



TechGDPR

Privacy Policy for Consulting Activities

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Who we are

TechGDPR DPC GmbH provides data protection consultancy services and we are located in Heinrich-Roller Str. 15, 10405 Berlin, Germany (hereafter “TechGDPR”, “we”, “us”, “our”). Any data protection related questions you might have about how we handle your personal data or if you wish to exercise your data subject rights, please contact us by post or at privacy@techgdpr.com.

When does this Privacy Notice apply?

This Privacy Notice describes how we, as a controller, collect, use and share your personal data. It applies to personal data you voluntarily provide to TechGDPR in the context of client relationship management and delivery of our products and services.

What data we collect and for what purpose

TechGDPR collects data voluntarily provided to TechGDPR by clients. TechGDPR processes Personal Data as described below. The following data and related categories of the data subject are also documented in our data data mapping (or record of data processing activities) in the sense of Art. 30 GDPR.

1. Engage with our services

TechGDPR may collect personal data provided by the clients for the purposes of the performance of a contract pursuant to Art 6(1)(b) GDPR. The information we may collect is first name, last name, company name, email address, phone number, picture, position and role. This data is processed as long as it is necessary to perform the contractual relationship, unless otherwise provided (see section *Termination of the client relationship*). Accounting and billing data such invoices, bank details and VAT number, is processed on the basis of a legal obligation in the sense of Art. 6 (1) (c) GDPR. These categories of data are stored for 10 years.

We also process the feedback you give to help us assess the quality of our service provision and guide our decision making (quality management). We carry out this processing in our legitimate interests as per Art 6(1)(f) GDPR. We store this information for one years after the end of our consulting contractual relationship.

2. Internal and external communication required to deliver services/products

To perform our services we deploy several third party providers. When selecting them and their services, we observe the GDPR legal requirements. We have concluded a data processing agreement (DPA) with each of them in accordance with Art. 28 GDPR. More information around data transfers out of the EEA or to non adequate countries can be found below in the section Security and International Data Transfers.

Platform working spaces: Google Workspace and Slack

Internally, we use [Google](#) Workspace for our email service, calendar and internal document management. We also use it to communicate and provide our services to our clients, we then collect the client's name, title and email address.

We use [Slack](#) to communicate as a team and generally to improve our response time to client needs. Signed clients can also choose to communicate with us through Slack. The data collected in the scope of this communication is legitimized under performance of a contract as laid out under Art (6)(1)(b) of the GDPR. You can learn more about Slack's [ISO 27001](#) and [ISO 27018](#) certifications, security policies and procedures on their [security page](#).

Data processed on Slack is deleted within 25 months after the end of our engagement with you.

Platform video meeting spaces: Zoom and Google Meet

TechGDPR customarily conducts a GDPR discovery workshop as (one of the) first step(s) in a consultancy engagement. It supports in building a good client relationship and it allows us to educate the client about key aspects of the GDPR, and to collect essential information about the clients business, technology and processes. To conduct the GDPR discovery workshop and single meetings with clients' employees and executives we normally deploy video-meeting platforms such as "[Zoom](#)" and "[Google Meet](#)". They are respectively messenger and conference software that enable IP-based image and sound transmissions. The video call single meetings (i.e., between our and clients' employees) that are most of the cases conducted in Google Meet. The types of personal data that are processed by us before and during the video meetings include inventory data (e.g. name and surname, company position), contact data (e.g. e-mail,). Since these meeting are necessary for us to carry out our consultancy services, this processing activity is legitimized under performance of a contract between us and the client as laid out under Art (6)(1)(b) of the GDPR. Instead, the GDPR discovery workshop is usually performed and recorded in Zoom. Here the video (recording) processing activity and the related personal data (name, surname, face, voice, position at the company, visual and vocal contributions) is carried out in our legitimate interests in the sense of Art 6(1)(f) GDPR. Here we take care of the principles of purpose limitation and data minimization. For instance, You can limit the amount of personal data that we process during the video recording by not opening the camera, by pseudonymization of your name (i.e., BA, instead of Barack Obama), or by not participating in the GDPR discovery workshop and, eventually, by offering your availability for a one-to-one meeting that is not recorded. You have the right to object to this processing activity. We will make sure that you are informed in advance about our data processing activities, in particular as regarding the video-recording activity. TechGDPR does not share the recorded video with third parties. Occasionally, the client might also ask to have access into it since it is the direct interested party. This data sharing is justified under the legitimate interests of a third party as per Art 6(1)(f) GDPR. The recorded-video is processed until the project is completed, plus 2 months. The meeting here is recorded for the legitimate purpose of achieving accuracy in performing our services with the client. We recheck the recording in order to have an accurate understanding of client organizations which support us to perform our consultancy services. We might store the recording video either in our internal systems (e.g, USB stick) or in Google Drive.

