

Data Protection Policy for EASE 5 – Early Adopter Program

Introduction

This Data Protection Policy provides information on how we process the personal data of users registered to the EASE 5 - Early Adopter Program and their rights in this regard.

For any questions or requests in this respect, please feel free to contact us via email to eaprogram@afmg.eu or by phone at +49 (0)30 467 092 – 30.

Overview:

1. General

- 1.1. Data Controller and Data Processor identification
- 1.2. Definitions

2. Data processing

- 2.1. When registering for the EASE 5 – Early Adopter Program
- 2.2. Via Feedback Board
 - 2.2.1. Visibility of the data publicly
 - 2.2.2. Automated data processing
- 2.3. Via Mailing and Survey Platform
 - 2.3.1. Automated data processing
- 2.4. Duration of the processing
- 2.5. Lawfulness of the processing

3. Automated data processing via EASE 5 Early Adopter software

- 3.1. To activate the software
- 3.2. To analyze software usage and improvement activation levels

4. Additional automated data processing

- 4.1. IP address and device information
- 4.2. Usage of cookies

5. Recipients of the Personal Data

6. Your rights as a Data Subject

1. General

1.1. Data Controller and Data Processor identification

The Data Controller in relation to the processing of personal data in the context of the EASE 5 - Early Adopter Program is AFMG Technologies GmbH (hereinafter: "AFMG", "we", and "us"), Borkumstr. 2, 13189 Berlin, Germany. Tel.: +49 (0)30 467 092 – 30, Fax.: +49 (0)30 467 092 – 27, email: info@afmg.eu.

AFMG's Data Processor in regards to the hosting of the Mailing and Survey Platform used within the EASE 5 – Early Adopter Program is The Rocket Science Group, LLC d/b/a Mailchimp (hereinafter: "Mailchimp"), 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, United States of America.

AFMG's Data Processor in regards to the hosting of the Feedback Board used within the EASE 5 – Early Adopter Program is UseResponse Inc. (hereinafter: "UseResponse"), 412 N Main St Ste100, Buffalo, WY 82834, United States of America.

AFMG's Data Processors in the context of the automated processing via EASE 5 – Early Adopter software are:

- Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA (server hosting); and
- IP-Projects GmbH & Co KG, Am Vogelherd 14, 97295 Waldbrunn (server hosting).

1.2. Definitions

Personal Data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

GDPR is an abbreviation for REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Data Controller means the entity that determines the purposes and means for the processing of Personal Data.

Data Processor means the entity that processes Personal Data on behalf of the Data Controller.

Sub-processor means any Data Processor engaged by AFMG's Data Processors, such as UseResponse, Mailchimp or their affiliates, to assist in fulfilling their obligations with respect to providing services as Data Processor to AFMG.

EASE 5 - Early Adopter Program (hereinafter: "EA Program", "Program") is a program provided by AFMG where registered customers are granted access to a time-limited license for the Early Adopter version of EASE 5 ("Software"), and are provided with communication platforms, such as the Feedback Board and the Mailing and Survey Platform, where they can communicate with AFMG and other participants of the Program about topics related to the development of version 5 of EASE. Information provided within the context of the EA Program is stored and processed for improvements to version 5 of EASE, to the EASE 5 – Early Adopter Program, and to AFMG's processes.

Feedback Board (hereinafter: "Early Adopter Feedback Board", "Feedback Board", "Board") is one of the communication platforms available to participants of the EASE 5 – Early Adopter Program. Participants of the Program can use this discussions forum to provide usage feedback about the Early Adopter version of EASE 5, discuss about possible new features and problem resolutions with AFMG and other users, to exchange information related to the EA Program, to request technical support, as well as to provide specific and private feedback to AFMG. The Feedback Board website (hereinafter: "Board Website", "Website") is hosted by UseResponse and is accessible via the URLs <https://eafeedback.afmg.eu>.

Mailing and Survey Platform is a communication platform of the EASE 5 – Early Adopter Program. It is used by AFMG for the sending of emails to participants of the Program, e.g., in order to communicate in general about topics related to the Program and to the development of EASE 5, to inform about new versions of the EASE 5 – Early Adopter software available for download, and to send digests of the recent activity on the Feedback Board. This platform is also used to send you surveys, and to process the data resulting from these surveys.

