



Privacy Policy

Last updated: December 6, 2023

Introduction

Welcome to IntellectEU!

Protecting your data is a top priority for IntellectEU Group ("IntellectEU"). You can explore our internet pages without sharing personal information. However, if you order our services, decide to utilize our products or post a job application, we may need to process your Personal Data.

We follow the General Data Protection Regulation ("GDPR") and country-specific data protection laws related to IntellectEU. This Privacy Policy explains what Personal Data we collect, why we collect it, and how we use it. It also informs you of your rights regarding your data.

IntellectEU, as the Controller, has put in place measures to protect your data. While we strive for complete security, please be aware that internet-based data transmissions may have potential security gaps.

We may update this Privacy Policy, and we'll notify you of any significant changes through our website or other means. If you continue to use our internet pages after such changes, it means you agree to them.

This Privacy Policy is constructed with 2 layers: short and detailed.

Below you can review the short part. To find more details, please refer to [Part 2](#).

PART 1 – Short Version

1. Definitions

To make our data protection declaration clear, we use certain terms, as defined by GDPR. We want everyone, including our customers and partners, to easily understand these terms:

Personal Data: Information about a person that can directly or indirectly identify them, such as a name, identification number, or online identifier.

Data Subject: Any person whose Personal Data is processed by the Controller. Any reference to "**you**" or "**your**" shall have the same meaning.

Processing: Any operation on Personal Data, whether automated or not, including collection, recording, storage, and more.

Restriction of Processing: Marking stored Personal Data to limit future Processing.

Profiling: Automated Processing to evaluate personal aspects, like work performance, economic situation, or health.



Controller: The entity or a natural person determining the purposes and means of Personal Data Processing.

Processor: The entity or a natural person Processing Personal Data on behalf of the Controller.

Third Party: Any entity other than the Data Subject, Controller, Processor, or those authorized by them.

Consent: The Data Subject's freely given, specific, informed, and unambiguous agreement to the Processing of their Personal Data.

2. Controller Information

For matters related to data protection and privacy, the Controller, as defined by GDPR and other applicable data protection laws, is the IntellectEU Group. Here are our offices:

- **IntellectEU N.V.**
Address: Kanaalbrugstraat 15-5.1, 1500 Halle, Belgium
- **IntellectEU, Lda. Unipessoal**
Address: Alameda Dos Oceanos, N°61 1.1, 1990-208 Lisboa, Portugal
- **IntellectEU Inc.**
Address: 2 S. Biscayne Blvd, Suite 3200 Miami FL 33131, US
Note: IntellectEU Inc. has appointed IntellectEU N.V. as its Representative in the European Union, in accordance with Article 27 of the GDPR.
- **INTELLECTEU Sp. z.o.o**
Address: ul. Hoza, No. 86, ap. 210, Warsaw, 00-682, Poland
- **Email applicable for all offices:** info@intellecteu.com

3. Cookies

IntellectEU's internet pages use Cookies (as defined below), which are text files stored in your computer via an internet browser.

What are Cookies?

Cookies often have a unique identifier (Cookie ID), a character string that helps websites recognize your specific internet browser. They make your online experience more user-friendly and enable features that wouldn't be possible without them.

How do we use Cookies?

Cookies allow IntellectEU to provide you with a better website experience. They help us optimize information and offers for you. For example, if you've added items to an online shopping cart, a Cookie remembers those items.

Your Control Over Cookies:

You can prevent Cookies from being set on our website by adjusting your internet browser settings. You can delete already set Cookies at any time through your browser or other software. It's recommended to keep Cookies enabled for a smoother experience.



Note: Some website features may be restricted without certain Cookies.

4. Collection of General Data and Information

When you visit the IntellectEU website, certain general data and information are automatically collected and stored in server log files. This includes:

- Browser Types and Versions
- Operating System Used
- Referrer (Website from which you reached our site)
- Sub-websites (like catalyst.intellecteu.com)
- Date and Time of Access
- Internet Protocol Address (IP Address)
- Internet Service Provider
- Other similar data in case of attacks on our IT systems

Purpose of Data Collection:

- Deliver content correctly
- Optimize website content and ads
- Ensure long-term viability of IT systems
- Provide information for law enforcement in case of cyber-attacks

We analyze this data anonymously to:

- Increase data protection and security
- Optimize and upgrade the website
- Optimize the protection of Personal Data

Note: The information collected is separated from Personal Data provided by the user, ensuring anonymity and data protection.

