



Privacy Policy for the use of hotDu (as of 27.01.2025)

We are delighted that you are using hotDu and would like to say thank you! On this page you will find explanations about what personal data hotDu collects, how we handle this data and what options you have as a user. hotDu respects your privacy and takes the protection of your data very seriously. We endeavour to design the service for users to be as data-efficient as possible. We therefore operate this website and the services we offer on it in accordance with the applicable data protection laws, in particular the EU General Data Protection Regulation (“GDPR”) and the German Federal Data Protection Act (“BDSG”). This Privacy Policy is intended to explain in a transparent and clear manner how we process your personal data. We also inform you about your rights and the options you have to exercise control over your data and protect your privacy.

Details on the processing of your personal data in connection with cookies and other tracking technologies used when using the hotDu website and app can be found in our [Cookies & tracking information](#).

We recommend that you read this privacy policy carefully and check it regularly for updates when you use our website and services.

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1 Contact / Responsible body

Unless otherwise stated in this Privacy Policy or in our [Cookies- & Tracking Information](#), StG Media – Marketing GmbH & Co.KG (hereinafter “**hatDu**” or “we” or “us”) is responsible for data processing.

You can contact us as follows:

StG Media – Marketing GmbH & Co.KG,
 - Kundenservice hatDu Deutschland –
 Gewerbepark Ebbendorf 4,
 49176 Hilter am Teutoburger Wald,
 Deutschland
 Telefon: +49 (0) 5409 40369 -40
 Telefax: +49 (0) 5409 40369 -11
 E-Mail: datenschutz@hatdu.info

2 Collection, processing and use of personal data

2.1 Forms of data collection

Personal data is any information relating to an identified or identifiable natural person (e.g. name, address, telephone number, date of birth or e-mail address).

When we process personal data, this means for example that we collect, store, use, transmit to others or delete this data.

hatDu collects and processes your personal data exclusively in the following cases:

- If you visit our website without being a member.
- If you contact us directly.
- When you install our **hatDu** app.
- If you create a free or paid user account with **hatDu** and then use **hatDu**.

The use of the services offered by **hatDu** is voluntary. This applies to all the collection and processing procedures listed above. The provision of personal data by users is therefore basically voluntary. However, in order to use **hatDu** 's services, it is particularly necessary for users to provide personal data during registration or for our IT systems to automatically collect personal data when they visit our website. The use of the **hatDu** service also requires that your profile information and your ratings can be disclosed to other **hatDu** users after placement.

Please note that the **hatDu** service is available in numerous countries (you can view the list of these countries on our website <https://www.hatdu.info/listen/laenderliste/>). The information stored in your profile will be made visible to the respective user in the respective country of the referred user after a successful referral. **hatDu** can search for your business partners in any of the countries released by users in their request.

If you do not want **hatDu** to process your personal data, **hatDu** will not be able to provide its services as described in the [General Terms and Conditions](#) .

Below you will find a detailed overview of the data that **hatDu** collects when you use the service. Please take the time to read this information carefully.”

2.2 What data does **hatDu** collect when you use the **hatDu** website?

Every time the **hatDu** website is accessed, the Internet browser being used transmits certain usage data, which is stored in so-called server log files. This data includes, among other things:

- Information about the browser type and the Internet service provider of the user as well as the operating system used (e.g. Windows 11, Apple OS, etc.)
- IP address (Internet Protocol address) of the accessing computer, tablet or smartphone
- Name of the page accessed
- Date and time of access
- The referrer URL (origin URL) from which the user came to the accessed page
- Amount of data transferred
- Status message on whether the retrieval was successful
- Session identification number (session ID)
- Session participant pseudonym
- User ID (profile ID) on the **hatDu** platform (only for **hatDu** users)

- Screen resolution used

In addition to the aforementioned usage data, the respective user ID is stored in so-called login data records each time you log in to the **hatDu** platform. Furthermore, cookies or pseudonymous IDs, such as user ID or ad ID, may be stored on your device during or after your visit to the **hatDu** website. For further details on the use of cookies and tracking technologies, please refer to our [Cookies- & Tracking Information](#).

We use translation services for the hatdu.info website, Google Maps and YouTube to provide learning content for our platform. The translation of the **hatDu** platform (hatdu.de), on the other hand, is carried out without the integration of third-party services. The aforementioned services are provided by Google Ireland Limited (Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland). When accessing the website, you have the option of consenting to the processing of your personal data by Google in accordance with Art. 6 Para. 1 Letter a) GDPR as part of the cookie query. In particular, Google's services process the above-mentioned data to provide the services and to carry out its own marketing measures and can assign these to existing Google accounts, regardless of whether you are logged into a Google account such as YouTube in your browser or not. The transfer of data to Google LLC in the USA is permitted under Art. 45 Para. 1 GDPR in conjunction with Google's certification under the EU-US Privacy Framework. You can find further information on our handling of cookies in our [Cookie- & Tracking Information](#).

