

PRIVACY POLICY

A. CONTROLLER

The controller responsible for the processing of your personal data is

Humans.de GmbH

Sebastian-Kneipp-Straße 41
Frankfurt am Main, Hesse 60439
Germany

Telephone number: +49 69 950647460

Website: <https://naked-mobile.de>

B. GENERAL INFORMATION, APPLICABILITY OF THE PRIVACY POLICY

This Privacy Policy defines the categories of personal data and processing activities when you use our website (hereinafter referred to as the „Service“) or submit your personal data to us through Meta Lead Forms. Please read this Privacy Policy carefully to understand our practices regarding your data and how we will process it. By accessing or using Service, you agree to this Privacy Policy and our Service's terms of use.

This Privacy Policy may change from time to time. Your continued use of our Service after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. The necessity to obtain an explicit consent where applicable remains unaffected by this.

This Privacy Policy applies to:

- Your personal data, collected from you directly if you get registered and authorized or filled out forms on our website;
- Your personal data, collected from you directly if you get filled out Meta Lead Forms;
- The information collected automatically when you use our website.

Our Service shall be provided in the territory specified in the relevant Service's terms of use. We conduct our activities, including the collection and use of users' personal data, in accordance with the legal requirements of the country in which your data is collected. The laws and standards regarding the processing of personal data in different countries may differ and may not match the requirements for personal data that apply in your country of citizenship or residence. By submitting your data or using our Service, you agree that your personal data will be processed in accordance with the requirements of the country in which the Service is provided and in accordance with Service's terms of use and applicable law.

Persons under the age of 16

Our offer is not aimed at persons under the age of 16. Persons under the age of 16 may not provide any information to us. We do not knowingly collect personal information from anyone under the age of 16. If you are under the age of 16, you should not use our Service or provide any information about yourself. If we learn that we have collected personal information from a person under the age of 16 without verification of parental

consent, we will delete that information. If you believe that we might have any information from anyone under the age of 16, please contact us at hello@naked-mobile.de.

C. CONTACT DETAILS OF THE DATA PROTECTION OFFICER OUR DATA PROTECTION OFFER IS:

bytelaw Attorneys
Attorney at Law Olga Stepanova
Bockenheimer Landstraße 51-53
60325 Frankfurt am Main
hello@naked-mobile.de

D. CATEGORIES OF PERSONAL DATA – LEGAL BASIS – PURPOSE

We collect the following categories of your personal data:

1. General information about the user (surname, first name, telephone number, e-mail, country of residence, citizenship, preferred language, date of birth, gender, address of residence, payment card number/IBAN number, details of the identity document);
2. Information about the user's devices on which he/she uses our Service, including but not limited to IP addresses, geolocation data, information about the devices and web browsers used by the user;
3. Information about the user's activity using the Service, in particular, the type of activity, its date and time, paid or unpaid basis of the activity, service provider, URL of the page from which the user logged into the Service and/or to which the user switched from the Service, duration of the session using the Service, session beginning and ending dates.
4. Information about the user's payment transactions on the Service (bank card data, transactional information, date, time and place of transaction, type of the paid service, name of the service provider).

We collect this information:

- When you provide it to us.
- Automatically as you navigate through our Service. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

Detailed information, including the legal basis for processing your data, the purpose and the retention period, can be viewed in table form (see Appendix A).

You have the right to withdraw your consent to receiving promotional email, SMS or Push by writing to our mailbox hello@naked-mobile.de.

Some content, including the payment technology and KYC on the Service are served by third parties. These third parties may use cookies alone or in conjunction with web beacons or

other tracking technologies to collect information about you when you use our Service. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. We do not control these third parties' tracking technologies or how they may be used.

Opting out of Collection of your Information for Tracking

If you disable or refuse cookies, please note that some parts of our site may then be inaccessible or not function properly. To do this, you need to change the conditions for collecting cookies on our website by selecting the necessary in the consent banner.

If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at hello@naked-mobile.de. Although we do our best to honor the privacy preferences of our Users, we are not able to respond to Do Not Track signals from your browser or device at this time.

