



**alphaflow Contract Management (alphaflow-contract)  
Privacy Notice in accordance with Articles 13 and 21 GDPR**

### **1. General Information**

The protection of your personal data is of great importance to us at alphaflow GmbH. For this reason, we aim to provide you with comprehensive transparency regarding the processing of your data. Only if the processing is comprehensible to you as a data subject can you be adequately informed about the scope, purposes, and benefits of the processing.

The controller within the meaning of the General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), and other applicable data protection laws is:

alphaflow GmbH  
Stahlhöferweg 11  
44227 Dortmund  
E-Mail: [info@alphaflow.gmbh](mailto:info@alphaflow.gmbh)  
Web: <http://www.alphaflow.gmbh/>

Hereinafter referred to as the “**controller**” or “**we**”.

Note: Please be aware that within our application (hereinafter also referred to as the “App”), you may access links to other applications or websites operated not by us, but by third parties. Such links are either clearly marked or can be recognized by a change in your browser’s address bar or by switching to another app that you have previously installed. We are not responsible for compliance with data protection requirements or the secure handling of your personal data on such third-party websites or applications.

### **2. Definitions**

#### **Cookies**

Cookies are text files that are stored on or read from your device by an application. They contain alphanumeric character strings which allow, for example, the recognition of a user and their settings upon returning to the website that set the cookie, to maintain a logged-in session, or to analyze specific usage behavior for statistical purposes.

### **3. General Information on Data Processing**

We process personal data within the limits permitted by law. This means that all data processing activities must be based on a legal basis, as defined in Article 6(1) of the General Data Protection Regulation (GDPR). Most processing operations are based on our legitimate interest (Art. 6(1)(f) GDPR), on processing necessary for the performance of a contract (Art. 6(1)(b) GDPR), or on consent you have given (Art. 6(1)(a) GDPR). In the case of processing based on consent, we will inform you separately about the consent process and provide additional details.

Personal data may only be processed for clearly defined purposes (Art. 5(1)(b) GDPR). Once the purpose of the processing no longer applies, your personal data will be deleted or protected by technical and organizational measures (e.g., through pseudonymization). The same applies after the expiry of a mandatory retention period—except where further storage is necessary for the conclusion or performance of a contract. In addition, statutory obligations may require longer storage or disclosure to third parties (in particular, to law enforcement



authorities). Subject to the legally required cases described above, your personal data will not be passed on to third parties.

In all other cases, the type and duration of storage, as well as the nature of the data collected and processed, depend on which features of the application you use in each individual case. We will gladly provide you with specific information about this upon request, in accordance with Article 15 GDPR.

#### **4. Data Processing in Connection with the Use of the Application**

When using the application alphaflow Contract Management (technically: alphaflow-contract) and its full range of functionalities, the processing of certain personal data is required.

##### **4.1 Data Collection at the Start of Application Use**

When you start using the application, your master or user data is collected. This includes your user ID and your email address. These personal data are automatically transmitted to us via the d.velop Cloud Center.

The data are processed for the purpose of enabling and ensuring the functionality of the application, as well as maintaining the security of our information technology systems. Use of the app without login is not possible. The processing of your personal data for the aforementioned purposes is necessary in order for us to fulfill our contractual obligations to you. The legal basis for this processing is therefore Article 6(1)(b) GDPR.

Personal data will only be shared with third parties where strictly necessary. There is no intention or plan to transfer data to third countries or international organizations. Such transfers do not occur, unless otherwise specified in this Privacy Policy.

##### **4.2. Contact via Contact Form & Email Address**

When you use the contact form in our application or contact us via email, the personal data you provide will initially be processed and made available to us for further handling. Upon transmission, the data will be stored in our information technology systems. Processing takes place for the purpose of responding to your inquiry.

In addition, the date and time of the contact request as well as your IP address will be stored. This is done for the purposes of preventing misuse and ensuring the security of our information technology systems. These purposes constitute legitimate interests within the meaning of Article 6(1)(f) GDPR.

Your personal data will generally be retained until the underlying matter giving rise to your inquiry is resolved. Your data will not be disclosed to third parties. There is no intention to transfer your data to a third country or an international organization.

The use of the contact form and the submission of your data is entirely voluntary. However, please note that use of the form and processing of your inquiry is not possible without providing your data.

#### **5. Data Processing on Behalf (Commissioned Processing)**

In some cases, we engage external service providers to process your data on our behalf. These service providers have been carefully selected and commissioned by us. They are bound by our instructions and are subject to regular monitoring. Our data processing agreements comply with the strict requirements of Article 28 GDPR as well as the guidance of the German data protection authorities. Any transfers of personal data to the United States are carried out exclusively in accordance with the European Commission's adequacy decision of July 10, 2023, for the EU-U.S. Data Privacy Framework.

#### **6. Rights of Data Subjects**

Under applicable data protection law, you as a data subject have the following rights:

- The right of access pursuant to Article 15 GDPR
- The right to rectification of your data pursuant to Article 16 GDPR



- The right to erasure (“right to be forgotten”) pursuant to Article 17 GDPR
- The right to restriction of processing pursuant to Article 18 GDPR
- The right to data portability pursuant to Article 20 GDPR

The rights to access and erasure are subject to the limitations set forth in Sections 34 and 35 of the German Federal Data Protection Act (BDSG).

In addition, you have the right to lodge a complaint with a supervisory authority pursuant to Article 77 GDPR in conjunction with Section 19 BDSG.

#### **7. Automated Individual Decision-Making Including Profiling**

No automated individual decision-making, including profiling, takes place.

#### **8. Notification Obligations of the Controller**

If your personal data has been lawfully disclosed to third parties (recipients), we will inform them of any rectification, erasure, or restriction of processing in accordance with Articles 16, 17(1), and 18 GDPR. This notification obligation does not apply where it proves impossible or involves a disproportionate effort. Upon request, we will also inform you about the recipients of your data.

#### **9. Right to Object**

Under Article 21 GDPR, you have the right to object: This means that you have the right, at any time and on grounds relating to your particular situation, to object to the processing of your personal data which is based on Article 6(1)(e) or (f) GDPR.

No specific justification is required if you object to the processing of personal data for direct marketing purposes. This also applies to profiling, insofar as it is related to direct marketing.

#### **10. Right to Withdraw Consent to the Processing of Personal Data**

If the processing of your personal data is based on your consent (Article 6(1)(a) GDPR), you have the right to withdraw that consent at any time in accordance with Article 7(3) GDPR. The processing carried out prior to the withdrawal remains lawful; the withdrawal only affects processing activities from the time it is received. You may declare your withdrawal informally by post or email. Following receipt of your withdrawal, your personal data will no longer be processed—unless permitted by another legal basis. If no such legal basis exists, your data must be erased without undue delay in accordance with Article 17(2) GDPR.

Please address your withdrawal to:

alphaflow GmbH  
Stahlhöferweg 11  
44227 Dortmund  
E-Mail: [info@alphaflow.gmbh](mailto:info@alphaflow.gmbh)