2.3 Registration Process

When registering free of charge (conclusion of a so-called "user account" in accordance with the GTC), it is mandatory to provide the following personal data. Registration cannot be completed without this data.

This is the following data:

- Name, first name
- Gender
- Address data
- E-Mail-Address
- Date of birth
- Password chosen by the user
- Telephone number, Fax number, Mobile number
- Identity card or Passport
- Identification data of users from identification documents

A photo of the **hatDu** user can also be stored as a profile picture, although this photo will not be displayed to other members and will not be made available by e-mail or otherwise.

During registration, your identity and address must match the data on your valid identity card or valid passport. As part of the registration and verification process, users are required to create a video that the **hatDu** customer service will review and delete immediately after the review has been completed. The function of the email address is also confirmed by **hatDu** customer service during registration with the help of a verification email.

If user verification exceeds the capacity of **hatDu** customer service, **hatDu** reserves the right to transfer the verification process to a data processor. Only the personal data required to confirm identity will be transmitted. This may involve the use of a video chat and/or telephone call (if offered). The service provider will also store the time and duration of the chat, your IP address and your profile ID. The processing of the aforementioned data is necessary for technical and billing purposes. The video communication is end-to-end encrypted. Video chat and audio content is not stored. **hatDu** does not collect or transmit any other data in connection with the video chat. If you do not want **hatDu** to transmit your personal data, IP address and profile ID to its processor or to store the time and duration of the chat, you should not use the video chat function. The **hatDu** website service or the **hatDu** app cannot be used without verification.

If you provide additional voluntary data beyond your personal data, such as the address of a company, when registering or later in your user profile, **hatDu** also processes this data.

No personal data of the **hatDu** profile or the voluntarily provided data is displayed on the website or app for other users to see. All users are anonymous on the **hatDu** website until personal data is exchanged through a brokerage.

2.4 Requests and Offers

In addition, the **hatDu** user may be required to provide personal data in their request or offer in order to enable the provision of a service in response to their request, such as the language spoken, health-related characteristics that serve as the basis for the creation of the offer.

We also collect personal data from users who make a request and from offerors, insofar as this information is required in order to arrange a freely requested contact with a potential provider. This may also include details such as information about work, products and services as well as the background to a request or offer.

2.5 Referral of users by hotDu

Once a user has submitted an offer in response to a request, the requesting user can receive the contact information of the offeror after reviewing the offer. This does not constitute a transfer of personal data, but rather the essential contractual content between the user and hotDu.

We use your personal data in hotDu exclusively for the provision, use and billing of our services and for aggregated statistics, unless further use of the data is provided for by law or you have expressly consented to this. Users therefore provide personal data when using the hotDu service. This reciprocal relationship is not intended to prevent users from exercising their rights in connection with data privacy (section 8).

2.6 Communication with members, communication with customer service

It is not possible for members to communicate with each other.

Please note that communication with our customer service is subject to the following conditions:

- (1) If you use the contact form, the transmission of your request is encrypted. Our reply will also be transmitted in encrypted form if your mail provider supports Transport Layer Security (TLS);
- (2) If you contact us by e-mail, the transmission of e-mails is also transport-encrypted, provided that your e-mail provider supports TLS transport encryption.
- (3) If a chat function is available for logged-in members, communication with hotDu customer service takes place via an SSL-encrypted connection (transport encryption). If you use this function, a chat protocol will be made available to you.

If you would like to communicate by e-mail with content encryption, please contact hotDu by post or fax instead. You can find our address details in the [Imprint](#).

Please note that communication between hotDu and you will only take place via the e-mail address stored with hotDu or via notifications on the hotDu website (if offered).

Should the external contact not function directly with each other after the mediation, the communication between the requestor and the offeror, which is sent by e-mail via our customer service, is stored. Data is also stored if you take part in surveys or communicate with us, e.g. if you contact our customer service or send us a question, answer or request.

2.7 Advertising e-mails - Newsletter - News

When setting up a free user account on the hotDu website, you enter your e-mail address during registration. This will be used to send you promotional emails about free and paid products from StG Media - Marketing GmbH & Co KG without requiring your separate consent. If we have received your e-mail address in connection with our service and you have not objected to this, we reserve the right to inform you regularly by e-mail about hotDu innovations and topics relating to hotDu, based on Section 7 (3) UWG.

On the hotDu website you also have the option of subscribing to a free newsletter by clicking a checkbox. The email address stored in your profile will be used for this purpose. While you use your active hotDu account, you will also receive emails with personalized instructions to help you make the most of the hotDu service.

Advertising emails (including newsletters and personalized guides) are sent using transport encryption if your email provider supports "Transport Layer Security" (TLS) transport encryption.