E. DISCLOSURE OF YOUR INFORMATION

We may disclose your personal data as described in this Privacy Policy, if necessary, on the basis of your consent:

- To contractors, service providers and other third parties that we use to support our business activities; detailed information can be found in Appendix B;
- To fulfil the purpose for which you provide them;
- For any other purpose disclosed by us when you provide the personal data.

If you wish to withdraw your consent, which you can also do at any time with regard to the transfer of your personal data to third parties, please contact hello@naked-mobile.de.

Even if you refuse to allow us to disclose your personal data to third parties as described in this section, we may disclose your personal data if we are required to do so by law. In particular, we may disclose your personal data:

- To comply with court orders, laws or legal process, including responding to requests from governments or public authorities.
- To enforce or apply our Terms of use of the appropriate Service and other agreements and/or policies referenced therein;
- If we believe that disclosure is necessary or appropriate to protect the rights, property, or safety of Humans, our customers, our service providers or others (see Art. 21 (1) GDPR).

F. RIGHTS OF DATA SUBJECTS

The rights of data subjects can be found in Appendix C.

G. DATA PROTECTION MEASURES

How we protect your personal information

We use a variety of administrative, technical, and physical security measures designed to protect your personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use while it is under our control.

Data Security, Storage and Transfer

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Links to Other Websites and services

The Service may contain links to and from third party websites of our business partners, advertisers, and social media sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. We strongly recommend that you read their privacy policies and terms and conditions of use to understand how they collect, use, and share information. We are not responsible for the privacy practices or the content on the websites of third party sites.

APPENDIX A – CATEGORIES OF PERSONAL DATA – LEGAL BASIS – PURPOSE – RETENTION PERIOD

Categories of personal data	Legal basis	Purpose	Retention period
Information that you provide to us			
For the provision of our Service, we require mandatory information from you. For all optional or other processes we will collect your consent.			
Information that you provide: <ul style="list-style-type: none"> when filling out forms on our website not related to our Service or where we are required to obtain a consent such as for the KYC process 	Your consent pursuant to Article 6 (1) lit. a) GDPR.	Providing our optional services and ensuring KYC procedures to verify your identify.	We will delete your personal data as soon as it is no longer required to fulfil the purpose for which it was collected or you have withdrawn your consent, whichever comes first.
Information that you provide: <ul style="list-style-type: none"> at the time of registering to use our Service, accepting the terms of use of the Service. 	Your consent pursuant to Article 6 (1) lit. b) GDPR.	Providing our Service and its contents to you, ensuring onboarding procedures. Payment card or IBAN binding.	We will delete your personal data as soon as it is no longer required to fulfil the purpose for which it was collected or if you have decided to terminate our Service, unless retention obligations are applicable. According to Section 147 German Tax Code we are required to retain payment data for 10 years after the payment was received by us. All other information we delete 3 years after the end of the year when you or we decided to terminate our Service.
Information that you provide by filling in Meta Lead Forms.	Article 6 (1) lit. (f) GDPR	Ensuring our lead generation and marketing communication activities	We will delete your personal data as soon as it is no longer required to fulfil the purpose for which it was collected or you have withdrawn your consent, whichever comes first.

Categories of personal data	Legal basis	Purpose	Retention period
Information We Collect Through Automatic Data Collection Technologies			
As you navigate through and interact with our Service, we use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns. For this, we use browser and flash cookies. A browser cookie is a small file placed on the hard drive of your computer or smartphone. A flash cookie may use local stored objects.			
<p>We use technically necessary cookies which are collecting the following personal data:</p> <ul style="list-style-type: none"> Information about your computer and internet connection, including your IP address, operating system, and browser type. Information about your smartphone, including IMEI, operating system, etc. 	Art. 6 (1) lit. (f) GDPR.	Without the use of cookies, some of the functions of our website may not be available as they need to recognize your browser even after switching pages. Furthermore, we need the data for verifying the system and server integrity. Our legitimate interest in processing your personal data lies in these purposes.	We delete your personal data as soon as it is no longer required to fulfill the purpose for which it was collected, i.e. usually 30 days after your website visit.
<p>We use analytic and tracking cookies to collect and process the following personal data:</p> <ul style="list-style-type: none"> Details of your use of our Service, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Service. Information and traffic transmitted using our Service. Web Beacons. Pages of our the Service and our e-mails contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs). 	Your consent pursuant to Article 6 (1) lit. a) GDPR.	We use the data to optimize the use of our website for you, to collect and store information about your preferences and navigation to, from, and on our Service, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content	We will delete your personal data as soon as it is no longer required to fulfil the purpose for which it was collected or you have withdrawn your consent, whichever comes first.

