

PRIVACY POLICY

Last updated: January 7th 2025

1. General information

Rinkel B.V. (hereinafter "**Rinkel**", "**we**" or "**us**") takes the protection of personal data very seriously.

We treat personal data confidentially and always in accordance with the applicable data protection laws, in particular Regulation (EU) 2016/679 (hereinafter "**General Data Protection Regulation**" or "**GDPR**"), the German Federal Data Protection Act (hereinafter "**BDSG**"), and in accordance with the provisions of this privacy policy.

The aim of this privacy policy is to inform you (hereinafter "**data subject**" or "**you**") in accordance with Art. 12 et seq. GDPR about how we process your personal data and for what purposes we process your personal data when using our website [<https://start.rinkel.com/de-de/>] (hereinafter "**Website**" and together "**Websites**"), our app, our services or contacting us.

Unless otherwise stated in this privacy policy, the terms used here have the meaning as defined in the GDPR.

2. Data controller

Rinkel acts as a controller within the meaning of the GDPR in relation to your personal data processed in connection with the use of our Websites, our app, our services or a contact made to or by Rinkel.

If you have any questions about this privacy policy or the processing of your personal data, you can contact us at the following contact details:

Rinkel B.V.
Weena 505
NL-3013, AL Rotterdam
The Netherlands
E-mail: help@rinkel.nl

3. Categories, purposes and legal bases of the personal data processed

We process different categories of your personal data for different purposes. Below you can see which data we process in which contexts, for which purposes and on which legal basis we base the respective processing.

3.1. Visiting our Website

When visiting our Websites for informational purposes, i.e., mere viewing and without you providing us with any other information, certain personal data is automatically collected each time the Websites are called up and stored in so-called server log files. These are:

- Browser type and version. The specific type and model of Internet browser you are using, such as Google Chrome, Mozilla Firefox, or Microsoft Edge, along with the specific version of the browser.
- Operating system used. Your operating system for your digital activity, such as Windows, macOS, Linux, iOS, or Android.

- Host name of the accessing computer. The unique name that your device has on the Internet or on a local network.
- The date and time of access. The exact time of access to the Website.
- IP address of the requesting computer. The unique numeric identifier assigned to a device when it connects to the Internet.

Such data is not merged with other data sources, and the data is not evaluated for marketing purposes.

Legal basis:

The legal basis for the temporary storage and processing of such personal data is Art. 6 para. 1 sent. 1 lit. f GDPR. Our legitimate interest here is to be able to provide you with technically functional, attractive and user-friendly Websites as well as to ensure the security of our systems.

Duration of the storage:

Such personal data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data stored in log files, this is the case after 7 days at the latest.

However, in some cases, e.g., due to legal retention periods we might be under the legal obligation to continue the storage of your personal data.

3.2. Using our services

When using our services or ordering hardware products from us, we collect and process the following personal data:

- First and last name.
- Phone number(s), including your own phone number and phones number of your contacts
- (Billing) address.
- E-mail address.
- Payment information.
- IP address.

Legal basis:

We will process such information in order to provide you with our services and, thus, for the performance of a contract or in order to take steps prior to entering into a contract in accordance with Art. 6 para. 1 sent. 1 lit. b GDPR.

Duration of storage:

We will delete your personal data as soon as the purpose for data storage and processing no longer applies.

However, in some cases, e.g., due to legal retention periods we might be under the legal obligation to continue the storage of your personal data.

3.3. User account

To use our services, we require you to setup a user account. When you register your user account, we process the following personal data:

- First and last name.
- (Billing) address.
- Phone number.
- IP address.
- E-mail address.
- Payment information.
- Password.

Legal basis:

We process the aforementioned information to create your user account and, thus, such data will be processed for the performance of a contract or in order to take steps prior to entering into a contract in accordance with Art. 6 para. 1 sent. 1 lit. b GDPR.

Duration of the storage:

You can delete your user account at any time by sending an e-mail with your request to help@rinkel.nl We will delete your user account when it has been inactive for 3 years.

3.4. Contact

It is possible to contact us on our Website or by e-mail. When you contact us, we collect and process certain information in connection with your specific request, such as, e.g., your first and last name, e-mail address, IP address, and other data requested by us or data you voluntarily provide to us (hereinafter "**Contact Data**").

Legal basis:

If you contact us as part of an existing contractual relationship or contact us in advance for information about our range of services, the Contact Data will be processed for the performance of a contract or in order to take steps prior to entering into a contract and to respond to your contact request in accordance with Art. 6 para. 1 sent. 1 lit. b GDPR.

