

PEOPLET – PRIVACY POLICY

Version 1.0 (Draft)

Last updated: [dd/mm/yyyy]

1. General Information regarding Data Processing

Peoplet is a software-as-a-service platform designed for organizational network analysis, visualization of organizational relationships, and related analytical insights.

Depending on your relationship with us, and how you have come in contact with our services, different parts of this Privacy Policy will apply to you.

If you have been invited to or are using a Peoplet workspace created by an organization (e.g. your employer or another subscribing company or institution), that organization is the controller of the information provided to Peoplet via the use of the platform, and Peoplet acts as a processor on behalf of that organization. To understand how your data are processed in that context, you will need to review the controller's internal policies, notices, and instructions, as well as any privacy information they provide to you.

In all other cases, including visits to our website, direct communication with us, account administration, contracting and billing, Peoplet will be the controller of your data and the following provisions will apply.

Further details on processing carried out by Peoplet as a processor are governed by the applicable Data Processing Agreement concluded with the Customer.

1.1. Peoplet as Data Controller

Data controller is Peoplet j. d. o. o., Lindar 176, Lindar, Republic of Croatia ("we/us" or "Peoplet").

- Contact: [x]
- Email: [x]
- Privacy contact: [x]
- Company registration details: [x]

Peoplet has not appointed a Data Protection Officer, as it is not required to do so under Article 37 of the General Data Protection Regulation (GDPR).

For any questions, requests or concerns related to the processing of personal data, data subjects may contact Peoplet at: [x]

1.2. Scope of Data Processing

Personal data are any information relating to an identified or identifiable natural person.

Applicable legal provisions are in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“General Data Protection Regulation”, GDPR), as well as applicable national data protection legislation, including the Croatian Act implementing the GDPR (Zakon o provedbi Opće uredbe o zaštiti podataka), and other applicable laws depending on the processing context.

1.3. Your Rights

In accordance with statutory provisions, you as the data subject have the following rights:

- the right to access,
- the right to rectification or erasure,
- the right to restriction of processing,
- the right to data portability,
- if you have provided us with your personal data on the basis of consent, you may withdraw the consent at any time with effect for the future,
- you may object to the processing of your personal data if your personal data are processed for direct marketing purposes and/or on the basis of legitimate interests pursuant to Article 6(1)(f) GDPR, insofar as there are reasons arising from your particular situation.

To exercise the rights named above you may contact us at any time, for example via email to:

You also have the right to lodge a complaint with a supervisory authority of your choice. In Croatia, the competent supervisory authority is:

Croatian Personal Data Protection Agency (AZOP)

Selska cesta 136, 10000 Zagreb, Croatia

<https://azop.hr> (contact information available on the website)

An overview of the Data Protection Authorities in the EU/EEA may also be found via the EDPB members list:

https://edpb.europa.eu/about-edpb/about-edpb/members_en

1.4. Storing and Deleting Data

The duration of data storage depends on the respective data category and processing activity. If the storage period is not further specified, your personal data will be deleted or blocked as soon as the purpose or legal basis for storage ceases to apply.

Personal data will not be deleted if retention is required by law (e.g. statutory accounting or tax obligations) and in the event of a possible legal dispute, to the extent necessary for the establishment, exercise or defense of legal claims.

1.5. Profiling and automated decision making

We do not use automated decision-making, including profiling within the meaning of Article 22 GDPR, when processing data concerning our Website or Platform.

1.6. Data Security

For the best possible security of user data, our service through the Website and Platform is provided via a secure SSL/TLS connection between your device and our servers, meaning that data are transmitted in encrypted form.

We have implemented suitable technical and organizational measures to protect personal data, including access controls, role-based authorization, and security measures appropriate to the risks

1.7. Data Processing by Third Parties / Data Processing outside the EU

We may use third-party service providers that process your data for the purposes described in this Privacy Policy (e.g. hosting, infrastructure, customer support, analytics, and other technical services). Such providers act as processors on our behalf where applicable and are bound by data processing agreements.

