



Privacy Policy:

anuboXBRL GmbH & Co. KG

I. Name and Address of the Controller

The controller within the meaning of the General Data Protection Regulation and other national data protection laws of the member states as well as other data protection provisions is:

anuboXBRL GmbH & Co. KG
represented by the Managing Director
of anubo Verwaltungs GmbH
Dr. Bodo Kesselmeier
Stadelbergerstr. 32
82256 Fürstenfeldbruck
Germany
Phone: +49 8141 35758 - 0
Email: info@anubo.com
Website: <https://anubo.com>

II. General Information on Data Processing

1. Scope of the Processing of Personal Data

We generally process personal data of our users only to the extent necessary to provide a functional website as well as our content and services. The processing of personal data of our users takes place regularly only with the consent of the user. An exception applies in such cases where prior consent cannot be obtained for factual reasons and the processing of the data is permitted by legal regulations.

2. Legal Basis for the Processing of Personal Data

Insofar as we obtain the consent of the data subject for processing operations involving personal data, Art. 6(1)(a) GDPR serves as the legal basis. When processing personal data that is necessary for the performance of a contract to which the data subject is a party, Art. 6(1)(b) GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

Insofar as the processing of personal data is necessary for compliance with a legal obligation to which our company is subject, Art. 6(1)(c) GDPR serves as the legal basis. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6(1)(d) GDPR serves as the legal basis.

If processing is necessary to safeguard a legitimate interest of our company or a third party, and the interests, fundamental rights, and freedoms of the data subject do not override the former interest, Art. 6(1)(f) GDPR serves as the legal basis for the processing.

3. Data Deletion and Storage Duration

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage ceases to apply. Storage may also take place if this has been provided for by the European or national legislator in Union regulations, laws, or other provisions to which the controller is subject.

Data will also be blocked or deleted when a storage period prescribed by the aforementioned standards expires, unless there is a necessity for further storage of the data for the conclusion or performance of a contract.

III. Provision of the Website and Creation of Log Files

1. Description and Scope of Data Processing

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer.

The following data is collected:

- (1) Information about the browser type and version used
- (2) The user's operating system
- (3) The user's internet service provider
- (4) The user's IP address
- (5) Date and time of access
- (6) Websites from which the user's system accesses our website
- (7) Websites that are accessed by the user's system via our website

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user.

2. Legal Basis for Data Processing

The legal basis for the temporary storage of the data and the log files is Art. 6(1)(f) GDPR.

3. Purpose of Data Processing

Temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

Storage in log files is carried out to ensure the functionality of the website. In addition, the data serves us to optimize the website and to ensure the security of our information

technology systems. An evaluation of the data for marketing purposes does not take place in this context.

These purposes also constitute our legitimate interest in data processing pursuant to Art. 6(1)(f) GDPR.

4. Duration of Storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of data collection for the provision of the website, this is the case when the respective session has ended.

In the case of storage of data in log files, this is the case after seven days at the latest. Further storage is possible. In this case, the IP addresses of the users are deleted or anonymized, so that an assignment of the calling client is no longer possible.

5. Objection and Removal Option

The collection of data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility of objection on the part of the user.

IV. Use of Cookies

1. Description and Scope of Data Processing

Our website uses cookies. Cookies are text files that are stored in the internet browser or by the internet browser on the user's computer system. When a user accesses a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string that enables a clear identification of the browser when the website is called up again.

We use cookies to make our website more user-friendly. Some elements of our website require that the accessing browser can also be identified after a page change.

The following data is stored and transmitted in the cookies:

- Language settings and other technical settings related to the page selected and displayed by the user, as well as the necessary technical functionality of the website.
- Results of the consents obtained from the user, such as cookie consent or cookie rejection. Cookie user consent is only obtained if the website contains cookies that relate to optional functionalities, i.e., go beyond "necessary cookies."
- Items in the shopping cart
- Log-in information

We may also use cookies on our website to analyze user browsing behavior. This allows the following data to be transmitted:

- Search terms entered
- Frequency of page views
- Use of website features

The user data collected in this way is pseudonymized using technical precautions. Therefore, it is no longer possible to assign the data to the accessing user. The data is not stored together with other personal data of the users.

When accessing our website, users are informed by an information banner about the use of cookies for analysis purposes and referred to this privacy policy. In this context, there is also information on how to prevent the storage of cookies in the browser settings.