Cookie is a simple computer file made of text, which is typically stored by the end user's browser when visiting a website. It can include a range of information, such as details about your device and usage behavior, previously visited websites, and custom configurations. This data can be used, e.g., to allow websites to operate properly, to personalize the user's experience when visiting a website, and to find out if someone has visited a website before.

2. Data Processing

2.1. When registering for the EASE 5 – Early Adopter Program

Explanation and purposes of processing

Through the AFMG Online Store, available via <https://store.afmg.eu>, you have the possibility to purchase the item "Registration for the EASE 5 - Early Adopter Program". The registration for the EASE 5 - Early Adopter Program occurs once your purchase is successfully completed.

The **email address** provided by you via the order form is thereafter stored and used for the following purposes:

- **To create your account on the Feedback Board**, to allow you to manage and use your Board account, and to allow AFMG sending you emails and email notifications from the Board as described in the section 2.2. The Feedback Board is available from <https://eafeedback.afmg.eu> and is hosted by UseResponse on our behalf.
- **To register you for the Mailing and Survey Platform**, in order to allow you to manage your account and use this platform, and so that AFMG can send you emails and surveys from this platform as described in section 2.3. The Mailing and Survey Platform is hosted by Mailchimp on our behalf.
- **To contact you in the context of the EASE 5 – Early Adopter program**, e.g., for general communication, or to answer to support requests related to this program.
- **To allow AFMG to identify you as a customer.**
- **To look for your avatar from your Gravatar account** at <http://gravatar.com/>, in case you made one available, in order to set it as your avatar in the Feedback Board and in the Mailing and Survey Platform, for your own convenience.

An "avatar" is an image that represents you online - a small picture that appears next to your name when you interact with websites. Your avatar at the Feedback Board can be changed or removed at any time from your profile page on the Board.

The email address used for the purposes above is not visible to other participants of the Early Adopter Program, and it can be changed at any time via your profile pages on the Feedback Board and on the Mailing and Survey Platform.

The **full name** provided by you via the order form is also used after the purchase is successfully completed for the following purposes:

- **To define your profile name for the Feedback Board**, in a way that allows you to identify yourself on the Board, and that does not allow other users to derive your full name. The profile name is stored and used on notifications from the Board, and to allow you and other users of the Board to identify topics and comments created by you. The profile name also allows AFMG to identify you so that support and private requests can be handled properly. The profile name can be changed at any time via your profile page on the Feedback Board.
- **To define your profile name for the Mailing and Survey Platform.** The profile name is stored and used for identification purposes, to send you emails and surveys from this platform within the context of the EASE 5 – Early Adopter Program, and in order to manage these surveys and the data resulting from them. The profile name can be changed at any time via your profile page on the Mailing and Survey Platform.
- **To allow AFMG to identify you as a customer.**

- **To contact you in the context of the EASE 5 – Early Adopter program**, e.g., for direct communication, or to answer to support requests related to this program.

During registration to the Feedback Board a **password** is generated and sent to you, in order to allow you to log in to the Board. For the time being, and at least for the duration of the EASE 5 Early Adopter Program, users who are not registered to the Board cannot access it or view its contents. The password is stored in an encrypted format that is not human-readable. You can change your password at any time via your profile page on the Feedback Board.

2.2. Via the Feedback Board

Explanation and purposes of processing

The Feedback Board is the customer's feedback platform for the development of EASE 5. It is an exclusive forum provided by AFMG so that participants of the EASE 5 – Early Adopter Program can provide feedback and information that can be used for the Software development, and for improvements to the EASE 5 - Early Adopter Program and the company's processes. Via the Feedback Board you can interact not only with AFMG, but also with other participants of the Program.

The Feedback board is hosted by UseResponse on behalf of AFMG. The data collected through this platform is stored and processed within the European Union.

Whenever using the Feedback Board **the Personal Data provided by you via topics, comments, votes, support tickets and emails to eafeedback@afmg.eu** will be stored and processed in order to allow you to provide us with feedback about the development of EASE 5, to interact and discuss with other users of the Software and AFMG about ideas and problems related to the Software, to raise questions related to Software, to allow you to provide AFMG information that may be useful for the development of the software, for improvements to the EASE 5 – Early Adopter Program, and for improvements to the company's processes. The data will also be processed in order to allow AFMG to provide you with support, to allow AFMG staff to be informed about feedback and requests coming from you, and to manage these requests. Support tickets are private and are visible only to you and AFMG.

