DATA PROTECTION INFORMATION

OUR TREATMENT OF YOUR DATA AND YOUR RIGHTS - INFORMATION PURSUANT TO ARTICLES 13, 14 AND 21 OF THE DATA PROTECTION BASIC REGULATION (GDPR)

- Release July 30, 2019 -

This data protection information applies to the processing of your personal data (a) when using our website *http://www.wearecosyn.com* and (b) also when providing our services. For legal and/or organizational reasons, changes or adjustments to our data protection declaration will be necessary from time to time. Please refer to the current version of our data protection declaration, which can be viewed and printed out at any time on our website at *http://www.wearecosyn.com/privacy*.

In the following we would like to inform you which personal data we process for which purpose and which rights you are entitled to in this context. You will find general information under **I. General**, details on the processing of personal data, under **II. Processing of personal data when using our website** and **III. Processing of personal data when providing our services** and an instruction on the rights to which you are entitled under **IV. Your rights**.

I. General Information

Personal data is all data that can be related to the user personally, such as his name, postal address or e-mail address, but also the IP address assigned to him. The term “processing” covers any handling of personal data such as collection, recording, organization, sorting, storage, adaptation or modification, reading out, querying, use, disclosure by transmission, dissemination or any other form of provision, comparison or linking, restriction, deletion or destruction.

1. Responsible Data Processor

Responsible for the processing of your personal data:

COSYN UG (hereinafter referred to as "we" or "COSYN"), Speditionstraße 15a, 40221 Düsseldorf, registered at Düsseldorf Local Court under HRB 86786, represented by the Managing Director Arne Kötting, telephone +49 211 5457 1806 (reachable here during normal business hours, Monday to Friday 9 a.m. to 6 p.m.), e-mail: hello@wearecosyn.com.

2. Which data from which sources do we process?

We process personal data that you voluntarily provide to us or that is collected in the course of using our website.

Further information on this can be found in *Section II - Processing of personal data when using our website* and *Section III - Processing of personal data when providing our services*.

3. For which purpose do we process your data and on which legal basis?

We process your personal data for various purposes in accordance with the relevant data protection regulations, in particular the GDPR and the German Federal Data Protection Act (BDSG).

In principle, the following purposes can be considered for processing: Processing

- for the fulfilment of contractual obligations (Art. 6 para. 1 lit. b) GDPR) in the context of the provision of our services
- to protect legitimate interests (Art. 6 para. 1 lit. f) GDPR), e.g. the improved presentation of our website, direct advertising, etc.
- on the basis of your consent (“Einwilligung” Art. 6 para. 1 lit. a) GDPR) and/or
- on the basis of legal requirements (Art. 6 para. 1 lit. c) GDPR).

Further information on this can be found in *Section II - Processing of personal data when using our website* and *Section III - Processing of personal data when providing our services.*

4. Who receives your data?

Service providers used by us and working on our behalf (so-called contract processors, cf. Art. 4 No. 8 GDPR) may receive personal data. We use the following contract processors or categories of contract processors, some of whom process data outside the EU and/or the EEA:

- IT service provider
- Cloud service provider (USA)
- CRM service provider (USA)
- Survey service provider (USA)
- Mailing service provider (USA)
- Google Inc. (USA)

If a transfer is made to a third country, this is done on the legal basis of (a) a corresponding agreement on order processing and (b) the EU-US Privacy Shield.

We will not pass on your data to third parties who process personal data under their own responsibility (so-called persons responsible, cf. Art. 4 No. 7 GDPR) without your consent. If you use this service, your data may be transferred to third countries, i.e. countries outside the EU, due to the third-party providers involved.

Further information on this can be found in *Section II - Processing of personal data when using our website* and *Section III - Processing of personal data when providing our services*.

5. Storage of data

We process your personal data only as long as it is necessary for the fulfilment of the respective processing purpose.

In addition, we are subject to various storage and documentation obligations, including those arising from the German Commercial Code (HGB) and the German Tax Code (AO). These can last up to 10 years.

Finally, the storage period is also assessed according to the statutory limitation periods, which can be up to thirty years, for example according to §§ 195 et seq. of the German Civil Code (BGB), whereby the regular limitation period is three years.

Further information on this can be found in *Section II - Processing of personal data when using our website* and *Section III - Processing of personal data when providing our services*.

