schönbrunner Street 231, 1120 Vienna, Austria
Phone: +439974354
Email: privacy@jentis.com
Website: www.jentis.com
Company registration number: FN 529675i
Responsible court: Commercial Court of Vienna

Our Data Protection Officer is DataCo GmbH, Dachauer Street 65, 80335 Munich, Germany, and can be contacted via +49 89 7400 45840 or their website: www.dataguard.de

2. General information on the data processing activities

We process the personal data of our Customers to the extent necessary in order to:

- provide a functioning and user-friendly software with all of its features and content (see Section "Provision of the JENTIS Software")
- manage the contractual relationship relating to the use of the JENTIS Software (see Section "Management of the contractual relationship")

Legal basis for data processing

- For the processing of personal data required for the performance of a contract of which the data subject is party, Art. 6 (1)(b) GDPR serves as the legal basis. This also applies to processing operations required to carry out pre-contractual activities.
- When it is necessary to process personal data in order to fulfil a legal obligation to which our company is subject, Art. 6 (1)(c) GDPR serves as the legal basis.
- If vital interests of the data subject or another natural person require the processing of personal data, Art. 6 (1)(d) GDPR serves as the legal basis.

- If the processing of data is necessary to safeguard the legitimate interests of our company or that of a third party, and the fundamental rights and freedoms of the data subject do not outweigh the interest of the former, Art. 6 (1) (f) GDPR will serve as the legal basis for the processing of data.

Storage duration

We retain your personal data only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for your data, we consider the amount and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for statistical purposes, in which case we may use this information indefinitely without further notice to you.

We review our retention periods for personal data on a regular basis. For more information about our data retention policies, please contact us at privacy@jentis.com.

3. Data subject rights

Subject to mandatory legal provisions or conflicting obligations, you may request from us at any time and free of charge information about your personal data processed by us, the correction of any errors in your personal data, the termination of the processing of your personal data or the erasure of your personal data.

In particular, if you qualify as "data subject" under the terms of the GDPR, you have the right to:

- Request information about the personal data we process about you, in accordance with Art. 15;
- in accordance with Art. 16, to request without undue delay the rectification of inaccurate data or the completion of incomplete personal data stored by us;
- in accordance with Art. 17, to request the erasure of your personal data stored by us, unless the processing of the data is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise or defence of legal claims;

- in accordance with Art. 18, to request the restriction of the processing of your personal data, insofar as the accuracy of the data is contested by you or the processing is unlawful;
- in accordance with Art. 20, to receive your personal data processed by us in a structured, commonly used and machine-readable format or to request its transfer to another controller;
- in accordance with Art. 7 (3), to withdraw the consent you have given us at any time. As a result, we will no longer be able to continue the data processing based on this consent;
- in accordance with Art. 77, the right to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or the legal address of JENTIS for this purpose.
- if the processing of your personal data is processed on the basis of legitimate interests pursuant to Art. 6 (1)(f), object to the processing of your personal data pursuant to Art. 21, provided that there are grounds based on your particular situation or the objection is directed against direct marketing. In the latter case, you have a general right to object, which will be implemented by us without any indication of a specific situation.

If you wish to exercise any of these rights, please send us your request (Link).

Please provide any information in your request that will help us identify you in our database, such as your name or email address. If possible, add to your request information about the data processing to which you are referring. We will make sure to process your request in a timely manner.

4. Provision of the JENTIS Software

We collect and process personal data of users of the JENTIS Software for the purpose of providing the JENTIS Software.

4.1. Use of cookies

We use strictly necessary cookies for the provision of the service. Cookies are text files that are stored in the internet browser or by the internet browser on the user's computer system. When a user calls up a software, a cookie may be stored on the user's operating system. This

cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the software is called up again.

To ensure that the user's account is maintained and its preferences and configuration is saved, it is necessary that the user is recognised even after a page is changed or closed. Therefore, we store information in cookies, which is strictly necessary for the operation of the software, such as your user settings and preferences (e.g. selected modes, language settings)

We use other essential cookies for software diagnostics and analysis of the software usage for the purpose of ensuring the quality and security of our software and its content.

