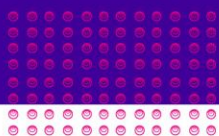




Table of Content

1.	Privacy Policy.....	2
2.	Scope.....	2
3.	Legal bases	3
4.	Contact details of the data protection controller.....	4
5.	Storage Period.....	4
6.	Rights in accordance with the General Data Protection Regulation	4
7.	Austria Data protection authority	5
8.	Event management.....	5
8.1	Why do we use the data.....	5
8.2	What data is processed?.....	5
8.3	Duration of data processing.....	5
8.4	Right of withdrawal.....	5
8.5	Legal basis	6
8.6	Processor.....	6
9.	Online Events	6
9.1	Why do we use the data.....	7
9.2	What data is processed?.....	7
9.3	Duration of data processing.....	7
9.4	Right of withdrawal.....	7
9.5	Legal basis	7
9.6	Livestream Event - Livestorm	8
10.	Film and photo shoot at enspired events.....	9
10.1	Why do we use the data.....	9
10.1.1	Facebook.....	9
10.1.2	Instagram.....	10
10.1.3	LinkedIn.....	10
10.1.4	X (formerly Twitter).....	11
10.2	What data is processed?.....	12
10.3	Duration of data processing.....	12
10.4	Right of withdrawal.....	12
10.5	Legal basis	12
11.	Marketing.....	13
11.1	Why do we use marketing?.....	13



11.2	What data is processed?.....	13
11.3	Duration of data processing.....	13
11.4	Right of withdrawal.....	14
11.5	Legal basis	14
11.6	Processor.....	14
12.	Email-Marketing.....	15
12.1	What is Email-Marketing?.....	15
12.2	Why do we use Email-Marketing?	15
12.3	Which data are processed?	16
12.4	Duration of data processing.....	16
12.5	Withdrawal – how can I cancel my subscription?	16
12.6	Legal basis	16
12.7	Newsletter – Tool Hubspot.....	17
13.	Additional and further Information.....	17

1. Privacy Policy

We have written this privacy policy in order to explain to you, in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#) and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered as gender-neutral.

2. Scope

This privacy policy applies the personal data processed by our company and to all personal data processed by companies commissioned by us (processors) within the scope of inspired events. With the term personal data, we refer to information within the meaning of Article 4 No. 1 GDPR, such as the name, email address and postal address of a person. The scope of this privacy policy includes:

- Event Management
- Online Events
- Film and pictures taken at inspired events
- Marketing
- E-Mail Marketing

3. Legal bases

In the following privacy policy, we provide you with transparent information on the legal principles and regulations, i.e. the legal bases of the General Data Protection Regulation, which enable us to process personal data. Whenever EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016. You can of course access the General Data Protection Regulation of the EU online at EUR-Lex, the gateway to EU law, at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>.

We only process your data if at least one of the following conditions applies:

1. **Consent** (Article 6 Paragraph 1 lit. a GDPR): You have given us your consent to process data for a specific purpose. An example would be the storage of data you entered into a contact form.
2. **Contract** (Article 6 Paragraph 1 lit. b GDPR): We process your data in order to fulfill a contract or pre-contractual obligations with you. For example, if we conclude a sales contract with you, we need personal information in advance.
3. **Legal obligation** (Article 6 Paragraph 1 lit. c GDPR): If we are subject to a legal obligation, we will process your data. For example, we are legally required to keep invoices for our bookkeeping. These usually contain personal data.
4. **Legitimate interests** (Article 6 Paragraph 1 lit. f GDPR): In the case of legitimate interests that do not restrict your basic rights, we reserve the right to process personal data. For example, we have to process certain data in order to be able to operate our website securely and economically. Therefore, the processing is a legitimate interest.

Other conditions such as making recordings in the interest of the public, the exercise of official authority as well as the protection of vital interests do not usually occur with us. Should such a legal basis be relevant, it will be disclosed in the appropriate place.

In addition to the EU regulation, national laws also apply:

- In **Austria** this is the Austrian Data Protection Act (**Datenschutzgesetz**), in short **DSG**.

