

Data protection statement (version 05/24/2018)

1. Name and contact details of data controller responsible for processing

This data protection information applies to data processing by the data controller draw2talk Unternehmergesellschaft (UG) (with limited liability), Am Museum 3, 82377 Penzberg, Germany, email: mail@draw2talk.com, phone 0049 (0)8856 8020445

2. Collection and storage of personal data; type and purpose of use thereof on visiting the website

When you access our website www.drawlk.com, the browser used on your device will automatically send information to our website's server. This information will be stored temporarily in a so-called logfile.

The following information will be captured automatically and stored until automatic deletion:

- IP address of requesting computer
- Date and time of access
- Name and URL of file accessed
- The website you were referred from (Referrer URL)
- Browser used and where applicable the operating system of your computer as well as the name of your access provider

The data referred to will be processed by us for the following purposes:

- To ensure a smooth connection to the website
- To ensure trouble-free use of the website
- Assessment of system security and stability as well as
- Other administrative purposes

The legal basis for the data processing is art. 6 para. 1 sentence 1 f GDPR. Our legitimate interest derives from the above-listed purposes of data collection. In no circumstances will we use the data collected to draw conclusions about you personally.

We also use cookies when you visit our website. For more information, see no. 5 of this data protection statement.

3. Invitations

As a registered user, you may invite other individuals to use the Internet platform of the operator. The operator processes the collected data on behalf of the registered user solely for the purpose of making contact between the already registered user and the user not yet registered and shall not use it for any other purposes.

The operator will send an invitation to the individuals you have invited via e-mail. Each invitee has the opportunity to object to the use of his e-mail address for invitations.

Please note that the recipients of the invitation will be shown your e-mail address when you send an invitation.

4. Sharing data with third parties

Your personal data will not be shared with any third party for any purpose other than those listed below.

We will share your personal data with third parties only if:

- You have provided your express permission under art. 6 para. 1 sentence 1 a GDPR
- The sharing is required under art. 6 para. 1 sentence 1 f GDPR for bringing claims or for the exercise or defence of our rights and there are no grounds to suppose that you have an overwhelming legitimate interest in your data not being shared
- Sharing is required under art. 6 para. 1 sentence 1 c DSGVO, as well as if
- Sharing is permitted under statute and, under art. 6 para. 1 sentence 1 b GDPR, is required for the management of a contractual relationship with you
- You send invitations as per no. 3 of this statement

5. Cookies and Browser Local Storage

We use cookies on our website. These are small files that are automatically created by your browser and saved on your device (laptop, tablet, smartphone etc.) when you visit our website. Cookies will not damage your device and nor do they contain any viruses, trojans or other malware.

Cookies store information that is produced in connection with the specific device that was used. This does not mean, however, that we can use this information to directly identify you.

The use of cookies enables us to make our website more user-friendly. For this purpose we use what are known as session cookies to tell us whether you have already visited specific pages of our website. Session cookies are automatically deleted when you leave the site.

We also place temporary cookies on your device, which likewise serve to improve user-friendliness and are stored on your device for a specific period. If you re-visit our website in order to use our services, the site will automatically remember you from your previous visit along with the information you entered and the settings you selected, so you won't have to enter these again.

The data processed via cookies is required for the purposes mentioned and to safeguard our legitimate interests as well as those of third parties as per art. 6 para. 1 sentence 1 f GDPR.

You can disable the storage of cookies in your browser, limit the storage to specific websites or adjust your browser so that it notifies you whenever a cookie is sent. You can delete cookies from your device's storage at any time. Please note, however, that it is not possible to use the services of the operator if session cookies are rejected.

The registered user stays logged in to the website automatically, unless the user disables this feature in the account settings on the operator's website. For this purpose, the service uses HTML5 Browser Local Storage instead of permanent cookies. Depending on the browser, the Browser Local Storage may also be deleted by deleting the history (all content). In these circumstances as well as when changing the username and/or password, the user must log in again. Due to Browser Local Storage, using a browser function such as "login automatically on this computer" is not necessary.

6. Analysis tools

We do not use any analysis tools.

7. Social media plug-ins

On the basis of art. 6 para. 1 sentence 1 f GDPR, and in order to increase awareness of our organisation, we use social plug-ins from the social networks Facebook, Twitter, and Instagram. The marketing purposes that lie behind the use of these plug-ins constitute legitimate interest in the sense intended by GDPR.

The responsibility for ensuring that the plug-ins are operated in accordance with data protection regulations lies with the providers of the plug-ins concerned. In order to provide visitors to our website with as much protection as possible, the plug-ins require two clicks to use.