The Software development occurs at AFMG's own discretion and AFMG receiving your feedback does not presuppose that AFMG will implement any features or resolve any issues with the Software.

Potentially confidential data, such as real acoustic design project files, personal files and data, as well as confidential documents shall not be shared via topics on the Board. Private communications with AFMG can be accomplished via email to eafeedback@afmg.eu or by submitting a support ticket from the Board.

Only limited profile information - such as your profile name, the date you joined the Board, the date of your last visit to Board, the overall number of entries you created, and the topics created by you – are visible to other users of the Board.

Notifications via email and to your web browser (if you choose to accept this means of sending notifications), will be sent to you whenever changes or additions occur to topics of your interest, i.e., topics you are following, and for the purpose of informing you about the latest status of the discussions you participate or monitor, for your own convenience. You are automatically subscribed to receive notifications from topics you created, topics you commented on, topics you explicitly chose to follow, topics that include comments you voted for, as well as topics you voted for. You can change your preferences in order to start or stop following a topic and receiving notifications related to it from the topic page at any time. An overview of all topics you follow is accessible from your Board profile page, from where you can also unsubscribe from them.

AFMG may also contact you via email from the Feedback Board for general communication related to the EASE 5 – Early Adopter Program.

2.2.1. Visibility of the Personal Data publicly

For the duration of the EASE 5 Early Adopter Program, the contents of the Feedback Board are visible and accessible only to persons registered for the EA Program, to AFMG, and to Data Processors designated by AFMG appropriately.

At any time after the end of the EASE 5 Early Adopter Program, at the discretion of AFMG, and with prior announcement, the Feedback Board shall be made visible and available for registrations publicly. AFMG will announce the change before it occurs and you will have the chance to cancel your account and remove your Personal Data if you wish to do so. Unless removed, the Personal Data entered by you and visible to other Board users shall thereafter be also visible to guests (unregistered users) visiting the Board. This will allow you, AFMG and other users of the EASE software to use the feedback provided on the Board as input for future discussions, even via different communication channels, as well as to benefit other users of the EASE software, who would be able to view the contents of the Feedback Board as a support knowledge base.

2.2.2. Automated data processing

Explanation and purposes of processing

Your activity on the Feedback Board - i.e. the information about which **topics and comments you created and when they were last modified**, for which **topics or comments you voted**, **statistical data** about the entries you created, the **support tickets and email communications between you and AFMG** via eafeedback@afmg.eu, the **date you joined the Board and last visited it**, your **role on the Board**, and which **topics you are following (are subscribed to) and would like to receive notifications for** – is stored and processed in order to allow you to easily view and manage the content you entered on the Board from your profile page, to allow you to manage your subscriptions and thus for which topics you would like to receive notifications, for the provision and improvement of the services available from the Feedback Board, to allow AFMG to provide you with support and answer support requests from you, as well as to allow AFMG to manage the Board. Your activity information is visible only to you and AFMG.

2.3. Via Mailing and Survey Platform

Explanation and purposes of processing

The Mailing and Survey Platform is one of the tools used by AFMG within the EASE 5 – Early Adopter Program in order to communicate with you, and to receive information that may be useful for the development of the Software, and for improvements to the EASE 5 Early Adopter Program and the company's processes.

The Mailing and Survey Platform is hosted by Mailchimp on behalf of AFMG. The data collected via this platform is transferred to, stored, and processed in the United States.

Your email address may be used to contact you via the Mailing and Survey Platform in order to inform you about new Software versions available, to send you survey requests and to allow AFMG to manage these surveys, to inform you about recent activity on the Feedback Board, and for general communication related to the EASE 5 – Early Adopter Program, the development of EASE 5, and the company's processes.

Through your preferences page on the Mailing and Survey Platform, you can pause the receiving of some types of email notifications from this platform, by unchecking one or more of the following options:

- Notify me about new survey questions available;
- Notify me about updates to the EASE 5 - Early Adopter software;
- Send me digests about the recent activities in the Feedback Board.

The options available here may be changed at any time by AFMG.