We may process personal data using providers located in the EU/EEA and, where necessary, in third countries (including the United States). Where personal data are transferred outside the EU/EEA, we ensure that EU data protection standards are maintained through appropriate safeguards, such as Standard Contractual Clauses approved by the European Commission and, where applicable, additional technical and organizational measures.

A list of relevant processors and information regarding third-country transfers is available upon request via email to [x].

2. Data processing on our website

2.1. Server Logs

Nature and purpose of data processing

We collect data on each visit to our website [x] ("Website") in the form of so-called server log files. These may include:

- name of the website visited,
- date and time of the visit,
- data amount transferred,
- information on a successful call,
- browser type and browser version,
- operating system of the user,

- referrer URL (the page visited before),
- IP address and the requesting provider, and, where a mobile end device is used:
 - country code,
 - language,
 - device name,
 - operating system name and version.

Server log files are used exclusively for statistical evaluation, troubleshooting, optimization of our services and to ensure the stability and operational security of the Website.

Legal basis

Where personal data (such as IP addresses) are processed, the legal basis is Article 6(1)(f) GDPR, based on our legitimate interest in quality assurance, system integrity and website security.

Recipients

Recipient of the data is [x – hosting / infrastructure service provider]. The service provider acts as a processor on our behalf and processes the data only in accordance with our documented instructions under a data processing agreement.

Third-country transfer

Where the service provider is located outside the EU/EEA, appropriate safeguards are implemented. The data processing agreement includes Standard Contractual Clauses approved by the European Commission and adequate guarantees ensuring compliance with EU data protection standards.

Storage duration

Server log files and IP addresses are deleted after [x – e.g. 30 days], unless longer retention is required for security or legal reasons.

2.2. Newsletter

Nature and purpose of data processing

When you register for our newsletter, we process your email address and name. Our newsletter contains information about Peoplet, its services, features and related updates.

In connection with newsletter registration and delivery, we may also process:

- IP address,
- device information,
- email service provider,
- date and time of registration, and

- information on newsletter usage (e.g. whether a newsletter was opened and how it was interacted with).

Newsletter usage analysis is carried out for the purpose of improving content relevance and communication effectiveness.

Legal basis

The processing of personal data for sending and analyzing newsletters is based on your consent pursuant to Article 6(1)(a) GDPR.

Recipients

Recipient of the data is [– **newsletter service provider**], acting as a processor on our behalf under a data processing agreement.

Transfer to third countries

Where data are transferred outside the EU/EEA, adequate safeguards are in place, including Standard Contractual Clauses approved by the European Commission.

Storage duration

We process your personal data for newsletter purposes until you withdraw your consent.

Revocation of consent

You may unsubscribe from our newsletter at any time by using the “unsubscribe” link included in each newsletter or by contacting us at []

2.3. Careers section on our Website

Nature and purpose of data processing

If you apply for an open position via our Website, we process your application data for recruitment purposes.

In order to submit your application, you are required to provide personal data such as:

- name,
- email address,
- resume and/or CV.

Depending on the position and recruitment stage, we may also process additional information, including:

- date of birth,
- telephone number,

- gender,
- employment and career history,
- qualifications and education,
- country of residence,
- language skills, and
- any other information you voluntarily provide during the application process.

If you provide personal data of third parties (e.g. referees), you are responsible for ensuring that such persons have consented to the disclosure of their data and to the processing described in this Privacy Policy.

In particular, we process application data in order to:

- communicate with you and manage the application process,
- respond to inquiries,
- verify information and contact references where appropriate,
- manage disputes, claims or investigations related to the application, and
- comply with legal and regulatory obligations.

Failure to provide required personal data may result in our inability to process your application.

Legal basis

Personal data are processed for the purpose of taking steps prior to entering into an employment contract pursuant to Article 6(1)(b) GDPR and, where applicable, for establishing an employment relationship in accordance with applicable national employment and labor law, in particular the Croatian Labour Act (Zakon o radu).