Cookies are stored on the user's computer and transmitted to our site by the user. The data is stored as long as necessary for the above-mentioned purposes and is not stored together with other personal data of the users. You as the user have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically.

Please note that if cookies are deactivated for our software, it may no longer be possible to fully use all functions of the software.

4.2. Account maintenance and usage

As part of the provision of the software, we collect personal data about the account, usage and software configuration of the software users to enable the functioning of the software, analyse its usage, identify potential usability issues/areas of confusion for the user and optimise the software functionalities.

Scope of processed data

Category	Description
Login Data	username, email address, password, time of login Users can create accounts in the JENTIS software and set their login data there themselves. The source of the information of the personal data in the sense of Art. 14 (2) (f) GDPR can be the user or his/her employer, who creates the account or forwards the required data to JENTIS for the creation of a user account.

Usage Data	User action data; metadata such as length of visit, page views, navigation paths, page interaction information such as scrolling, clicks, mouse-overs, and mouse tracking; information about the timing, frequency and pattern of use; traffic; customer survey responses. Usage data is stored in the log files of our server and maintained to ensure the security of the software, monitor its usage in the context of our contractual relationship and ensure traceability of configuration changes in the context of our data protection compliance. The Usage data is analysed with the help of the following third-party tools: ● Mouseflow, provided by the company Mouseflow ApS (Flaesketorvet 68 1711 Copenhagen V Denmark). More information on how your Usage Data is processed can be found in the provider's Privacy Policy: https://mouseflow.com/legal/company/privacy-policy. Via the following link you can deactivate the processing of your personal data by Mouseflow: https://www.Mouseflow.com/policy ● Google Analytics provided by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA and the representative in the Union Google Ireland Ltd., Gordon House, Barrow Street, D04 E5W5, Dublin, Ireland. Here you can find out more about how Google processes your data: https://policies.google.com/technologies/partner-sites
Account Data	Domain names, settings and configurations, connected tools and CMP vendors

Legal basis:

The collection of this data is based on Art. 6 (1)(f) GDPR. It is our legitimate interest to ensure the error-free provision of the software and its optimisation.

Duration of storage:

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. The personal data that we process for the provision of our software and services will be deleted after termination of the contract, unless they must be preserved due to legal retention periods.

4.3. Information security

As part of our commitment to ensuring the security and integrity of information relating to the software usage, we implement regular data backup procedures. These backups allow us to restore data in the event of system failures, data corruption, or other unforeseen incidents.

Processed data	Purpose	Third party data recipient	Legal basis
Database backups, which include Account Data (see 3.2)	Disaster recovery, preventing fraud, ensuring the security of our information technology systems	Catalogic Software Inc. 140 E. Ridgewood Ave. Suite 415, South Tower, Office 416 Paramus, NJ 07652 https://cloudcasa.io/legal/privacy/	Legitimate interest, Art 6 (1) (f) GDPR

4.4. Hosting

Our software is hosted by one of the following cloud providers in accordance with our customer's choice and as indicated in the Data Processing Agreement between JENTIS and its customers:

Name	Contact data	Server location
IONOS SE	Attn: Data Protection datenschutz@ionos.de Elgendorfer Str. 57, 56410 Montabaur	Western Europe (EU)
Akenes SA (Exoscale)	Attn: Data Protection Boulevard de Grancy 19A 1006 – Lausanne, Switzerland	Western Europe (EU)
Microsoft Ireland Operations, Ltd.	Attn: Data Protection One Microsoft Place South County Business Park Leopardstown, Dublin 18, D18 P521	Western Europe (EU)

The servers automatically collect and store technical data in so-called server log files, which your browser automatically transmits when you visit the software. The information stored is:

- Browser type and browser version
- Internet Service Provider
- Operating system used
- Referrer URL (web pages from which your system accessed our software)
- Host name of the accessing computer
- Date and time of access
- IP address

This data is not merged with other data sources. The collection of this data is based on Art. 6 (1)(f) GDPR. It is our legitimate interest to ensure the technically error-free performance of and optimisation of the software - for this purpose, the server log files must be collected.