AFMG may still contact you through the Mailing and Survey Platform, and within the scope of the Early Adopter Program, even if all options above are unchecked, for communication related to the development of EASE 5 and to the EASE 5 – Early Adopter Program, and for matters related to your participation in this Program.

The Personal Data provided by you via the Mailing and Survey Platform, either by answering a survey or an email sent from this platform, will be stored and processed in order to allow you to provide us with feedback about the development of EASE 5, to interact and discuss with AFMG about ideas and problems related to the Software, to allow you to provide AFMG with information that may be useful for the development of the Software, for improvements to the EASE 5 – Early Adopter Program, and for improvements to the company's processes. The data will also be processed in order to allow AFMG to provide you with support, to allow AFMG staff to be informed about feedback and requests coming from you, and to manage these requests.

2.3.1. Automated data processing

Your activity on the Mailing and Survey Platform, i.e., the information about which surveys were sent to you, and the time and date of your answer, are stored and processed in order to

allow AFMG to manage the surveys within the context of the EASE 5 – Early Adopter Program. Your activity information is visible only to AFMG.

2.4. Duration of the processing

The collected Personal Data described in sections 2.1, 2.2, and 2.3 above will be stored and processed only for as long as it is required for the purposes for which it has been collected, provided no exception as per Art. 17 (3) GDPR applies. Art. 17 (3) GDPR lays out the exceptional conditions for not erasing Personal Data.

At any time after the end of the EASE 5 - Early Adopter Program, at the discretion of AFMG, and with prior announcement, the Feedback Board shall be made read-only. Users of the board will still be able to access its contents and manage their accounts, however adding new content will not be possible. The Feedback Board will be deactivated and all Personal Data will be permanently removed at a point of time up to five years after entering read-only state.

Your registration in the EASE 5 – Early Adopter Program can be cancelled at any time via email to eaprogram@afmg.eu. AFMG will offer to anonymize the Personal Data collected as described in sections 2.1, 2.2, and 2.3 so that it can continue to be used as a resource for the Software development. If you choose not to let AFMG keeping your data in an anonymized way, within 30 days after cancelling your registration we will permanently delete the Personal Data. In either case, you will no longer be able to login to the Feedback Board, to receive notifications from the Board, and to receive surveys in the context of EASE 5 Early Adopter Program. Further participation in the EASE 5 Early Adopter Program will no longer be possible.

We do not intend to store your Personal Data longer than needed.

2.5. Lawfulness of the processing

Consent

The consent granted by you in the course of purchasing the Registration for the EA Program is voluntary, as you are free to decide not to participate in the EA Program:

“Register me for the EASE 5 – Early Adopter Program. I hereby authorize AFMG to store and use my data (email, full name, information provided by me) according to section 2 of the [Data Protection Policy for EASE 5 – Early Adopter Program](#).

This includes amongst others using my email address for identification and communication purposes, e.g., for sending information related to the development of EASE 5, for sending and managing surveys, and for general communication within the scope of the EASE 5 – Early Adopter Program. Information provided by me may be stored and processed for improvements to AFMG’s software and processes, as well as for improvements to the EASE 5 – Early Adopter Program. Content posted in the Feedback Board may be publicly available. AFMG may also

collect and process information on my activity on the Board. I acknowledge that my data may be transferred to, stored, or processed in the United States, where the Mailing and Survey Platform of the EASE 5 - Early Adopter Program is hosted.

The consent can be revoked at any time with effect for the future, e.g. by contacting AFMG via email to eaprogram@afmq.eu. Further participation in the EASE 5 Early Adopter Program will then no longer be possible."

It is not possible to purchase the Registration for the EA Program without granting consent for the storage and processing of your data as described in this section.

Your registration to the EASE 5 Early Adopter Program, as well as the processing and storage of your Personal Data as described above, will take place only after your purchase was successfully completed.

Legal basis

The legal basis for the processing of data subject to Sections 2.1 to 2.4 above is Art. 6 (1) (a) GDPR.

3. Automated data processing via EASE 5 - Early Adopter software

After registering for the EASE 5 – Early Adopter Program, you can download the Software from the AFMG Download Portal (<http://downloads.afmq.eu>). This section applies specifically to data processing within the scope of using the Software.