Recipients

Recipient of the data is [x – recruitment / HR service provider], acting as a processor on our behalf under a data processing agreement.

Transfer to third countries

Where applicable, appropriate safeguards for transfers outside the EU/EEA are implemented, including Standard Contractual Clauses approved by the European Commission.

Storage duration

Application data are retained for [x – e.g. 6 months] after notification that the application was unsuccessful, unless longer retention is required by law or consent is given for further processing.

2.4. Talent Pool

Nature and purpose of data processing

If we cannot offer you a position immediately, we may ask for your consent to include your application data in our talent pool in order to inform you about future opportunities.

Processing in this context includes the personal data listed under section 2.3.

Legal basis

The processing is based on your explicit consent pursuant to Article 6(1)(a) GDPR.

Recipients and transfer to third countries

See section 2.3.

Storage duration

Where consent is given, we will retain your data in the talent pool for no longer than [x – e.g. 2 years].

Revocation of consent

You may withdraw your consent at any time with effect for the future by contacting us at [x]

2.5. Contacting us

Nature and purpose of data processing

If you contact us by email or via an online contact form, we process your contact details (e.g. name, email address) and the content of your inquiry in order to respond to your request and, where necessary, to follow up.

Legal basis

Processing is carried out on the basis of our legitimate interests in efficient communication pursuant to Article 6(1)(f) GDPR, or for pre-contractual measures or performance of a contract pursuant to Article 6(1)(b) GDPR.

Recipients

Recipient of the data is [x – communication / support service provider], acting as a processor under a data processing agreement.

Transfer to third countries

Where applicable, adequate safeguards for transfers outside the EU/EEA are in place, including Standard Contractual Clauses approved by the European Commission.

2.6. Website Analytics

Nature and purpose of data processing

Our Website uses cookie-based technologies to analyze website usage and improve functionality. This includes compilation of aggregated usage statistics that do not directly identify individual users.

Performance cookies may transmit IP addresses to [x – analytics service provider], and collected data may be linked to Peoplet user accounts where applicable.

Legal basis

Processing is carried out based on your consent pursuant to Article 6(1)(a) GDPR.

Recipients

Recipient of the data is [x – analytics provider], acting as a processor on our behalf.

Withdrawal of consent

You may withdraw your consent at any time via “Manage cookie settings” on the Website. An opt-out cookie will be stored on your device.

2.7. Advertisement (conversion tracking and retargeting)

Nature and purpose of data processing

We may use cookie-based technologies for conversion tracking and retargeting in order to measure the effectiveness of advertising campaigns and deliver targeted advertisements.

Processed data may include:

- unique online identifiers,
- IP address,
- information about interactions with the Website (e.g. clicks, pages visited).

Legal basis

Processing is carried out based on your consent pursuant to Article 6(1)(a) GDPR.

Recipients

Recipient of the data is [x – advertising / marketing service provider], acting as a processor on our behalf.

Retention period

Advertising-related data are deleted after [x – e.g. 1 year].

Withdrawal of consent

Consent may be withdrawn at any time via “Manage cookie settings” on the Website.

2.8. User Surveys

Nature and purpose of data processing

We may conduct voluntary online surveys in order to gather feedback and improve our services. When participating, we process your email address and survey responses.

Legal basis

Processing is based on your consent pursuant to Article 6(1)(a) GDPR.

Recipients

Recipient of the data is [x – survey tool provider], acting as a processor on our behalf.

Retention period

Personal data are processed until consent is withdrawn.

Withdrawal of consent

You may withdraw your consent at any time with effect for the future by contacting us at [x]

2.9. Website Security and Abuse Prevention

Nature and purpose of data processing

In order to ensure the security, integrity and availability of our Website, and to prevent misuse, unauthorized access, automated scraping, fraud or other abusive activities, we process technical and security-related data.

This may include, in particular:

- IP address,
- date and time of access,
- request and access patterns,

- error and security logs,
- information necessary to detect and mitigate suspicious or malicious behavior.

