

# Privacy Policy

## Introduction

This privacy policy informs you about the type, scope and purpose of the collection and use of personal data on this website [www.ncardia.com](http://www.ncardia.com) by Ncardia Belgium, Ncardia Netherlands, Ncardia Germany and Ncardia USA (hereinafter called “we” or “us”). We are responsible for all personal data collected on this website, unless this privacy policy provides different information.

Personal data is information that can be used to identify a person, i.e. information that can be traced back to a person. This typically includes your name, e-mail address or telephone number. In addition, however, purely technical data that can be traced back to a person must also be regarded as personal data.

## Contact details of the data controller:

Ncardia AG  
Nattermannallee 1, Bldg S20  
50829 Cologne  
Germany  
Tel.: +49 (0) 221 99 88 18 0  
Info@ncardia.com

## Contact details of the data protection officer:

Name: Stephen O’Rourke  
Address: Ncardia AG, Nattermannallee 1, 50829 Cologne, Germany  
E-Mail: DPO@Ncardia.com

## Your Rights

On request, you have the **right to obtain free information** on your stored personal data. Additionally, you have the **right to obtain the rectification of inaccurate personal data**, the **right to obtain a restriction of excessively processing of personal data** as well as the **right to obtain the erasure** of unlawful processed personal data or data which is stored too long (as far as there are no legal obligations to store the data). Furthermore you have the right to receive your personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller (**right to data portability**).

Insofar you have also a right to object in individual processes this is dealt within the description of the individual process.

In order to exercise your rights you can write an e-mail to [DPO@ncardia.com](mailto:DPO@ncardia.com).

In addition, you have the **right to lodge a complaint with a supervisory authority**.

### Voluntary Provision of Data

The provision of your personal data on this website is generally neither required by law nor by contract. You are not obliged to disclose personal data on this website. However, the provision of the functions of this website requires the processing of your personal data.

### Data recipients

Generally, we do not transfer personal data, except we mentioned this expressively in this Privacy Policy. Nevertheless, this website is hosted by our service provider Netrex Internet Solutions BV Oostdam 2, Woerden, The Netherlands. Netrex Internet Solutions BV automatically process the abovementioned personal data. This is done exclusively in accordance with our instructions and on our behalf according to a processing contract, Art. 28 GDPR.

The transfer of personal data to the abovementioned service provider is based on Art. 6 (1) lit. f GDPR. According to Art. 6 (1) lit. f GDPR the processing of personal data is lawful if the processing is necessary for the purpose of the legitimate interests pursued by us, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Our legitimate interest consists in the use of special service providers that realize hosting better than we do. You can object to this data processing at any time if there are reasons which exist in your particular situation and which speak against the data processing. In order to do so you can write an e-mail to the data protection officer.

### Information on Cookies

Cookies are small text files which are stored on your terminal device by the browser used when you access our website. In this way you can "recognize" individual services of a website and "remember" which settings you have made. This serves on the one hand the user-friendliness of web pages and thus the users (e.g. storage of login data). On the other hand, cookies are used to collect statistical data on website use and to use the data thus obtained for analysis and advertising purposes.

Some cookies are automatically deleted from your terminal device as soon as you leave the website (so-called session cookie). Other cookies are stored for a certain period of time, which does not exceed two years in each case (persistent cookies). We also use so-called third party cookies, which are managed by third parties in order to offer certain services.

You can influence the use of cookies. Most browsers have an option that restricts or completely prevents the storage of cookies. However, it is pointed out that the use and especially the comfort of use are limited without cookies.

## Overview about the Processes

Personal data are processed on this website in the context of the following processes:

1. Newsletter
2. Server Log Files
3. Contacting
4. Google Analytics
5. Google Tag Manager
6. Intercom

### Newsletter

By providing your email address and requesting to receive our newsletter, you will be sent the (usually bi-monthly) Ncardia newsletter. Please note that you can unsubscribe at any time by either clicking the UNSUBSCRIBE button from within the emails or simply send an email to [DPO@Ncardia.com](mailto:DPO@Ncardia.com) with your request.

### Legal Basis

This data processing is based on a consent which you have given by registering for the newsletter. According to Art. 6 (1) lit. a GDPR the processing of personal data is lawful if the data subject has given consent to the processing of his or her data for one or more specific purposes. Within the frame of registering for the newsletter you have given the following consent:

*“Subscribe to our newsletter updates.”*

### Storage Period

Data which is stored within the frame of the newsletter registration will be deleted if you have successfully unsubscribed from the newsletter.

### Server Log Files

Each time you access the website, we automatically collect a series of technical data, which is personal data.

These are:

- User’s IP address
- Name of the requested website respectively the data file
- Date and time of the access
- Transferred data volume
- Report of successful retrieval

- Browser type and version
- User's operating system
- The terminal device used by the user, including MAC address
- Referrer-URL (the previously visited website)

This data is not combined with any other personal data that you actively provide on the website. We collect server log files for the purpose of administering the website and to be able to recognize and prevent unauthorized access.

### **Legal Basis**

The processing of personal data within the frame of the log files is based on Art. 6 (1) lit. f GDPR. According to Art. 6 (1) lit. f GDPR the processing of personal data is lawful if the processing is necessary for the purpose of the legitimate interests pursued by us, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Our legitimate interest is in the easier administration and the ability to detect and track hacking. You can object to this data processing at any time if there are reasons which exist in your particular situation and which speak against the data processing. In order to do so you can write an e-mail to the data protection officer.

