

# MONEDO PRIVACY POLICY

## Overview

Your privacy is important to us. We will process and protect your personal data in accordance with legal and regulatory requirements, especially under the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG). This privacy policy explains in a clear and transparent manner the way in which your personal data may be collected and processed on our website ([www.monedo.com](http://www.monedo.com)). Please be informed that we may make changes to this privacy policy at any time. Information about such changes and the latest version of this privacy policy will be posted on our website.

## Person Responsible for your Personal Data

Monedo Holding GmbH  
Jürgen-Töpfer-Straße 50, Haus 18,  
22763 Hamburg  
Email: [communications@monedo.com](mailto:communications@monedo.com)  
Phone: +49 40 605 905 60

## Data Protection Officer

If you would like to contact our external DPO directly, please address your queries to: Dr. Jana Jentzsch Alsterarkaden 13, 20354 Hamburg, [privacy@monedo.com](mailto:privacy@monedo.com)

## Personal Data Processing

Our website serves the primary purpose of providing information to potential partners, potential employees and other users. As such, we do not carry out any major processing of personal data.

However, if you voluntarily enter your name, email address, and phone number in our contact form to send us a query or request, we will use this data for the purpose of responding to your message. Such data will be processed only to the extent that processing is necessary in order to take steps at your request prior to entering into a contract, or to otherwise respond to your individual request. The legal basis for processing is Article 6 sect. 1 (a) or (b) GDPR.

In addition, if you apply for a job on our website's career page, we will use the data you voluntarily enter in our job application form for the purpose of contacting you and/or for evaluating your application. It may also be necessary to process such data in order to take steps which are required before entering into an employment contract.

If your application is successful, any data provided on our website's career page may be further processed for (or in relation to) your future employment with us, and to allow us to carry out the monitoring activities required of us as an equal opportunities employer. For further information

on the processing of your personal data in the employment context, you will be able to refer to our internal privacy policy accessible to our staff.

There are no negative consequences if you do not provide us the above mentioned personal data. However, incomplete or incorrectly completed applications cannot be considered. Without providing your personal data it will not be possible to process the application and the application will be closed.

The legal basis for processing job application data is Article 6 sect. 1 b) GDPR to the extent that this is necessary to process and evaluate the application.

## **Cookies**

Certain technical data may be collected automatically for the purpose of analysing, monitoring, and improving the use of our website. We use cookies for these purposes. A cookie is a small text file containing an identifier (a string of characters) that uniquely identifies your browser.

Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid unless you delete it before its expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The legal basis for using cookies on our website is your consent (Article 5 sect. 3 Directive 2002/58/EC), which we shall assume that you have given if you continue to use our website after you are informed of the use of cookies on the website. You can delete the cookies in the privacy features of your browser at any time, or from the hard drive of your computer.

Please note that we only use third party cookies (Youtube and Google Analytics cookies) on our website and have no control over how they function. However, we briefly outline below the purpose and expiration dates of these third party cookies.

## **Youtube videos**

The inclusion of a Youtube video on any website allows Google, Inc. 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (“Google”) to install cookies on the device of a website visitor. Through these cookies, Google is able to count the number of times Youtube videos are played on any website. In the case of our website, these cookies will be installed on your device by Google if you press the play button on a Youtube video. By pressing the play button, you consent to cookies being stored on your device. The expiration date for these cookies is no longer than 24 months after your last visit to our website.

## **Google Analytics**

We also use Google Analytics, a web analytics service which Google provides. Google Analytics uses cookies to generate information (including IP address) about the use of our website. Such information is aggregated and then sent to Google servers in the U.S. for

storage. The expiration date for these cookies is no longer than 24 months after your last visit to our website.

IP anonymization is active on this website. Google will use this information on our behalf to evaluate the use of our website by users, compiling reports on aggregate website activity and to provide us with other website and internet related services.

Website visitors who don't want their data to be used by Google Analytics can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) running on our website to prohibit their information from being used by Google Analytics. Using the Google Analytics opt-out plugin will not prevent site owners from using other tools to measure site analytics.

To opt-out of Analytics for the web, visit the Google Analytics opt-out page at Google Analytics opt-out browser add-on and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser. Updates to your browser or operating system may affect the functionality of the opt-out add-on.