Such processing is carried out solely for security monitoring, incident prevention, incident response and forensic analysis, and not for tracking or profiling of individual users.

Legal basis

Where personal data are processed, the legal basis is Article 6(1)(f) GDPR, based on our legitimate interests in ensuring network and information security, protecting our Website and systems, and preventing misuse.

Recipients

Recipient of the data is [– **security, hosting or infrastructure service provider**], acting as a processor on our behalf under a data processing agreement.

Transfer to third countries

Where security-related processing involves service providers located outside the EU/EEA, appropriate safeguards are in place. The data processing agreements include Standard Contractual Clauses approved by the European Commission and adequate guarantees ensuring compliance with EU data protection standards.

Storage duration

Security-related logs and records are retained for [] days, unless longer retention is required to investigate, document or respond to security incidents or to comply with legal obligations.

2.10. Pre-contractual Business Communication and Demo Requests

Nature and purpose of data processing

If you contact us via our Website to request a product demo, pricing information, technical clarification or other business-related information, we process the personal data provided by you for the purpose of assessing your request and initiating pre-contractual measures.

Processed data may include:

- name,
- business email address,
- company name and role,
- content of your inquiry and related correspondence, and
- metadata associated with the communication.

The processing is limited to business-to-business communication and does not involve automated decision-making or profiling.

Legal basis

The processing is carried out for the purpose of taking steps at your request prior to entering into a contract pursuant to Article 6(1)(b) GDPR. Where the processing does not directly relate to pre-contractual measures, it is based on our legitimate interest in conducting business-to-business communication pursuant to Article 6(1)(f) GDPR.

Recipients

Recipient of the data is [– CRM, sales or communication service provider], acting as a processor on our behalf under a data processing agreement.

Transfer to third countries

Where personal data are transferred outside the EU/EEA, appropriate safeguards are implemented. The data processing agreements include Standard Contractual Clauses approved by the European Commission and adequate guarantees ensuring an adequate level of data protection.

Storage duration

Personal data processed in connection with pre-contractual communication are retained for [] months after the last interaction, unless a contractual relationship is established or longer retention is required by law.

3. Data processing in connection with our App (Desktop, Web, and Mobile)

3.1. Service Provision

Nature and purpose of data processing

As part of the provision of the Peoplet service via web application and, where applicable, desktop or mobile applications, Customers and their authorized Users can collect, visualize and analyze organizational relationship data, including organizational network structures, interaction patterns and related analytical outputs.

Depending on the data entered into or processed through the App by or on behalf of the Customer, personal data may be processed. Such data typically relate to Users or other individuals within the Customer's organization and may include identifiers, role-related information, relational data and interaction metadata.

Peoplet processes such personal data exclusively on behalf of and under the instructions of the Customer, for the sole purpose of providing the contracted SaaS service. Peoplet does not determine the purposes or essential means of such processing.

Personal data processed within a Customer's workspace are logically segregated from data of other Customers and are not accessible across workspaces.

For the purpose of ensuring service continuity and data integrity, personal data may be included in system backups and disaster recovery measures, which are subject to appropriate access controls and retention limitations in accordance with the Data Processing Agreement.

The App is designed to support organizational insight and visualization and is not intended to be used for automated decision-making, individual employee evaluation, disciplinary measures or employment-related decisions.

The App does not use large language models, generative AI systems or automated content-generation tools for processing Customer data [**x - unless and until explicitly introduced**].

Peoplet is not intended for the processing of special categories of personal data within the meaning of Article 9 GDPR, unless the Customer ensures a valid legal basis and implements appropriate safeguards.

Legal basis

The processing described above is necessary for the performance of a contract pursuant to Article 6(1)(b) GDPR. Where Peoplet acts as a processor, the legal basis is determined by the Customer as data controller and governed by the applicable Data Processing Agreement pursuant to Article 28 GDPR.

Recipients

Recipients of the data may include [**x – hosting, infrastructure or technical service providers**], acting strictly as processors on Peoplet's behalf under data processing agreements and only in accordance with Peoplet's documented instructions.