Should other regional or national laws apply, we will inform you about them in the following sections.

4. Contact details of the data protection controller

If you have any questions about data protection, you will find the contact details of the responsible person or controller below:

enspired GmbH
Wagenseilgasse 3
1120 Vienna

E-Mail: privacy@enspired-trading.com

5. Storage Period

It is a general criterion for us to store personal data only for as long as is absolutely necessary for the provision of our services and products. This means that we delete personal data as soon as any reason for the data processing no longer exists. In some cases, we are legally obliged to keep certain data stored even after the original purpose no longer exists, such as for accounting purposes.

If you want your data to be deleted or if you want to revoke your consent to data processing, the data will be deleted as soon as possible, provided there is no obligation to continue its storage.

We will inform you below about the specific duration of the respective data processing, provided we have further information.

6. Rights in accordance with the General Data Protection Regulation

You are granted the following rights in accordance with the provisions of the [GDPR](#) (General Data Protection Regulation) and the Austrian [Data Protection Act \(DSG\)](#):

- right to rectification (article 16 GDPR)
- right to erasure (“right to be forgotten”) (article 17 GDPR)
- right to restrict processing (article 18 GDPR)
- right to notification – notification obligation regarding rectification or erasure of personal data or restriction of processing (article 19 GDPR)
- right to data portability (article 20 GDPR)
- Right to object (article 21 GDPR)
- right not to be subject to a decision based solely on automated processing – including profiling – (article 22 GDPR)






If you think that the processing of your data violates the data protection law, or that your data protection rights have been infringed in any other way, you can lodge a complaint

with your respective regulatory authority. For Austria this is the data protection authority, whose website you can access at <https://www.data-protection-authority.gv.at/>.

7. Austria Data protection authority

Manager: Mag. Dr. Andrea Jelinek
Address: Barichgasse 40-42, 1030 Wien
Phone number.: +43 1 52 152-0
E-mail address: dsb@dsb.gv.at
Website: <https://www.dsb.gv.at/>

8. Event management

-  Data subjects: Persons who sign up for attending an enspired event
-  Purpose: organization and administration of events
-  Processed data: Name, contact information (e.g. e-mail)
-  Storage period: as long as the purpose of the processing requires it
-  Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests).

8.1 Why do we use the data

We collect your personal data for the processing and transmission of data for the organization and administration of events hosted by us.

If necessary for the nature of the event, contact details may be provided to other participants.

8.2 What data is processed?

If you sign up for attending an enspired event we store next to your e-mail address, title, name, position and company name. In case we need your consent for any data processing regarding our events, we also store your consent.

8.3 Duration of data processing

Your data will be stored after collection for as long as the purpose of the processing requires it.

8.4 Right of withdrawal

If you consented to the data processing, you can withdraw your consent at any time without giving reasons. To do so, please send an e-mail to our contact address listed above. We will delete your data immediately in compliance with the retention periods.

8.5 Legal basis

The data processing regarding the event management is based on our legitimate interest (Article 6 (1) f GDPR).






8.6 Processor

HubSpot processes data from you, among other things, in the USA. HubSpot is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

Additionally, HubSpot uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, HubSpot commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847. You can find out more about HubSpot's data processing in their privacy policy at <https://legal.hubspot.com/de/privacy-policy>.

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with HubSpot. This contract is required by law because HubSpot processes personal data on our behalf. It clarifies that HubSpot may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <https://legal.hubspot.com/dpa>.

9. Online Events

-  Data subjects: Persons who sign up and attend an enspired online event
-  Purpose: organization and administration of events
-  Processed data: Name, contact information (e.g., e-mail), account name, other data that the person shares voluntarily during or before the event, recording of the online event
-  Storage period: as long as the purpose of the processing requires it
-  Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests).

9.1 Why do we use the data

We collect your personal data for the processing and transmitting data for the organization and administration of online events hosted by us.

Contact details may be provided to other participants if necessary for the nature of the event.