If you no longer wish to receive promotional emails, newsletters or personalized guides from hotDu, you can object to the use of your email address stored in your profile for such purposes at any time:

- (1) To do so, click on the unsubscribe link at the end of the respective email

or

- (2) Adjust your profile on the website under "My Account" / "Settings" by checking a box to deactivate the free newsletter

or

- (3) Contact hotDu customer service.

After you have unsubscribed, you can resubscribe to hotDu's informative advertising emails at any time in your profile on the website under "My Account" / "Settings" by clicking on a checkbox to activate the free newsletter.

Even non-registered guests can register on the hotDu website to receive the above-mentioned hotDu newsletter. To do so, a form shall be filled out with the following personal data (salutation, title, first name, last name, email address, date of birth and newsletter configuration) and thereby consent to the use of this for the subscribed newsletter. The processing and use of this personal data then takes place as described in this data protection notice.

If you no longer wish to receive promotional emails, newsletters or personalized guides from hotDu, you as a guest of the hotDu website have the option at any time to object to the use of your email address stored in the newsletter tool for such purposes:

- (1) To do so, click on the unsubscribe link at the end of the respective email

or

(2) Contact **hatDu** customer service.

2.8 Data processing by App-Stores

If the **hatDu** app is offered and you install it via an app store operator (e.g. Google or Apple), you may have to conclude a user agreement with the respective app store operator in order to gain access to their portal. This access requires a valid account with the app store operator and a corresponding device (e.g. smartphone). When you download the app, your email address, user name, customer number of the downloading account, individual device ID, payment information and the time of download are transmitted to the respective app store operator. **hatDu** has no influence on the data processing when installing the app. In this case, the app store operator is solely responsible for processing your data. For information about their data processing practices, please contact the app store operator directly. **hatDu** is only responsible for data processing within the **hatDu** app once it is installed and used on your device.

2.9 What data does **hatDu** collect when you use the **hatDu** -App?

Every time a user opens the **hatDu** app on their device, **hatDu** automatically collects certain data and information from the device's operating system. This includes, among other things, storing the device's IP address in order to ensure the functionality of the app and to analyze usage.

The data collected by **hatDu** includes usage data, login data and information about push messages:

Usage data

Every time the **hatDu** app is accessed, usage data of the respective app users is stored. This data is:

- the operating system used and, if there is, the browser type
- current language setting of the smartphone
- Information about the user's Internet service provider
- IP address (Internet Protocol address) of the accessing computer
- Device used
- Device ID (e.g. UDID, IDFA) to identify your device(s) for secure authentication
- User ID on the **hatDu** platform (only from registered **hatDu** users)
- Name of the page accessed and, if applicable, the page of origin
- Date and time of retrieval
- amount of data transferred
- status message indicating whether the retrieval was successful
- Data that you provide to us as part of requests or offers (2.4) or communication with us (2.6)

In addition to the data already mentioned, tracking technologies or pseudonymous IDs may also be recorded during or after use of the **hatDu** app. These include advertising IDs, such as the "Identifier for Advertisers" (IDFA) from Apple or the "Advertising ID" from Google, which are used to analyze the use of the app for advertising purposes and to enable targeted advertising.

This data helps us better understand user behavior, optimize app performance, and personalize advertising within the app. For more information on the use of tracking technologies and pseudonymous IDs, see our notice on [Cookies- & Tracking Information](#).

Login-Data

Every time a **hatDu** user logs on to the network, the following usage data is stored in the so-called login logs:

- Date and time of login
- User ID on the **hatDu** platform (email address)
- IP address (Internet Protocol address)
- Device ID (e.g. UDID) to identify your device(s) for secure authentication

This data is stored to enable the use of the platform, to ensure secure access and to identify possible sources of error. It also serves to improve the user experience and prevent fraud attempts.

In addition to the data mentioned above, pseudonymous IDs (such as a user ID or an advertising ID) may also be stored on your device when using the **hatDu** app. These IDs are unique identifiers that are not directly linked to your identity, but can be used to track your behaviour within the app or to offer personalized advertising.

This data is used to improve the app experience, for example by analyzing usage habits or displaying relevant advertising. For more information about these technologies and your control options, see our [Cookies- & Tracking Information](#) Notice.

Push-Notifications

Depending on the settings and functions of your mobile device, you will receive so-called push messages when using the **hatDu** app, even if the app is not currently being actively used. These messages include those that are necessary for the performance of the contract as well as advertising messages that present you with news and offers from **hatDu**.

You have the option to deactivate push notifications at any time via the **hatDu** app settings or the system settings of your device if you do not wish to receive further notifications.

2.10 GPS data when using the **hotDu** -App

If a **hotDu** user uses the radius search, the device's location data is retrieved at that moment. This can include GPS data, possibly also Wi-Fi information and the device ID. This information is used to determine the user's current location and to set a corresponding search radius that enables the user to find suitable results in their area.

