

Privacy Policy Productsup Academy

Responsible body for processing according to GDPR

The person responsible for privacy policy within the meaning of the General Data Protection Regulation and other data protection laws in the member states of the European Union and other provisions of a data protection nature is:

Productsup GmbH
Alex-Wedding-Straße 5
10178 Berlin
Germany

Privacy Policy

We welcome you on our web pages and appreciate your interest. The protection of your personal data is very important to us. Therefore, we conduct our activities in accordance with applicable personal data protection and data security legislation. Therefore, we act in accordance with the laws concerning personal data and data security. We would like to inform you below which data of your visit is used for which purpose. Should there be any further questions concerning the handling of your personal data, you are welcome to contact our data protection supervisor:

Nils Möllers
Keyed GmbH
Siemensstraße 12
48341 Altenberge
info@keyed.de
<https://www.keyed.de>

1. What is personal data?

The concept of personal data is defined in the Bundesdatenschutzgesetz and in the EU GDPR. Accordingly, these are individual details about personal or material circumstances of a specific or identifiable natural person. This includes, for example, your civil name, your address, your telephone number or your date of birth.

2. Scope of anonymous data collection and data processing

Unless otherwise stated in the following sections, no personal data is collected, processed or used when using our websites. However, we find out through the use of analysis and tracking tools certain technical information based on the data transmitted by your browser (for example, browser type/version, operating system used, our visited websites including length of stay, previously visited website). We only evaluate this information for statistical purposes.

3. Legal basis for the processing of personal data

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of personal data.

In the processing of personal data necessary for the performance of a contract to which the data subject is a part of, art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations required to carry out pre-contractual actions.

Insofar as processing of personal data is required to fulfil a legal obligation that is subject to our company, art. 6 para. 1 lit. c GDPR serves as the legal basis.

If vital interests of the data subject or another natural person require the processing of personal data, art. 6 para. 1 lit. d GDPR serves as the legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and if the interests, fundamental rights and fundamental freedoms of the person concerned do not outweigh the former interest, art. 6 para. 1 lit. f GDPR serves as the legal basis for processing.

4. Registration on our website

If the data subject takes advantage of the possibility to register on the website of the controller by providing personal data, the data will be transmitted to the controller in the relevant input mask. The data is stored by the data controller for internal use only. The data will be deleted as soon as they are no longer required for the purpose for which they were collected. We collect the following data:

- E-mail address
- Username
- Company address
- IP address

During registration, the user's IP address and the date and time of registration are stored. This serves to prevent abuse of the services. The data will not be passed on to third parties. An exception is made if there is a legal obligation to pass on data.

The registration of data is required for the provision of content or services. Registered persons have the possibility to delete or change the stored data at any time. The person concerned will receive information about their stored personal data at any time.

5. Ways to contact

On the websites of Products Up GmbH there is a contact form that can be used for electronic contact. Alternatively, contact via the provided e-mail address is possible. If the data subject contacts the controller through one of these channels, the personal data transmitted by the data subject will be automatically stored. The storage serves solely for purposes of processing or contacting the person concerned. A transfer of data to third parties does not take place. Legal basis for the processing of the data is in the presence of the consent of the user art. 6 para. 1 lit. a GDPR.

The legal basis for the processing of the data transmitted in the course of sending an e-mail is article 6 (1) lit. f GDPR. If the e-mail contact aims to conclude a contract, then additional legal basis for the processing is art. 6 para. 1 lit. b GDPR.

The data will be deleted as soon as it is no longer necessary for the purpose of its collection. For the personal data from the input mask of the contact form and those sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when it can be inferred from the circumstances that the relevant facts have been finally clarified.

Any additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

6. Routine deletion and blocking of personal data

The controller will only process and store personal data of the data subject for as long as necessary to achieve the purpose of the storage. In addition, such storage may take place if provided for by the European or national legislator in EU regulations, laws or other regulations to which the person responsible for processing is subject.

As soon as the storage purpose is removed or a storage period prescribed by the aforementioned regulations expires, the personal data is routinely blocked or deleted.