9.2 What data is processed?

If you sign up to attend an enspired online event, we store next to your e-mail address, name, contact information, account name and other data that the person shares voluntarily during or prior to the event. In case we need your consent for any data processing regarding our events, we also store your consent.

During our online events there is sometimes the possibility to participate in polls. Other participants do not see who has voted how, and only the overall result is displayed. However, we can see the individual votes.

During our online events it will also be possible to ask questions and participate in the chat. The other participants as well as we can view these questions and the chat history.

By default, only the first name of the participant is visible and the full name of the participant is only displayed if it is in the interest of the online event. The type of name display is visible in the chat.

Since we have an interest in allowing people to participate in our online events who sometimes could not attend or were prevented at short notice, our online events are recorded, including the interactions that took place during the online event (votes, questions, chat). The recordings are available online and can be viewed afterwards.

9.3 Duration of data processing

Your data will be stored after collection for as long as the purpose of the processing requires it.

9.4 Right of withdrawal

If you consented to the data processing, you can withdraw your consent at any time without giving reasons. To do so, please send an e-mail to our contact address listed above. We will delete your data immediately in compliance with the retention periods.

9.5 Legal basis

The data processing regarding the event management is based on our legitimate interest (Article 6 (1) f GDPR) in case that we asked for your consent the data processing is based on your consent pursuant to Art. 6 para. 1 lit. a GDPR.

9.6 Livestream Event – Livestorm

To hold our online events we use Livestorm, which is an online web conferencing software for webinars and virtual meetings. The provider of this service is the the Company Livestorm SAS (Commercial name "Livestorm") registered at 60 rue François 1er, 75008 Paris, France.

The following data will be processed by Livestorm :

- Name
- Account name (login)
- Email address
- Interactions with the platform during a webinar
- Other data you voluntarily share on the Livestorm platform or with the us

Livestorm also processes data in the USA, among other countries. Livestorm uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 GDPR) as the basis for data processing with recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Livestorm undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the USA. These clauses are based on an implementing decision of the EU Commission.






You can find the decision and the corresponding standard contractual clauses here, among other places: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de.

To learn more about the data processed through the use of Livestorm, please see the Privacy Policy at <https://livestorm.co/privacy-policy>.

Data processing agreement (DPA) Livestorm

We have concluded an order processing agreement (DPA) with Livestorm within the meaning of Article 28 of the General Data Protection Regulation (GDPR). This contract is required by law because Livestorm processes personal data on our behalf. It clarifies that Livestorm may only process data they receive from us according to our instructions and must comply with the GDPR.

10. Film and photo shoot at enspired events

-  Data subjects: Persons who attend enspired events.
-  Purpose: Shooting films and pictures for documentation and marketing purposes.
-  Processed data: Filming, photography and sound recordings of participants at the event, if mentioned: name, job description, work related information given by the interviewed person
-  Storage period: as long as the purpose of the processing requires it, in the case of publication the storage period also depends on third parties
-  Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests).

10.1 Why do we use the data

To share our knowledge and passion about energy we use the pictures and films for marketing purposes (event reports, promotion of follow-up events & self-marketing) and documentation purposes.

We will use the data for the mentioned marketing purposes and will therefore also use and publish them on our website, social media platforms, print media and press as well as for internal use.

10.1.1 Facebook

We use the social media platform Facebook (Facebook fan page). The provider of this service is the American company Meta Platforms Inc. The responsible entity for the European area is the company Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland).

Facebook processes data from you, among other things, in the USA. Facebook respectively Meta Platforms is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

Additionally, Facebook uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Facebook commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847.

Our joint commitments were also set out in a publicly available agreement at https://www.facebook.com/legal/controller_addendum

Facebook's data processing terms, which correspond to the Standard Contractual Clauses, can be found at <https://www.facebook.com/legal/terms/dataprocessing>.

You can find out more about the data that is processed by using Facebook in their Privacy Policy at <https://www.facebook.com/about/privacy> and their cookie guidelines at <https://www.facebook.com/policy/cookies/>.

