

# Legal bases for the Privacy Policies of Teamplace and Cortado Mobile Solutions

#### Legal bases of the processing in the EU General Data Protection Regulation (GDPR)

The provider or processor may only process personal data of users if one of the following applies (Article 6 paragraph 1 DSGVO):

- a) the data subject has given *consent* to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the *performance of a contract* to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a *legal obligation* to which the controller is subject;
- d) processing is necessary in order to protect the *vital interests of the data subject* or of another natural person;
- e) processing is necessary for the performance of a task carried out in the *public interest* or in the *exercise of official authority* vested in the controller;
- f) processing is necessary for the purposes of the *legitimate interests pursued by the controller* or by a third party

Specifically, the processing of personal data mentioned in the **Cortado Mobile Solutions GmbH (CMS)** Privacy Policies – e. g. related to teamplace.net, cortado.com or Cortado MDM – is based on the following of the above mentioned legal bases:

### Legal bases for the Privacy Policies of CMS in detail

Processing of personal data	Legal basis
Analytics (collection of data and their evaluation with re-	Art. 6 para. 1 (a) GDPR (user's consent)
gard to the behaviour of visitor):	
e. g. Google Analytics	
Display content from external platforms:	Art. 6 para. 1 (a) GDPR (user's consent)
e.g. YouTube Video Widget	
Hosting and backend infrastructure:	Art. 6 para. 1 (b) GDPR (performance of a con-
e. g. Microsoft Azure, Amazon Web Services, WPEngine	tract)
Registration and Login:	Art. 6 para. 1 (b) GDPR (performance of a con-
e.g. directly on the Cortado ID Server or via social login at	tract)
Google (Google OAuth), Linkedin (Linkedin OAuth) or Mi-	
crosoft (OneDrive OAuth)	
Remarketing and Behavioural Targeting (marketing):	Art. 6 para. 1 (a) GDPR (user's consent)
e. g. LinkedIn Website Retargeting	
Tag management (provision of scripts and others for the	with regard to essential functions: Art. 6 para. 1
website):	(b) GDPR (performance of a contract),
e.g. with Google Tag Manager	with regard to all other functions: Art. 6 para. 1 (f)
	GDPR (legitimate interests pursued by CMS)
Management of user databases:	with regard to the provision of services requested
e. g. with Freshsales	by you: Art. 6 para. 1 (b) GDPR (performance of a
	contract),



	with regard to all other functions: Art. 6 para. 1 (f) GDPR (legitimate interests pursued by CMS)
Management of support and contact requests (helpdesk): e. g. with Freshdesk	Art. 6 para. 1 (b) GDPR (performance of a contract)
Direct marketing: e. g. information on products, newsletters	with regard to the provision of information requested by you: Art. 6 para. 1 (b) GDPR (performance of a contract), with regard to all other marketing measures: Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (legitimate interests pursued by CMS)
further Forms: e. g. contact or offer forms	Art. 6 para. 1 (b) GDPR (performance of a contract)
Photos and video recordings at customer or partner events, at trade fairs or conferences: for marketing purposes	by name: Art. 6 para. 1 (a) GDPR (user's consent), anonymously: Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (legitimate interests pursued by CMS)
Teamplace and Cortado MDM: Cloud services	with regard to the provision of the service requested by you: Art. 6 para. 1 (b) GDPR (performance of a contract), with regard to all other functions: Art. 6 para. 1 (f) GDPR (legitimate interests pursued by CMS)
Crashlytics: Monitoring service for the Teamplace app provided by Google	with regard to the provision of the service requested by you: Art. 6 para. 1 (b) GDPR (performance of a contract), with regard to all other functions: Art. 6 para. 1 (f) GDPR (legitimate interests pursued by CMS)
Log data: access data recorded by web servers or cloud services for verification purposes, for troubleshooting and to identify and defend against hacker attacks	Art. 6 para. 1 (f) in conjunctin with Recital 47 GDPR (legitimate interests pursued by CMS)

## Subprocessors of the Cortado Mobile Solutions GmbH

The following companies process personal data on behalf of CMS:

Name and address of Subprocessor

Description of performance

**Cortado Holding AG**, Alt-Moabit 91b, 10559 Berlin, Germany (parent company) Company's business activities, like:

- administration of websites, social media and web- and cloud services such as Teamplace, Amazon Web Services, Microsoft Azure and Cortado MDM
- services such as marketing, sales, customer support, recruiting, team-management, processing of payments and accounting
- representation of contractor towards authorities and companies in legal and tax matters, auditing, personnel management, retirement and profit sharing
- security organization such as IT administration, IT security, alarm system and security

Cortado Inc., 3858 Walnut St #130, Denver, CO 80205, USA (subsidiary company)

services for the Supplier (such as sales, consulting and customer support)



**Cortado Pty Ltd.**, Level 12, Plaza Building, Australia Square, 95 Pitt Street, NSW 2000 Sydney, Australia (subsidiary company) services for the Supplier (such as sales, consulting and customer support)

**Amazon Web Services EMEA SARL**, 38 Avenue John F. Kennedy, L-1855, Luxembourg

hosting of cloud services such as Teamplace on Amazon Web Services (AWS)

**Microsoft Corporation**, One Microsoft Way, Redmond, Washington 98052, USA

hosting of the cloud service Cortado MDM on Microsoft Azure

#### **Provider and Processor**

Cortado Mobile Solutions GmbH Alt-Moabit 91a 10559 Berlin Germany

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