Categories of personal data	Legal basis	Purpose	Retention period
Third-Party Use of Cookies and Other Tracking Technologies			
We may share, or we may permit third party online advertising networks, social media companies and other third party services, to collect information about your use of our Service. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, click stream information, browser type, time and date you visited the site or mobile application, and other information.	Your consent pursuant to Article 6 (1) lit. a) GDPR	Improving the usability of our Service and improving our marketing campaigns.	We will delete your personal data as soon as it is no longer required to fulfil the purpose for which it was collected or you have withdrawn your consent, whichever comes first.
Contact with you			
We will send you advertising information via various communication channels (e.g. e-mail or SMS) for similar products or services if we have received your e-mail address or telephone number in connection with the sale of a product or service and you did not object to it which you can do without incurring any costs other than the transmission costs according to the basic rates.	Article 6 (1) lit. (f) GDPR	To promote our various services, which is also our legitimate interest	We delete your personal data as soon as it is no longer required to fulfill the purpose for which it was collected, i.e. the communication has been fully completed or you have objected to the processing in accordance with Art. 21 GDPR, depending on which circumstance occurs first.
We use your telephone number and can contact you by telephone.	Your consent pursuant to Article 6 (1) lit. a) GDPR	To inform you about our services	We delete your personal data as soon as it is no longer required to fulfill the purpose for which it was collected, i.e. we no longer provide information about our services by telephone or you have withdrawn your consent, whichever comes first.

TRUSTED SHOPS SERVICES

Humans.de GmbH uses the services of Trusted Shops SE. Trusted Shops SE offers various solutions such as Trustmark, Buyer Protection and user review platform.

In this context, the processing of personal data is carried out by the parties (Humans.de GmbH and Trusted Shops SE) under joint responsibility in accordance with Article 26 GDPR.

The following section summarizes the purposes, composition and legal basis for personal data processing when using the services of Trusted Shops SE.

Categories of personal data	Legal basis	Purpose	Retention period
Access data of the Website user (IP address, access time, etc.).	Your consent pursuant to Article 6 (1) lit. a) GDPR.	Trustbadge widget displaying. Collecting reviews and providing Trusted Shops services for Website users.	We delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer use the Trustbadge widget or you revoke your consent, depending on which circumstance occurs earlier.
Email address, transaction number, order time, product purchased (if applicable), first name, last name and title (if applicable).	Article 6 (1) lit. b) GDPR.	Collecting email addresses and sending evaluation invitations to users as part of the fulfillment of the contract with Trusted Shops.	We delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. after the evaluation invitation has been sent to you.
	Your consent pursuant to Article 6 (1) lit. a) GDPR.	Collecting e-mail addresses and sending rating invitations to users who are not registered with Trusted Shops Buyer Protection.	We will delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer collect or display reviews via Trusted Shops or you revoke your consent, depending on which circumstance occurs earlier.
Access data (IP address, access time, etc.), email address, submitted rating given (text and stars), transaction number. Possibly: name, location, product purchased, images uploaded.	Your consent pursuant to Article 6 (1) lit. a) GDPR.	Displaying evaluation results on the Trusted Shops platform.	We will delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer collect or display reviews via Trusted Shops or you revoke your consent, depending on which circumstance occurs earlier.
Email address.	Article 6 (1) lit. f) GDPR.	Entering users' e-mail addresses into the block list.	We will delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer collect reviews via Trusted Shops or you object to the processing within the meaning of Art. 21 GDPR.