10.1.2 Instagram

We use the social media platform Instagram. Instagram is a social media platform of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA. Since 2012, Instagram is a subsidiary company of Facebook Inc. and is a part of Facebook's products.

Instagram processes data from you, among other things, in the USA. Instagram respectively Meta Platforms is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

Additionally, Instagram uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Instagram commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847.

We have tried to give you the most important information about data processing by Instagram. On <https://help.instagram.com/519522125107875> you can take a closer look at Instagram's data guidelines.

The cookie guideline is the same as for Facebook, visit <https://www.facebook.com/policy/cookies/> for further information.

10.1.3 LinkedIn

We use the social media platform LinkedIn, of the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Moreover, LinkedIn Ireland Unlimited Company Wilton Place in Dublin is responsible for data processing in the European Economic Area and Switzerland.

LinkedIn also processes data in the United States, among other countries. Currently LinkedIn is not a participant of the [Data Privacy Framework Program](#). We would like to note, that US companies that do not participate in the Data Privacy Framework Program are not certified by the European Commission as having an adequate level of data protection. This can be associated with various risks to the legality and security of data processing. More information can be found at

https://ec.europa.eu/commission/presscorner/detail/en/qanda_23_3752 as well at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

LinkedIn uses standard contractual clauses approved by the EU Commission as the basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway, and especially in the USA) or data transfer there (= Art. 46, paragraph 2 and 3 of the GDPR). These clauses oblige LinkedIn to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847

We have tried to provide you with the most important information about data processing by LinkedIn. On <https://www.linkedin.com/legal/privacy-policy> you can find out more on data processing by this social media network. For further information on the cookies used by LinkedIn please see <https://www.linkedin.com/legal/cookie-policy>.

We have entered a Data Processing Agreement (DPA) with LinkedIn in accordance with Article 28 of the General Data Protection Regulation (GDPR). In our general section "Data Processing Agreement (DPA)" you can find out what a DPA is exactly and what it must contain.

This agreement is a legal requirement as LinkedIn processes personal data on our behalf. It clarifies that LinkedIn may only process any data they receive from us according to our instructions and in compliance with the GDPR. You can find the link to the Data Processing Agreement (DPA) at <https://www.linkedin.com/legal/l/dpa?>.

10.1.4 X (formerly Twitter)

We use X, a short message service and social media platform from the firm Twitter International Unlimited Company., One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland.

In their Privacy Policy, X repeatedly emphasizes that they do not save data from external website visits, provided you or your browser are in the European Economic Area or Switzerland. However, if you interact directly with X, the company will of course store your data.

X also processes data in the United States, among other countries. Currently X is not a participant of the [Data Privacy Framework Program](#). We would like to note, that US companies that do not participate in the Data Privacy Framework Program are not certified by the European Commission as having an adequate level of data protection. This can be associated with various risks to the legality and security of data processing. More information can be found at https://ec.europa.eu/commission/presscorner/detail/en/qanda_23_3752 as well at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

X uses standard contractual clauses, which are approved by the EU Commission, as the basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfers there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige X to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are

based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847

We hope we could give you a basic overview of X's data processing. We do not receive any data from X and are not responsible for what X does with your data. If you have any further questions on this topic, we recommend you to read X's privacy statement at <https://twitter.com/en/privacy>.

10.2 What data is processed?

If you attend one of our events, we may take film and photos (including audio recordings) in which you can be seen or heard. If you have agreed on being interviewed by us we also may state your name, job description, work related information given by you.

10.3 Duration of data processing

The data is stored for as long as it is necessary for the purpose of the data processing. In the case of publishing the recordings, the duration of data processing is further dependent on third-party providers and their deletion periods.

10.4 Right of withdrawal






You can withdraw your consent to being interviewed at any time without giving reasons. To do so, please send an e-mail to our contact address listed above. We will delete your data immediately in compliance with the retention periods. The withdrawal of consent does not affect the lawfulness of the processing (including publication) carried out on the basis of the consent until the withdrawal.