Transfer to third countries

Where personal data are processed outside the EU/EEA, appropriate safeguards are implemented. The data processing agreements include Standard Contractual Clauses approved by the European Commission and adequate guarantees ensuring compliance with EU data protection requirements.

Storage duration

Subject to applicable legal retention obligations, personal data processed through the App are retained for [**x – e.g. duration of the Customer contract plus a limited post-termination period**] or until deletion of the relevant user account or data by or on behalf of the Customer, as further specified in the Data Processing Agreement.

3.2. Registration and Sign-in

Nature and purpose of data processing

When registering for an account or signing in to an existing account, Peoplet processes certain personal data necessary for authentication and access control, such as:

- profile data (e.g. name, business email address),
- login credentials,
- IP address,
- company or organizational affiliation,
- role and access rights.

Legal basis

The processing is necessary for the performance of a contract pursuant to Article 6(1)(b) GDPR.

Recipients and third-country transfer

Recipient of the data is [x – identity management / authentication service provider], acting as a processor under a data processing agreement. Where applicable, third-country transfers are safeguarded by Standard Contractual Clauses.

3.3. Payment Processing

Nature and purpose of data processing

For paid services, Peoplet processes billing and payment-related data, which may include:

- profile data of the contractual contact person,
- company name,
- VAT number,
- billing and company address,
- payment transaction metadata.

Legal basis

Processing is necessary for the performance of a contract pursuant to Article 6(1)(b) GDPR and for compliance with legal obligations pursuant to Article 6(1)(c) GDPR.

Recipients and third-country transfer

Recipient of the data is [x – payment service provider], acting as a processor under a data processing agreement. Appropriate safeguards apply to any transfers outside the EU/EEA.

Storage duration

Payment and invoicing records are retained for [x – e.g. 10 years], in accordance with applicable accounting and tax laws.

3.4. Product Improvement (In-app Analytics)

Nature and purpose of data processing

Peoplet may use in-app analytics tools to understand how the App is used and to improve functionality, performance and user experience.

Processed data may include:

- usage data (e.g. log files, feature usage),
- user or workspace identifiers,
- device and technical metadata.

Such processing does not involve the analysis of organizational content or network data beyond aggregated or technical usage metrics.

Legal basis

Processing is carried out based on your consent pursuant to Article 6(1)(a) GDPR, where required.

Recipients and third-country transfer

Recipient of the data is [x – analytics service provider], acting as a processor under a data processing agreement. Transfers outside the EU/EEA are safeguarded by Standard Contractual Clauses.

Withdrawal of consent

Consent may be withdrawn at any time via “Manage cookie settings” or equivalent in-app controls [x].

3.5. Error Tracking

Nature and purpose of data processing

Peoplet uses error tracking and monitoring services to identify technical issues and ensure the availability and security of the App.

Processed data may include:

- profile data,
- error logs,

- device and technical usage data.

Legal basis

Processing is based on Peplet's legitimate interests pursuant to Article 6(1)(f) GDPR, namely quality assurance, troubleshooting and system security.

Recipients and third-country transfer

Recipient of the data is [x – error monitoring service provider], acting as a processor under a data processing agreement. Standard Contractual Clauses apply where data are transferred outside the EU/EEA.

3.6. Basic Customer Support

Nature and purpose of data processing

When contacting customer support for general questions or technical issues that do not require access to Customer data, Peplet processes:

- profile data,
- usage and technical data,
- company-related information.

Legal basis

Processing is necessary for the performance of the service contract pursuant to Article 6(1)(b) GDPR.

Recipients and third-country transfer

Recipient of the data is [x – support service provider], acting as a processor under a data processing agreement, with appropriate safeguards for third-country transfers.

3.7. Customer Support with Data Access

Nature and purpose of data processing

For specific support requests, Peplet may require temporary access to Customer data processed within the App, strictly to diagnose and resolve the reported issue.

Processed data may include:

- content stored in the App,
- profile data (name, email, company, location),
- usage and technical data.