Otherwise, the legal basis for the processing of Contact Data is Art. 6 para. 1 sent. 1 lit. f GDPR. The Contact Data is processed to pursue our legitimate interests in responding appropriately to customer/contact inquiries.

Duration of storage:

We will delete Contact Data as soon as the purpose for data storage and processing no longer applies (e.g., after your request has been processed).

However, in some cases, e.g., due to legal retention periods we might be under the legal obligation to continue the storage of your personal data.

3.5. Cookies

Our online service uses cookies. Cookies are small files in which we can store information to save you from having to provide your details every time you log in. But they also allow us to see that you are visiting us again. When you visit our online service for the first time, we display a message explaining cookies. We will ask you to accept them.

You can disable the use of cookies via your browser, but please note that this will restrict the operation of some elements of our online service.

We have entered into agreements with other companies that place cookies (see next section) about their use of those cookies. We have no control over or responsibility for the cookies placed by third parties. However, you are free to accept those cookies, at different levels.

We use the following types of cookies:

- **Functional cookies:** these cookies have a functional role within the website. The cookies ensure that the website functions properly.
- **Analytical cookies:** these cookies give us insight into how our website is used. Based on this information, we can make our website more user-friendly.
- **Marketing cookies:** these cookies make it possible to show you personalised advertisements (via our advertising partners).

The cookies may collect the following data from you, among others:

- Name
- Login information
- Screen display options
- IP address
- Cookie ID
- Website and click behaviour
- Referrer URL
- Behaviour within the application

On your first visit to our website, we will display a message explaining how cookies are used. We will ask for your consent for the use of cookies to the extent we are required to do so.

The list of the cookies we use is shown in the overview below.

Cookie, entity	Type:	Purpose:	Retention period:
Google Analytics	Analytical	To track how visitors use our website. We have entered into a data processing agreement with Google. It	Maximum 2 years

Google LLC, United States Privacy policy		contains strict arrangements about what information they are permitted to store.	
Google Enhanced Conversions Google LLC, United States Privacy policy	Marketing	To measure the effectiveness of our advertising campaigns.	Maximum 2 years
Google Firebase Authentication Google LLC, United States Privacy policy	Functional	To store the data of our users used in the sign in process.	Maximum 2 years
Google Firebase Cloud Google LLC, United States Privacy policy	Marketing	To send "push" notifications to our users.	Maximum 2 years
Meta Meta Platforms, Inc. Privacy policy	Marketing	We use Facebook and Instagram to advertise our service(s) to their users. We track whether a Meta user (ID) has decided to visit our website and/or sign up for a (trial) subscription with Rinkel. We have entered into a data processing agreement with Meta, which includes strict agreements on how they can use the data they receive.	Maximum 3 months

3.6. Marketing

With your consent, we may process your personal data to send you a newsletter via e-mail or WhatsApp that contains information about our products and services. To send you the newsletter via e-mail, we require processing your e-mail address, date and time of your registration, your IP address and browser type. To send you the newsletter via WhatsApp, we require processing your phone number.

Our newsletters and emails contain so-called tracking links that enable us to analyse the behaviour of newsletter/emails recipients. We may collect personal data such as regarding the opening of the newsletter/emails (date and time), selected links, and the following information of the accessing computer system: IP address used, browser type and version, device type and operating system ("Tracking Data"). This enables us to statistically analyze the success or failure of online marketing campaigns.

Legal basis:

The data processing activities with regard to the newsletter sending [and newsletter tracking] only take place if and insofar as you have expressly consented to it within the merits of Article 6 para. 1 sent. 1 lit. a GDPR. Your prior consent for such processing activities is obtained during the newsletter subscription process (double opt-in) by way of independent consent declaration referring to this privacy policy.

You can revoke your consent at any time with effect for the future by clicking on the unsubscribe link in e-mails or WhatsApp messages. The withdrawal of your consent does not affect the lawfulness of processing based on your consent before its withdrawal.

Duration of storage:

We will delete your personal data as soon as the purpose for data storage and processing no longer applies. Your e-mail address and you phone number will be stored for as long as the subscription to our newsletter is active.

However, in some cases, e.g., due to legal retention periods, we might be under the legal obligation to continue the storage of your personal data.

4. Data receiver

We might transfer your personal data to certain data receivers if such transfer is necessary to fulfill our contractual and legal obligations.

In individual cases, we transfer personal data to our consultants in legal or tax matters, whereby these recipients act independently in their own data protection responsibilities and are also obliged to comply with the requirements of the GDPR and other applicable data protection regulations. In addition, they are bound by special confidentiality and secrecy obligations due to their professional position.

In the event of corporate transactions (e.g., sale of our business or a part of it), we may transfer personal data to involved advisors or to potential buyers.