3.1. To activate the software

Explanation and purposes of processing

As part of the activation process for the Software, we collect a number of Personal Data from the user to generate a license key, which is stored on the respective computer of the user to verify the proper licensing of the Software.

The following data is collected for this purpose:

- Log-in credentials of the user (email and password)
- Time of log-in and license activation
- License selected by the user for activation (if several are available under the user's account)
- Hardware information (BIOS version, CPU information, etc.) to generate a hardware key on which the license is based
- Possibly further information voluntarily provided by the user during the licensing process

- This data will be used only to generate the license key and for support purposes with regard to licensing and will not be further stored. It cannot be reconstructed from the license key.

Legal basis

The legal basis for the processing is Art. 6 para. 1 sentence 1 lit. b GDPR. Data processing is necessary for the purpose of fulfilling the contract in order to ensure proper licensing of the software used.

3.2. To analyze software usage and to improve the software

Scope and purpose of processing

To analyze the use of the software and for improving the software within the EA Program, we collect the following data, which is automatically sent to our server.

- Session start and end (i.e. the runtime of the program)
- A random ID that uniquely identifies the PC to us, but is not assigned to individual users
- Version number of the software
- Information about program errors that occur during runtime

Consent

The above data processing takes place on the basis of your consent given in the course of downloading the software:

I agree that, for the analysis of the use and improvement of the software in the context of the Early Adopter Program, software usage data is collected in pseudonymized form. Information on our processing of personal data can be found in section 3.2 of [Data Protection Policy for EASE 5 – Early Adopter Program](#). The consent can be revoked at any time with effect for the future (e.g., by email to eaprogram@afmg.eu). Further participation in the EASE 5 Early Adopter Program will then no longer be possible.

Legal Basis

The legal basis for this data processing is Article 6 (1) sentence 1 lit. a GDPR. You have the right to revoke your consent at any time with effect for the future. Please note that further participation in the EA Program is then no longer possible, as analyzing the use of the software in order to improve the software is the core objective of the EA Program.

The above data will be stored by us in pseudonymized form until you revoke your consent or until the EA Program expires.

4. Additional automated data processing

4.1. IP Address and device information

Explanation and purposes of processing

When visiting the Feedback Board website, information collected and processed through technically automated means is sent to UseResponse servers.

When visiting the website under the address of afmg.us3.list-manage.com, in order to e.g., manage your preferences for the Mailing and Survey Platform or answer a survey, information collected and processed through technically automated means is sent to Mailchimp servers.

The following information is automatically processed when you visit these websites:

- The IP address and operating system of your computer or other end device (e.g., tablet or smartphone)
- Browser data, such as type, version, display settings, language, usage data, log files, and requests sent by your browser

The IP address and operating system of your device are necessary for technical reasons, so that you can visit and use these websites. These websites cannot be accessed and cannot operate properly without this data being processed. The processing of the IP address is either anonymized or the IP address is deleted once it is no longer required for technical reasons for you to access/use the above websites.

Browser data is also necessary for technical reasons, so that the websites above can operate properly and be displayed suitably. In addition, this data is used for optimization of the above websites and as a basis for future improvements to it (when applicable).

Legal basis

The legal basis for this processing of data is Art. 6 (1) (f) GDPR. The legitimate interest in processing the relevant data is that it makes using the Feedback Board and Mailing and Survey Platform technically possible, allows optimization of the content display for the user, and enables the continued improvement of the internet service in the future.

4.2. Usage of cookies

When accessing the Feedback Board

When you visit the Feedback Board website, UseResponse sets first-party cookies on your device for the purposes described below. These cookies are automatically removed after they expire.

The following **essential cookies** are strictly necessary to provide you with services and to use some of the features available through the Feedback Board website.

Cookie Name	Description
preferred_interface	This cookie is used to remember the customer's choice of the preferable interface - desktop version or mobile interface.
views	The cookie is used to count the number of unique users that visited the topic or article page in the forum portal.
polls	The cookie is set when the user voted in the poll to prevent his repeat voting.
votes	The cookie is set when the user voted for an idea or a comment in it, in order to prevent his repeated voting.
abuse	The cookie is set when the user reported an inappropriate content in the topic or a comment in it to prevent his repeated reporting.
URSESSID	This cookie is a so-called session cookie. It preserves user session state across page requests and is necessary for the administration of the website.
votes_csrf_key csrf_protection_votes_csrf_key	The cookie prevents boosting the number of topic votes with automatic tools.
registration_email	The cookie is used for security reasons to save the email address after the registration to match it during the next user signing in.
reset_password_data	This cookie is set to save the user id while the password is reset.
oauth_resolution	The cookie is used for customers' social login via Facebook and Google, when applicable.
acd_timestamp	The cookie is used to limit the comment submission rate to one per minute.
ur_remember_me	The cookie is used as an identifier to renew the session.