Access is limited in scope and duration and subject to authorization in accordance with the Data Processing Agreement.

Legal basis

Processing is carried out based on explicit authorization or consent pursuant to Article 6(1)(a) GDPR and/or contractual necessity pursuant to Article 6(1)(b) GDPR, as applicable.

Storage duration

Any Customer data accessed for support purposes are deleted immediately after resolution of the issue.

Withdrawal of consent

Consent may be withdrawn at any time with effect for the future by contacting [x]

3.8. Fonts

Nature and purpose of data processing

To ensure proper display of the App, font files may be loaded from external servers, which requires processing of IP addresses.

Legal basis

Processing is based on Peoplet's legitimate interest pursuant to Article 6(1)(f) GDPR in ensuring functionality and visual consistency of the App.

Recipients and third-country transfer

Recipient of the data is [x – font service provider], acting as a processor under a data processing agreement, including Standard Contractual Clauses where applicable.

3.9. Product News

Nature and purpose of data processing

Based on feature usage or user activity, Peoplet may send product-related updates and feature announcements to improve user experience and awareness.

Legal basis

Processing is based on your consent pursuant to Article 6(1)(a) GDPR.

Recipients and third-country transfer

Recipient of the data is [x – email or messaging service provider], acting as a processor under a data processing agreement, with appropriate safeguards for international transfers.

Withdrawal of consent

You may withdraw your consent at any time by using the unsubscribe option included in such communications.

3.10. Feature Requests and Feedback

Nature and purpose of data processing

Peoplet may collect feedback and feature requests submitted by Users, including through third-party tools [x – e.g. feedback platform].

Processed data may include:

- name,
- email address,
- user identifier,
- submitted feedback content.

Legal basis

Processing is carried out pursuant to Article 6(1)(b) GDPR (performance of a contract) or Article 6(1)(f) GDPR (legitimate interest in improving the product).

Storage duration

Feedback data are retained for as long as the relevant user account remains active or until deletion is requested.

3.11. Workspace and Usage Analytics

Nature and purpose of data processing

Peoplet may process aggregated and technical analytics related to workspace usage in order to understand general adoption patterns and improve system performance.

Such analytics do not involve evaluation of individual employees or automated decision-making concerning individuals.

Legal basis

Processing is based on legitimate interests pursuant to Article 6(1)(f) GDPR, or on consent pursuant to Article 6(1)(a) GDPR where required.

Recipients and third-country transfer

Recipients may include service providers located in the EU/EEA or third countries, acting as processors under data processing agreements with appropriate safeguards.

3.12. Sales Outreach Efforts

Nature and purpose of data processing

Peoplet may receive business contact data from third-party sources for B2B sales outreach purposes, including:

- business email address,
- job title or role,
- company affiliation.

Legal basis

Processing is carried out on the basis of Peoplet's legitimate interest pursuant to Article 6(1)(f) GDPR in conducting B2B sales activities.

Recipients and third-country transfer

Recipients may include [– CRM or sales enablement providers], acting as processors under data processing agreements with Standard Contractual Clauses where applicable.

4. Third-Party Integrations

4.1. General Information on Integrations

Peoplet may allow Customers and Users to connect the App with third-party services, tools or platforms ("Third-Party Integrations") in order to enable interoperability, data exchange or extended functionality.

The use of any Third-Party Integration is optional and initiated solely by the Customer or an authorized User. Peoplet does not activate integrations by default and does not transfer data to third parties without an explicit action by the Customer or User.

Where a Third-Party Integration is enabled, personal data may be transferred to or accessed by the respective third-party provider in accordance with the Customer's instructions.

4.2. Scope of Data Access and Responsibility

Depending on the specific integration enabled, Peoplet may receive access to or transmit data such as:

- data and content selected by the Customer or User for integration,
- identifiers required for authentication or authorization,
- metadata necessary to enable technical interoperability.

Peoplet and the respective third-party provider each act as independent controllers for the personal data processed within their own systems, unless otherwise expressly agreed.

