

Privacy Information for Data Subjects

(February 2024)

Dealfront Group GmbH (in the following "Dealfront", "we", "our", "us") operates a search engine/web crawler that automatically collects and processes publicly available data and information on the Internet. Our web crawlers visit millions of web pages daily to discover business information relevant to our clients. In certain cases, they may also collect personal information, for example, if your name appears on a public website of your company, then our web crawlers may index that page and display the information on our platform to our customers if they search your company or information in connection with your company.

This Privacy Information for Data Subjects ("Privacy Information") explains how we collect, use and protect your personal data. We are committed to protecting your privacy and ensuring that your personal data is processed in accordance with the European General Data Protection Regulation (GDPR) and applicable data privacy laws.

For information on how we process personal data on our platform or in connection with our services, please refer to <https://www.dealfront.com/privacy-notice/>.

1. Who is responsible for the data processing and who can I contact?

For the purposes of this Privacy Information, the data controller of the personal data collected, processed and stored by and in conjunction with our search engine is Dealfront Group GmbH, with registered office at Durlacher Allee 73, D-76131 Karlsruhe, Germany (hereinafter "Data Controller").

You can always contact the Data Controller by e-mail at: privacy@dealfront.com.

For any questions regarding the data processing carried out in the context of using the platform or our services and products, may also contact Henri Markkanen, the group data protection officer ("DPO") designated by Dealfront at any time by email: dpo@dealfront.com.

2. Which sources and data do we use?

Similar to popular search engines, we process **publicly available sources** on the Internet, for example,

- Company websites
- Social media platforms
- Public records databases (such as government websites, commercial and trade registers and databases)
- News websites and archives (such as newspapers and news channels)
- Blogs and forums
- Consumer portals and marketplaces
- Special interest sites, job boards or listings
- Directories for patents, trademarks, grants, etc.
- Publicly available online phone directories
- Publicly available academic and research databases
- Publicly available data sets (such as those published by government agencies or academic institutions).

Whenever possible we try to (for each record) store and display a deep-link to the individual sources we may find.

In addition to publicly available data, we also query publicly available data from **open interfaces and services** such as:

- Companies' email servers (MX records)
- Domain databases (Whois records)
- IP databases (e.g. DNS, ripe.net, etc.)
- Geolocation services (e.g. nominatim)

While such services may not produce deep-links we try to indicate if possible when we last fetched a full or partial record.

As a third basis we also **derive additional information** by combining datasets using heuristics, AI and machine learning systems. For example, we may guess your email address, using a combination of publicly available data such as your first and last name with a known pattern for your company's email domain. If we do so, we have implemented accuracy checks in order to ensure the correctness of such data. We are also using data collected through the usage of our systems to optimise such algorithms, e.g. removing data that other users flagged as inaccurate or showing a last seen date for certain records.

Lastly we do act as a data processor for some of our customers with regard to personal data contained in their CRM systems. While we may use such data in an aggregated and anonymized form, such data itself will only be available to a limited subset within the authorised group. As our customer is the data controller, the information duties under the respective data protection laws lie with them. However, if a customer has agreed that we should fulfil certain information duties on their behalf, we may provide the required information to the data subjects concerned.

3. Which personal data do we collect?

Like all search engines Dealfront is built to process public unstructured information. So whatever data is accessible about you on the public web may also end up in our indexes. However since the purpose of our service is B2B sales and marketing, we only create structured records of a very specific format. This may result in the following personal data processed about you:

- name
- birth dates
- job title
- departement
- business email address
- other contact details (e.g. business phone, social media profile link)
- affiliated company name and details
- your IP address

Please note that we are on purpose NOT extracting or processing any data regarding sensitive information like financial data, medical details, political affiliations, private demographic information (e.g. number of children), etc.

Our search index is a fully automated and dynamic system, meaning that if the original data source disappears or is no longer publicly available, the system will also automatically update or delete the piece of personal data after a reasonable amount of time (see Section 7 below).

4. For what purpose do we process your data?

Unlike any of the popular search engines, Dealfront isn't free to use for anyone. We only process data and display search results to our registered customers and users within a controlled and secure environment for the following purposes:

- To help our clients gain relevant information for marketing and sales purposes.
- To help our clients update and improve their own databases and data correctness
- To improve and develop our services and products.

5. Legal bases, balancing of interests

The legal basis for processing personal data obtained through our systems is our legitimate interests (Art. 6 (1) lit. f GDPR) in providing and marketing our services to our users and clients, improving our products and services and growing our business. We believe that our legitimate interests are not overridden by the rights or interests of the data subjects, since the vast majority of data we process has already been made publicly available.

You can, of course object at any time to the processing of your personal data. For more information please see section 8 below.

