Legal bases for the Privacy Policies of ezeep and ThinPrint

Legal bases of the processing in the EU General Data Protection Regulation (GDPR)

The provider or processor may only process personal data of users if one of the following applies (Article 6 paragraph 1 DSGVO):

a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

c) processing is necessary for compliance with a legal obligation to which the controller is subject;

d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;

e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

Specifically, the processing of personal data mentioned in the ThinPrint GmbH Privacy Policies – e.g. related to ezeep.com, thinprint.com or Mobile Session Print – is based on the following of the above mentioned legal bases:

Legal bases for ThinPrint’s Privacy Policies in detail

<table>
<thead>
<tr>
<th>Processing of personal data</th>
<th>Legal basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Analytics (collection of data and their evaluation with regard to the behaviour of visitor): e.g. Google Analytics</td>
<td>Art. 6 para. 1 (a) GDPR (user’s consent)</td>
</tr>
<tr>
<td>Display content from external platforms: e.g. YouTube Video Widget</td>
<td>Art. 6 para. 1 (a) GDPR (user’s consent)</td>
</tr>
<tr>
<td>Hosting and backend infrastructure: e.g. Microsoft Azure, Amazon Web Services, WPEngine</td>
<td>Art. 6 para. 1 (b) GDPR (performance of a contract)</td>
</tr>
<tr>
<td>Registration and Login: e.g. directly on the ThinPrint ID Server or via social login at Google (Google OAuth), Linkedin (Linkedin OAuth) or Microsoft (OneDrive OAuth)</td>
<td>Art. 6 para. 1 (b) GDPR (performance of a contract)</td>
</tr>
<tr>
<td>Remarketing and Behavioural Targeting (marketing): e.g. LinkedIn Website Retargeting</td>
<td>Art. 6 para. 1 (a) GDPR (user’s consent)</td>
</tr>
<tr>
<td>Tag management (provision of scripts and others for the website): e.g. with Google Tag Manager</td>
<td>with regard to essential functions: Art. 6 para. 1 (b) GDPR (performance of a contract), with regard to all other functions: Art. 6 para. 1 (f) GDPR (legitimate interests pursued by ThinPrint)</td>
</tr>
<tr>
<td>Management of user databases: e.g. with Freshsales</td>
<td>with regard to the provision of services requested by you: Art. 6 para. 1 (b) GDPR (performance of a contract), with regard to all other functions: Art. 6 para. 1 (f) GDPR (legitimate interests pursued by ThinPrint)</td>
</tr>
</tbody>
</table>
Management of **support and contact requests** (helpdesk):  
- e. g. with Freshdesk  
- *Art. 6 para. 1 (b) GDPR (performance of a contract)*

**Direct marketing**: e. g. information on products, newsletters  
- with regard to the provision of information requested by you: *Art. 6 para. 1 (b) GDPR (performance of a contract)*,  
- with regard to all other marketing measures:  
  - *Art. 6 para. 1 (f) in conjunction with Recital 47 GDPR (legitimate interests pursued by ThinPrint)*

**Forms**: e. g. contact or offer forms  
- *Art. 6 para. 1 (b) GDPR (performance of a contract)*

**Photos and video recordings**: at customer or partner events, at trade fairs or conferences: for marketing purposes  
- by name: *Art. 6 para. 1 (a) GDPR (user’s consent)*,  
- anonymously: *Art. 6 para. 1 (f) in conjunction with Recital 47 GDPR (legitimate interests pursued by ThinPrint)*

**Mobile Session Print**: Cloud service as part of the ThinPrint Engine product for the delivery of print jobs from remote desktop sessions to mobile devices  
- with regard to the provision of the service requested by you: *Art. 6 para. 1 (b) GDPR (performance of a contract)*,  
- with regard to all other functions: *Art. 6 para. 1 (f) GDPR (legitimate interests pursued by ThinPrint)*

**Crashlytics**: Monitoring service of the ezeep app provided by Google  
- with regard to the provision of the service requested by you: *Art. 6 para. 1 (b) GDPR (performance of a contract)*,  
- with regard to all other functions: *Art. 6 para. 1 (f) GDPR (legitimate interests pursued by ThinPrint)*

**Log data**: access data recorded by web servers or cloud services for verification purposes, for troubleshooting and to identify and defend against hacker attacks  
- *Art. 6 para. 1 (f) in conjunction with Recital 47 GDPR (legitimate interests pursued by ThinPrint)*

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**Subprocessors of the ThinPrint GmbH**

The following companies process personal data on behalf of ThinPrint:

<table>
<thead>
<tr>
<th>Name and address of Subprocessor</th>
<th>Description of performance</th>
</tr>
</thead>
</table>
| **Cortado Holding AG**, Alt-Moabit 91b, 10559 Berlin, Germany (parent company) | Company’s business activities, like:  
  - administration of websites, social media and web- and cloud services such as ezeep, ThinPrint Cloud Printer, Amazon Web Services, Open Telekom Cloud, Microsoft Azure, Teamplace, Cortado MDM, ClassMarker and ThinPrint Mobile Session Print  
  - services such as marketing, sales, customer support, recruiting, team-management, processing of payments and accounting  
  - representation of contractor towards authorities and companies in legal and tax matters, auditing, personnel management, retirement and profit sharing  
  - security organization such as IT administration, IT security, alarm system and security services for the Supplier (such as sales, consulting and customer support) |
| **Cortado Inc.**, 3858 Walnut St #130, Denver, CO 80205, USA (subsidiary company) |  |
| **Cortado Pty Ltd.**, Level 12, Plaza Building, Australia Square, 95 Pitt Street, NSW 2000 Sydney, Australia (subsidiary company) |  |
Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg
hosting of cloud services such as ezeep, ThinPrint Cloud Printer and ThinPrint Notification Server (of ThinPrint Mobile Session Print) on Amazon Web Services (AWS)

Microsoft Corporation, One Microsoft Way, Redmond, Washington 98052, USA
hosting of the cloud service ezeep on Microsoft Azure

ScriptRunner Software GmbH, Ludwig-Erhard-Straße 2, 76275 Ettringen, Germany
Skript-Verwaltung für die ThinPrint Management Services (Tpms)

Stratodesk Software GmbH, Gabelsberger Straße 11–13, 9020 Klagenfurt, Austria
External licensing in case of use of the management software Stratodesk Notouch Center aka ThinPrint Hub Remote Management (www.stratodesk.com)

SurveyMonkey Europe UC, 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland
Survey platform as a cloud service

Zendesk Inc., 1019 Market Street, San Francisco, California 94103, USA
Live-Chat Zopim as cloud service

Provider and Processor
ThinPrint GmbH
Alt-Moabit 91a
10559 Berlin
Germany
E-mail: dataprotection@thinprint.com