

General Privacy Policy

for the Aam Digital website, communications, newsletter and events

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Controller: Aam Digital GmbH, c/o Impact Hub Berlin, Rollbergstraße 28 A, 12053 Berlin, Germany. Further company and registration details are available in our imprint. For privacy and data protection questions relating to processing for which Aam Digital acts as controller, contact data-protection@aam-digital.com.

Our Privacy Policy for the Aam Digital Software-as-a-Service (SaaS) Service is kept separately as SaaS Privacy Policy.

1. Scope and roles

This General Privacy Policy explains how Aam Digital GmbH processes personal data when you visit our website, interact with us outside a hosted Aam Digital service, contact us, subscribe to newsletters, register for webinars or events, or otherwise communicate with us. For these activities, Aam Digital GmbH generally acts as controller under the GDPR.

For purposes of this Privacy Policy, “Customer Content” means data, content, files, and personal data submitted to a hosted Aam Digital service by or on behalf of a customer or its authorized users; and “Standard Subprocessor” means a subprocessor identified in Aam Digital’s current List of Standard Subprocessors.

If you use a hosted Aam Digital service as a customer or authorized user, the SaaS Privacy Policy and, where applicable, the applicable data processing agreement (the “Applicable DPA”) describe the additional processing activities for the hosted service. Where we process personal data contained in Customer Content on behalf of a customer, the customer generally acts as controller and Aam Digital acts as processor. Where the customer acts as processor on behalf of another controller, Aam Digital acts as further processor or subprocessor on behalf of that customer. Where we ask you to provide personal data for our controller-side activities and identify information as required, that information is required to process the relevant request, registration, contractual relationship, or legal obligation. If you do not provide required information, we may be unable to provide the requested interaction or service. Other information is optional unless stated otherwise.

2. Website usage statistics and live demo interactions

We use locally operated, privacy-conscious analytics software listed in our service-provider overview to understand how visitors use our website and to improve our information, usability, security, and misuse prevention. The website analytics and live-demo interactions described in this section are separate from the operational monitoring used within hosted customer environments; that SaaS processing is described in our SaaS Privacy Policy. We do not use advertising tracking or cross-site tracking.

For this purpose, we may process the website from which you visited us, the pages and interactions on our website, interactions with the live demo integrated into the website, the date and duration of your visit, an anonymized or shortened IP address, and limited technical information associated with the request.

The legal basis is our legitimate interest in improving and securing our website and understanding how our information is used (Art. 6(1)(f) GDPR). Where consent is legally required for a specific technology, we will request consent before using it. Statistical data is stored on systems controlled by us and is not used for advertising profiling.

3. Contact, support requests, and other communications

If you contact us by email or other communication channels, we process the information you provide, such as your name, email address, organization, message content, attachments, communication metadata, and any other information needed to respond to you. We use this

information to answer requests, provide information, handle support or sales communications, maintain business records, and protect our rights and systems.

The legal basis is, depending on the context, performance of a contract or pre-contractual steps (Art. 6(1)(b) GDPR), our legitimate interest in communicating with you and managing our organization (Art. 6(1)(f) GDPR), or compliance with legal obligations (Art. 6(1)(c) GDPR). We may use email-hosting, communication-management, CRM, or support service providers listed in our service-provider overview to help our team manage such communications.

These controller-side communication tools are not used to process Customer Content stored in hosted Aam Digital environments for Aam Digital's own communication purposes. A provider may separately act as a Standard Subprocessor for SaaS processing where that distinct role is disclosed in the Standard Subprocessor List. If you include personal data or confidential information in an email or support request, that information may be processed by the relevant email or communication provider as part of handling your communication. Please avoid sending sensitive beneficiary/participant data or unnecessary Customer Content through ordinary email or support channels.

4. Newsletter

If you subscribe to our newsletter, we process your email address and, where provided, your name, organization, preferences, subscription topics, consent records, and newsletter interaction information. We use this information to send the newsletter and manage subscriptions. The legal basis is your consent (Art. 6(1)(a) GDPR), and you may withdraw consent at any time by unsubscribing or contacting us. We use a newsletter service provider listed in our service-provider overview to send newsletters.