II. Processing of personal data when using our website

1. Automatic collection of access data / server log files

When you visit our web pages, the following data record is automatically saved for each access, whereby these data are not saved together with other personal data about you:

- Browser type and version
- Operating system
- Internet server provider
- IP address
- Date and time of the respective access
- Visited websites, namely referrer URL (website from which you came to our website), pages called up on our website and website which you call up after our website
- Name of the file retrieved and the amount of data transferred
- Country code, language settings, device name (only for mobile devices)

The personal data in log files are processed on the basis of Art. 6 para. 1 lit. f) GDPR for statistical evaluation. The purpose of data processing and our legitimate interest is to facilitate administration, to ensure that our web pages are presented in a way that meets the needs and security of our customers, and to detect and prosecute misuse.

The data are deleted as soon as they are no longer required for the purpose of their collection. This is the case when the respective session has ended. In the case of the storage of data in log files, this happens as far and as long as it is necessary for the provision of the services. In the case of storing the data in log files, this is the case after seven days at the latest.

2. Use of cookies

In order to make visiting our website attractive and to enable the use of certain functions, we use so-called cookies on various pages. Depending on the type of cookie, these serve the purpose of making it easier for

you to use our website, to present our website in a visually appealing manner or to be able to analyze your usage behavior on our website. Cookies are small text files that are stored on your terminal device. The cookies can be transmitted to a page when it is called up and thus enable the user to be identified.

When you visit our website, so-called session cookies are used which are automatically deleted from the user's hard drive as soon as the browser window closes. The session cookies are needed to assign successive page views to the respective users who simultaneously access our website. In addition, COSYN uses the following cookies:

Name	**Duration**	**Purpose**
lastUserAgentInfo_	unlimited	Detects when the user accesses the application with a different browser than the last time.
crc / UTM-info	1 year 100 days	Indicates whether the user called the COSYN website in response to a marketing campaign. A distinctive feature of the marketing campaign (the end of the URL that you used to access COSYN) is stored in this cookie.
useOfCookiesAgreed	unlimited	This cookie stores the information that the user has entered has agreed to the use of cookies on our website / platform.

The personal data in these cookies are processed on the basis of Art. 6 para. 1 lit. f) GDPR and the German Telemedia Act (**TMG**). The purpose of the data processing and our legitimate interest lies in the increased functionality of our website.

You may object ("widersprechen") to the use of these cookies. You can set your browser so that you are informed about the setting of cookies and decide individually on their acceptance or exclude the acceptance of cookies for certain cases or generally. We will also inform you about the specific cookies we use before you visit the website. You can delete cookies that have already been set. If cookies are not accepted, the functionality of our website may be restricted.

3. Contact form

On our website you will find a contact form which can be used to contact customers electronically. Alternatively, anyone can contact us via the e-mail address provided. If you contact us via one of these channels, your personal data entered and transmitted to us in encrypted form will be automatically stored.

If you use the contact form, the personal data collected will consist of the master data entered there (in particular name, telephone number, e-mail address) and possibly other personal data entered by you in the *"Your message"* field. If you contact us directly via email, we will record your email address and any personal data resulting from the text of the email.

We use the service provider SendGrid, Inc., 1801 California Street, Suite 500 Denver, Colorado 80202, USA, to process messages that potential customers send us via our web form as quickly as possible. The above data will be processed. SendGrid is certified according to the EU-US Privacy Shield (https://www.privacyshield.gov/participant?id=a2zt0000000TRktAAG&status=Active).

The processing is based on Art. 6 para. 1 lit. f) GDPR. The purpose of the data processing and our legitimate interest lies in being able to answer the messages addressed to us. In addition, we process the data on the basis of Art. 6 para. 1 lit. b) GDPR, insofar as the establishment of contact takes place in initiation of a contractual relationship.

If a contract is concluded between customers and us, we will also record your e-mail address and forward it to mailing service providers commissioned by us in order to be able to send you direct advertising for our services. You have the right to object to this specific use of your e-mail at any time by clicking on the corresponding link in the footer of the advertising e-mail sent to you. The legal basis for this use of your e-mail is Art. 6 para. 1 lit. f) GDPR in conjunction with § 7 para. 3 UWG. Finally, we use your express consent [Art. 1 para. 1 lit. a) GDPR in conjunction with § 7 para. 2 No. 1 1st alternative of German Unfair Competition Act (**UWG**)] or your presumed consent [Art. 1 para. 1 lit. f) GDPR in conjunction with § 7 Para. 2 No. 1 2nd alternative of UWG] for the purpose of obtaining feedback.

