

Privacy Policy

25/05/2018

When you contact us by e-mail or through our website as a prospective or existing customer, we collect and process personal data. When we refer to "SEPPmail", "we", "us" or "our", we mean SEPPmail – Deutschland GmbH and our affiliate, SEPPmail AG.

Like our customers, SEPPmail takes data protection very seriously, and we have designed our website and processes so that only as much personal data as is necessary is collected, processed and used. Personal data is never leased or sold to third parties for advertising purposes.

Access to personal data at SEPPmail is given only to persons who need the data to perform the tasks assigned to them within the controller's organisation, who have been informed about data protection laws and who have undertaken in accordance with applicable law (Article 5 of the EU General Data Protection Regulation (EU GDPR)) to comply with them. In accordance with Article 6(1) EU GDPR, personal data is collected, processed, used and transferred only to the extent necessary to provide services (support), handle inquiries (website), or perform contracts between SEPPmail (the controller) and visitors to its website/customers (the data subject).

Where our website allows you to enter personal or business-related information (e-mail addresses, names, postal addresses), the user expressly discloses such information voluntarily.

It is possible to use our website without providing personal data. The use of individual services on our website may be subject to different rules, and if so, they are explained separately below. We process your personal data (e.g. name, address, e-mail, telephone number, etc.) solely in accordance with the provisions of German data protection law. Data is deemed personal if it can be clearly assigned to a specific natural person. The German Federal Data Protection Act (*Bundesdatenschutzgesetz – BDSG*) and the German Telemedia Act (*Telemediengesetz – TMG*) form the legal basis for data protection. The following is intended to inform you about the nature, scope and purpose of the provider's use and processing of personal data.

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1 Personal data – what we collect and what we use this data for

1.1 Website

You can contact us and request information through our website:

- Request quote
- Request documents

When you do so, the following data is collected and transferred by e-mail to our sales department for processing:

- Your e-mail address
- First name
- Surname

This data is mandatory; otherwise we are unable to send you any information. You can decide whether you wish to enter additional personal data in the contact form such as your postal address, postal code, locality, country or telephone number.

This information is entered in our CRM to record the establishment of contact and to be able to document our interaction with you.

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how you use the site. As a rule, the information generated by the cookie about your use of this website will be transmitted to and stored by Google on servers in the United States. However, if this website anonymises IP addresses, your IP address will be truncated by Google within an EU member state or other EEA state before being transmitted to the United States. Only in exceptional cases will your full IP address be transmitted to Google servers in the United States and truncated there. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for the website operator and providing other services relating to website activity and Internet usage. Google will not associate your IP address with any other data held by Google. You can change your browser settings to prevent cookies from being saved on your computer. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore, you can prevent Google's collection and processing of the data generated by the cookie relating to your use of the website (including your IP address) by downloading and installing the browser plug-in available under: <https://tools.google.com/dlpage/gaoptout?hl=en>.

1.2 Online demo

Our website gives you the option of an online demo whereby you can send yourself a secure e-mail using our patented GINA technology.



Our system requires the following personal data in order to execute this task:

- Name
- Surname
- Country
- E-mail address
- Mobile number

This data is mandatory; otherwise it is not possible to automatically generate and send an e-mail in GINA format. Your mobile number is required so that we can send your initial password by SMS. You can decide whether you wish to enter additional personal data such as your postal address, postal code, locality or country.

An account is created on our virtual "appliance" and an encrypted and personalised test e-mail is sent to your e-mail address. The sales department receives an e-mail notifying it of the online demo. No further activities are performed.

1.3 Project notifications

Sales partners use the "Project notification" function to let us know about important projects and to request quotes and sales support.

The following personal data is collected in this context and processed in our CRM for documentation purposes.

- Name of partner
- Name of technician
- Name of sales contact
- Partner's e-mail address
- Name of customer
- Address of customer
- Contact technician
- Name of business decision-maker

The other data requested relates to the system parameters, which we need in order to be able to submit an initial quote.

This data is disclosed to our sales department by e-mail and also transferred to our distribution department to prepare a quote. The data is recorded in our CRM for documentation purposes.

1.4 Newsletters

Visitors to the SEPPmail websites have the option of subscribing to newsletters. The form we use for this purpose shows you which personal data is transferred to the controller when you subscribe to a newsletter.



SEPPmail uses newsletters to inform its customers and business partners at regular intervals about the latest news and developments concerning our software solution. As a rule, our company's newsletters can only be received if:

(1) the data subject has a valid e-mail address; and (2) the data subject has subscribed to the newsletter (opt-in process).