5. Webinars, events, and similar sign-ups

If you register for a webinar, event, or similar activity, we process registration details such as your name, email address, organization, role, selected topic, attendance information, and communication preferences. We use this information to organize the event, communicate with participants, and, where applicable, follow up on related questions. The legal basis is performance of the registration or event relationship (Art. 6(1)(b) GDPR), our legitimate interest in organizing events and communicating with interested participants (Art. 6(1)(f) GDPR), and, for marketing follow-up where required, your consent (Art. 6(1)(a) GDPR). We may use event-registration, CRM, or communication-management tools listed in our service-provider overview to manage webinar sign-ups and communication.

6. Recipients, service providers, and subprocessors

We use service providers and processors for hosting, email, communication management, newsletter delivery, analytics, events, security, and similar operational purposes. The current overview of relevant controller-side service providers and third-party services is available at <https://www.aam-digital.com/legal/service-providers>. Standard Subprocessors under the Applicable DPA for hosted Aam Digital services are listed separately at <https://www.aam-digital.com/legal/subprocessors> and are governed by the Applicable DPA. Customer-specific subprocessors used only for processing relating to a particular customer, where the Applicable DPA provides for them, may be separately authorized in accordance with the Applicable DPA and are not necessarily included in that public list. Not every provider listed on these documents is necessarily used for every activity or in the same legal role.

We require processors to protect personal data and process it only for the agreed purposes. We do not sell personal data and do not use website, contact, newsletter, or event data for third-party advertising profiling.

7. International transfers

We aim to use EU/EEA-based processing where feasible. Where personal data is transferred to a country outside the EU/EEA, we apply the transfer mechanism required under Chapter V GDPR.

Where the European Commission has adopted an applicable adequacy decision, the transfer may be based on that adequacy decision. Where no applicable adequacy decision exists, we use appropriate safeguards where required, in particular the EU Standard Contractual Clauses, supplemented by additional measures where necessary, or another transfer mechanism permitted under applicable data protection law. Relevant service providers and, where applicable, their processing locations are identified in our service-provider overview. Further information about the safeguards applicable to a particular transfer, including information on how to obtain a copy where available, can be requested at data-protection@aam-digital.com.

8. Retention

We retain personal data only for as long as necessary for the purposes described in this Privacy Policy, unless longer retention is required or permitted by law. In determining the applicable retention period, we take into account the duration of the relevant relationship or request, the purposes for which the information is needed, security and abuse-prevention requirements, applicable statutory retention obligations, and applicable limitation periods or the need to establish, exercise, or defend legal claims. Communication records may be retained for the period needed to handle the request and maintain appropriate business records. Newsletter data is retained until you unsubscribe or withdraw consent, subject to keeping limited suppression or proof-of-consent records where legally required. Website analytics are retained in anonymized, aggregated, or limited form where possible. Legal, accounting, tax, or dispute-related records may be retained for the applicable statutory periods.

9. Your rights

Subject to the conditions under the GDPR, you may have the right to request access, rectification, erasure, restriction of processing, and data portability. Where processing is based on consent, you may withdraw consent at any time with effect for the future. You also have the right to lodge a complaint with a competent data protection supervisory authority.

Right to object. Where we process your personal data on the basis of legitimate interests (Art. 6(1)(f) GDPR), you have the right to object to that processing at any time on grounds relating to your particular situation. We will then stop processing the personal data unless we demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims. Where we process personal data for direct marketing purposes, you may object at any time to processing for that purpose. If you object, we will no longer process your personal data for direct marketing.

To exercise rights regarding processing for which Aam Digital is controller, contact data-protection@aam-digital.com. If your request concerns data processed by an Aam Digital customer using a hosted Aam Digital service, please contact the organization using Aam Digital for the relevant processing. That organization will handle your request as controller or, where it acts as processor, coordinate with the relevant underlying controller. We will support the customer as required under the Applicable DPA and applicable law.

10. No automated decisions with legal or similarly significant effect

We do not use the processing described in this Privacy Policy for automated decision-making that produces legal effects concerning you or similarly significantly affects you within the meaning of Art. 22 GDPR. This does not mean that we do not use any technical automation; it means that we do not make decisions solely by automated means that produce legal or similarly significant effects.

11. Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes in our website, tools, communication processes, legal requirements, or organizational practices. Where required by applicable law, we will provide additional notice of material changes in an appropriate manner. The current version will be published on our website.