Your location data will only be accessed when necessary for a search query you perform. This data will remain on your device only temporarily.

The location determined by your device is transferred to a digital map (e.g. Google Maps or Apple Maps) via an interface (API). Our app does not send active location data to external systems or third parties.

If you do not want to share your location data, you can deactivate this in the settings of your device. Alternatively, you can use the search function of your preferred map app or browser.

The data processing is carried out based on the general terms of use in accordance with Art. 6 Para. 1 Letter b) GDPR and to provide the GPS service expressly requested by the user in accordance with Section 25 Para. 2 No. 2 TDDDG.

3 Processing purposes and legal bases

The processing of your personal data by **hotDu** is carried out for the purposes listed below and is based on the legal bases mentioned. If the processing is based on a legitimate interest, we will explain which interests **hotDu** pursues:

- Your data will be used to provide the **hotDu** platform and to fulfill the services listed in the [General Terms and Conditions](#). This includes in particular:
 - Providing our website to non-registered users;
 - Provision and use of our website and app for registered **hotDu** users;
 - Providing a contact option and answering inquiries via the platform;
 - Enabling the conclusion of a contract including invoicing;
 - Sending emails and/or push notifications with contact details or other contract-relevant messages.

The legal basis for these purposes are the GTC of **hotDu** within the meaning of Art. 6 Para. 1 Letter b) GDPR. If **hotDu** processes special categories of data within the meaning of Art. 9 Para. 1 GDPR based on the user's input, Art. 9 Para. 2 Letter a) GDPR - your consent - serves as the legal basis.

- A/B tests are carried out on the basis of our legitimate interest in accordance with Art. 6 Para. 1 Letter f) GDPR. Our interest lies in optimizing the user-friendliness and increasing the attractiveness of our website.
- **hotDu** uses various measures to prevent misuse and ensure the security of IT systems. For this purpose, personal data, including location-related information from IP addresses, is processed, which is collected during registration, when filling out requests or offers, and when maintaining the **hotDu** profile. This data is automatically analysed and stored in a database in order to identify possible signs of misuse. The automated evaluation is compared with empirical values. If misuse is suspected, a manual review is carried out by a **hotDu** employee. The employee examines relevant data, attributes, images, ratings, and the associated texts and profile photos in order to evaluate the suspicion. In addition, **hotDu** offers its users functions such as „ **Report request** „and „ **Report offer** “which enable possible violations to be reported. Reported profiles are also manually checked by customer service. To ensure the identity of users, **hotDu** also offers SMS verification. The voluntarily provided mobile phone number is used for a cell phone-based identity check. The legal basis for these measures is the legitimate interest of **hotDu** and its users in protecting the platform from contractual and/or illegal actions in accordance with Art. 6 Para. 1 Letter f) GDPR. In addition, **hotDu** fulfils legal obligations in the areas of data security, system protection and the prosecution of unauthorized access in accordance with Art. 6 Para. 1 Letter c) GDPR.
- In order to present you with tailor-made products and service offers from other users, **hotDu** processes your data in a partially automated process. This is not a fully automated decision-making process in accordance with Art. 22 GDPR. The aim is to provide you with offers tailored to your individual needs. The following information is used for these personalized suggestions: age, gender, marketing channel used, the device with which users registered (e.g. app or website). This processing is carried out based on the contractual obligations between you and **hotDu** in accordance with Art. 6 Para. 1 Letter b) GDPR and our legitimate interest in being able to address our users in a targeted and individual manner in accordance with Art. 6 Para. 1 Letter f) GDPR.
- If outstanding invoices or partial payments are not paid despite repeated reminders, **hotDu** reserves the right to pass on the necessary data to a debt collection service provider in order to initiate the debt collection process. This also includes the transmission of data for the purpose of carrying out fiduciary collection. In the case of disputed payments, the necessary information is also passed on to our payment service providers in order to be able to enforce our legal claims. This can happen in particular in the event of disputes over payment obligations, inquiries from banks or in the resolution of conflicts in connection with chargebacks. The legal basis for this data processing is both the fulfilment of the existing contract within the meaning of the General Terms and Conditions in accordance with Art. 6 Para. 1 Letter b) GDPR and **hotDu** 's legitimate interest in ensuring the contractually agreed payments in accordance with Art. 6 Para. 1 Letter f) GDPR.
- We process your data to protect and defend our legal claims. The legal basis for this data processing is our legitimate interest in asserting and defending our rights in accordance with Art. 6 Para. 1 Letter f) GDPR.
- We process your data to operate our website and to provide the tele media services expressly requested by users. The legal basis for this data processing is Section 25 Para. 2 No. 2 TDDDG.
- We process your data for self-promotion through advertising emails, push messages, newsletters, (user) surveys and personalized guides that exclusively concern products from StG Media - Marketing GmbH & Co.KG. The legal basis for this data processing is the legitimate interest of StG Media - Marketing GmbH & Co.KG in direct marketing

for its own products in accordance with Art. 6 Para. 1 Letter f) GDPR and Section 7 Para. 3 UWG. The newsletter is sent based on your express consent in accordance with Art. 6 Para. 1 Letter a) GDPR.