The servers used for the hosting of the software are geographically located exclusively in the EEA.

5. Management of the contractual relationship

To ensure a smooth service-related communication, we process **Customer data**, which includes business information such as purchase history and personal data of representatives of our customers such as first name, last name, business email address, title, company name, salutation, company role, telephone number(s).

Third party involved:

- HubSpot, Inc., Two Canal Park, Cambridge, MA 02141 USA
- Salesforce.com, Inc., 415 Mission Street, CA 94105 San Francisco, United States

In this context, we use the customer relationship management (CRM) services provided by Salesforce.com, Inc. and HubSpot, Inc. Hubspot stores the data on EU-based servers. Salesforce uses servers located in the United States, and therefore personal information may be transferred to, stored, or processed in the United States.
Both providers participate in and have certified their compliance with the EU-U.S. Privacy Shield Framework.
We take your privacy seriously and have implemented measures to ensure your data is processed in accordance with applicable data protection laws.

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by email at privacy@jentis.com.

Please note that the third party providers have their own privacy policies, where you can find more information in respect to the handling of data we provide to them as part of the customer relationship management:

Hubspot: https://legal.hubspot.com/privacy-policy

Salesforce: https://www.salesforce.com/company/privacy

Duration of storage:

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. The personal data that we process for the provision of our software and services will be deleted after termination of the contract, unless they must be preserved due to legal retention periods.

5.1. E-mail communication

Purpose:

Communication of relevant information about JENTIS services and events.

In the context of the customer relationship, we communicate relevant information about the JENTIS services and events to our customers and partners via email, including notices about updates of the JENTIS Software.

The following personal data is used:

First and last name, email address, organisation

Legal basis:

The legal basis for the processing of data transmitted while sending an email is Art. 6 (1)(f) GDPR due to our legitimate interest in having service-related communication with existing customers and partners.

Right to objection:

You can object to receiving such service notices at any time without stating reasons by sending us a short message to privacy@jentis.com or directly as a response to the received email.

5.2. In-app communication

We provide the JENTIS Help Desk as an in-app communication channel for your requests and concerns.

Processed data	Purpose	Third party data recipient	Legal basis
Information related to tickets created by the software users; customer contact information; any data that the creator of the ticket may additionally provide	In-app communication service	Atlassian. Pty Ltd Level 6, 341 George Street Sydney NSW 2000 Australien https://www.atlassian.com/legal/privacy-policy	Legitimate interest, Art 6 (1)(f) GDPR

6. Data transfer to third countries

JENTIS may transfer your personal data outside the EU/EEA, including to third-party companies (contracted service providers) to the extent necessary for the data processing activities described in this Policy. When JENTIS engages in international data transfers of personal data, it relies on:

- Adequacy Decisions, as adopted by the European Commission ("EC"), based on Article 45 of Regulation (EU) 2016/679 (GDPR) – for more information, and to access the full list of countries deemed adequate to date, please visit https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions, or
- the EC's Standard Contractual Clauses ("SCCs") supplemented by additional security measures as recommended by the European Data Protection Board.

If the level of data protection in a particular country is lower than in the EU/EEA, we conclude EU standard contractual clauses for the transfer of personal data to third countries with such providers to ensure that the level of protection for your personal data in the third country is equivalent to that in the EU due to technical and organisational measures. JENTIS continually monitors the circumstances surrounding such transfers to ensure that these maintain, in practice, a level of protection that is essentially equivalent to the one guaranteed by the EU/EEA data protection laws.

7. Contact

Please address any questions or requests in connection with this Privacy Policy by contacting us at any time by letter or email at:

Jentis GmbH

Schönbrunner Straße 231

1120 Vienna

Austria

Phone: +43 1 997 43 54

Email: privacy@jentis.com

Website: www.jentis.com

Company Registration Number: FN 529675j

Responsible Court: Commercial Court of Vienna

We are available to you for any inquiries and concerns regarding data protection.