Peoplet processes data obtained via Third-Party Integrations exclusively for the purpose of providing the requested integration functionality and strictly in accordance with the Customer's instructions.

4.3. Authorization and Revocation

Authorization for Third-Party Integrations is granted on a per-integration and, where applicable, per-user basis.

Customers and Users may revoke access to a Third-Party Integration at any time through the relevant settings within the App or via the third-party provider's authorization controls. Upon revocation, Peoplet will no longer access or process data via the relevant integration.

4.4. Legal Basis

Where the use of a Third-Party Integration involves the processing of personal data, such processing is carried out on the basis of:

- the Customer's instructions in the context of the SaaS service and the applicable Data Processing Agreement, and/or
- the explicit consent of the User pursuant to Article 6(1)(a) GDPR, where required.

The applicable legal basis for processing within the third-party provider's systems is determined solely by that provider

4.5. Third-Party Privacy Policies

Each Third-Party Integration is subject to the privacy policy and terms of the respective third-party provider.

Peoplet has no influence over and assumes no responsibility for the data processing activities of third-party providers beyond the scope of data processed within Peoplet's systems.

Customers and Users are encouraged to review the applicable privacy policies of any third-party service before enabling an integration.

4.6. Future Integrations

Peoplet may introduce additional Third-Party Integrations in the future. Information on the scope, purpose and data processing implications of such integrations will be made available prior to activation.

5. Cookies

Our Website uses so-called cookies. Cookies are small text files that are stored on your device and in your browser. Cookies do not cause any harm to your device and do not contain viruses.

Cookies serve the purpose of making our Website and services more user-friendly, more effective and more secure.

5.1. Types of Cookies Used

We may use the following categories of cookies on our Website:

- Essential cookies - Cookies that are necessary for the operation of the Website and its basic functionalities (e.g. page navigation, security, load balancing). Without these cookies, the Website cannot function properly.
- Performance and analytics cookies - Cookies that help us understand how visitors interact with the Website by collecting information such as pages visited, time spent on the Website and error messages. These cookies are used exclusively to improve the performance and usability of the Website.
- Marketing cookies - Cookies that may be used to track visitors across websites in order to display relevant advertisements or measure the effectiveness of advertising campaigns.

[x – confirm which cookie categories are actually used]

5.2. Session Cookies and Persistent Cookies

Most of the cookies used on the Website are so-called session cookies, which are automatically deleted when you close your browser. Session cookies are used to associate successive page requests within a single browsing session.

Other cookies may be persistent cookies, which remain stored on your device until you delete them manually or until they expire. Persistent cookies allow us to recognize your browser during future visits.

5.3. Consent and Cookie Banner

When you visit the Website for the first time, a cookie banner may be displayed allowing you to accept or reject non-essential cookies.

By clicking “Accept” or equivalent, you consent to the use of cookies in accordance with your selected preferences. If you do not consent to non-essential cookies, only essential cookies will be set.

Your consent decision is stored in a cookie so that you are not asked again on subsequent visits, unless you delete this cookie or change your preferences.

[x - confirm exact wording and functionality of the cookie banner and consent management tool]

5.4. Legal Basis

Where personal data are processed through cookies:

- essential cookies are processed based on our legitimate interest pursuant to Article 6(1)(f) GDPR, and
- performance, analytics and marketing cookies are processed based on your consent pursuant to Article 6(1)(a) GDPR, in conjunction with applicable ePrivacy rules.

5.5. Managing and Withdrawing Cookie Consent

You may withdraw your consent to the use of non-essential cookies at any time by adjusting your cookie settings via the Website or by changing your browser settings.

Most browsers allow you to:

- notify you before a cookie is placed,
- accept or reject cookies on a case-by-case basis,
- block cookies altogether, or
- automatically delete cookies when the browser is closed.

Please note that disabling cookies may limit the functionality and convenience of using the Website.