- We process your data to comply with statutory retention periods and other statutory or legal obligations and provisions, such as those that exist in the context of tax audits or official and judicial information and other orders. The legal basis for this data processing is the fulfilment of our legal obligations in accordance with Art. 6 Para. 1 Letter c) GDPR.
- We process your data for further communication purposes in the context of inquiries. The legal basis for this data processing can be either a pre-contractual legal relationship in accordance with Art. 6 Para. 1 Letter b) GDPR or a legal obligation in accordance with Art. 6 Para. 1 Letter c) GDPR.
- We process your data in order to publish your product review on the **hotDu** website and, if applicable, in other media. The legal basis for this processing is your consent in accordance with Art. 6 Para. 1 Letter a) GDPR.
- We can anonymize your personal data so that you cannot be identified by us or third parties. We can use this anonymized data, for example, to create statistics to optimize our product development. The legal basis for this is Art. 6 Para. 1 Letter f) GDPR, the protection of our legitimate interests in the context of a balance of interests, in order to present our offer correctly.

The processing purposes and the legal basis for the processing of personal data using "cookies" and other tracking technologies when using **hotDu** can be found in our [Cookies- & Tracking information](#).

If the legal basis for the processing of your personal data is your consent, you have the right to revoke your consent at any time. The revocation does not affect the legality of the processing carried out based on the consent until the revocation. If the processing is based on our legitimate interest, you also have the right to object to the processing of your personal data at any time for reasons arising from your particular situation. In this case, Art. 21 GDPR applies. You can find more information in section 8.

4 Transfer of data to third parties; service providers

4.1 Transfer of data

The transfer of the user's data to other users in the context of contact between requesting and offering users does not constitute data transfer to third parties (see 2.4).

Generally, **hotDu** will only pass on your personal data to third parties if this is necessary to fulfil the contract, if we or the third party have a legitimate interest in the transfer, if you have given your consent or if this is necessary to fulfil a legal obligation. If personal data is passed on to third parties on the basis of a legitimate interest, we will explain our legitimate interest in this data protection policy.

In addition, personal data may be passed on to third parties in the following cases:

- To service providers, insofar as they require the data to carry out a contract processing agreement with us.
- To providers of marketing tracking technologies and analytics tools (see our [Cookies- & Tracking information](#) Notice for more information);
- Due to legal requirements or due to enforceable administrative or judicial orders.
- In the context of legal disputes, for example with courts or our lawyers, in debt collection proceedings or during financial audits or company audits (by auditors or tax auditors).
- For legal advice: Where necessary, we will pass on your personal data to professional advisors, such as management consultants or tax advisors, who are subject to special professional confidentiality obligations.
- In case of possible criminal offenses, to the responsible investigative authorities.
- In the event of a sale of the company to the purchaser.

If personal data is regularly transmitted to other third parties, this will be explained in this privacy policy or in our [Cookies- & Tracking Information](#). If the transmission is based on consent, an additional explanation can also be provided at the time the consent is obtained.

We will not pass on your personal data to third parties for commercial purposes without your prior consent.

4.2 Service Providers

hotDu reserves the right to use service providers to collect or process personal data. These service providers only receive personal data from **hotDu** that they need for their specific activities.

hotDu uses service providers for the following tasks, among others, unless the service providers are already named in this privacy policy or in our cookie and tracking policy:

- Sending emails, push notifications and newsletters to members.
- Provision of server capacities for processing and storing data.
- Support from external payment services and service providers in payment processing and in the event of debt collection proceedings.

Depending on which payment method you select during the ordering process on the purchase page, **hotDu** will pass on the data collected to process payments (e.g. bank details) to the credit institution commissioned to process the payment or to payment service providers commissioned by **hotDu**. In some cases, the payment service providers also collect this data themselves under their own responsibility. In this case, the data protection declaration of the respective payment service provider applies.

The service providers are usually integrated as so-called data processors. This means that these service providers may only process personal data of users of this online service in accordance with **hatDu**'s instructions.

