

Data Privacy Statement of the ThinPrint GmbH

This Data Privacy Statement applies to all products, services and websites distributed by ThinPrint GmbH, Alt-Moabit 91a, 10559 Berlin, Germany (hereinafter referred to as "ThinPrint"). ThinPrint strongly emphasizes the protection of your personal data. ThinPrint adheres to any and all applicable data protection provisions, including but not limited to the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz, BDSG).

Data collected by the ThinPrint website or the Mobile-Session-Print-Service and use thereof

User data

In order to use ThinPrint resources and services, you must register with ThinPrint. With this registration you can, for example, download software and documents and use the online shop. To register, fill out a form that collects the following personal information: first name and surname, company name, phone number and e-mail address, optional country and preferred language. In addition, ThinPrint stores the password you have chosen for registration. When using the online shop, the following information is required: first and last name, postal address, country, e-mail address, payment method and, if applicable, the e-mail address of your system administrator. In addition, you can optionally specify: VAT number, company name, telephone number, Gmail address, name of your tenant. Furthermore, ThinPrint stores accumulating billing data.

Personal data you made available is used to fulfill the service contract ThinPrint concluded with you. In addition, we use your e-mail address and – if necessary – phone number for purposes of direct marketing purposes (information on products, newsletters, etc.). The legal basis of such processing is the protection of *legitimate interests* pursued by ThinPrint (Article 6 para. 1 (f) in conjunction with recital 47 and 50 GDPR).

Optionally, you can use existing login data from Microsoft, LinkedIn or Google to register or log in to ThinPrint. This means that data is only sent to Microsoft, LinkedIn or Google if you explicitly click on the button in question. In this case, ThinPrint will retrieve the following information from Microsoft, LinkedIn or Google: your public profile and your e-mail address (to associate your accounts). Conversely, Microsoft, LinkedIn or Google each registers your use of the ThinPrint account.

In general, any and all information that allows us to individually identify people are considered personal information. We always receive and transmit any and all personal data by way of encryption.

When using the cloud service *ThinPrint Mobile Session Print* – which is part of the product *ThinPrint Engine* – you may use your (corporate) e-mail address to register at the Mobile Session Print server. This is only used to identify you as a member of your company domain and to enable you to use this particular printing service with your mobile device. Here, the legal basis of such processing is the protection of *legitimate interests* pursued by ThinPrint (Art. 6 para. 1 (f) in conjunction with recital 47 GDPR).

Usage data

On your visit to a ThinPrint website, we send a **cookie**, e.g. a small electronic file consisting of a certain character string allowing us to identify your browser. Additional cookies are used for caching your user preferences. All ThinPrint cookies are recognizable by the string **thinprint.com**, which can be found in the name of the cookie. However, you have the option to set your browser to refuse cookies or to ask you every time a cookie is sent.

Furthermore, ThinPrint servers automatically record usage data that your browser sends when you visit a website or that logs your use of the Mobile Session Print Service. These so-called **log data** include your web request, IP address, browser type, browser language, date and time of a request and cookies. These log data allow to clearly distinguish your browser from other browsers. If required, log data is used by ThinPrint only for purposes of evidence, error detection as well as for identifying and repelling hacker attacks. These data will be automatically deleted after 30 days. The legal basis of such processing is the protection of *purposes of legitimate interests* pursued by ThinPrint (Art. 6 para. 1 (f) in conjunction with recital 47 GDPR).

Third parties / Target group orientated ads

ThinPrint uses the following third parties for analytical purposes and/or to place their own interest-based ads on the websites of these third-party providers:

- Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA (for analytics + ads)
- Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA (for ads)
- Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025, USA (for ads)

For ads, cookies (also referred to as tags, user action or tracking pixels) from the above mentioned third-party providers are placed in your web browser once you have logged in with your third-party account and looked at or clicked on an advertisement there. This allows ThinPrint to track users' actions, the effectiveness of advertisements for statistical and market research purposes and to display ads regarding products or services that may interest you. All data collected this way is anonymous for ThinPrint (usage data); in other words, ThinPrint does not see the individual user's personal data (user data).