7. Rights of the data subject

If your personal data has been processed, you are affected in the sense of the GDPR and you have the following rights to the responsible person:

7.1 Right of access

You may ask the person in charge to confirm if personal data concerning you is processed by us.

If such processing is available, you can request information from the person responsible about the following information:

1. The purposes for which the personal data are processed;
2. The categories of personal data that are processed;
3. The recipients or the categories of recipients to whom the personal data relating to you have been disclosed or are still being disclosed;
4. The planned duration of the storage of your personal data or criteria for determining the duration of storage if specific information is not available;
5. The existence of a right to rectification or deletion of personal data concerning you, a right to restriction of processing by the controller or a right to object to such processing;
6. The existence of a right of appeal to a supervisory authority;
7. All available information about the source of the data if the personal data is not collected from the data subject;
8. The existence of automated decision-making including profiling under article 22 (1) and (4) GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

You have the right to request information about whether the personal data relating to you is transferred to a third country or to an international organization. In this connection, you can request the appropriate guarantees in accordance with art. 46 GDPR in connection with the transmission of information.

7.2 Right of rectification

You have a right to rectification and/or completion to the controller, if the processed personal data concerning you is incorrect or incomplete. The responsible person must make the correction without delay.

7.3 Right of restriction of processing

You may request the restriction of the processing of your personal data under the following conditions:

1. If you contest the accuracy of your personal information for a period of time that enables the controller to verify the accuracy of your personal information;
2. The processing is unlawful and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
3. The controller no longer requires personal data for the purposes of processing, but you need them to assert, exercise or defend legal claims, or
4. If you objected to the processing pursuant to art. 21 (1) GDPR and have not yet determined whether the legitimate reasons of the person responsible outweighed your reasons.

If the processing of personal data concerning you has been restricted, this data – except for your storage – may only be used with your consent or for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons of important public interest of the Union or a member State.

If the limitation of the processing under the conditions mentioned above are restricted, you will be informed by the person in charge before the restriction is lifted.

7.4 Right of cancellation

7.4.1 You may require the controller to delete your personal information without delay, and the controller shall promptly delete that information if any of the following is true:

1. Your personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
2. You revoke your consent to the processing pursuant to art. 6 para. 1 lit. a or Art. 9 para. 2 lit. a GDPR and there is no other legal basis for processing.
3. Pursuant to art. 21 para. 1 GDPR you give objection to the processing and there are no prior justifiable reasons for the processing, or pursuant to art. 21 (2) GDPR you give objection to the processing.
4. Your personal data has been processed unlawfully.
5. The deletion of personal data concerning you is required to fulfill a legal obligation under Union law or the law of the member States to which the controller is subject.
6. The personal data concerning you was collected in relation to information society services offered pursuant to art. 8 para. 1 GDPR.

7.4.2 If the person in charge has made the personal data concerning you public and pursuant to article 17 (1) of the GDPR is required to delete it, is taking due account of the technology available and the costs of implementation, including appropriate technical measures, to inform data controllers who process the personal data that you have requested the deletion of any links to such personal data or copies or replications of such personal data.

7.4.3 The right to deletion does not exist if the processing is necessary

1. To exercise the right to freedom of expression and information;
2. To fulfill a legal obligation required by the law of the Union or of the member States to which the controller is subject, or to perform a task of public interest or in the exercise of official authority conferred on the controller;
3. For reasons of public interest in the field of public health pursuant to art. 9 (2) lit. h and i and art. 9 (3) GDPR;
4. For archival purposes of public interest, scientific or historical research purposes or for statistical purposes pursuant to article 89 (1) of the GDPR, in so far as the law referred to in paragraph 1 is likely to render impossible or seriously affect the achievement of the objectives of that processing, or
5. To assert, exercise or defend legal claims.

7.5 Right of information

If you have the right of rectification, erasure or restriction of processing to the controller, he/she is obliged to notify all recipients to whom your personal data has been disclosed of this correction or deletion of the data or restriction of processing, unless: this proves to be impossible or involves a disproportionate effort.

You have a right to the person responsible to be informed about these recipients.