Please note that if you purchase the **hatDu** service or offer details via app store operators as third-party providers (such as Apple or Google Play), no payment data processing is carried out by **hatDu**. In this case, the app store operator is itself the independent controller responsible for handling the payment process.

hatDu uses the following service providers to process the order and only transmits the personal data necessary for this purpose:

Newsletter:

CleverReach GmbH & Co. KG, //CRASH Building, Schafjückenweg 2, D-26180 Rastede, Deutschland

IT-Server:

NetWork Team GmbH, Heinrich-Stürmann-Weg 7, D-49124 Georgsmarienhütte, Deutschland

PayPal:

PayPal (Europe) S.à r.l. et Cie, S.C.A.; 22-24 Boulevard Royal; L-2449 Luxembourg

Sparkasse Osnabrück SEPA-Direct debit:

Sparkasse Osnabrück, Anstalt des Öffentlichen Rechts, Wittekindstr. 17-19, D-49074 Osnabrück, Deutschland

Creditreform (debt collection):

Verband der Vereine Creditreform e. V., Hammfelddamm 13, D-41460 Neuss, Deutschland

4.3 Transfer of data to non-EEA countries

Your personal data may also be passed on to third parties (jointly with us or solely responsible parties and processors) based in countries outside the EU/EEA. In these cases, we ensure that the recipient has an adequate level of data protection before the data is transferred.

This is done by:

- An [Adequacy decisions of European Commission](#) for the respective country pursuant to Art. 45 GDPR, or
- An agreement of [Standard Contractual Clauses \(SCC\) of European Union](#) with the recipient in accordance with Art. 46 GDPR, in which additional technical and organizational protective measures may be used.

Alternatively, there may be sufficient consent from our users that allows the transfer of personal data to third countries.

With your consent, data will be transmitted to Google for integration into Google Maps, the Google website translation service or YouTube videos. Google LLC and its European subsidiary Google Ireland Limited are certified under the EU-US data protection framework, ensuring that the data transfer falls under the EU Commission's adequacy decision under Art. 45 GDPR for the USA.

You have the option of obtaining an overview of the specific recipients (processors) in third countries as well as a copy of the specifically agreed regulations (EU standard contractual clauses) to ensure an appropriate level of data protection. Please use the contact details in Section 1 of this privacy policy.

5 Protection of your data

hatDu uses various security measures such as encryption and authentication tools in accordance with the current state of the art to protect the security, integrity and availability of the personal data of its guests and users. In detail, these are the following measures:

- Strict authorization criteria for access to your data and two-factor authentication.
- Storage of confidential data in encrypted form.
- Firewall protection of IT systems to protect against unauthorized access.
- Permanent monitoring of access to IT systems in order to detect and prevent the misuse of personal data.
- After successful verification of the provided video file with the ID card or passport, the video file will be immediately deleted by **hatDu** from the **hatDu** server. The user will receive confirmation of the deletion of the video file by email and can also view the processing status of the deletion on the website under "**My Account**" / "**Mein Profile**".

Regarding this, we recommend that you familiarize yourself with the security tips for using the **hatDu** service. For more information on this topic, please see the FAQs at the following link: <https://www.hatdu.info/faq/>.

6 Duration of storage; Retention Obligations

We only store your personal data for as long as it is necessary to provide our services or to comply with legal or contractual obligations. As soon as these obligations no longer exist, we delete your data, unless there are legal regulations, such as tax or commercial retention periods, that require longer storage (e.g. invoices).

Data subject to such a retention period will be blocked until the end of this period.

Users with a registered **hatDu** account have the option to revoke the storage of their personal data at any time. This can be done by terminating and then deleting the profile. To initiate this process, simply log into your **hatDu** account, go to "**My Account**" and select the option "**Account Deactivate**" under "**Settings**". Alternatively, you can contact customer service. After a four-week period in which the account remains accessible for open payments, the account will be permanently deactivated.

Should a **hatDu** user remain inactive for a period of 24 months, the personal profile data is automatically deleted. However, uninstalling the **hatDu** app from your device has no effect on the data stored in your user profile.

Log files are kept for a maximum of 14 days before they are deleted. Should it be necessary to store these files for evidence purposes, for example in the event of an investigation, they will be stored for a correspondingly longer period until the incident has been conclusively resolved. In some cases, such data may also be passed on to the relevant investigative authorities. An example of this would be log files that contain information about who, when and what content was uploaded to the **hatDu** platform.

Please note that if retention periods prevent deletion, your data will initially be blocked until these periods expire.

As part of the exercise of data subject rights, **hatDu** stores all relevant data for the duration of the statutory limitation period (usually 36 months) in order to be able to provide appropriate evidence.

If a user cancels their **hatDu** account or has their data deleted voluntarily, historical data such as reviews, completed placements, inquiries and offers will be stored outside the **hatDu** network for a period of four years. If this data is linked to a new registration of a user within this period, it can be manually assigned to the new **hatDu** user profile.

7 Obligation to provide data

There is no obligation to provide us with your personal data. However, in order to use certain functions of our online service, such as registering or participating in a competition, it may be necessary for you to provide us with personal data. In such cases, we will inform you explicitly and transparently, for example through separate data protection notices for a competition. Information that is required to use a specific service is usually marked with an *. If you decide not to provide this information, you will unfortunately not be able to use the corresponding services.