When accessing the webpages provided by the Mailing and Survey Platform

When you visit one of the webpages provided by the Mailing and Survey platform, under the address of afmg.us3.list-manage.com, in order to e.g., manage your preferences or answer a survey, Mailchimp uses first-party cookies for the purposes described below. These cookies are automatically removed according to the specified expiration date.

The following **essential cookies** are strictly necessary to provide you with services and to use some of the features available through the Mailing and Survey Platform.

Cookie Name	Description	Expiration
_mclid, and _abck	These cookies are strictly necessary to provide you with services available through the Mailing and Survey Platform and to use some of its features, such as access to secure areas.	1 year.

ak_bmsc	This cookie is strictly necessary to provide you with services available through the Mailing and Survey Platform and to use some of its features, such as access to secure areas.	2 hours.
bm_sz, and bm_sv	This cookie is strictly necessary to provide you with services available through the Mailing and Survey Platform and to use some of its features, such as access to secure areas.	4 hours.

How to refuse cookies

You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies you may still use the Feedback Board and the Mailing and Survey Platform webpages available to you, although your access to some functionality and areas of these webpages may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, refer to your browser's help menu for more information. You will also find instructions on how to change your cookie preferences for some of the most popular browsers here:

[Cookie settings in Chrome](#)

[Cookie settings in Firefox](#)

[Cookie settings in Internet Explorer](#)

[Cookie settings in Safari on Mac](#)

Legal basis

The legal basis for this processing of data is Art. 6 (1) (f) GDPR. The legitimate interest in processing the data is that it enables the use of the above websites and their functions, as well as the optimization of the content displayed to the user.

5. Recipients of the Personal Data

Processors

The storage and processing of the Personal Data via the Feedback Board as described in sections 2.2, 2.4, and 4 is carried out by UseResponse on behalf of and based on instructions provided by AFMG. The Personal Data is stored within the EU based on a controller-processor-agreement with UseResponse. UseResponse provides appropriate safeguards to guarantee an adequate level of data protection for any data processed outside the EEA by standard data protection clauses adopted by the commission pursuant to Art. 46 (2) lit c GDPR a copy of which can be provided on request.

The storage and processing of the Personal Data via the Mailing and Survey Platform as described in sections 2.3, 2.4, and 4 is carried out by Mailchimp on behalf of and based on instructions provided by AFMG. The Personal Data is transmitted outside the EU based on a controller-processor-agreement. Mailchimp is required to provide an adequate level of protection (within the meaning of EU Data Protection Law) for the Personal Data. Mailchimp contractually commits to transfer and process the Personal Data in compliance with the [Standard Contractual](#)

[Clauses](#) for processors, as approved by the European Commission or Swiss Federal Data Protection Authority (as applicable).

The storage and processing of the Personal Data collected by automated means via the Software as described in section 3 is carried out by Microsoft Corporation, as well as IP-Projects GmbH & Co KG, on behalf of and based on instructions provided by AFMG. The hosting of the data takes place exclusively on servers within the European Union.

Sub-processors

UseResponse uses its affiliates and a range of third-party Sub-processors to assist in providing the services in the context of EASE 5 - Early Adopter Feedback Board. UseResponse is required to enter into written agreement with its Sub-processors imposing data-protection terms that require the Sub-processors to protect the Personal Data to the standard required by data-protection laws and the controller-processor-agreement between us and UseResponse.