5. Contacting Us through the Website

On the IntellectEU website, you can quickly and easily contact us electronically. We provide a general email address for direct communication. When you reach out to us via email or a contact form, the Personal Data you share is automatically stored. This data, provided voluntarily, is used to process your inquiry and for communication purposes.

Key Points:

- Personal Data is stored for Processing and communication with you.
- We do not share this Personal Data with Third Parties.
- Your privacy is important to us, and we ensure that your information is kept secure.



6. Email Marketing

IntellectEU may use third-party data augmentation services to provide you with marketing emails that could be relevant to you and your company. The categories of Personal Data processed by IntellectEU may include:

- First name
- Last name
- Email address
- Position/title
- Phone number
- Non-precise location data (e.g., country/state/county)

The purpose is to inform you about our products, services, publications, and events. For this Processing we are relying on our legitimate interest unless explicit Consent is requested.

Your Options to Object against this Processing:

- Opt-out via the "Unsubscribe" link in marketing emails.
- Object to Processing anytime via email at privacy@intellecteu.com.

Personal Data is shared within IntellectEU Group and with its relevant Processors. IntellectEU retains the Personal Data for up to 1 calendar year from the first marketing email.

Note: If you opt out, certain Personal Data may be retained on a "do not contact" list.

7. Purpose for Collection and Storage of Personal Data

At IntellectEU, we may use your Personal Data and information collected through our services for various reasons, including:

- **Service Operation:** Provide, operate, optimize, and maintain our services.
- **Customer Support:** Handle customer inquiries and support requests.
- **Website Management:** Manage the IntellectEU website, system administration, and security.
- **Transaction Processing:** Process and complete transactions.
- **Statistical Insights:** Compile aggregated statistics to understand customer preferences.
- **Communication:** Send technical alerts, reports, updates, security notifications, and service-related communications.
- **Marketing Communications:** Provide marketing communications in accordance with your preferences or based on legitimate interests.
- **Transactions through Intermediary:** Perform transactions through intermediaries, such as payment providers.
- **Security and Investigations:** Investigate and prevent crimes, fraud, unauthorized access, breaches of terms and policies, and other wrongful behavior.
- **Legitimate Business Purposes:** Carry out other legitimate business purposes and those listed in our terms and conditions available on our website.
- **Lawful Purposes:** Fulfill other lawful purposes about which we notify you.\

8. Routine Erasure and Blocking of Personal Data

At IntellectEU, we process and store your Personal Data only for the time required to achieve the intended purpose of storage, as permitted by European legislator or other applicable laws and regulations.

Key Points:

- **Storage Duration:** Personal Data is stored for the necessary period based on the purpose and legal requirements.
- **End of Storage Purpose:** If the storage purpose no longer applies or the prescribed storage period expires, we routinely block or erase Personal Data.
- **Compliance:** All actions are in accordance with legal requirements set by the European legislator and other competent legislators.

We prioritize the responsible handling of your data, ensuring it is retained only for as long as necessary and in compliance with applicable laws.

9. Rights of the Data Subject

Under GDPR, you are granted with certain rights. Here is a short summary of your rights:

- **Right of Confirmation**
You have the right to confirm whether we are Processing your Personal Data.
- **Right of Access**
You can request free information about your stored Personal Data at any time. This includes details such as Processing purposes, categories of data, and more.
- **Right to Rectification**
If your Personal Data is inaccurate or incomplete, you have the right to rectification.
- **Right to Erasure (Right to be Forgotten)**
You can request the erasure of your Personal Data if certain grounds apply.
- **Right of Restriction of Processing**
If you contest data accuracy, oppose erasure, or need data for legal claims, you can request Processing restriction.
- **Right to Data Portability**
You have the right to receive your Personal Data in a machine-readable format.
- **Right to Object**
You can object to Processing based on specific grounds. If Processing is for direct marketing, you have the right to object.
- **Automated Individual Decision-Making, Including Profiling**
You have the right not to be subject to decisions based solely on automated Processing.
- **Right to Withdraw Data Protection Consent**
You can withdraw your Consent to the Processing of your Personal Data at any time.

You may exercise your rights by sending us an email to privacy@intellecteu.com.

