

**Privacy Policy  
(Data Protection Declaration)  
of Valispace GmbH**

This is the Privacy Policy of Valispace GmbH, registered with the commercial register B of the local court of Bremen under HRB 31369 HB, Hermann-Köhl-Str. 7, 28199 Bremen (hereinafter referred to as "Valispace", "we" or "us").

**1 Scope of this Privacy Policy**

- 1.1 This Privacy Policy applies to any personal data that Valispace collects and processes in the course of the operation of the website [www.valispace.com](http://www.valispace.com) (hereinafter referred to as "Website"). This Privacy Policy does not apply to personal data collected offline.
- 1.2 This Privacy Policy describes how Valispace gets and handles personal data of a user (hereinafter referred to as "you", if applicable) when he/she visits the Website or receives services via the Website.
- 1.3 This Privacy Policy does not apply to websites which are under the control of third parties with which the Website may be linked. Valispace does not have any influence on the content or the data protection practices of third-party websites. Valispace is not responsible in this regard. Please refer to the Privacy Policies of the respective third-party websites.

**2 Contact**

- 2.1 Valispace may be processor or controller within the meaning of data protection law, depending on whether Valispace processes data on the basis of a data processing agreement or not.
- 2.2 If you have questions or concerns relating to the handling of your personal data by us as controller or if you wish to exercise any of your rights as listed in Section 13, please contact us under the following contact details:

**Postal address:**

Valispace GmbH  
- Datenschutz -  
Hermann-Köhl-Str. 7  
28199 Bremen

**E-mail:**

[privacy@valispace.com](mailto:privacy@valispace.com)

- 2.3 Several personal data are processed by Valispace's subsidiary Galactic Purpose, Unipessoal, LDA Rua da Prata, 80 6º, 1100-420, Lisboa, Portugal, as processor. Valispace keeps full responsibility for Galactic Purpose's processing activities.

**3 Description and Scope of Data Collection**

Valispace collects and evaluates personal data and other data as described within the following:

**4 Log Files**

4.1 When visiting the Website, web servers log the interaction of the user with the site in something called a log file. Standard log files contain basic information such as:

- At which time which pages were viewed, and
- The internet protocol (hereinafter referred to as “IP”) address of the user.

4.2 Valispace uses this information to analyze trends, administer the site, track user’s movement, and gather broad demographic information for aggregate use in its server statistical reports. Valispace does not undertake to identify IP addresses with individual users.

**5 Cookies**

5.1 Valispace uses cookies. Valispace automatically receives the IP address of the user when the user visits the Website. The cookies are solely used to measure the effectiveness of the Website. Valispace has no access to or control over cookies that are used by third parties. Cookies which are strictly necessary by technical reasons to visit the Website are used by default and will be notified to the user when entering the website. No non-necessary cookies will be used unless the user accepts cookies in the cookie consent popup shown at the beginning of the session. These settings can always be changed by clicking the “Change cookies settings” button in the bottom right corner.

5.2 Valispace uses the following cookies on the Website:

| Cookie   | Type        | Duration of Storage | Description   |
|--|-------------|---------------------|---|
| Calendly (_calendly_session)                                       | third party | 20 days             | Domain: calendly.com. This cookie is associated with Calendly, a Meeting Scheduler that Valispace uses on its website. This cookie allows the meeting scheduler to function within the website. More information in the <a href="#">Calendly Privacy Policy</a> |
| Drift.com (DFTT_END_USER_PREV_BOOTSTRAPPED; driftt_aid;driftt_sid) | third party |                     | Domain: drift.com This cookie is associated with Valispace’s chat service, Drift. These cookies are   |

|                               |                        |                |   |
|-------------------------------|------------------------|----------------|---|
|                               |                        |                | used to provide the best experience to users when using the chat service on the Website.<br>More information in the <a href="#">Drift Privacy Policy</a>  |
| Google Analytics (_ga; _gid;) | first party persistent | 2 years; 1 day | Domain: valispace.com.<br>This cookie is associated with Google Universal Analytics. These cookies are used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. Valispace masks each user's last three IP digits, which does not enable Valispace to specifically identify the user's identity.<br>More information in the <a href="#">Google Privacy Policy</a> |

## 6 Further Third Party Services

Apart from the cookies listed in the section above, Valispace uses the following third party services:

### 6.1 Zoho

Valispace uses Zoho as customer relationship management tools to improve and maintain the quality of Valispace's customer service.

More information in the [Zoho Privacy Policy](#)

### 6.2 Slimstat

Valispace uses Slimstat to assess and understand complex data from Valispace's blog, such as:

- Website traffic;
- User's movement;
- Average reading time/article.

More information in the [Slimstat Privacy Policy](#)

### **6.3 GSuite**

GSuite is a Google service which offers different versions of Google products. It is a useful tool for the Valispace team to collaborate more efficiently and share work-related information, including user's information, in a timely manner.

More information in the [Google Privacy Policy](#)

### **6.4 Hotjar**

- 6.4.1 Valispace uses Hotjar in order to better understand the users' needs and to optimize Valispace's service and experience. Hotjar is a technology service that helps to better understand the user experience (e.g. how much time a user spends on which pages, which links the user chooses to click, what the user does and does not like, etc.). This enables Valispace to build and maintain its service with user feedback. Hotjar uses cookies and other technologies to collect data on users' behavior and their devices, in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display Valispace's website. Hotjar stores this information in a pseudonymized user profile. Valispace will never use this information to identify an individual user or to match it with further data on an individual user.