However, these usage data may be stored and processed by the respective third party. If you also log-in to your relevant third-party account using the same web browser, the pertinent third-party provider could connect your usage data with your local account – thus your user data – and use for their own promotional purposes. To prevent that from happening, you can either block the third-party cookies via browser settings or use two different web browsers on the same device – one for visiting the ThinPrint website and another one for logging in to the third-party provider account.

ThinPrint only uses the collected personal data as indicated for the purposes they were actually intended for. Apart from that, the purposes include the provision of ThinPrint's services and products for users and the development of new services and products.

To analyze the activities on its websites, ThinPrint uses the functions of Google Analytics. To ensure anonymization of IP addresses, Google provides an extension to the Google Analytics Code. Integrating the code extension "anonymizelp". By using the code extension, the last 8 bit of the IP address will be deleted and therefore anonymized. This only permits a rough localization and is approved by the German data protection authorities. ThinPrint anonymizes any and all IP addresses before their transmission to Google via Javascript with the code line "ga('set', 'anonymizelp', true);" or "_gaq.push(['_gat._anonymizelp']);" in your browser (see <https://support.google.com/analytics/answer/2763052?hl=en>).

Data collected by ThinPrint

ThinPrint offers sale, consulting and support of its services. For this purpose, personal data is stored in a customer database of Freshworks Inc. (1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA). The legal basis of the procedure is the protection of *legitimate interests* pursued by ThinPrint (Article 6 para.1 (f) in conjunction with recital 47 GDPR).

At customer or partner events, at trade fairs or conferences, photographs are taken or occasionally videos are recorded for marketing purposes. The persons depicted will not be named without their consent. Here, the legal basis of processing the mentioned data is the protection of *legitimate interests* pursued by ThinPrint (Article 6 para. 1 (f) in conjunction with recital 47 GDPR).

Your approval for the collection of personal data / Objection

If you register for a specific service on the ThinPrint websites – for example ThinPrint Mobile Session Print –, we ask for your personal data (see above). If such data shall be used for a purpose other than that stated above, we will request your consent for us doing so by checking an applicable box on the website. Without your express prior consent, ThinPrint will not use your personal information for other purposes than that stated above.

You are at all times entitled to refuse to provide personal information or to object processing of provided personal data. Please be aware though that in such case ThinPrint might not be able to offer you all available services. If you object to the further processing of your personal data (Art. 21 GDPR) or demand its erasure (Art. 17 GDPR), ThinPrint shall delete

said data immediately; in the case of pending obligations arising from an existing contractual relationship between you and ThinPrint upon termination of this contractual relationship or, if applicable, after a statutory retention period has expired.

Transfer of personal data to third parties

In addition to the purposes outlined above for *analytics* and *interest-based ads*, ThinPrint is providing the users' e-mail address to the newsletter service provider *Avenue 81 Inc. d/b/a Leadpages* (251 N. 1st Avenue, Suite 200, Minneapolis, MN 55401, USA). Furthermore, ThinPrint uses various platforms from the cloud service provider *Freshworks Inc.* (1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA) such as *Freshdesk* for support and consulting and *Freshsales* for customer relationship management (customer database). When using the online shop, we will transmit the e-mail address you provide and the identification number (ID) assigned to you to *Chargebee Inc.* (340 S Lemon Ave # 1537, Walnut, California 91789, USA) or *Bright Market LLC dba FastSpring* (801 Garden Street, Suite 201, Santa Barbara, CA 93101, USA) for invoicing and payment processing. The legal basis of processing is the protection of *purposes of legitimate interests* pursued by ThinPrint (Art. 6 para. 1 (f) in conjunction with recital 47 and 50 GDPR).