2. Legal Basis for Data Processing

The legal basis for the processing of personal data using cookies is Art. 6(1)(f) GDPR.

3. Purpose of Data Processing

We use analysis cookies to improve the quality of our website and its content. Analysis cookies tell us how the website is used, allowing us to continuously optimize our offerings. For example, we learn which additional information about our offerings, such as specific specialist articles or news on our website's blog, is particularly interesting or less interesting. This allows us to optimize our information presentation and our offerings for you.

Our legitimate interest in processing personal data pursuant to Art. 6 (1) (f) GDPR also lies in these purposes.

4. Duration of Storage, Objection and Removal Option

Cookies are stored on the user's computer and transmitted by it to our site. Therefore, as a user you also have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or restrict the transmission of cookies. Already stored cookies can be deleted at any time. This can also be done automatically. If cookies for our website are deactivated, it may no longer be possible to use all functions of the website in full.

V. Links to third-party websites

Our website may also contain links to websites other than our anubo.com domain. These links are visible before clicking, usually by hovering the mouse pointer over the link (hereinafter referred to as the target link), so that it is clear in advance whether the click will leave the anubo.com domain.

The domain of the target link may collect personal information, but this depends on several factors, including whether the user is already logged in to that domain (hereinafter referred to as the target domain).

By clicking on a link to a domain (here, a third-party domain), an Internet user usually assumes that responsibility for data protection lies solely with the respective owner of the target domain. If necessary, the user can consult the data protection regulations of the target domain in advance, since the link is visible before clicking.

Our website generally does not collect any personal data in connection with such links. We also do not transfer non-personal data to such third-party websites in connection with a click. If we (have to) deviate from this general rule in individual cases, the user will be informed in advance within the framework of the legal regulations.

1. Description and Scope of Data Processing

N/A

2. Legal Basis for Data Processing

N/A

3. Purpose of Data Processing

N/A

4. Duration of Storage, Objection and Removal Option

no storage

VI. Newsletter

1. Description and Scope of Data Processing

Our website may offer the option to subscribe to a free newsletter. When registering for the newsletter, the data from the input form (the user's email address) is transmitted to us. Additionally, the following data is collected during registration:

- IP address of the requesting computer
- Date and time of registration

During the registration process, your consent is obtained for the processing of your data, and reference is made to this privacy policy.

If you purchase goods or services on our website and provide your email address in the process, this address may subsequently be used by us to send a newsletter. In such a case, the newsletter will only contain direct advertising for our own similar goods or services.

The newsletters are sent via our own server in Bavaria and thus without transferring your email address to third parties. We also intend to continue relying solely on our own mail servers and avoid the use of third-party newsletter providers. Should this no longer be technically or economically feasible in the future, we hereby guarantee that we will only engage newsletter service providers based within the EU. In any case, your data will be used exclusively for sending the newsletter.

2. Legal Basis for Data Processing

The legal basis for the processing of data after registration for the newsletter, provided consent has been given by the user, is Art. 6(1)(a) GDPR.

The legal basis for sending newsletters following the sale of goods or services is § 7(3) UWG (German Act Against Unfair Competition).

3. Purpose of Data Processing

The user's email address is collected to deliver the newsletter.

Other personal data collected during the registration process is used to prevent misuse of the services or the provided email address.

4. Duration of Storage

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. Accordingly, the user's email address is stored as long as the newsletter subscription is active.

Other personal data collected during the registration process is usually deleted after seven days.

The metadata of emails generated by our web server (such as newsletters, notifications during the double opt-in process, etc.) is automatically deleted after six months. Metadata includes the email address, date, and subject line of the email. The contents of the emails are not stored on the web server.

5. Objection and Removal Option

Users may cancel their newsletter subscription at any time. A corresponding link is provided in every newsletter.

This also enables users to withdraw their consent to the storage of personal data collected during the registration process.

VII. Registration

1. Description and Scope of Data Processing

On our website, we offer users the opportunity to register by providing personal data. The data is entered into an input mask, transmitted to us, and stored. The data is not shared with third parties.

The following data is collected during the registration process:

- (1) User's name
- (2) Company
- (3) Postal address
- (4) Customer category, in particular category in the financial data communication process (e.g., issuer, agency, auditing firm, software manufacturer, authority, investment professional, service provider, etc.)
- (5) User's email address
- (6) User's telephone number
- (7) User's IP address
- (8) Date and time of registration

As part of the registration process, the user's consent to the processing of this data is obtained.