10.Data Protection for Job Applications

We collect and process Personal Data of job applicants for the purpose of managing the application procedure. This Processing may include electronic methods, especially when applicants submit documents via email or web forms on our website.

Key Points:

- **Purpose:** Collect and process Personal Data for the application procedure.
- **Electronic Processing:** Application data may be processed electronically.
- **Employment Contract:** If an employment contract is established, submitted data will be stored for employment relationship Processing according to legal requirements.
- **Data Erasure:** If no employment contract is established, application documents are automatically erased two months after the refusal decision, unless other legitimate interests, such as those required by the General Equal Treatment Act (AGG), oppose erasure.

We value the privacy of our applicants and adhere to legal standards throughout the application process.

11.Links to Third Parties

Our website may contain links leading to Third Parties' website, including links to our accounts in social media platform such as Facebook, Instagram, Google Analytics, YouTube, LinkedIn, X (prev. Twitter).

Clicking on those links may allow third parties to collect or share your Personal Data. We do not control these third-party websites and are not responsible for their use of your Personal Data. Please read privacy notices on their websites carefully.

12.Data Protection and Google Analytics Usage

This website uses Google Analytics, a web analytics service provided by Google Ireland Limited. Google Analytics analyzes website traffic, helping us optimize the site and assess the effectiveness of online advertising.

Key Points:

- **Google Analytics Component:** We've integrated Google Analytics to gather insights into website visitor behavior, such as the source of the visit, pages viewed, and duration.
- **Anonymizer Function:** Google Analytics employs certain application to anonymize IP addresses from visitors accessing our site within the European Union or other Contracting States.
- **Purpose:** The goal is to analyze website traffic. Google uses the collected data to evaluate site usage, generate online reports, and provide other services related to our website.
- **Cookies:** Google Analytics places a Cookie on the user's device to track information like access time, location, and frequency of visits. This data is transmitted to Google in the United States.
- **Opting Out:** Users can prevent the setting of cookies and data collection by adjusting browser settings. Additionally, a browser add-on is available at <https://tools.google.com/dlpage/gaoptout> to opt-out of Google Analytics data collection.

- **Browser Add-on Installation:** Installing the browser add-on is considered an objection to Google Analytics. If the user's system is later modified or reinstalled, the add-on must be reinstalled to maintain the opt-out.
- **Additional Information:** For more details and Google's data protection provisions, visit <https://www.google.com/intl/en/policies/privacy/> and <http://www.google.com/analytics/terms/us.html>.

13. Legal basis for the Processing

We use different legal bases for Processing your Personal Data as per GDPR. Here are some examples:

- **Consent:** Various Marketing/KYC forms, "Contact us" webpage, "Schedule a meeting" webpage.
- **Performance of a Contract:** Job application procedure.
- **Pre-contractual Measures:** Communications preceding the order of services or products.
- **Legal Obligation:** Tax reporting
- **Vital Interests:** Health-related incidents of our employees
- **Legitimate Interests:** Email marketing

14. Period for which the Personal Data will be stored

Your Personal Data will be stored by IntellectEU in its Controller capacity under certain limitations. Sometimes, these limitations are dictated by various laws (e.g. tax-related regulations) or reasonable business necessity. To be transparent with you, we would like you to know about the following **Key Points**:

- **Retention Period:** Personal information will be retained for the period necessary to fulfill the purposes outlined in the privacy policy.
- **Extension of Retention Period:** A longer retention period may be required or permitted by law, especially for legal, tax, regulatory reasons, or other lawful purposes.
- **Disposal of Data:** When there is no ongoing legitimate business need to process personal information, we will either delete or anonymize it.
- **General Personal Data Retention Period:** The general retention period for Personal Data is stated as 30 days after the end of the purpose of its collection.
- **Specific Data Retention Periods:** Some specific types of data, such as general delivery and open stats data, are mentioned to be stored for at least 180 days from the mailing date.
- **Criteria for Storage Period:** The criteria used to determine the period of storage for Personal Data is the respective statutory retention period.
- **Routine Deletion:** After the expiration of the statutory retention period, data is routinely deleted if it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

15. Miscellaneous

Some related sections are too short to be kept in each separate section. To increase the readability, we present all of them in one place for your convenience. Here we outline the circumstances under which the provision of Personal Data is required, whether by law or contract.