ThinPrint web pages and cloud services include a number of social media buttons such as Twitter, Facebook, and LinkedIn. Data will only be sent to the respective third-party provider if you explicitly click on the relevant button. By doing so, your browser establishes a direct connection to a web server of the respective social network. As a result, the social network receives the information that you have accessed one of our corresponding websites. If you are logged in to the social network at the same time and with the same browser you visit our website, the social network can assign your website visit to your account. Again, we recommend using two different web browsers on the same device to use our websites and services on the one hand, and to log in to the social network on the other, should you wish to exclude the use of your usage data for advertising purposes.

Without your consent, ThinPrint will only transfer or disclose your personal data upon presentation of a search warrant, judicial order, judicial decree or another form of lawful cases regulated by law. In such cases, the legal basis lies in the *compliance with a legal obligation* (Art. 6 para. 1 (c) GDPR).

Data security

ThinPrint uses adequate security measures to prevent unauthorized access or change, transfer or deletion of personal information. Such measures include, but are not limited to, internal review of our data collection practices, data storage and processing as well as technical and organizational security measures to prevent access to the systems we use to store such sensitive data.

Any and all data collected via the cloud solution *ThinPrint Mobile Session Print* are filed at the facilities of *AWS US East (N. Virginia)*. AWS is the cloud provider *Amazon Web Services Inc.* (410 Terry Avenue North, Seattle WA 98109, USA), which only provides the server platform. The management of the encryption of the connection to AWS data including their encryption is the responsibility of ThinPrint and its parent *Cortado Holding AG* (Alt-Moabit 91 b, 10559 Berlin, Germany). AWS has been certified according to German principles of Basic IT Security by the TÜV Austria Group. For further information on data privacy and compliance at AWS, please visit https://aws.amazon.com/compliance/re-sources/?nc1=h_ls.

In addition, ThinPrint websites including online shop are hosted at *WP Engine Inc.* (504 Lavaca Street, Suite 1000, Austin, Texas 78701, USA). WP Engine only provides the web server platform. The management of the data including the encryption, however, lies exclusively with ThinPrint. For further information on data privacy and compliance at WP Engine, please visit <https://wpengine.com/legal/privacy/>.

Access to such data is internally limited to such members of staff who for the operation, development, and improvement of our services and products require knowledge of such data. Such members of staff are required to adhere to special

confidentiality requirements. If such members of staff, however, breach the secrecy requirements, they have to face consequences under labor law and/or criminal prosecution.

Enforcement

ThinPrint regularly checks compliance with this Data Privacy Statement. If you have any questions, comments, requests for information, rectification, processing restrictions, portability or erasure of data, please feel free to contact our duly appointed Data Protection Officer at dataprotection@thinprint.com. **You have the right to object to the processing of your personal data or to revoke your consent at any time.** In addition, you have the right to complain to the relevant recourse authority.

Offer to conclude a Data Processing Agreement

In your capacity as a business customer, on your instructions and within the framework of the service provision personal data is collected, processed and / or used by ThinPrint. According to Art. 28 GDPR the contracting authority – i.e. you – is responsible for complying with the data protection rules. You can fulfill this obligation by concluding a Data Processing Agreement with ThinPrint, which meets the legal requirements of the GDPR. Upon request ThinPrint will be happy to provide you with a draft of a Data Processing Agreement along with an Addendum describing our technical and organizational security measures to protect personal data. Once provided to you, you only have to check and sign these documents. If you have any concerns, inquiries or if you need further information or assistance, we are happy to assist you at dataprotection@thinprint.com.

Alterations and amendments

Please note that this Data Privacy Statement may be altered and/or amended from time to time. Without your express consent, though, we will not restrain your rights under the current Data Privacy Statement. Amendments and/or alterations concerning the Data Privacy Statement will be announced by ThinPrint on the websites. Earlier versions of the Data Privacy Statement will be filed and will be available for reference upon your request.

Berlin, February 2019