Additionally, we also use services provided by various specialized companies, e.g., IT service providers, that process data on our behalf (hereinafter "**Data Processors**"). We have concluded a data processing agreement according to Art. 28 GDPR or EU standard contractual clauses of the EU Commission pursuant to Art. 46 para. 2 lit. c GDPR with each service provider and they only process data in accordance with our instructions and not for their own purposes.

Our current Data Processors are:

Data Processor	Purpose of commissioning the Data Processor / purpose of processing
Mailchimp	Newsletter Sending

Google	Google Analytics for Tracking & Advertising
Facebook	Advertising
Intercom	Email sending, Customer Service Support chat
Chartmogul	Business insights
Sentry	Development error reports
Bugfender	Problem detection on Android and IOS apps
Slack	Internal business communication
OpenAI	Provide automated AI call insights
Rev	Call transcriptions (audio to text)
LinkedIn	Advertising
Hubspot	Email Sending
Cloudfare	Website security
VWO	Website A/B testing
Trustpilot	Review collecting
Appcues	In-app and Portal messages
Mixpanel	Insights into customers ' use
Canny	Track customers ' feedback
Apple	Apple Appstore to process subscriptions
Google	Google Play Store to process subscriptions
SolarWinds	Spam and undesirable emails detection
Microsoft	Internal email correspondence
Appsflyer	Track acquisition and analyse advertising campaigns

5. Data transfers to third countries

Your personal data is generally processed in Germany and other countries within the European Economic Area (EEA).

However, it may also be necessary for personal data to be transferred recipients located outside the EEA, i.e., to third countries, such as the USA. If possible, we conclude the currently applicable EU standard contractual clauses of the EU Commission pursuant to Art. 46 para. 2 lit. c GDPR with all processors located outside the EEA. Otherwise, we ensure that a transfer only takes place if an adequacy decision exists with the respective third country and the recipient is certified under this, if necessary. We will provide you with respective documentation on request.

6. Your rights

The following rights are available to you as a data subject in accordance with the provisions of the GDPR:

6.1. Right of revocation

You may revoke your consent to the processing of your personal data at any time pursuant to Art. 7 para. 3 GDPR. Please note, that the revocation is only effective for the future. Processing that took place before the revocation remains unaffected.

6.2. Right of access

Under the conditions of Art. 15 GDPR you have the right to request confirmation from us at any time as to whether we are processing personal data relating to you. If this is the case, you also have the right within the scope of Art. 15 GDPR to receive access to the personal data as well as certain other information about the personal data and a copy of your personal data. The restrictions of § 34 BDSG apply.

6.3. Right to rectification

Under the conditions of Art. 16 GDPR you have the right to request us to correct the personal data stored about you if it is inaccurate or incomplete.

6.4. Right to erasure

You have the right, under the conditions of Art. 17 GDPR, to demand that we delete the personal data concerning you without delay.

6.5. Right to restrict processing

You have the right to request that we restrict the processing of your personal data under the conditions of Art. 18 GDPR.

6.6. Right to data portability

You have the right, under the conditions of Art. 20 GDPR, to request that we hand over, in a structured, common and machine-readable format, the personal data concerning you that you have provided to us. Please note that this right only applies where the processing is based on your consent, or a contract and the processing is carried out by automated means.

6.7. Right to object

You have the right to object to the processing of your personal data under the conditions of Art. 21 GDPR.

6.8. Right to complain to a supervisory authority

Subject to the requirements of Art. 77 GDPR, you have the right to file a complaint with a competent supervisory authority. As a rule, the data subject may contact the supervisory authority of his or her habitual residence or place of work or place of the alleged infringement or the registered office of Rinkel. The supervisory authority responsible for Rinkel is the [Dutch Data Protection Authority](#) (Autoriteit Persoonsgegevens). A list of all German supervisory authorities and their contact details can be found [here](#).

7. Obligation to provide data

When you visit our Websites, app, or use our services you may be required to provide us with certain personal data as described in this privacy policy. Beyond that, you are under no obligation to provide us with personal data. However, if you do not provide us with your personal data as required, you may not be able to contact us and/or we may not be able to contact you to respond to your inquiries or questions.

8. Automated decisions/profiling

The processing of your personal data carried out by us does not contain any automated decisions in individual cases within the meaning of Art. 22 para. 1 GDPR.

9. Changes to this privacy policy

We review this privacy policy regularly and may update it at any time. If we make changes to this privacy policy, we will change the date of the last update above. Please review this privacy policy regularly to be aware of any updates. The current version of the privacy notice can be accessed at any time at <https://start.rinkel.com/de-de/agb>.