2. Legal Basis for Data Processing

The legal basis for processing the data, if the user has given their consent, is Art. 6 (1) (a) GDPR.

The legal basis for processing the data transmitted when sending an email is Art. 6 (1) (f) GDPR. If the email contact is aimed at concluding a contract, an additional legal basis for processing is Art. 6 (1) (b) GDPR.

3. Purpose of Data Processing

User registration may be required for:

- (1) the provision of Software as a Service (SAAS), such as add-ins for Microsoft software products.
- (2) the provision of specific content and services, such as

- (3) product information tailored to a specific customer group and/or specific offers.
- (4) the sending of the information you request by email or post.
- (5) contacting customer support via email, post, or telephone (orders, order processing, billing, etc.).
- (6) a web forum for software support.
- (7) product support via email or telephone.

Alternatively, user registration may be required to fulfill a contract with the user or to carry out pre-contractual measures. For example, for certain product variants, it must be ensured that contracts are only concluded with users of the target customer group.

4. Duration of Storage

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. This is the case for the data collected during the registration process if the registration on our website is canceled or modified.

In the case of a registration process for the fulfillment of a contract or for the implementation of pre-contractual measures, the data will be deleted when the data is no longer required for the execution of the contract. Even after the conclusion of the contract, it may be necessary to store the contractual partner's personal data in order to comply with contractual or legal obligations.

5. Objection and Removal Option

As a user, you have the option to cancel your registration at any time. You can have the data stored about you changed at any time. You can initiate the change or deletion of data yourself after logging in to our website.

If the data is required to fulfill a contract or to carry out pre-contractual measures, premature deletion of the data is only possible if contractual or legal obligations do not prevent deletion.

VIII. Contact form and email contact

1. Description and Scope of Data Processing

Our website may contain a contact form that can be used for electronic contact. If a user uses this option, the data entered in the input mask will be transmitted to us and stored. This data includes:

- Reason for interest (e.g., product purchase, partnership, press, event organizer, supplier, potential employee)

- anubo product name and version (if applicable)
- Company, if applicable
- anubo customer number, if applicable
- User name
- Email
- Telephone
- Free communication

The following data is also stored when the message is sent:

- The user's IP address
- Date and time
- Page URL
- User agent - technical data on the operating system, browser version, etc.

Your consent to the processing of the data will be obtained during the sending process, and reference will be made to this privacy policy.

Alternatively, you can contact us via the provided email address. In this case, the user's personal data transmitted with the email will be stored.

The data will not be passed on to third parties in this context. The data will be used exclusively for processing the conversation.

2. Legal Basis for Data Processing

Rechtsgrundlage für die Verarbeitung der Daten ist bei Vorliegen einer Einwilligung des Nutzers Art. 6 Abs. 1 lit. a DSGVO.

Rechtsgrundlage für die Verarbeitung der Daten, die im Zuge einer Übersendung einer E-Mail übermittelt werden, ist Art. 6 Abs. 1 lit. f DSGVO. Zielt der E-Mail-Kontakt auf den Abschluss eines Vertrages ab, so ist zusätzliche Rechtsgrundlage für die Verarbeitung Art. 6 Abs. 1 lit. b DSGVO.

3. Purpose of Data Processing

The processing of the personal data from the input mask serves us solely to process the contact. In the case of contact via email, this also constitutes the necessary legitimate interest in processing the data. The other personal data processed during the sending process serves to prevent misuse of the contact form and to ensure the security of our information technology systems.

4. Duration of Storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data from the contact form input mask and those sent via

email, this is the case when the respective conversation with the user has ended. The conversation is concluded when it can be inferred from the circumstances that the matter in question has been conclusively clarified.

The metadata of the emails created by our web server (e.g., with the data from the contact form) is automatically deleted after 6 months. This metadata includes the email address, date, and subject of the email. The content of the emails, i.e., the data from the contact form, is not stored on the web server.

5. Objection and Removal Option

The user has the right to withdraw their consent to the processing of personal data at any time. If the user contacts us by email, they can withdraw their consent to the storage of their personal data at any time. In such a case, the conversation cannot be continued.