8 Overview of data subject rights

8.1 How can you assert your rights?

To assert your rights, please contact the contact details provided under point 1 or our customer service. Make sure that you clearly identify yourself so that we can correctly assign your request. You can also use the corresponding options in your **hatDu** profile to change data that you provided when registering or to object to advertising measures. Please note, however, that certain information, such as your date of birth, can only be changed by customer service.

If retention obligations prevent deletion, your data will initially be blocked.

8.2 Right to Information and Right to Rectification

You have the right to know from **hatDu** whether we process personal data about you. In addition, you can request information about the data stored, including the type of data processed, the purpose of processing, the possible recipients, the storage period and the rights to which you are entitled as a data subject.

If your data is incorrect or incomplete, you can request that it be corrected or completed. If we have passed your data on to third parties, we will inform them of the changes in accordance with legal requirements.

8.3 Your right to deletion

If the legal requirements are met, you have the right to demand the immediate deletion of your personal data. Such a right exists in particular if:

- Your data is no longer required for the purposes originally pursued;
- The processing was based on your consent and you have withdrawn it;
- You have objected to the use of your data for advertising purposes;
- You have objected to the processing for personal reasons and we cannot demonstrate compelling prevailing reasons;
- Your data has been processed unlawfully;
- Your data must be deleted to comply with legal requirements.

However, the right to deletion is not unlimited. We are not obliged to delete data that we must continue to store due to statutory retention periods. Likewise, data that is required to assert legal claims is excluded from the right to deletion.

As a registered **hatDu** user, you can delete the data in your profile or your profile yourself by logging in exclusively to the **hatDu** website and clicking on "**My Account**" on the **hatDu** website and selecting the option "**Account Deactivate**" under "**Settings**" thereby starting the relevant deletion process.

If there are legal retention obligations, your data will initially only be blocked and not immediately deleted.

8.4 Your Right to Restriction of Processing

In certain circumstances, you can request that we restrict the processing of your personal data. This applies in particular in the following cases:

- If you doubt the accuracy of your data, it will be blocked until the accuracy has been verified.
- If the processing of your data is not lawful and you wish to restrict its use instead of deletion.
- If we no longer need your data for its intended purpose, but you still need access to it to protect your legal rights.
- If you have objected to the processing for personal reasons, the restriction will be applied until it is determined whether your reasons outweigh the processing.

8.5 Your Right to Data Portability

You have the option of receiving personal data that you have provided to us as part of the contract fulfilment or based on your consent in a common and machine-readable format. You can also ask us to transmit this data directly to a third party named by you, as far as this is technically feasible.

8.6 Your Right to Withdraw Consent

If you have given us your consent to process your data, you can revoke this consent at any time and with effect for the future. Such a revocation does not affect the legality of the processing carried out up to that point. After your revocation, certain services based on your consent can no longer be provided unless you consent to data processing again. Please note that this does not affect the essential services for which data processing takes place in accordance with the terms of use.

8.7 Your Right to Object to Direct Marketing

You have the option to object to the use of your personal data for advertising purposes at any time ("advertising objection"). Please note, however, that for organizational reasons it is possible that your data will still be used for an advertising campaign that has already started, despite your objection to advertising.

8.8 Your Right to Object for Personal Reasons

You have the right to object to the processing of your personal data if it is based on our legitimate interest and you can provide specific reasons for doing so. In this case, we will stop processing your data unless there are compelling and legitimate reasons under the statutory provisions that make further processing necessary and outweigh your rights.

8.9 Right to Complain to the Supervisory Authority

You have the right to complain to a data protection authority. You can contact the data protection authority responsible for your place of residence or your federal state or the data protection authority responsible for us. This is:

The State Commissioner for Data Protection Niedersachsen
Prinzenstraße 5, 30159 Hannover, E-Mail: poststelle@lfd.niedersachsen.de

9 Links to other Websites

On our website you will find links to external websites. We bear no responsibility for how these third parties handle your personal data. We recommend that you read the privacy policy of the respective third-party website to find out how your data is collected and processed there.

10 Social Media

10.1 Social Media Links

No so-called social media plugins are used on the **hatDu** platform. Instead, the social media buttons only contain text links to the respective pages of the social networks. Therefore, no data is transmitted from **hatDu** to the operators of the social media. However, plugins such as the YouTube video player can be integrated into the external **hatDu** tutorial website <https://www.hatdu.info>. In these cases, the responsibility for compliance with data protection regulations lies with the operators of the respective social platforms, possibly jointly with **hatDu**, in accordance with section 10.2. Further details can be found in the data protection notices of the respective platforms.