Key Points:

- **Legal and Contractual Requirements:** The provision of Personal Data is partly required by law, such as finance and tax regulations. It can also result from contractual provisions, for example, information on the contractual partner.
- **Necessity for Contract Conclusion:** In some cases, it may be necessary for you to provide Personal Data to conclude a contract with IntellectEU.
- **Obligation of the Data Subject:** You shall be obligated to provide Personal Data when entering into a contract with IntellectEU.
- **Consequences of Non-Provision:** The non-provision of Personal Data in these cases would result in our inability to conclude the contract with you.
- **Information to Data Subject:** In context-specific events, IntellectEU will clarify to you whether the provision of your Personal Data is required by law or contract, whether there is an obligation to provide such Personal Data, and the consequences of not providing the required Personal Data.

16.Contact us

To exercise your rights or for any questions regarding this Privacy Policy, please feel free to reach out to us at privacy@intellecteu.com.

PART 2 – Detailed Version

Thank you for showing interest in IntellectEU!

Data protection is of a particularly high priority for the management of IntellectEU Group (“**IntellectEU**”). The use of the Internet pages of IntellectEU is possible without any indication of personal data; however, should a data subject opt to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country specific data protection regulations applicable to IntellectEU. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, IntellectEU has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means.

We may modify this Policy from time to time. We will provide you with notice of any material changes to this Policy by publishing or communicate the changes through our website or by other means so that you may review the changes before continuing to use our Internet pages. Your continued use of the Internet pages after we publish any changes to this Policy means that you are consenting to the changes.

1. Definitions

The data protection declaration of IntellectEU is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

a) Personal data

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is someone 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.

b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

c) Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

e) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

g) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

h) Processor

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

j) Third Party

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, is authorised to process personal data.



k) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wish by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member States of the European Union and other provisions related to data protection is:

The IntellectEU Group with the following offices:

a) IntellectEU N.V.

Kanaalbrugstraat 15-5.1

1500 Halle, Belgium Email: info@intellecteu.com

Website: <https://www.intellecteu.com/>.

b) IntellectEU, Lda. Unipessoal

Alameda Dos Oceanos, Nº61 1.1,

1990-208 Lisboa, Portugal

Email: info@intellecteu.com

Website: <https://www.intellecteu.com/>

c) IntellectEU Inc.

2 S. Biscayne Blvd, Suite 3200

Miami FL 33131, US

Email: info@intellecteu.com

Website: <https://www.intellecteu.com/>

IntellectEU Inc. appointed IntellectEU NV as its Representative in the European Union, pursuant to Article 27 of the GDPR.

d) INTELLECTEU Sp. z.o.o

ul. Hoza, No. 86, ap. 210, Warsaw,

00-682, Poland

Email: info@intellecteu.com

Website: <https://www.intellecteu.com/>



In case of questions referring to data protection and privacy issues please don't hesitate to contact us at privacy@intellecteu.com.

3. Cookies

The Internet pages of IntellectEU use Cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use Cookies. Many cookies contain a so-called Cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the Cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other Cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of Cookies, IntellectEU can provide the users of this website with more userfriendly services that would not be possible without the Cookie setting.

By means of a Cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses Cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the Cookie is thus stored on the user's computer system. Another example is the Cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a Cookie.

The data subject may, at any time, prevent the setting of Cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of Cookies. Furthermore, already set Cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. Since Cookies allow the data subject to access some of the features of our website, it is recommended to keep them. Without certain Cookies, some functionality of our website may be restricted. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

4. Collection of general data and information

The website of IntellectEU collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files.

Data that may be collected automatically (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, IntellectEU does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our



website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, IntellectEU anonymously analyses collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

5. Contact possibility via the website

The website of IntellectEU contains information that enables a quick electronic contact with our company, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

6. Email marketing

IntellectEU may obtain your personal data from third party data augmentation services to provide you with marketing emails that could be of interest to you and your company. In such a case, the following categories of personal data may be processed by IntellectEU: first name, last name, e-mail address, position/title, phone number, non-precise location data (e.g. country/state/county). The purpose of the processing is to inform you via any e-mail about our products, services, publications and events which IntellectEU think may be of interest to you and your company.