We use the newsletter tool Mailchimp, The Rocket Science Group LLC, 675 Pnce De Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA, to send you information by e-mail. We will send your email address to Mailchimp. Mailchimp is certified under the EU-US Privacy Shield Agreement (https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active). There is also a Data Processing Addendum to ensure compliance with EU data protection regulations.

4. Application by freelancers

On our website you will find a Click-Through application which freelancers can use to apply for inclusion in our freelancer pool (hereinafter: "COSYN Community"). If you contact us via this channel, your entered and encrypted personal data will be stored automatically.

The personal data processed there includes your master and contact data (e.g. full name, address, e-mail address, telephone number) and other personal data (e.g. personal description, work experience and preferences, link to LinkedIn profile).

For the written application of freelancers we use the online survey tool SurveyGizmo, Widgix, LLC, 4888 Pearl East Cir, Suite 100W, Boulder, Colorado 80301, USA. SurveyGizmo is certified under the EU-US Privacy Shield Agreement (https://www.privacyshield.gov/participant?id=a2zt0000000L0kSAAS&status=Active). There is also a Data Processing Addendum to ensure compliance with EU data protection regulations.

If your application is not accepted into the COSYN Community, your data will be deleted after six months at the latest. If you are accepted into the COSYN Community, your data will be transferred to the corresponding database.

We process the data on the basis of Art. 6 para. 1 lit. b) GDPR, as far as the establishment of contact takes place in initiation of a contractual relationship.

If a contract is concluded between freelancers and us, we will also record your e-mail address and forward it to mailing service providers commissioned by us in order to be able to send you direct advertising for our services. You have the right to object to this specific use of your e-mail at any time by clicking on the corresponding link in the footer of the advertising e-mail sent to you. The legal basis for this use of your e-mail is Art. 6 para. 1 lit. f) GDPR in conjunction with § 7 para. 3 UWG. Finally, we use your express consent [Art. 1 para. 1 lit. a) GDPR in conjunction with § 7 Para. 2 No. 1 1st UWG] or your presumed consent [Art. 1 para. 1 lit. f) GDPR in conjunction with § 7 Para. 2 No. 1 2nd UWG] for the purpose of obtaining feedback.

We use the newsletter tool Mailchimp, The Rocket Science Group LLC, 675 Pnce De Leon Ave NE, Suite 5000, Atlanta, Georgia 30308, USA, to send you information by e-mail. We will send your email address to Mailchimp. Mailchimp is certified under the EU-US Privacy Shield Agreement (https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active). There is also a Data Processing Addendum to ensure compliance with EU data protection regulations.

5. COSYN Community

After successfully agreeing to join the COSYN community, the freelancer fills out a complete profile, which - like a curriculum vitae - primarily represents the most important career stages. For the purpose of payment processing, we collect the following payment data in this profile (account number/BLZ or IBAN, BIC, name of account holder) and general billing data (tax number). The general retention periods apply.

To create a profile, we use the online survey tool SurveyGizmo, Widgix, LLC, 4888 Pearl East Cir, Suite 100W, Boulder, Colorado 80301, USA, so that the above data is transmitted to SurveyGizmo. SurveyGizmo is certified under the EU-US Privacy Shield Agreement (https://www.privacyshield.gov/participant?id=a2zt0000000L0kSAAS&status=Active). There is also a Data Processing Addendum to ensure compliance with EU data protection regulations.

We forward a partially anonymous freelancer profile to interested customers for selection purposes. Payment data and invoice data of the freelancer are not passed on to the customer.

We process the data on the basis of Art. 6 para. 1 lit. b) GDPR for the fulfilment of the contract.

6. Google Tools

We use various Google Inc. tools on our website for various purposes. These are Google Analytics, Google Tag Manager and Google Recaptcha. Google LLC which are EU-US Privacy Shield certified (https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active). In the following we inform you in detail about these tools.

- **Google Analytics**

  We use Google Analytics, a web analytics service provided by Google LLC, Mountain View, CA, USA ("Google"). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the service, such as the data listed in Section II.1, is generally transmitted to and stored by Google on servers in the United States. However, due to the activation of IP anonymization on our website, Google's IP address is previously shortened within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States, where it will be shortened. The **IP anonymization is active on our website.** On behalf of COSYN, Google will use this information to evaluate your use of our website, to compile reports on website activity and to provide

us with other services related to the use of our website and the Internet. The IP address transmitted by your browser as part of Google Analytics is not combined with other data from Google.