5.6. Third-Party Cookies and Opt-Out Options

Where third-party cookies are used, you may find additional information and opt-out options provided by third-party organizations, including:

- <http://www.aboutads.info/choices/>
- <http://www.youronlinechoices.com/>

If analytics services such as Google Analytics are used, it may also be possible to prevent data collection by installing a browser plugin provided by the relevant service provider, for example:

<https://tools.google.com/dlpage/gaoptout>

[x – confirm whether specific third-party analytics or advertising tools are used]

5.7. Cookie List

The table below will be updated to reflect the cookies actually used on the Website:

| Service Provider | Cookie Name | Purpose | Storage Duration |
|------------------|-------------|---|------------------|
| [x] | [x] | Essential / Performance / Marketing | [x] |
| [x] | [x] | Essential / Performance / Marketing | [x] |

This list may be updated from time to time to reflect changes in the cookies used.

6. Data Processing on our Social Media Pages

Peoplet operates social media pages on selected social media platforms (“Social Media Pages”), which may include, from time to time:

- Facebook
- Instagram
- LinkedIn
- X (formerly Twitter)

[x - confirm which social media platforms are actually operated by Peoplet]

When you visit one of our Social Media Pages, personal data may be processed both by Peoplet and by the respective social media provider.

The respective social media provider acts as an independent data controller with regard to the processing of personal data within its own platform and systems. The provider’s privacy policy applies to such processing and contains information on the nature, scope and purposes of data processing, as well as on the exercise of data subject rights.

Peoplet has no full access to the personal data processed by social media providers and does not control the processing carried out by them. However, you may also contact Peoplet regarding data protection matters related to our Social Media Pages, and we will forward such requests to the relevant provider where appropriate.

Please note that personal data may be processed outside the EU/EEA by social media providers, in accordance with their respective data transfer mechanisms and safeguards

6.1. Data Processing and Legal Basis

Through our Social Media Pages, we communicate with users, provide information about our services and interact with the public.

In this context, we may process personal data that you voluntarily provide to us, such as:

- comments,
- messages,
- reactions (likes, shares),
- publicly visible profile information.

Such data are processed solely for the purpose of communicating with you, responding to your inquiries and maintaining our public presence.

If you access social media platforms using multiple devices, the respective provider may perform cross-device analysis. Peoplet has no influence over such processing.

Legal basis

Processing by Peoplet is carried out based on:

- your consent pursuant to Article 6(1)(a) GDPR,
- the necessity to respond to inquiries or communications pursuant to Article 6(1)(b) GDPR, and/or
- Peoplet's legitimate interests pursuant to Article 6(1)(f) GDPR in maintaining public communication and corporate presence.

6.2. Page Insights and Statistics

Social media providers may make aggregated and anonymized statistical information ("Insights") available to Peoplet regarding the use of our Social Media Pages.

Such insights allow us to understand how users interact with our content and to improve the presentation and reach of our public communications. Peoplet does not receive personally identifiable data through such insights and cannot attribute usage data to individual users.

Where applicable, Peoplet and the relevant social media provider may act as joint controllers within the meaning of Article 26 GDPR for the processing of page insights data. Further information on such arrangements is provided by the respective social media provider.

Details of the joint controllership arrangement, where applicable, are made available by the respective social media provider.

6.3. Cookies and Tracking by Social Media Providers

Social media providers may use cookies, tracking technologies and similar tools when you visit our Social Media Pages, including for analytics and advertising purposes.

Peoplet has no influence over the placement or use of such technologies by social media providers. Information on cookies, tracking and opt-out options can be found in the respective providers' privacy and cookie policies

6.4. Exercising Your Rights

You may exercise your data subject rights directly with the relevant social media provider, as they have direct access to and control over the processing of your personal data.

You may also contact Peoplet regarding data protection matters related to our Social Media Pages. Where Peoplet is not the competent controller, we will forward your request to the respective provider.

7. Questions

If you have any questions regarding this Privacy Policy or the processing of your personal data, or if you wish to exercise your rights under applicable data protection laws, you may contact us at any time.

Please direct privacy-related inquiries, requests or complaints to:

Email: [x]