Please be aware, that unless IntellectEU explicitly request your consent to process your personal data, IntellectEU rely on its own and your company's legitimate interest to send you relevant marketing communications. The privacy impact of such processing of your personal data is low, as IntellectEU contacts you in your professional capacity. You can opt out of processing for email marketing purposes by clicking on the "Unsubscribe" link situated within any marketing emails sent to you. You also have the right to object to the processing at any time by contacting us via e-mail: privacy@intellecteu.com. Keep in mind that where you withdraw your consent or unsubscribe (as applicable), the third-party's product which IntellectEU is utilizing to conduct marketing campaigns will retain certain personal data (only to the extent that it is absolutely required) on its "do not contact" list.

IntellectEU may share your personal data with companies within IntellectEU Group. IntellectEU will also share your personal data with third-parties that carry out services on our behalf such as marketing solution providers as mentioned above. IntellectEU will process your personal data unless you opt out of the processing for email marketing purposes, but not longer than 1 calendar year from the date of a first marketing email sent to you. Upon expiry of the mentioned time-frame, IntellectEU shall automatically stop processing your personal data with further deletion of such personal data and instruct involved third-parties to do the same with exception for events mentioned in this section.

7. Purpose for collection and storage of Personal Data

IntellectEU may use your Personal Data and information collected through the services for a range of reasons, which include:

- To provide, operate, optimize and maintain the services;
- To deal with customer enquiries and support requests;
- To manage the IntellectEU website, system administration and security;
- To process and complete transactions;
- To compile aggregated statistics about the operation and use of the services and to better understand the preferences of our customers;
- To send our customers technical alerts, reports, updates, security notifications and other service-related communications;
- To perform transactions through intermediary (payment provider);
- For the purpose of marketing communications (where this is in accordance with Your communication preferences or if based on legitimate interest purposes);
- To investigate and prevent crimes, fraud, unauthorized access or use of services, breaches of terms and policies, and other wrongful behavior;
- To carry out other legitimate business purposes, as well as other lawful purposes listed in our terms and conditions available on our website and/or other purposes about which we notify you.

8. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

9. Rights of the data subject

a) Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller and write an inquiry at: privacy@intellecteu.com.

b) Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information: • the purposes of the processing;

- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data is transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

c) Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

d) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by IntellectEU, he or she may, at any time, contact us at privacy@intellecteu.com.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employee of IntellectEU will arrange the necessary measures in individual cases.

e) Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by IntellectEU, he or she may at any time contact us at privacy@intellecteu.com. The employee of IntellectEU will arrange the restriction of the processing.

f) Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of IntellectEU at privacy@intellecteu.com.

g) Right to object



Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

IntellectEU shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If IntellectEU processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to IntellectEU to the processing for direct marketing purposes, IntellectEU will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by IntellectEU for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of IntellectEU at privacy@intellecteu.com. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

h) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, IntellectEU shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of IntellectEU and write an email to: privacy@intellecteu.com.

i) Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time. If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of IntellectEU at privacy@intellecteu.com.

10. Data protection for applications and the application procedures

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by e-mail or by means of a web form on the website to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

11. Third Party Links

Our website include links to other websites, whose privacy practices may be different from ours. If you submit Personal Data to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Our website include links to our pages in various social media. These social media may collect information about your IP address and from which webpage you are visiting our accounts in such social media, and they may set a cookie to make sure the feature functions properly. Any information, communications, or materials you submit to us via a social media platform is done at your own risk without any expectation of privacy. We cannot control the actions of other users of these platforms or the actions of the platforms themselves. Your interactions with those features and platforms are governed by the privacy policies of the companies that provide them.

12. Data protection provisions about the application and use of Google Analytics (with anonymization function)

On this website, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

For the web analytics through Google Analytics the controller uses the application "_gat._anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a Cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The Cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties. The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of Cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>.

Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

13. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing

operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor was injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. It considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

14. Period for which the personal data will be stored

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by law, for legal, tax or regulatory reasons, or other lawful purposes. Where we have no ongoing legitimate business need to process Your personal information, we will either delete or anonymize it.

General Personal Data retention period is 30 days after the end of the purpose of it's collection. The general delivery and open stats data, which are stored for at least 180 days as of the mailing date. The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

15. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

We clarify that the provision of personal data is partly required by law (e.g. finance and tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her.

The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject may contact us via email privacy@intellecteu.com. IntellectEU clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.



16. Contact us

To exercise your rights or for any questions regarding this Privacy Policy, please feel free to reach out to us at privacy@intellecteu.com.