The video-meeting third-party providers may process usage data and metadata for security purposes, service optimisation or marketing purposes that are linked to your respective access account. We therefore invite you to read the privacy notices of the respective third party providers available at their platform.

Ensuring compliance

TechGDPR is under obligation to comply with all applicable laws and regulations, including, but not limited to those of the European Union, Germany and the state of Berlin. For this reason we may have to collect, process and retain your details for an extended period of time as a legal obligation (Art 6(1)(c) GDPR).

Information required to track your choices and consent regarding the processing (or use) of your Personal Data or reception of marketing materials is stored to ensure compliance with the GDPR.

Security and international data transfers

We use third party software across several countries, personal data may therefore be transferred to a country outside the EU/EEA. To protect your personal data, we enter into data protection agreements (DPAs) and maintain both technical and organizational safeguards around the processing of your data.

The Standard Contractual Clauses we rely on can be provided on request by reaching out to privacy@techgdpr.com

Who your data is made accessible to

TechGDPR hosts the majority of its services and systems itself on servers within the EU. We use a transactional email provider and a mailing list service, both located in the EU to deal with our mailing needs.

In the case your personal details are visible on an incoming or outgoing invoice, they may also be transmitted to our tax advisor as well as to the financial authorities (German Finanzamt).

Your rights as a data subject

At any time, you can request from TechGDPR to receive information about which personal data TechGDPR processes about you. You can also request the correction or deletion of such personal data. Please note, however, that TechGDPR can delete your personal data only if there is no statutory obligation or prevailing obligation on TechGDPR to retain it.

If TechGDPR uses your personal data based on consent or the performance of a contract, you may also request a copy of the personal data that you have provided to TechGDPR. To do so, please contact us at privacy@techgdpr.com and specify the information or processing activities to which your request relates.

Furthermore, you can request that we restrict your personal data from any further processing if:

- You are contesting the accuracy of the data we hold about you, for as long as we need to verify this claim.
- If you believe the processing of the data is unlawful, but you oppose the erasure of the data and request restriction of processing instead.

- If we no longer need your data for the original purpose, but you need them for the establishment, exercise or defense of legal claims.
- If you have objected to the use of your data, while we evaluate if our legitimate grounds for processing your data override yours, as required by Art 21 of the GDPR.

Please direct any such request to privacy@techgdpr.com

Your right to lodge a complaint

We encourage you to contact us at privacy@techgdpr.com if you have any privacy related concerns. Should you disapprove of the response we have provided to you, you have the right to lodge a complaint with our supervisory authority, or with the data protection authority of the European member state you live or work in. The details of the supervisory authority responsible for Berlin, Germany, are:

Berliner Beauftragte für Datenschutz und Informationsfreiheit
Friedrichstr. 219
10969 Berlin
Germany
Phone: 030/138 89-0

<http://www.datenschutz-berlin.de>

Termination of the client contractual relationship

Upon the termination of a client relationship or the completion of a project, we will retain project information for up to two years from the end of a project or contract, for the purpose of defending the quality of our work in case of disputes. This is based on the lawful basis of legitimate interest (Art 6.1(f) of the GDPR). Where possible, such information will be restricted after the completion of a contract or project.

Changes to this Privacy Policy

We may modify this privacy policy at any time to comply with legal requirements as well as developments within our organization. When we do, we will revise the date and version at the top of this page