

PRIVACY POLICY

Version effective from 26.08.2024

the previous version of the Privacy Policy is available [here](#).

WHAT IS A PRIVACY POLICY?

We would like to provide you with details concerning our processing of your personal data in order to give you full knowledge and comfort in using our website.

Since we operate in the online sector, we know how important it is to protect your personal data. Therefore, we make particular efforts to protect your privacy and information you provide us with.

We carefully select and apply appropriate technical measures, in particular programming and organisational measures, to ensure protection of the personal data we process. Our website uses encrypted data transmission (SSL), which ensures protection of your identity.

In our Privacy Policy you will find all key information regarding our processing of your personal data.

Please read it, we promise it won't take more than a few minutes.

Who are the co-administrators of the website www.tripus.com?

The co-administrators of the website are Tripus systems GmbH with registered office in Bubesheim (Germany), Am Hohen Rain 2, 89347 Bubesheim, registered in the commercial register of Memmingen Local Court under registration number HRB 12249, NIP: DE814159590 (i.e.: we), Telephone number: +49 8221 901 60, E-Mail: sales@tripus.com and

"TRIPUS - POLSKA" SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Bierutów, ul. Żeromskiego 18, 56-420 Bierutów, registered with the District Court for Wrocław (Poland) Fabryczna, VI Commercial Division of the National Court Register, KRS no. 0000054178, NIP 9111004141, REGON 930482520, BDO 000054753, with share capital of: PLN 784,200.00, telephone: +48 713156321, e-mail: sprzedaz@tripus.com



PERSONAL DATA

Which legal regulation governs the processing of your personal data?

Your personal data are collected and processed by us in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ EU L 119, p. 1), commonly referred to as: GDPR. In the scope not regulated by the GDPR, the processing of personal data is governed by the Personal Data Protection Act of 10 May 2018.

Your personal data will also be processed in accordance with the Telecommunications and Digital Services Act of May 13, 2024 (TDDDG).

Who are the co-administrators for the processing of your personal data?

The co-administrators of your personal data are:

Tripus systems GmbH with registered office in Bubesheim (Germany), Am Hohen Rain 2, 89347 Bubesheim, registered in the commercial register of Memmingen Local Court under registration number HRB 12249, NIP: DE814159590 (i.e.: we), Telephone number: +49 8221 901 60, E-Mail: sales@tripus.com and

"TRIPUS - POLSKA" SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ with its registered office in Bierutów, ul. Żeromskiego 18, 56-420 Bierutów, registered with the District Court for Wrocław (Poland) Fabryczna, VI Commercial Division of the National Court Register, KRS no. 0000054178, NIP 9111004141, REGON 930482520, BDO 000054753, with share capital of: PLN 784,200.00, telephone: +48 713156321, e-mail: sprzedaz@tripus.com

The controller of the website has appointed a data protection officer who will answer any questions you may have regarding the processing of your personal data:

Iris Lehmann

E-mail: datenschutz@tripus.com



What personal data do we process and for what purpose?

On our website we offer a variety of services as part of which we process different personal data on different legal grounds.

Objective	Personal data	Legal basis for the processing	Data retention time
conclusion and performance of an agreement	First name, last name, correspondence address, VAT number, e-mail address, telephone number	article 6(1)(b) of the GDPR, i.e. processing in order to take action at your request, prior to conclusion of a contract, and processing necessary for the performance of a contract to which you are party	until the expiry of the limitation period for claims concerning the performance of the contract
ensure continuity of communication and allow the administrator to be contacted on business matters	First name, last name, e-mail address, telephone number, postal address	Article 6(1)(f) GDPR, i.e. processing for the purpose of the administrator's legitimate interest in maintaining continuity of communication and enabling contact with the administrator in matters relating to business operations	until you object to the processing of your personal data
Registration	E-mail address, order data	Art. 6 I lit. a GDPR, i.e. based on your consent for the opening of a customer account.	until you object to the processing of your personal data. You can delete your customer account at any time.
Contact form	First name, last name, e-mail address, telephone number	article 6(1)(f) of the GDPR, i.e. processing for the purpose of pursuing our legitimate interest in maintaining the continuity of communication and enabling contact with us in matters of business	until you object to the processing of your personal data



Objective	Personal data	Legal basis for the processing	Data retention time
		activity.	
traffic analysis on the website	IP address, browser data	Article 6(1)(a) GDPR, i.e. on the basis of your Consent	until you object to the processing.
Direct marketing for our own goods and services, including remarketing	IP address, browser data	Article 6(1)(a) GDPR, i.e. on the basis of your Consent	until you object to the processing.
the determination, investigation and enforcement of claims as well as the defense of claims before the courts and other state authorities	First name, last name, home address, tax number, e-mail address, telephone number, IP number, bank account number, payment card number.	Article 6(1)(f) GDPR, i.e. processing for the pursuit of our legitimate interest in the establishment, investigation and enforcement of claims and the defense of claims before courts and other public authorities	until the expiry of the limitation period for claims relating to the performance of the contract
Compliance with the obligations arising from legislation, in particular tax and accounting regulations	First name, last name, company, tax identification number, e-mail address, telephone number, postal address, payment card number	Article 6(1)(c) GDPR, i.e. processing is necessary for compliance with our legal obligations, in particular tax and accounting regulations	until the expiry of the legal obligations of the joint controllers that justify the processing of the personal data

Voluntary provision of personal data

The provision of the required personal data is voluntary, but it is necessary for us to provide services to you.