### **What is an IP address?**

The IP address is a worldwide unique string of numbers which is assigned to each device (e.g. smartphone, tablet, PC) connected to the Internet. The IP address depends on which Internet access your device is currently connected to the Internet. This can be the IP address that your Internet provider has assigned to you, for example, if you are connected to the Internet via your W-LAN at home. It can also be an IP address assigned to you by your mobile phone provider or the IP address of a provider of a public or private W-LAN or other Internet access. In its currently most common form (IPv4), the IP address consists of four number blocks. In most cases, as a private user, you will not use a constant IP address, as this is only temporarily assigned to you by your provider (so-called "dynamic IP address"). With a permanently assigned IP address (so-called "static IP address") a clear assignment of user data is easier in principle. Except for the purpose of tracking unauthorized access to our website, we do not use this data on a personal basis, but only evaluate on an anonymous basis which of our websites are favored, how many accesses are made daily and the like.

Our website already supports the new IPv6 addresses. If you already have an IPv6 address, you should also know the following: The IPv6 address consists of eight blocks of four. The first four blocks are, as with the entire IPv4 address, typically assigned dynamically by private users. However, the last four blocks of an IPv6 address (so-called "interface identifiers") are determined by the terminal device that you use to browse the website. Unless otherwise set in your operating

system, the so-called MAC address is used for this. The MAC address is a type of serial number that is assigned uniquely for each IP-capable device worldwide. We do not store the last four blocks of your IPv6 address. We generally recommend that you activate the so-called "Privacy Extensions" on your terminal device in order to make the last four blocks of your IPv6 address more anonymous. Most common operating systems have a "Privacy Extensions" function, which, however, is not preset by default in some cases.

### **Storage Period**

The log data is automatically deleted after 30 days. We reserve the right to store log data longer, if there are facts which suggest that an illegal access has taken place (such as the attempt of hacking or a so-called DOS-attack).

### **Contacting**

When you contact us (for example by e-mail or by using the contact form), the information provided by you will be stored for the purpose of processing the request and in the event that further questions arise.

### **Legal Basis**

The processing of personal data within the frame of contacting is based on Art. 6 (1) lit. a and lit. f GDPR. According to Art. 6 (1) lit. f GDPR the processing of personal data is lawful if the processing is necessary for the purpose of the legitimate interests pursued by us, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Our legitimate interest consists in the provision of this website's functions [if applicable, enter different interests, i.e. marketing]. You can object to this data processing at any time if there are reasons which exist in your particular situation and which speak against the data processing. In order to do so you can write an e-mail to the data protection officer.

### **Storage Period**

The personal data stored within the scope of establishing contact will be deleted if the request has been completely clarified and it is also not to be expected that the concrete contacting will become relevant again in the future.

### **Google Analytics**

This website uses Google Analytics, a web analysis service of Google LLC ("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses several "cookies" (see above) to identify your browser. The

information generated by the cookies about your use of this website is usually transferred to a Google server in the USA and stored there. However, we have activated the IP anonymization function on this website so that Google will shorten your IP address within Member States of the European Union or in other signatory states to the Agreement on the European Economic Area previously. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activities and to provide the website operator with further services associated with website use and Internet use. The IP address transmitted by your browser in the context of Google Analytics will not be merged with other Google data. For the exceptional situations in which personal data is transferred in the USA, Google has submitted to the EU-US-Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

### **Legal Basis**

The processing of personal data within the frame of Google Analytics is based on Art. 6 (1) lit. a and lit. f GDPR. According to Art. 6 (1) lit. f GDPR the processing of personal data is lawful if the processing is necessary for the purpose of the legitimate interests pursued by us, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Our legitimate interest consists in analyses of website's use. You can prevent the transmission of data generated by the cookie and relating to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

### **Storage Period**

The personal reference is deleted directly by the partial deletion of the IP addresses, so that only statistical data is stored.

### **Google Tag Manager**

This website uses Google Tag Manager. This is a tool of Google LLC („Google“), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Tag Manager is a solution that allows marketers to manage web page tags through a single interface. The Tool Tag Manager itself (which implements the tags) is a cookieless domain. The tool triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. The Google Tag Manager itself does not process any personal data. If deactivation has been made at the domain or cookie level, it will remain in effect for all tracking tags implemented with

Google Tag Manager. By completely disabling tracking in your browser, you are also preventing Google Tag Manager from working.

## **Intercom**

This website uses Intercom. This is a tool by Intercom, Inc., 98 Battery Street, Suite 402, San Francisco, CA 94111 USA ("Intercom"). We use Intercom for additional data analysis, e.g. to query the time of registration or user activity within the scope of support. Intercom can also be used as a communication medium for e-mails or (push) messages within the product. In order to better understand our user base, Intercom collects publicly available information, such as a user's company, job title, website, social network handle and physical addresses. For more information go to <http://docs.intercom.io/privacy>. You can disagree to the use of Intercom by contacting us.

To improve the user experience in our applications, we use the Intercom service of Intercom Inc. for sending messages by e-mail and for live chats. We transmit your e-mail address and your name to Intercom as personal data.

Intercom, Inc. has joined the "Safe Harbor" program, which aims to achieve a higher level of data protection for non-EU companies. For further information to the data security with Intercom go to <http://docs.intercom.io/privacy>.