6. Who are the recipients of the processed data?

We may share data with the following recipients:

a. Dealfront group

In order to offer you comprehensive support and to ensure an ongoing high quality of our services and products, Dealfront Group GmbH relies on the assistance of Dealfront Germany GmbH and Dealfront Finland Oy (each a "Joint Controller" and together the "Joint Controllers"). The legal basis for such processing is Art. 6 (1) lit. b as well as Art. 6 (1) lit. f (legitimate interest in providing and improving our services). In accordance with Art. 26 of the GDPR, the Joint Controllers have entered into a Joint Controller Agreement stipulating in a transparent manner their respective responsibilities with regard to compliance with their obligations under the GDPR. The essential content of the Agreement is available: <https://marketing.dealfront.com/essential-content-of-the-joint-controller-agreement-en.pdf>.

In addition, we may share data with other affiliates for marketing or customer support purposes. Such processing activity is based on Art. 28 GDPR in conjunction with a data processing agreement concluded with the respective affiliates.

b. Service Providers

We may share some data with some companies that help us provide our services (for example hosting providers). The legal basis for this data transfer and processing activity is Art. 28 GDPR in conjunction with a data processing agreement concluded with the respective service provider. These service providers are only allowed to use the data shared with them for the specific task they've been hired to do:

- Contact data management / CRM tools
- Cloud Storage and Hosting Provider
- Data accuracy and data analysis tools
- Data analytics providers

While Dealfront operates globally, our servers and main data processing activities are exclusively done in the European Union. On rare occasions, we may, however, transfer your personal data to third-party service providers located outside of the European Economic Area (EEA). In such cases, we will ensure that appropriate safeguards are in place to protect your personal data, such as standard contractual clauses approved by the European Commission.

c. Dealfront users and clients

We may display your data to our clients and users who have subscribed to our services and who have a legitimate interest in the data (Art. 6 (1) lit. f GDPR) in order to promote their business and market their services. Please note that our clients act as data controllers with regard to such data. Thus, they are solely responsible for their data processing activities and handle their processing operations and data subject rights requests independently from us.

d. Legal Disclosure

We may disclose your personal data to comply with legal requirements and obligations, including court orders or to comply with legitimate requests from law enforcement agencies or regulators

e. Change of ownership

We may disclose your personal data in the event of an acquisition, merger or other transaction to the new owner

7. Data Retention

When processing and storing personal data, we make sure that data is only stored for as long as is necessary for the intended purpose.

If the personal data are stored in our search index, the data is kept as follows: In case data can be found by our web crawlers in several different sources (e.g. in the commercial register, in the website's imprint, and on a public social media profile), the **storage period** depends on the last successful access to the respective data in one of the related public sources. If this was more than 12 months ago for all available sources, the data will no longer be displayed in our search index. The data are also deleted if the data subject asserts their right to have the data deleted by us.

8. How can I obtain information and what are my rights?

You may be entitled to exercise some or all of the following rights:

1. require (i) information as to whether your personal data is retained and (ii) access to and/or duplicates of your personal data retained, including the purposes of the processing, the categories of personal data concerned, and the data recipients as well as potential retention periods;
2. request rectification, removal or restriction of your personal data, e.g. because (i) it is incomplete or inaccurate, (ii) it is no longer needed for the purposes for which it was collected, or (iii) the consent on which the processing was based has been withdrawn;
3. refuse to provide and – without impact to data processing activities that have taken place before such withdrawal – withdraw your consent to processing of your personal data at any time;
4. **object, on grounds relating to your particular situation, that your personal data shall be subject to a processing. In this case, please provide us with information about your particular situation. After the assessment of the facts presented by you we will either stop processing your personal data or present you our compelling legitimate grounds for an ongoing processing;**
5. take legal actions in relation to any potential breach of your rights regarding the processing of your personal data, as well as to lodge complaints before the competent data protection regulators;
6. require (i) to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and (ii) to transmit those data to another controller without hindrance from our side; where technically feasible you shall have the right to have the personal data transmitted directly from us to another controller; and/or

7. not to be subject to any automated decision making, including profiling (automatic decisions based on data processing by automatic means, for the purpose of assessing several personal aspects) which produce legal effects on you or affects you with similar significance.

You may (i) exercise the rights referred to above or (ii) pose any questions or (iii) make any complaints regarding our data processing by contacting at: privacy@dealfront.com.

If you want to lodge a complaint with the official data protection authority, please visit the website <https://www.baden-wuerttemberg.datenschutz.de/> for more information.

9. No automated profiling

Profiling describes a type of automated processing of personal data that consists in assessing, analysing, or predicting certain personal aspects such as health or personal preferences and which produces legal effects on the data subject. Dealfront does not use such profiling.

10. Changes to this Privacy Information

We reserve the right to amend this Privacy Information to ensure continued compliance with legal requirements or to reflect changes to our services in the Privacy Notice..