Please send your withdrawal of consent and objection to storage to: anubo Verwaltungs GmbH, Data Protection, Stadelbergerstr. 32, D-82256 Fürstenfeldbruck, or by email to poststelle@anubo.com. In this case, all personal data stored during the contact process will be deleted.

IX. Web analysis by Matomo

1. Scope of processing of personal data

We may use the open-source software tool Matomo (formerly PIWIK) on our website to analyze the surfing behavior of our users. If this technical function is technically active, users will be informed about the use of cookies for analysis purposes via an information banner when they visit the website. The software places a cookie on the user's computer (see above for information on cookies). When individual pages of our website are accessed, the following data is stored:

- (1) Two bytes of the IP address of the user's accessing system
- (2) The accessed website
- (3) The website from which the user accessed the accessed website (referrer)
- (4) The subpages accessed from the accessed website
- (5) The length of time spent on the website
- (6) The frequency of website visits

The software runs exclusively on our website's servers. Users' personal data is only stored there. The data will not be passed on to third parties.

The software is configured so that the IP addresses are not stored in full, but two bytes of the IP address are masked (e.g.: 192.168.xxx.xxx). This means that the shortened IP address can no longer be assigned to the accessing computer.

2. Legal basis for the processing of personal data

The legal basis for the processing of users' personal data is Art. 6 (1) (f) GDPR.

3. Purpose of data processing

The processing of users' personal data enables us to analyze their surfing behavior. By evaluating the data obtained, we are able to compile information about the use of the individual components of our website. This helps us to continuously improve our website and its user-friendliness. These purposes also constitute our legitimate interest in processing the data in accordance with Art. 6 (1) (f) GDPR. By anonymizing the IP address, the users' interest in the protection of their personal data is sufficiently taken into account

4. Duration of Storage

The data will be deleted as soon as it is no longer needed for our recording purposes. In our case, this is after 180 days.

5. Possibility of Objection and Removal

Cookies are stored on the user's computer and transmitted from there to our site. Therefore, you as the user have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to fully use all of the website's functions.

We offer our users the option of opting out of the analysis process on our website - provided the analysis process is generally activated. To do so, you must follow the corresponding link. This will place another cookie on your system, signaling our system not to store the user's data. If the user deletes the corresponding cookie from their system in the meantime, they must set the opt-out cookie again.

Further information on the privacy settings of the Matomo software can be found under the following link: <https://matomo.org/docs/privacy/>.

X. Rights of the Data Subject

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights vis-à-vis the controller:

1. Right to information

You can request confirmation from the controller as to whether personal data concerning you is being processed by us.

If such processing occurs, you can request information from the controller about the following:

- (1) the purposes for which the personal data are being processed;
- (2) the categories of personal data being processed;
- (3) the recipients or categories of recipients to whom the personal data concerning you have been or will be disclosed;
- (4) the planned duration of storage of the personal data concerning you or, if specific information is not available, criteria for determining the storage period;
- (5) the existence of a right to rectification or erasure of the 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 to lodge a complaint with a supervisory authority;
- (7) all available information about the origin of the data if the personal data are not collected from the data subject;
- (8) the existence of automated decision-making, including profiling, pursuant to Art. 22 (1) and (4) GDPR and - at least in these cases - meaningful information about the logic involved, as well as the significance and intended consequences of such processing for the data subject.

You have the right to request information about whether the personal data concerning you will be transferred to a third country or to an international organization. In this context, you can request to be informed of the appropriate safeguards pursuant to Art. 46 GDPR in connection with the transfer.

2. Right to rectification

You have the right to have the personal data concerning you rectified and/or completed by the controller if the personal data concerning you that are processed are inaccurate or incomplete. The controller must carry out the rectification immediately.

3. Right to 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 the personal data concerning you for a period enabling the controller to verify the accuracy of the personal data;

(2) the processing is unlawful and you oppose the erasure of the personal data and instead request the restriction of their use;

(3) the controller no longer needs the personal data for the purposes of the processing, but you require them to assert, exercise, or defend legal claims, or

(4) if you have objected to the processing pursuant to Art. 21 (1) GDPR and it has not yet been determined whether the legitimate reasons of the controller outweigh your reasons.

If the processing of personal data concerning you has been restricted, this data - apart from its storage - may only be processed with your consent or for the establishment, exercise, or defense of legal claims or to protect the rights of another natural or legal person, or for reasons of important public interest of the Union or a Member State.