10.5 Legal basis

This processing of personal data is based on a legitimate interest (pursuant to Art. 6 para. 1 lit. f GDPR). After giving you the information about the data processing at our events and the possibility not to be filmed etc. we assume that you consent to the mentioned data processing. If you do not agree with being filmed or photographed, you can contact us at any time at privacy@enspired-trading.com or let our team know at the relevant event.

If you have given consent to be interviewed by us, the data processing is based on your consent pursuant to Art. 6 para. 1 lit. a GDPR.

11. Marketing

-  Data subjects: Persons who have provided us with their contact information for the purpose of further or recurring contact.
-  Purpose: Contacting for further discussions, customer acquisition, direct marketing via telephone, e-mail or other communication channel.
-  Processed data: Personal information given during the registration for the event or whilst the event e.g. business card
-  Storage period: Deletion upon declaration of non-interest, but no longer than 3 years.
-  Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests).

11.1 Why do we use marketing?

If you have shown interest in our products or services and have provided us with your data for further contact, we will of course be happy to get in touch with you. We will add your data to our marketing file so that they do not get lost.

11.2 What data is processed?

In addition to e-mail address, your title, name, address, telephone number, position and company name may also be stored. However, only if you agree to this data storage. The data marked as such are necessary so that we can contact you personally. Providing this information is voluntary, but failure to provide it will result in you not being able to be contacted by us. We record your declaration of consent so that we can always prove that this complies with our laws. If we have already had a personal conversation with you, e.g. at a trade fair, we will also make a note of the content of the conversation so that we can tailor further contact and continued conversations more individually.

11.3 Duration of data processing

If you have no interest in further marketing activities on our part with you, we may store your data for up to three years on the basis of our legitimate interests so that we can still prove your consent at that time. We may only process this data if we need to defend ourselves against any claims.

However, if you confirm that you have given us your consent to the data processing in question, you can submit an individual deletion request at any time.

11.4 Right of withdrawal

You can withdraw your consent to be contacted by us for marketing and business purposes at any time without giving reasons. To do so, please send an e-mail to our contact address listed above. We will delete your data immediately in compliance with the retention periods.

11.5 Legal basis

Inclusion in our marketing file is based on your consent (Article 6 (1) a GDPR). This means that we may only contact you if you have consented to this. If applicable, we may also send you advertising messages on the basis of Section 174 of the Telecommunications Act 2021, provided that you have become our customer and have not objected to the use of your e-mail address for direct advertising.

11.6 Processor

For marketing purposes, we use HubSpot, a digital marketing tool. The service provider is the American company HubSpot, Inc, 25 First St 2nd Floor Cambridge, MA, USA. The company also has a registered office in Ireland, among other places, with the address 1 Sir John Rogerson's Quay, Dublin 2, Ireland.






HubSpot processes data from you, among other things, in the USA. HubSpot is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

Additionally, HubSpot uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, HubSpot commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847. You can find out more about HubSpot's data processing in their privacy policy at <https://legal.hubspot.com/de/privacy-policy>.

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with HubSpot. This contract is required by law because HubSpot processes personal data on our behalf. It clarifies that HubSpot may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <https://legal.hubspot.com/dpa>.

12. Email-Marketing

Email Marketing Overview

-  Affected parties: newsletter subscribers
-  Purpose: direct marketing via email, notification of events that are relevant
-  Processed data: data entered during registration, but at least the email address. You can find more details on this in the respective email marketing tool used.
-  Storage duration: for the duration of the subscription
-  Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

12.1 What is Email-Marketing?

We use email marketing to keep you up to date. If you have agreed to receive our emails or newsletters, your data will be processed and stored. Email marketing is a part of online marketing. In this type of marketing, news or general information about a company, product or service are emailed to a specific group of people who are interested in it.

If you want to participate in our email marketing (e.g. newsletter), you usually just have to register with your email address. To do this, you have to fill in and submit an online form. However, we may also ask you for your title and name, so we can address you personally in our emails.