If the IP address is made anonymous, data processing is carried out on the legal basis of Art. 6 para. 1 lit. f) GDPR or TMG, whereby our legitimate interests, namely quality assurance or statistical analysis of user behavior, are pursued.

In addition, you can prevent Google from collecting the data generated by the cookie and related to your use of COSYN (including the IP address) as well as Google from processing this data by downloading and installing the browser plug-in available under the following link: http://tools.google.com/dlpage/gaoptout?hl=de.

You may also exercise your right to opt-out by clicking on the appropriate link below under IV.5 - *Opt-out Options*. This will set an opt-out cookie that will prevent your information from being collected in the future when you visit this website.

Further information can also be found in Google's Privacy Policy: http://www.google.de/policies/privacy/.

- **Google Tag Manager**

  Our website uses the Google Tag Manager of Google LLC, Mountain View, CA, USA ("Google"). The Tag Manager itself does not process any personally identifiable information about users.

  With the Google Tag Manager, website tags can be managed via an interface. Tags are small pieces of code on your website that are used, among other things, to measure visitor behavior, measure the impact of online advertising and social channels, use remarketing and targeting, and test and optimize our website. The Tag Manager tool itself (which implements the tags) is a cookie-free domain. The tool triggers other tags that may themselves collect data. Google Tag Manager does not access this data. If a deactivation has been made at domain or cookie level, it will remain for all tracking tags implemented with Google Tag Manager. We will never share data with other Google products without your consent.

  As far as personal data are processed, the data processing takes place on the legal basis Art. 6 para 1)lit.f) GDPR and the TMG, whereby our authorized quality assurance and statistical analysis of user behavior are pursued. In connection with the use of Google Analytics, the above applies.

  You can also find more information in Google's data protection declaration: services.google.com/sitestats/en.html and https://www.google.com/intl/de/tagmanager/use-policy.html.

- **Google Recaptcha**

  For some forms we use the service reCAPTCHA from Google. Google collects certain data to determine whether a person or machine is accessing our website, such as your IP address, screen and window resolution, the language set in your browser, the time zone you are in, the browser's user agent and installed browser plug-ins. We have added the code "get._anonymizeIP();" to the service. This causes Google to shorten your IP address. For more information on how to shorten your IP address, see the Google Analytics explanations above.

7. YouTube

We use YouTube from Google to embed videos on our websites. Responsible for data processing is: YouTube LLC, 901 Cherry Avenue, San Bruno, CA 94066, USA, as part of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA94043, USA. Google LLC. Is EU-US Privacy Shield certified (https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active).

When you visit our sites where YouTube videos are embedded, your IP address can be sent to YouTube. A cookie will also be installed on your computer. YouTube therefore learns that you have watched a video on our website. If you are logged in to YouTube, this information is also assigned to your user account. We are not aware of the collection and use of your data by YouTube that would then be possible. YouTube sets up a so-called extended data protection mode for data protection-compliant integration. This mode is activated for all videos embedded by us. For further information on the subject of data protection, we refer to the following data guideline: https://www.google.de/intl/de/policies/privacy/.

We use the so-called Shariff solution on our website. Shariff takes care that social networks can only request data from users when they click on the corresponding button.

III. Processing of personal data in the provision of our services

1. Customer/COSYN relationship

In addition to the possibility of contacting us via our website and, for example, concluding a contract, it is also possible for us to receive personal data from you via personal contact with you, which we also process on the legal basis of Art. 6 para. 1 lit. b) GDPR for the purpose of initiating and/or fulfilling contracts.

Following the enquiry, a personal telephone call will take place between the customer and us if necessary. Here either only questions about the service or our company will be answered directly or a concrete project as well as a possible consultation by us will be discussed. As a rule, data without personal reference is recorded (company name/company, project location, project name, project object, requirement profile of the freelancer, project scope, notified remuneration, any additional information). In individual cases, this may involve personal data that we need to store on an access-protected cloud service.

If necessary, the project-related data, including contact persons, will be passed on to the Free-lancer.