7.6 Right of Data Portability

You have the right to receive the personal information that you provide to the controller in a structured, common and machine-readable format. You also have the right to transfer this data to another person without hindrance by the person responsible for providing the personal data, provided that

1. The processing on a consent acc. art. 6 para. 1 lit. a GDPR or art. 9 para. 2 lit. a GDPR or on a contract acc. art. 6 para. 1 lit. b GDPR is based and
2. The processing is done by automated means.

In exercising this right, you also have the right to obtain the personal data concerning you directly from one person responsible to another person responsible, as far as technically feasible. Freedoms and rights of other persons may not be affected.

The right to data portability does not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the controller.

7.7 Right to object

You have the right at any time, for reasons that arise from your particular situation, to object against the processing of your personal data, which pursuant to art. 6 para. 1 lit. e or f GDPR takes place; this also applies to profiling based on these provisions.

The controller will no longer process the personal data concerning you unless he can demonstrate compelling legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing is intended to assert, exercise or defend legal claims.

If the personal data relating to you is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

If you object to processing for direct marketing purposes, your personal data will no longer be processed for these purposes.

Regardless of directive 2002/58/EC, you have the option, in the context of the use of information society services, of exercising your right to object through automated procedures that use technical specifications.

7.8 Right to revoke the data protection consent declaration

You have the right to revoke your data protection consent declaration at any time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

7.9 Automated decision on a case-by-case basis, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on you or, in a similar manner, significantly affects it. This does not apply if the decision

1. Is required for the conclusion or performance of a contract between you and the controller,
2. Is permissible on the basis of Union or member State legislation to which the controller is subject, and that legislation contains appropriate measures to safeguard your rights and freedoms and your legitimate interests, or
3. With your express consent.

However, these decisions must not be based on special categories of personal data pursuant to art. 9 (1) GDPR, unless art. 9 (2) lit. a or g and reasonable procedures have been taken to protect the rights and freedoms and your legitimate interests.

Regarding the cases mentioned in a. and c., the person responsible shall take reasonable steps to safeguard the rights and freedoms and your legitimate interests, including at least the right to obtain the intervention of a person by the controller, to express his or her own position and to contest the decision.

7.10 Right to complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to complain to a supervisory authority, in particular in the member State of its place of residence, employment or the place of the alleged infringement, if you believe that the processing of your personal data violates against GDPR.

The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy under article 78 of the GDPR.

8. Products Up Academy

Description and purpose: We offer our customers to purchase access to our training platform to train the use of our software solution. After you have purchased access via our store, your data will be transferred to our LMS (Learn-Management-System) and you will receive an invitation email with your access data.

Legal basis: The legal basis for the processing of personal data is the fulfillment of a contract in accordance with Art. 6 para. 1 letter b) GDPR.

Recipient: Recipients are Products Up GmbH and Absorb Software Inc (a company based in Canada, with place of business in #2500 – 685 Centre St. S, Calgary, Alberta - CANADA.

Transfer to third countries: Personal data is transferred to third countries.

Duration of data storage: The data will be deleted as soon as they are no longer necessary for the purpose of their collection. In addition, the data will be deleted if you revoke your consent or request the deletion of your personal data.

Possibility to object: You have the possibility to revoke your consent to data processing at any time. A revocation does not affect the effectiveness of data processing operations in the past.

Contractual or legal obligation: There is no contractual or legal obligation to provide the data.

Further data protection information via link: Further information can be obtained under <https://www.absorblms.com/support/privacy-policy/>.

9. Third Parties

9.1 Google Analytics

Description and purpose: This website uses the service "Google Analytics", which is provided by Google LLC. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse the use of the website by users. The service uses "cookies" - text files which are stored on your end device. The information collected by the cookies is usually sent to a Google server in the USA and stored there. If necessary, Google Analytics is used on this website with the code "gat._anonymizeIp();" extended to ensure anonymous recording of IP addresses (so-called IP-Masking). Please also note the following information on the use of Google Analytics: Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The IP address of users is shortened within the member states of the EU and the European Economic Area. This shortening means that the personal reference of your IP address is no longer necessary. Within the framework of the agreement on commissioned data, which the website operators have concluded with Google LLC, the latter uses the information collected to create an evaluation of website use and website activity and provides services associated with Internet use.