## **Data Recipients**

With regard to persons applying for a job on our website, your job application data will be disclosed to Greenhouse Software, Inc (110 Fifth Avenue, 3rd Floor, New York, NY 10011 USA), the company that provides the software that we use for optimising our recruitment process.

Greenhouse has provided sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing of your data will meet legal and regulatory requirements and ensure the protection of your rights and freedoms. The company is self-certified under the EU-US Privacy Shield, which ensures an adequate level of protection for personal data data transferred from the EU to the US.

Similarly, your IP address may be collected by Google and stored in the US. This may be the case if you were logged into your Google account when visiting our website. The company is self certified under the EU-US Privacy Shield which ensures an adequate level of protection for personal data transferred from the EU to the US.

Please note that we may be required to disclose your data to public authorities. However, we will only do so if we have a legal obligation to comply with a request from them. In all other cases, your data will not be sold or disclosed to third parties.

## **Your Personal Data Rights**

We respect your personal data rights and will endeavour to provide all reasonable measures to help you exercise control over your personal data. You have the following rights:

**Data Access, Art. 15 GDPR:** you may request a transcript of the personal data being processed by us and other relevant information by requesting us to confirm whether or not

personal data concerning you are being processed. Where that is the case, we will provide you with records of the personal data as requested and possible, and additional relevant information we may be required to provide you with regards to how we use and treat that personal data.

**Data Rectification, Art. 16 GDPR:** you may request that we rectify your personal data if you consider the affected data to be out of date or inaccurate. We may require you to justify or authenticate your request for the purpose of protecting you from identity theft , and also for complying with legal requirements. Therefore, in the event you provide insufficient information, we may not be able to honour your request to rectify your data.

**Restriction of Data Processing, Art. 18 GDPR:** you may request that we restrict the processing of your personal data where you consider that such data is inaccurate, being processed unlawfully, required for the establishment, exercise or defence of legal claims, or where you object to the processing of such data based on our legitimate interests. We will examine your request closely and inform you of our assessment of whether the right applies to your particular case and we have proceeded to restrict the data processing.

**Data Erasure (right to be forgotten), Art. 17 GDPR:** you also have the right to request that we erase or delete your personal data. In certain cases, the request for the deletion of your personal data may be denied, as we would be unable to delete your data pursuant to applicable data retention obligations under applicable Law.

**Consent Revocation, Art. 7 GDPR:** where we are processing your personal data for a certain purpose on the basis of consent, you have the right to withdraw your consent to the processing of your personal data at any time. The withdrawal of consent shall not affect the legality of processing which was performed prior to your withdrawal of consent.

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### **Right to Object, Art. 21 GDPR**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. In that case, we will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your individual interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

Wherever your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

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**How to exercise your rights:** You can exercise any of the above rights by contacting us via email ([privacy@monedo.com](mailto:privacy@monedo.com)). To facilitate the process, our Data Rights Request Form is available on request. Upon completing the Form, please send it to the same email address and we will resolve your request no later than 30 days from receiving it and making certain verifications to ensure we are in fact speaking with you.

In exceptional cases, we may require additional time to resolve your request, but we will inform you promptly about any such expected delays. Where you are not satisfied with our resolution of a particular request, we will always be available to further discuss with you the particular situation and will strive always to resolve it to the satisfaction of all interested parties. You also have the right to lodge a complaint with the Hamburg data protection authority.

### **Data Retention**

We will not store your data for a period that is longer than is necessary in relation to the purposes specified in this Policy. As such, we will delete your data as soon as the purposes for which they are processed have been fulfilled.

In particular, we will retain contact data for a period of six months where the purpose for processing it is to respond to a website visitor who, not being a potential partner, uses our contact form to request information from us.

Where a potential partner uses our contact form to request information from us, we will retain his/her contact data in accordance with legal retention periods and/or contractual statutes of limitation. If a potential partner does not become a partner after using our contact form to request information from us, we will only keep his/her contact data for a period of 12 months after the last communication between him and Monedo.

With regard to persons applying for a job on our website, we will retain their personal data for a period of 12 months following the rejection of a job application.

Last updated: 09.03.2020.