2. Freelancer/COSYN relationship

In addition to the possibility of contacting us via the application portal and, for example, of concluding a contract, it is also possible for us to receive personal data from you via personal contact with you, which we also process on the legal basis of Art. 6 para. 1 lit. b) GDPR for the purpose of initiating and/or fulfilling contracts.

We record the interview conducted in each case and note the information on your previous experience as a freelancer, your focus, your working method and similar. This includes your (a) professional self-assessment of your consulting skills and (b) comments on availability and desired project deployment as well as (c) similar, project-related information.

The information obtained via the application portal and/or in a personal interview will be passed on to potential customers whose requirement profile you meet, if necessary.

3. Tools used

Insofar as we have collected your data in order to process them for the purpose of fulfilling the contract on the basis of Art. 6 para. 1 lit. b) GDPR, we use the following tools, which require data transmission in the USA.

- For document management, we use the G-Drive service from Google Inc. Google is certified according to the EU-US-Privacy-Shield agreement (https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active). There is also an agreement on order processing to ensure compliance with data protection regulations applicable in the EU.
- We use the Google-based cloud service G-Suit. Google is certified under the EU-US Privacy Shield agreement (https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active). We also have a contract processing agreement in place to ensure compliance with EU data protection regulations.
- We use Pipedrive as a CRM tool. Pipedrive is certified according to the EU-US-Privacy-Shield agreement (https://www.privacyshield.gov/participant?id=a2zt0000000TSfxAAG&status=Active). There is also an agreement on order processing to ensure compliance with data protection regulations applicable in the EU.
- We also use the HelloSign tool from JN Projects, Inc., 301 Howard Street, Suite 200, San Francisco, California 94105, USA to digitally sign contracts between customers and freelancers. The signature also represents a personal date. In addition, the contract data is also transmitted to the USA. JN Projects is certified according to the EU-U.S. Privacy Shield (https://www.privacyshield.gov/participant?id=a2zt0000000TSqHAAW&status=Active). There is also an agreement on order processing to ensure compliance with data protection regulations applicable in the EU.

IV. Your rights

1. Information, rectification, cancellation, limitation of processing, data transfer

Every data subject has the right to information pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to cancellation pursuant to Art. 17 GDPR, the right to limitation of processing pursuant to Art. 18 GDPR and the right to data transfer pursuant to Art. 20 GDPR.

In order to exercise the aforementioned rights, you can contact the office mentioned in *Section I.1. General information*.

2. Revocation of consent

If you have given us consent to process your personal data, you can revoke this consent at any time. This does not affect the legality of the processing which took place on the basis of your consent until revocation.

In order to exercise your right of revocation, you can contact the office mentioned in Section I.1 *General Information*. Further possibilities can be found below under Section IV.5 *Opt Out Possibilities*.

3. Right of appeal to the supervisory authority

According to Art. 77 para. 1 GDPR you have the right to complain to the supervisory authority if you are of the opinion that the processing of your personal data does not take place lawfully, in particular if it violates the GDPR. The address of the supervisory authority responsible for us is:

State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia, Kavalleriestr. 2-4, 40213 Düsseldorf, Germany, Phone: 0211/38424-0, Fax: 0211/38424-10, E-Mail: poststelle@ldi.nrw.de.

4. Right of objection ("Widerspruchsrecht") pursuant to Art. 21 GDPR

Information about your right of objection according to Art. 21 Data Protection Basic Regulation (GDPR)

You have the right, for reasons arising from your particular situation, to object at any time to the processing of personal data concerning you on the basis of Art. 6 para. 1 lit. f) of the GDPR (data processing on the basis of a weighing of interests); this also applies to any profiling based on this provision within the meaning of Art. 4 para. 4 of the GDPR.

If you file an objection, we will no longer process your personal data unless we can prove compelling reasons for the processing worthy of protection which outweigh your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims.

If you object to the processing for purposes of direct marketing, the personal data will no longer be processed for these purposes. A weighing of interests will then not take place.

The objection can be made without form and should, if possible, be addressed to the body named in the data protection declaration in the Section *"Data controller"* (*Section I.1*). Further possibilities can be found below under *Section IV.5 Opt Out possibilities*.

5. Opt-Out possibilities

You may also simply revoke your consent to data processing or object to data processing on the basis of Art. 6 para. 1 lit. f) GDPR by clicking on the appropriate button or buttons below.

- Cookies Opt Out
- Google Analytics
- Unsubscribe from mailing list