The registration for newsletters generally works with the help of the so-called “double opt-in procedure”. After you have registered for our newsletter on our website, you will receive an email, via which you can confirm the newsletter registration. This ensures that you own the email address you signed up with, and prevents anyone to register with a third-party email address. We or a notification tool we use, will log every single registration. This is necessary so we can ensure and prove, that registration processes are done legally and correctly. In general, the time of registration and registration confirmation are stored, as well as your IP address. Moreover, any change you make to your data that we have on file is also logged.

12.2 Why do we use Email-Marketing?

Of course, we want to stay in contact with you and keep you in the loop of the most important news about our company. For this, we use email marketing – often just referred to as “newsletters” – as an essential part of our online marketing. If you agree to this or if it is permitted by law, we will send you newsletters, system emails or other notifications via email. Whenever the term “newsletter” is used in the following text, it mainly refers to emails that are sent regularly. We of course don’t want to bother you with our newsletter in any way. Thus, we genuinely strive to offer only relevant and interesting content. In our emails you can e.g. find out more about our company and our services or products. Should we commission a service provider for our email marketing, who offers a professional mailing

tool, we do this in order to offer you fast and secure newsletters. The purpose of our email marketing is to inform you about new offers and also to get closer to our business goals.

12.3 Which data are processed?

If you subscribe to our newsletter via our website, you then have to confirm your membership in our email list via an email that we will send to you. In addition to your IP and email address, your name, address and telephone number may also be stored. However, this will only be done if you agree to this data retention. Any data marked as such are necessary so you can participate in the offered service. Giving this information is voluntary, but failure to provide it will prevent you from using this service. Moreover, information about your device or the type of content you prefer on our website may also be stored. In the section Web-Hosting you can find out more about how your data is stored when you visit a website. We record your informed consent, so we can always prove that it complies with our laws.

12.4 Duration of data processing

If you unsubscribe from our e-mail/newsletter distribution list, we may store your address for up to three years on the basis of our legitimate interests, so we can keep proof your consent at the time. We are only allowed to process this data if we have to defend ourselves against any claims.

However, if you confirm that you have given us your consent to subscribe to the newsletter, you can submit an individual request for erasure at any time by e-mailing us at privacy@enspired-trading.com. Furthermore, if you permanently object to your consent, we reserve the right to store your email address in a blacklist. But as long as you have voluntarily subscribed to our newsletter, we will of course keep your email address on file.

12.5 Withdrawal – how can I cancel my subscription?

You have the option to cancel your newsletter subscription at any time. All you have to do is revoke your consent to the newsletter subscription. This usually only takes a few seconds or a few clicks. Most of the time you will find a link at the end of every email, via which you will be able to cancel the subscription. Should you not be able to find the link in the newsletter, you can contact us by email and we will immediately cancel your newsletter subscription for you.

12.6 Legal basis

Our newsletter is sent on the basis of your **consent** (Article 6 (1) (a) GDPR). This means that we are only allowed to send you a newsletter if you have actively registered for it beforehand. Moreover, we may also send you advertising messages on the basis of Section 175 of the Telecommunications Act (TKG) provided you have become our customer and have not objected to the use of your email address for direct mail.

12.7 Newsletter – Tool Hubspot

To manage the newsletter registration we use HubSpot, which is a tool for digital marketing. The provider of this service is the American company HubSpot Inc.. The responsible entity for the European region is the Irish company HubSpot (1 Sir John Rogerson's Quay, Dublin 2, Ireland).

HubSpot processes data from you, among other things, in the USA. HubSpot is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en.

Additionally, HubSpot uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, HubSpot commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847. You can find out more about HubSpot's data processing in their privacy policy at <https://legal.hubspot.com/de/privacy-policy>.

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with HubSpot. This contract is required by law because HubSpot processes personal data on our behalf. It clarifies that HubSpot may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <https://legal.hubspot.com/dpa>.

13. Additional and further Information

Please also see our [General Privacy Notice](#) for additional and further information.