10.2 Operation of Appearances in Social Networks

hatDu or StG Media – Marketing GmbH & Co.KG operates publicly accessible company presences on various social media platforms. When you visit our social media profiles, this triggers a large number of data processing operations. Below we would like to inform you about which personal data we collect, use and store from you when you visit our company presences on Facebook, Instagram etc.

10.2.1 We operate the following corporate websites:

- „Facebook“, which is operated by the provider Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, under the URL <https://www.facebook.com/hatdu/>
- „Instagram“, which is operated by the provider Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland under the URL <https://www.instagram.com/hatdu/>

- „LinkedIn“, which is provided by LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland under the URL <https://www.linkedin.com/company/hatdu/>
 - „YouTube“, which is operated by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland under the URL <https://www.youtube.com/@hatDuGeorgStrotmann>
- 10.2.2 For these information services, we use the technical platforms and services of the respective providers. We are not the original provider of these platforms. The aforementioned providers - with the exception of the providers of Facebook and LinkedIn, with whom we are jointly responsible for data processing within the framework of the web analysis tool Page-Insights - process your personal data exclusively and on their own responsibility.
- We would like to point out that the use of our company presence and its functions is your own responsibility, especially when interacting through comments, sharing and liking. The providers of these platforms use cookies, which are stored on your device even if, for example, you do not have your own Facebook or Instagram profile or are not logged in while visiting our site. These cookies enable the providers to create user profiles based on your preferences and interests and to show you appropriately tailored advertising (within and outside of, for example, Facebook or Instagram). The cookies remain on your device until you delete them. For details on the collection and storage of your personal data as well as the type, scope and purpose of its use by the operator Meta, please refer to the privacy statements of the respective social media platforms.
- Facebook: <https://www.facebook.com/privacy/policy/>
 - Instagram: <https://privacycenter.instagram.com/policy/>
 - LinkedIn: <https://de.linkedin.com/legal/privacy-policy/>
 - YouTube: <https://policies.google.com/privacy?hl=de/>
- We are not aware of, and have no influence on, how the respective platform operators use your data from visiting our profile pages and interacting with our posts for their own purposes, how long this data is stored and to what extent data is passed on to third parties and transmitted to countries outside the European Union. There is an adequacy decision of the European Commission dated July 10, 2023 for the transfer of data from the European Union to the USA under the EU-US Data Protection Agreement (successor to the former EU-US Privacy Shield). The platform operators are certified under this EU-US Data Protection Agreement.
- 10.2.3 As operators of the social media profile pages mentioned under point 1, we can only view the information stored in your public profile and only if you have such a profile and are logged in there while you interact with our respective social media profile page.
- In addition, the providers of Facebook, Meta Platforms and LinkedIn provide us with anonymous usage statistics (Page Insights), which we can use to improve user experience when visiting our profile page on this platform. Even though we are jointly responsible with the two operators for data processing within the framework of the web analysis tools Facebook Page Insights and LinkedIn Page Analytics, we have no access to the usage data that the two platforms collect to create these statistics. Meta Platforms and LinkedIn have committed to us to assume primary responsibility under the GDPR for the processing of this data, to fulfill all obligations under the GDPR regarding this data and to communicate the core of these obligations to you as the data subject. Further information on the content of our agreement with Meta Platforms Ireland Ltd on joint responsibility can be found at https://www.facebook.com/legal/terms/page_controller_addendum and with LinkedIn under <https://legal.linkedin.com/pages-joint-controller-addendum>.
- We use the opportunity to present our company on social networks to provide information about our company, share our job offers and activities and get in touch with users. These purposes also constitute our legitimate interest in data processing in accordance with Art. 6 Para. 1 Letter f) GDPR. The legal basis for data processing is therefore Art. 6 Para. 1 Letter f) GDPR.
- 10.2.4 If you would like to contact us, we will only process the personal data that you provide to us (e.g. name, email address). This data will be used solely for the purpose of answering your request. The legal basis is your consent and, if applicable, the initiation of the contract, Art. 6 Para. 1 Letters a) and b) of the GDPR.
- This data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. All public posts from you on one of our social media sites will remain in the timeline indefinitely, unless we delete them due to an update of the underlying topic, a legal violation or violation of our guidelines, or you delete the post yourself.
- 10.2.5 You can object to the processing of your personal data on the social media platforms by us at any time. To do so, simply send us an informal email to datenschutz@hatdu.info. We will then no longer process your data unless we can prove compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.
- 10.2.6 To exercise your rights as a data subject, you can contact us or the respective provider of the social media platform. If one party is not responsible for answering the request or needs to receive the information from the other party, we or the provider will forward your request to the respective partner. If you have any questions about profiling or the processing of your data when using the website, please contact the operators of the social media platforms directly. If you have any questions about the processing of your interaction with us on our site, write to the contact details provided above.