More information in the [Hotjar Privacy Policy](#)

- 6.4.2 The user can opt-out to the creation of a user profile, Hotjar's storing of data about the user's usage of the Website and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

## **7 Demo Signing Up and Newsletter**

- 7.1 The user may sign up for the test and demonstration functions offered on the Website (button Demo "Sign Up"). The user has to enter his full name and e-mail address. This personal data will not be shared with third parties besides in cases mentioned in this Privacy Policy.
- 7.2 By sharing this information through pressing the button Demo "Sign Up" and "Receive Newsletter", the user consents to receive Valispace's product information and/or newsletter respectively provided through MailChimp. Valispace uses analytics features from MailChimp to improve the user's experience and to further improve Valispace's product, website and newsletter content.

More information in the [Mailchimp Privacy Policy](#)

## **8 No Collection of Sensitive Personal Data**

Valispace does not request sensitive personal data, such as nationality, citizenship, race, ethnic origin or health information.

## **9 Purposes and Legal Basis of Data Processing**

Valispace processes personal data in accordance with applicable data protection laws, in particular with the provisions of the GDPR and the German Data Protection Act (Bundesdatenschutzgesetz – “BDSG”).

### **9.1 Fulfilment of Contractual Obligations (Art. 6 para. 1 lit. b GDPR)**

Valispace processes personal data to execute pre-contractual procedures and to perform its contractual obligations based on agreements with users. More information on the purposes of the data processing by Valispace may be found in the respective agreements and the respective Terms of Use.

### **9.2 Public Interest Requirements (Art. 6 para. 1 lit. e GDPR) and Balance of Interests (Art. 6 para. 1 lit. f GDPR)**

When necessary, Valispace processes the personal data of the user beyond the fulfilment of the contract in order to safeguard public interests, Valispace’s legitimate interests or the legitimate interests pursued by third parties. These may be, for example:

- Prevention and investigation of criminal offences (Art. 6 para. 1 lit. e GDPR);
- Enforcement of legal claims and defense in legal proceedings (Art. 6 para. 1 lit. f GDPR);
- Statistical reasons: These statistics are compiled exclusively for Valispace’s own purposes and are always conducted in anonymized form (Art. 6 para. 1 lit. f GDPR).

## **10 Who may Access the User’s Data**

Within Valispace, employees who are in charge to fulfill contractual and legal obligations by providing Valispace’s services to the user gain access to his/her data. The same applies mutatis mutandis to employees of Valispace’s subcontractor Galactic Purpose.

## **11 Safety Control Measures**

For data hosted on Valispace servers, in compliance with applicable law, Valispace has implemented appropriate technical and organizational measures in order to prevent the unauthorized, accidental or unlawful access, loss, alteration and leak of personal information. The user’s data is protected against unauthorized access through encrypted transmission and storage, a role and authorization concept, a data backup concept and physical security measures for the servers.

## **12 Details on the Saving of Personal Data**

The personal data collected are stored electronically, either on Valispace’s own servers in Germany or in a data centre of a commissioned service provider. Personal Data collected can also be stored in paper form. All electronic messages which are sent to or

from Valispace are automatically stored on an e-mail server that is operated either by Valispace or a service provider on behalf of Valispace. The Personal Data collected are stored by Valispace for as long as they are required for the handling of the services via the Website. They are then destroyed in compliance with the statutory retention regulations.

## **13 Your Rights**

13.1 Under the GDPR, you are entitled to the following rights, free of charge:

- 13.1.1 **Right to withdraw consent pursuant to Art. 7 GDPR:** In the limited circumstances where you have provided your consent to the processing of your personal data for a specific purpose you have the right to withdraw your consent for that specific processing at any time by using one of the addresses provided for in Section 2 above. The revocation of such consent does not affect the legality of the data processing performed until Valispace has received the revocation. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.
- 13.1.2 **Right of access pursuant to Art. 15 GDPR:** You have the right to obtain information on your data that are being processed by us and receive access to such data.
- 13.1.3 **Right to rectification pursuant to Art. 16 GDPR:** You have the right to request us to rectify any inaccurate or incomplete personal data we hold about you.
- 13.1.4 **Right to erasure pursuant to Art. 17 GDPR:** You have the right to obtain – under the statutory required preconditions of Art. 17 GDPR – the erasure of your data where there is no compelling reason for their continued processing, e.g. it is no longer necessary in relation to the purpose for which it was originally collected.
- 13.1.5 **Right to restrict processing pursuant to Art. 18 GDPR:** You have the right to ask us to restrict how we process your data subject to Art. 18 GDPR. In this case we will only be permitted to store the data but not further process it.
- 13.1.6 **Right to object pursuant to Art. 21 GDPR:** Under the requirements of Art. 21 GDPR, you have the right to object to the processing of your personal data at any time on grounds relating to your particular situation. The aforementioned general right to object applies to all processing purposes described in this Privacy Policy, which are based on the legal basis of legitimate interest. If you make legitimate use of such right, we will no longer process your personal data, unless we demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
- 13.1.7 **Right to lodge a complaint with a supervisory authority pursuant to Art. 77 GDPR:** You have the right to lodge a complaint with a supervisory authority, if

you think that our processing of your personal data is carried out by us by breaching applicable data protection law.

- 13.2 If you wish to exercise any of these rights, please contact us using the contact information in Section 2 above. We may need to request specific information from you in order to verify your identity and check your right to access the personal data or to exercise any of your other rights. This is a security measure to ensure that your personal data are not disclosed to any person who has no right to receive them.

#### **14 Changes to this Privacy Policy**

Valispace may change this Privacy Policy at any time with effect for the future. The then current version of this Privacy Policy will be made available on the Website. While Valispace does not intend to make changes to this Privacy Policy very often, the user shall always check the most current Privacy Policy. The most recent version date is located at the bottom of this Privacy Policy.

LAST UPDATED 03. September 2020