Recipients of personal data

The current list of bodies to which we pass on your personal data can be found [here](#).

Automated decision-making (including profiling)

We do not make automated decision and we do not use profiling in relation to you.



Will we transfer your personal data outside the EEA or to an international organization?

In order to use Google tools, your personal data may be transferred to the United States, where Google LLC. servers are located.

Google LLC. is included in the list of entities participating in the Data Privacy Framework (link: <https://www.dataprivacyframework.gov/s/participant-search>) therefore the protection of personal data is adequate in relation to the regulations in force in the European Union, in accordance with Commission Implementing Decision (EU) C(2023) 4745 of July 10, 2023 on the adequate level of protection of personal data in accordance with the EU-US Data Privacy Framework (link: <https://commission.europa.eu/system/files/2023-07/Adequacy%20decision%20EU-US%20Data%20Privacy%20Framework.pdf>).

We use the HubSpot system, which is managed by HubSpot Ireland Ltd. Therefore, your personal data processed within HubSpot may be transferred to the United States, where the servers of HubSpot Inc. are located.

HubSpot Inc. is listed as a participant in the Data Privacy Framework (Link: <https://www.dataprivacyframework.gov/s/participant-search>) and therefore data protection is adequate in relation to the regulations applicable in the European Union, in accordance with Commission Implementing Decision (EU) C(2023) 4745 of July 10, 2023 on the adequacy of the protection of personal data under the EU-US Privacy Framework (Link: <https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32023D1795&qid=1710923455391>).

WHAT RIGHTS DO YOU HAVE IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA BY US?

Under the GDPR Regulation, you have the right to:

- request access to their personal data,
- to request the rectification of your personal data,
- to demand the deletion of your personal data,
- to demand the restriction of the processing of personal data,
- to object to the processing of personal data,
- to request the portability of personal data.

If you submit one of the above requests to us, we will inform you immediately - and in any event within one month of receipt of the request - of the measures taken in relation to your request.



If necessary, we may extend the one-month period by a further two months due to the complexity of the request or the number of requests.

In any case, we will inform you of the extension within one month of receipt of the application and inform you of the reasons for the delay.

Right of access to personal data (Article 15 GDPR)

You have the right to be informed about whether we process your personal data. If we process your personal data, you have the right to:

- Access to personal data,
- be informed about the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients of such data, the envisaged period for which your data will be stored or the criteria used to determine that period, your rights under the GDPR and your right to lodge a complaint with the President of the Data Protection Authority, the source of such data, automated decision-making, including profiling, and the safeguards relating to the transfer of such data outside the European Union;
- to receive a copy of your personal data.

Right to rectification of personal data (Article 16 GDPR)

If your personal data is incorrect, you have the right to demand that we correct your personal data immediately. You also have the right to request that we complete your personal data.

The right to erasure of personal data, the so-called "right to be forgotten" (Article 17 GDPR)

You have the right to request the deletion of your personal data if:

- Your personal data are no longer required for the purposes for which they were collected or otherwise processed;
- You have withdrawn your express consent if the personal data was processed on the basis of your consent;
- Your personal data has been processed unlawfully;
- You have objected to the processing of your personal data for direct marketing purposes, including profiling, insofar as the processing of your personal data is related to direct marketing;
- You have objected to the processing of your personal data in connection with processing necessary for the performance of a task carried out in the public interest or processing



necessary for the purposes of the legitimate interests pursued by us or by a third party.

Despite your request for deletion of your personal data, we may continue to process your data for the establishment, investigation or defense of claims, about which you will be informed.

The right to request the restriction of the processing of personal data (Article 18 GDPR)

You have the right to request the restriction of the processing of your personal data if:

- you dispute the accuracy of your personal data. In this case, we will restrict the processing of your personal data for a certain period of time so that we can verify the accuracy of the data;
- the processing of your data is unlawful and you request the restriction of the processing of your personal data instead of the erasure of your personal data;
- Your personal data are no longer required for the purposes of processing, but are necessary for the establishment, exercise or defense of your claims;
- You have objected to the processing of your personal data - until we determine whether our legitimate interests outweigh the reasons for your objection.

Right to object to the processing of personal data (Article 21 GDPR)

You have the right to object at any time to the processing of your personal data, including profiling, in relation to the following

- processing necessary for the performance of a task carried out in the public interest or processing necessary for the purposes of the legitimate interests pursued by the joint controllers or by a third party;
- Processing for direct marketing purposes.

Right to portability of personal data (Article 20 GDPR)

You have the right to receive your personal data from us in a structured, commonly used and machine-readable format and to transmit those data to another controller.

By default, we provide you with your personal data in CSV format. If you prefer to receive your data in a different format, please indicate your preferred format in your request. Where possible, we will endeavor to provide you with your data in your preferred format.

You may also request that we transfer your personal data directly to another controller (where technically feasible).



Complaint to the supervisory authority

If you consider that the processing of your personal data infringes data protection law, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

Responsible supervisory authority Bavarian State Office for Data Protection Supervision (BayLDA) Promenade 18 91522 Ansbach, DE