Categories of personal data	Legal basis	Purpose	Retention period
<p>Access data (IP address, access time, etc.), email address, submitted rating given (text and stars), transaction number.</p> <p>Possibly: name, location, product purchased.</p>	Article 6 (1) lit. f) GDPR.	Collecting and analyzing information on user feedback via Control Center.	We will delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer collect reviews via Trusted Shops or you object to the processing within the meaning of Art. 21 GDPR.
Submitted rating (text and stars).	Article 6 (1) lit. f) GDPR.	Providing a system for commenting on feedback received, as well as a system for generating aggregate qualitative feedback data using artificial intelligence.	We will delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer collect reviews via Trusted Shops or you object to the processing within the meaning of Art. 21 GDPR.
Any personal data that may result from your Trusted Shops review.	Your consent pursuant to Article 6 (1) lit. a) GDPR.	Forwarding the collected rating (text and stars) to Google, so it is displayed in our Google profile, if this text contains your personal data.	We will delete your personal data as soon as it is no longer required for the purpose for which it was collected, i.e. when we no longer collect or display reviews via Trusted Shops or you revoke your consent, whichever occurs earlier.

APPENDIX B – RECIPIENTS

Name of the company	Type of information	Purpose
PAYONE GmbH	Surname, first name, payment card data and/or IBAN, telephone number, e-mail, country of residence, date of birth, address of residence	Payment card/IBAN binding Payment processing
WebID Solutions GmbH	Surname, first name, e-mail, country of residence, preferred language, date of birth, gender, address of residence	Perform KYC procedures
Vodafone GmbH	Surname, first name, telephone number, e-mail, country of residence, citizenship, preferred language, date of birth, gender, address of residence, payment card number/IBAN number, details of the identity document	Providing mobile operator services Providing eSIM card
Google LLC	Analytical and tracking cookies according to Appendix A	Improving marketing campaigns Improving the usability of our Service
Meta LLC	Analytical and tracking cookies according to Appendix A	Improving marketing campaigns Improving the usability of our Service
	Surname, first name and patronymic Telephone number E-mail	Support for the operation of Meta Lead Forms
ByteDance Ltd.	Analytical and tracking cookies according to Appendix A	Improving marketing campaigns Improving the usability of our Service
Twitter International Unlimited Company	Analytical and tracking cookies according to Appendix A	Improving marketing campaigns Improving the usability of our Service
Trusted Shops SE	Personal data of the website user according to Appendix A "Trusted Shops Services"	Provision of services on behalf of Trusted Shops SE

APPENDIX C – DATA SUBJECT RIGHTS FOR DATA SUBJECTS FROM THE EU

According to the relevant data protection regulations, you are entitled to the following rights with regard to the personal data concerning you under the respective legal requirements:

- in accordance with **Art. 7 pr. 3 GDPR**, you can **revoke your consent** to data processing carried out by us at any time with effect for the future;
- to request **information** about your personal data processed by us in accordance with **Art. 15 GDPR**;
- in accordance with **Art. 16 GDPR**, to immediately request the **correction of** incorrect or incomplete personal data stored by us;
- to demand the **erasure of** your personal data stored by us in accordance with **Art. 17 GDPR**, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- in accordance with **Art. 18 GDPR**, to demand **the restriction of the processing of** your personal data if the accuracy of the data is disputed by you, the processing is unlawful, but you refuse to delete it and we no longer need the data, but you need it for the assertion, exercise or defence of legal claims, or
- you have **objected** to the processing pursuant to **Art. 21 GDPR**;
- in accordance with **Art. 20 GDPR**, to **receive** your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transmitted to another controller, provided that the processing is carried out using automated procedures and is based on consent pursuant to Art. 6 pr. 1 lit. a or Art. 9 pr. 2 lit. a GDPR or on a contract pursuant to Art. 6 pr. 1 lit. b GDPR;
- in accordance with **Art. 21 GDPR**, if your personal data is processed by us on the basis of legitimate interests in accordance with Art. 6 pr. 1 sentence 1 lit. f GDPR, you can **object** at any time with effect for the future, provided that there are reasons for this arising from your particular situation. You can send an objection to our contact details given above. Please state what the objection is directed against.

You will not incur any costs for the fulfilment of the aforementioned rights.

You also have the right to **lodge a complaint with a data protection supervisory authority (Art. 77 GDPR)**. As a rule, you can contact the supervisory authority of your usual place of residence or our company headquarters. For us, this is the

Hessian Commissioner for Data Protection and Freedom of Information

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