8. Rights of data subjects

You have the right:

- under art. 15 GDPR to be informed as to the personal data we process about you. In particular you can demand information on the purposes for which your data is being processed, the categories of personal data held, the categories of recipient to whom your data has been or will be disclosed, the intended duration of storage, the existence of the right to correction, deletion, restriction of processing, objection, and complaint, the origin of your data (where it has not been collected by us) and the existence of any automated decision-making processes, including profiling and, where applicable, detailed information on how such profiling works;
- under art. 16 GDPR to the immediate correction of incorrect or incomplete personal data that we hold about you;
- under art. 17 GDPR to the deletion of the personal data that we hold about you, unless the processing is required i) for the exercise of the right to freedom of expression and information, ii) for compliance with a legal obligation, iii) on the basis of public interest or iv) to bring any claim or to exercise or defend our rights;
- under art. 18 GDPR to the restriction of the processing of your personal data where you dispute its accuracy or where the processing is unlawful but where you decline to have it deleted and we no longer need it but you however need it to bring claims, or for the defence or exercise of your rights, or if you have objected to the processing under art. 21 GDPR;
- under art. 20 GDPR to receive your personal data in a structured, commonly used and machine-readable format or to demand your data be transferred to another data controller;
- under art. 77 GDPR to complain to a supervisory authority. This is usually the authority responsible for your place of habitual residence or for your workplace or for our corporate premises.

9. Right to object

Where your data is processed on the basis of legitimate interests as per art. 6 para. 1 sentence 1 f GDPR, you have the right under art. 21 GDPR to object to the processing of your personal data, provided your grounds for doing so are based on your specific situation or your objection is to direct marketing, in which case you have a blanket right to object that we will comply with regardless of whether or not a specific situation applies.

If you wish to exercise your right to revoke your permission or to object, simply send an email to mail@draw2talk.com

10. Data security

When you visit our website, we use the commonly used SSL procedure (secure socket layer) in combination with the highest degree of encryption supported by your browser. This is generally 256-bit encryption. If your browser does not support 256-bit encryption, we will revert to 128-bit v3 technology. Whether or not an individual page of our website is transmitted in encrypted form can be seen from the locked version of the key or lock symbol in the status bar of your browser at the bottom of the page.

Besides that, we take other appropriate technical and administrative security measures to protect your data against accidental or intentional manipulation, partial or total loss or destruction, and unauthorised third-party access. Our security measures are continually being updated in accordance with technological developments.

11. Updating and amendment of this data protection statement

This data protection statement is currently valid and was last amended in May 2018.

On the basis of development of our website and the services offered in connection with it, or if there is change to statutory or official regulations, it may be necessary to amend this data protection statement. The most up-to-date version can be found on the site at <https://www.drawlk.com> and printed out.

Notes on processing of personal data under GDPR (version 05/24/2018)

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When you register with us, we collect the following information:

- valid email address

We collect this data in order to

- be able to identify you as our customer
- manage your contract
- correspond with you
- inform you of new functions of our service
- inform you of seasonal campaigns, discounts, and charity campaigns

This data processing is subject to your request and under art. 6 para. 1 sentence 1 b GDPR is necessary for the stated purpose of contractual processing and the mutual fulfilment of contractual obligations.

The personal data we collect will be held by us for as long as you keep your account with us and will only be deleted when your account is no longer active, unless under art. 6 para. 1 sentence 1 c GDPR we are obliged under tax law or commercial law (HGB, StGB, or AO) to keep it for longer for documentation purposes or unless under art. 6 para. 1 sentence 1 a GDPR you have consented to a longer storage period.

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- Sharing is permitted under statute and, under art. 6 para. 1 sentence 1 b GDPR, is required for the management of a contractual relationship with you
- You send invitations as per no. 3 of the data protection statement

4. Rights of data subjects

You have the right:

- under art. 7 para. 3 GDPR to revoke any consent you have provided. If you do so, we will not be able in the future to carry out the data processing that was based on this consent. However, due to legal obligations to retain and record information, and to enable us to exercise and defend our rights, your data cannot be completely deleted.
- under art. 15 GDPR to be informed as to the personal data we process about you. In particular you can demand information on the purposes for which your data is being processed, the categories of personal data held, the categories of recipient to whom your data has been or will be disclosed, the intended duration of storage, the existence of the right to correction, deletion, restriction of processing, objection, and complaint, the origin of your data (where it has not been collected by us) and the existence of any automated decision-making processes, including profiling and, where applicable, detailed information on how such profiling works;

- under art. 16 GDPR to the immediate correction of incorrect or incomplete personal data that we hold about you;
- under art. 17 GDPR to the deletion of the personal data that we hold about you, unless the processing is required i) for the exercise of the right to freedom of expression and information, ii) for compliance with a legal obligation, iii) on the basis of public interest or iv) to bring any claim or to exercise or defend our rights;
- under art. 18 GDPR to the restriction of the processing of your personal data where you dispute its accuracy or where the processing is unlawful but where you decline to have it deleted and we no longer need it but you however need it to bring claims, or for the defence or exercise of your rights, or if you have objected to the processing under art. 21 GDPR;
- under art. 20 GDPR to receive your personal data in a structured, commonly used and machine-readable format or to demand your data be transferred to another data controller;
- under art. 77 GDPR to complain to a supervisory authority. This is usually the authority responsible for your place of habitual residence or for your workplace or for our corporate premises.

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