List of current UseResponse Sub-processors:

- Digital Ocean, Inc.
- Google, Inc.
- Cloudflare, Inc.
- Twilio, Inc.
- Atlassian Corporation Plc
- Slack, Inc
- Zapier, Inc
- Salesforce.com, Inc
- UseResponse, Inc.
- Any other wholly-owned UseResponse, Inc. subsidiary organizations

These Sub-processors provide UseResponse with cloud hosting and storage services, content delivery, data transfer services, content review services, assist in providing customer support, as well as incident tracking, response, diagnosis, and resolution services. UseResponse may transfer and process your Personal Data anywhere in the world where UseResponse, its affiliates, or its Sub-processors maintain data-processing operations (within the limits of GDPR). If, in the performance of the data processing agreement, UseResponse transfers any Personal Data to a sub-processor located outside of the European Economic Area, UseResponse shall, in advance of any such transfer, ensure that a legal mechanism to achieve adequacy in respect of that processing is in place.

Mailchimp uses its affiliates and a range of third-party Sub-processors to assist in providing the services used by AFMG. Mailchimp is required to enter into written agreement with its Sub-processors imposing data-protection terms that require the Sub-processors to protect the Personal Data to the standard required by data-protection laws.

An up-to-date list of Mailchimp Sub-processors can be viewed here:

<https://mailchimp.com/legal/subprocessors/>

These Sub-processors provide Mailchimp with cloud hosting and storage services, content delivery, content review services, assist in providing customer support, as well as incident tracking, response, diagnosis, and resolution services. Mailchimp may transfer and process your Personal Data anywhere in the world where Mailchimp, its affiliates, or its Sub-processors maintain data-processing operations (within the limits of GDPR).

6. Your rights as a Data Subject

You may exercise certain rights regarding AFMG's processing of the Personal Data that relates to you.

Right to rectification

You have the right to obtain from AFMG the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement (Art. 16 GDPR).

Right to erasure

You have the right to obtain from AFMG the erasure of Personal Data concerning you (Art. 17 (1) GDPR), provided no exception as per Art. 17 (3) GDPR applies.

Within 30 days after we have received your request, we will permanently delete the Personal Data concerning you.

Right to revoke consent

You have the right to revoke consent to your registration to the EASE 5 – Early Adopter Program at any time and with effect for the future.

Consent can be revoked by email to eaprogram@afmg.eu with a simple declaration. Further participation in the EASE 5 Early Adopter Program will then no longer be possible.

Right to object to processing on the basis of legitimate interests

To the extent that processing of data is based on Art. 6 (1) (f) GDPR ("legitimate interests"), you have the right, under Art. 21 GDPR, and on grounds relating to your particular situation, to object at any time to the processing of Personal Data concerning you.

In the case of an objection, AFMG will no longer process the personal data, unless the processing serves the assertion, exercise, or defense of legal claims or AFMG can prove necessary, legitimate grounds for the processing that override the interests, rights, and freedoms of the Data Subject. Services that include functional components which are provided on this basis shall no

longer be used and further participation in the EASE 5 - Early Adopter Program will no longer be possible.

Right to access your data

You have the right, under Art. 15 GDPR, to obtain from AFMG confirmation as to whether or not Personal Data concerning you are being processed and, if applicable, to obtain a copy of the Personal Data undergoing processing.

You have the right to request confirmation from AFMG as to whether we are processing Personal Data concerning you. If this is the case, you have the right to access the Personal Data and the information specified in Art. 15 GDPR in conjunction with § 34 BDSG. This shall not apply if:

- The data is only stored because it may not be deleted due to legal or statutory storage obligations; or
- Exclusively serves the purpose of data security or data protection control.

Right to restrict the processing of your data

In certain cases, you have the right to obtain from AFMG restriction of processing of Personal Data concerning you. These cases are laid out in Art. 18 (1) GDPR.

Right to portability

You have the right to receive the Personal Data concerning you, which you have provided to AFMG, in a structured, commonly used, and machine-readable format and have the right to transmit those data to another Data Controller, in the cases laid out in Art 20 (1) GDPR.

Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority, in particular within the Member State of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of Personal Data relating to you infringes the GDPR (Art. 77 GDPR). Please refer to your local data protection authority for more information. On the European Commission website, you can refer to the [list of data protection authorities within the European Economic Area](#).

Berlin, December 2, 2021

Version: 2.0

We may review and, where necessary, update this data protection policy. If we plan to use the Personal Data of users registered to the EASE 5 – Early Adopter Program for a new purpose, that is incompatible with the original purposes for which consent has been provided, we will update this policy and request consent for the new purpose.