Legal basis: The legal basis is the norm of Art. 6 para. 1 lit. a) and Art. 49 para. 1 lit. a) GDPR, if anonymous data collection using the code "gat._anonymizeIp" does not take place. Otherwise, especially in the case of the use of "gat._anonymizeIp", Art. 6 para. 1 lit. f) GDPR is the legal basis.

Recipient: However, in the event that IP anonymisation is activated on this website, your IP address will be shortened by Google in advance within member states of the European Union or

in other contracting states of the Agreement on the European Economic Area. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on the website activities and to provide further services to the website operator in connection with the use of the website and the Internet. In addition, we use Google Conversion Tracking in connection with Google Analytics. This enables us to record the behaviour of our website visitors. For example, it shows us how many PDFs were downloaded from our website or how often the contact form was filled out. It also shows us how many clicks on advertisements from external sources (AdWords, LinkedIn, Xing, Facebook, Pinterest, Instagram etc.) have led to our website. The IP address transmitted by your browser within the framework of Google Analytics is not merged with other data from Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link (<https://tools.google.com/dlpage/gaoptout?hl=de>). You can prevent the collection by Google Analytics by clicking on the following link.

Transfer to third countries: Personal data is transferred to the USA under the Art. 46 GDPR and Art. 49 GDPR.

Duration of data storage: The data sent by us and linked to cookies, user IDs (e.g. User ID) or advertising IDs are automatically deleted after 14 months. The deletion of data whose retention period has been reached is automatically carried out once a month.

Cancellation and objection option: You can prevent the storage of cookies by adjusting your browser software accordingly; however, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser add-on. Opt-out cookies prevent the future collection of your data when visiting this website. To prevent Universal Analytics from collecting data across multiple devices, you must opt-out on all systems in use. Click here to set the opt-out cookie: [Deactivate Google Analytics](#)

Contractual or legal obligation: The provision of personal data is not required by law or contract, nor is it necessary for the conclusion of a contract. You are also not obliged to provide the personal data. However, failure to provide it may mean that you cannot or cannot fully use this function of our website.

Further data protection information via link: Further information on terms of use and data protection can be found at: <https://policies.google.com/?hl=de&gl=de>
<https://policies.google.com/privacy?hl=de&gl=de>

9.2 AVADA PDF Invoice

Description and purpose: On our website we use plugins of the service AVADA Commerce, Pte. Ltd, 1 Sohia rd, Peace Centre, Singapore. AVADA supports us with templates to simplify the

creation of PDF invoices. AVADA receives all the information you provide during the ordering process so that the invoice can be issued correctly.

Legal basis: The legal basis for the processing of personal data is the execution of the order according to Art. 6 para. 1 lit. a) GDPR.

Recipient: Recipient is AVADA Commerce, Pte. Ltd., 1 Sohia rd, Peace Centre, Singapore.

Transfer to third countries: A transfer of data to third countries takes place.

Duration of data storage: Personal data is stored for the duration of the respective legal retention period. After expiry of the deadline, the data will be routinely deleted, unless there is a need for a contract or fulfillment of the contract.

Possibility of objection: You have the possibility to revoke your consent to data processing at any time. A revocation does not affect the effectiveness of data processing operations in the past.

Contractual or legal obligation: There is no contractual or legal obligation to provide the data.

Further data protection information via link: Further information on data processing and information on data protection by AVADA can be found at <https://avada.io/privacy.html>.

10. Duration of storage of personal data

Personal data is stored for the duration of the respective legal retention period. After expiry of the deadline, the data will be routinely deleted, unless there is a need for a contract or fulfillment of the contract.

11. Security

We have taken extensive technical and operational safeguards to protect your data from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. Our security procedures are regularly reviewed and adapted to technological progress. In addition, privacy is granted on an ongoing basis through constant auditing and optimization of the privacy organization.

Products Up GmbH reserves all rights to make changes and updates to this Privacy Policy. This Privacy Policy was created by [Keyed GmbH](#)