The personal data collected during the subscription process is used solely for the purpose of sending our newsletter. The data subject may unsubscribe at any time. The data subject's consent to the storage of personal data for the purposes of sending the newsletter may be withdrawn at any time. Each newsletter contains a link for withdrawing such consent. In addition, you can unsubscribe from receiving newsletters at any time on the controller's website directly, or otherwise notify the controller that you wish to unsubscribe.

1.5 Product registration details

When you install our software solution, we request certain "product registration details". Even though for registration it is only necessary to enter the device ID contained in the supplied licence document, in some circumstances we will ask you to provide additional information, including:

- Your name
- Your postal address, including your country
- Telephone number

We use product registration details in order to register your product licence (i.e. to authenticate and verify your licence rights) and to enable the provision of maintenance and support services to you. We also use this information in order to send you product-specific information about new functions, reports or services.

1.6 Support Connection

SEPPmail (or any other organisation) is never able to access the appliance without the customer's explicit consent. Only when the customer activates Support Connection of its own accord is the machine able to be accessed, and only by authorised SEPPmail employees. In some cases, log files may be reviewed for the purpose of fault analysis, and they are deleted by our systems once the fault has been fixed.

The personal data contained in the log files is:

- E-mail addresses
- IP addresses

2 Data storage

Your data such as your name, address, e-mails, faxes, quotes, orders and payment records are stored in our CRM or e-mail archive until your consent is withdrawn. The terms of section



96 (3) of the German Telecommunications Act (*Telekommunikationsgesetz* – TKG) and Article 6(1)(a) (consent) and/or (b) (necessary for performance of a contract) of the GDPR provide the basis for processing this data.

If we enter into a contract with you, all data concerning the contractual relationship, even if you withdraw your consent to its processing, is stored in our central ERP system until the expiry of the retention period under tax law (7 years).

Your data is stored on our virtual machine at SEPPmail AG, Neuenhof (Switzerland), a back-up server in Leipzig, and on the mobile systems of our employees. Your data such as your name, address, e-mails, faxes, quotes, orders and payment records are stored in our CRM or e-mail archive until your consent is withdrawn. The terms of section 96 (3) of the German Telecommunications Act (*Telekommunikationsgesetz* – TKG) and Article 6(1)(a) (consent) and/or (b) (necessary for performance of a contract) of the GDPR provide the basis for processing this data.

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Your data is stored on our virtual machine at SEPPmail AG, Neuenhof (Switzerland), a back-up server in Leipzig, and on the mobile systems of our employees.

3 Security

We have gone to extensive lengths to ensure the security of customer data, such as using SSL encryption for all internal communication, AES data encryption and the latest firewall and anti-virus technology. E-mail traffic is encrypted if the content is particularly sensitive.

4 Rights of the data subject

As a natural person, you have certain "data subject" rights. You have the following rights under the GDPR:

a right to information and access under Article 15 GDPR;

a right to rectification under Article 16 GDPR;

a right to erasure under Article 17 GDPR;

a right to restrict processing under Article 18 GDPR; and

a right to data portability under Article 20 GDPR.

You also have a right under Article 77 GDPR to lodge a complaint with the competent data protection supervisory authority, however only in relation to data processing carried out by us in our own name as the controller. In the event that SEPPmail processes your data on behalf of a third party, you must contact the controller to exercise your right to lodge a complaint.

4.1 Information regarding your right to object under Article 21 GDPR

4.1.1 Right to object in specific cases

In addition to the aforementioned rights, you have the right to object at any time on grounds relating to your particular situation to any processing of your personal data based on Article 6(1)(e) GDPR (data processing in the public interest) or Article 6(1)(f) GDPR (data processing based on a balance of interests); this includes profiling based on these provisions as defined in Article 4(4) GDPR. If you lodge an objection, we will no longer process your personal data unless we are able to demonstrate compelling grounds for the processing which override your interests, rights and freedoms or serve the establishment, exercise or defence of legal claims. Please also note that if we stop processing your data on the basis of your objection, you may no longer have access or may only have restricted access to our websites or products.

4.1.2 Right to object to the processing of data for advertising purposes

You also have the right to object at any time to the processing of your personal data for direct marketing purposes, including subscription to our newsletter. If you lodge an objection, we will no longer process your personal data in future.

There is no prescribed form for objections. You may lodge an objection simply by sending an e-mail to the following address: datenschutz@seppmail.de

5 Changes

SEPPmail reserves the right to change this privacy policy. We will announce material changes to this privacy policy on our website at least 30 days before the changes take effect.

SEPPmail-Deutschland GmbH