If the restriction of processing has been restricted in accordance with the above-mentioned conditions, you will be informed by the controller before the restriction is lifted.

4. Right to erasure

a) Obligation to erase

You may request the controller to delete the personal data concerning you immediately, and the controller is obliged to delete this data immediately if one of the following reasons applies:

- (1) The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
- (2) You withdraw your consent on which the processing was based pursuant to Art. 6 (1) (a) or Art. 9 (2) (a) GDPR, and there is no other legal basis for the processing.
- (3) You object to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21 (2) GDPR.
- (4) The personal data concerning you were processed unlawfully.
- (5) The deletion of the personal data concerning you is necessary to fulfill a legal obligation under Union or Member State law to which the controller is subject.
- (6) The personal data concerning you were collected in relation to information society services offered in accordance with Article 8 (1) GDPR.

b) Information to third parties

If the controller has made the personal data concerning you public and is obliged to erase it pursuant to Art. 17 (1) GDPR, the controller shall take appropriate measures, including technical ones, taking into account the available technology and the implementation costs, to inform data controllers which process the personal data that you, as the data subject,

have requested the erasure of all links to these personal data or of copies or replications of these personal data.

c) Exceptions

The right to erasure shall not apply if processing is necessary

- (1) for exercising the right to freedom of expression and information;
- (2) for compliance with a legal obligation requiring processing by Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (3) for reasons of public interest in the area of public health pursuant to Article 9 (2) (h) and (i) and Article 9 (3) GDPR;
- (4) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes pursuant to Article 89 (1) GDPR, insofar as the right referred to in section a) is likely to render impossible or seriously compromise the achievement of the objectives of that processing, or
- (5) for the establishment, exercise, or defense of legal claims.

5. Right to information

If you have asserted your right to rectification, erasure, or restriction of processing vis-à-vis the controller, the controller is obliged to inform all recipients to whom the personal data concerning you was disclosed of this rectification, erasure, or restriction of processing, unless doing so proves impossible or involves disproportionate effort. You have the right to be informed by the controller of these recipients.

6. Right to data portability

You have the right to receive the personal data concerning you that you have provided to the controller in a structured, common, and machine-readable format. You also have the right to transmit this data to another controller without hindrance from the controller to whom the personal data was provided, provided that

- (1) the processing is based on consent pursuant to Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR or on a contract pursuant to Art. 6 (1) (b) GDPR and
- (2) the processing is carried out using automated procedures.

In exercising this right, you also have the right to have the personal data concerning you transmitted directly from one controller to another, where technically feasible. The freedoms and rights of others must not be adversely affected.

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

7. Right of Objection

You have the right to object at any time to the processing of personal data concerning you based on Art. 6 (1) (e) or (f) GDPR, for reasons related to your particular situation; this also applies to profiling based on these provisions.

The controller will no longer process the personal data concerning you unless they can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims. If the personal data concerning you is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purposes of such advertising; this also applies to profiling insofar as it is related to such direct marketing.

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

In connection with the use of information society services, you have the option of exercising your right of objection by means of automated procedures that use technical specifications - notwithstanding Directive 2002/58/EC.

8. Right to withdraw your consent to data protection

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

9. Automated decision-making in individual cases, including profiling

You have the right not to be subjected to a decision based exclusively on automated processing - including profiling - that has legal consequences for you or significantly affects you in a similar way. This does not apply if the decision

- (1) is necessary for entering into or fulfilling a contract between you and the controller,
- (2) is permitted by Union or Member State law to which the controller is subject, and this law contains appropriate measures to safeguard your rights and freedoms as well as your legitimate interests, or
- (3) is made with your explicit consent.

However, these decisions may not be based on special categories of personal data pursuant to Art. 9 (1) GDPR, unless Art. 9 (2) (a) or (g) GDPR applies and appropriate measures to protect your rights and freedoms as well as your legitimate interests have been taken.

With regard to the cases referred to in (1) and (3), the controller shall implement appropriate measures to safeguard your rights and freedoms as well as your legitimate interests, including at least the right to obtain human intervention on the part of the controller, to express his or her point of view, and to contest the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement, if you believe that the processing of personal data concerning you infringes the GDPR.

The supervisory authority with which the complaint was submitted will inform the complainant of the status and outcome of the complaint, including the possibility of a judicial remedy under Article 78 GDPR.

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