

# Privacy Statement

*Your privacy is important to us*

Chatter Labs Limited offers solutions to help families complement in clinic speech and language therapy sessions with regular home practice through digital games.

This privacy statement explains how Chatter Labs Limited collects, uses and manages personal data, for what purposes as well as what rights what rights data subjects have regarding their data.

References to Chatter Labs Limited products in this statement include Chatter Labs Limited services, websites and apps.

## **Data Protection Statement for Data Subjects Pursuant to Articles 12, 13 and 14 of the United Kingdom and European General Data Protection Regulation**

Data protection is a particularly high priority for the management of Chatter Labs Limited. The use of the website of Chatter Labs Limited is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website or our products, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Chatter Labs Limited. By means of this data protection declaration, our company would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Chatter Labs has implemented technical and organizational measures to ensure the most complete protection of personal data processed through this website and it's products. However, internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data via alternative means, e.g. by telephone.

## 1. Definitions

The data protection declaration of Chatter Labs Limited is based on the terms used by the United Kingdom Information Commissioner's Office for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

- a) **Personal data** Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- b) **Data subject** Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.
- c) **Processing** Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- d) **Restriction of processing** Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.
- e) **Profiling** Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
- f) **Pseudonymization** Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
- g) **Controller or controller responsible for the processing** Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- h) **Processor** Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- i) **Recipient** Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- a) **j) Third party** Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- b) **k) Consent** Consent of the data subject is any freely given, specific, informed and unambiguous indication of the wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## 2. Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in United Kingdom and Member states of the European Union and other provisions related to data protection is:

**Chatter Labs Limited**, C/O Smooth Accounting Limited 1000 Lakeside North Harbour, Western Road, Portsmouth, England, PO6 3EN

## 3. Website collection of general data and information

The website of Chatter Labs Limited collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using this general data and information, Chatter Labs Limited does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Chatter Labs

Limited analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our company, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

#### **4. Registration for product launch notification, newsletter or marketing communications**

On the website, users may be given the opportunity to register to our product launch waitlist, regular newsletter or marketing communications.

The specific use for which the data subject has provided consent to process their personal data is respected strictly. For example, the personal data collected as part of a registration for the product launch will only be used to send notification of product launch unless the data subject has explicitly chosen to opt-in to receive other communications from Chatter Labs Limited.

Chatter Labs Limited may inform its customers and business partners about an upcoming product launch for which data subject has explicitly given consent via the product waitlist registration form on the website. Chatter Labs Limited may inform its customers and business partners regularly by means of a newsletter about company offers if they have registered for the newsletter via the newsletter form on the website. Chatter Labs Limited may send other communications if the data subject has provided explicit consent to receive these.

These communications may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the waitlist (3) the data subject agrees to store and process personal data. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the product launch notification.

Chatter Labs Limited currently stores its data in Germany through our partner Hubspot. Please see [HubSpot Cloud Infrastructure and Data Hosting | Frequently Asked Questions](#)

During the registration process for product launch, newsletter or other communications, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

There will be no transfer of personal data collected from these activities to third parties. The consent to communication for specific purpose may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given

for notification of product launch, may be revoked at any time. To unregister from communications, an 'unsubscribe' link is found in each communication. It is also possible to revoke consent at any time directly on the website of the controller via the contact form on the website.

## **5. Newsletter and email communications tracking**

Our newsletter contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, Chatter Labs Limited may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the controller in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. Chatter Labs Limited automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **6. Website cookies and similar technologies**

Our website and products may include cookies, web beacons, or similar technologies from Chatter Labs Limited affiliates and partners as well as third parties, such as service providers acting on our behalf.

Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie.

We use cookies and similar technologies for storing and honoring your preferences and settings, enabling you to sign-in, improving our website performance, providing interest-based advertising, combating fraud, analyzing how our products perform and fulfilling other legitimate purposes.

Third party cookies may include:

- Social Media cookies designed to show you ads and content based on your social media profiles and activities on our website.
- Analytics cookies to better understand how you and others use our website so that we can make them better, and so the third parties can improve their own products and services.
- Required cookies used to perform essential website functions.

Where required, we obtain your consent prior to placing or using optional cookies that are not (i) strictly necessary to provide the website; or (ii) for the purpose of facilitating communication.

The following list is an inventory of our websites' cookies:

Cookie Name	Provider's privacy link	Description
<b>_fbp</b>	<a href="#">Facebook Privacy Policy</a>	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.
<b>_hssrc __hstc _hssc _hs_cookie_cat_pre f _cf_bm</b>	<a href="#">Hubspot Privacy Policy</a>	Used by Hubspot for ad targeting and user understanding website user behaviour
<b>_ga _gid _gat gac*</b>	<a href="#">Google Analytics Privacy Policy</a>	Used by Google to track user website behaviour, website conversion, ads campaign performance.

You have a variety of tools to control the data collected by cookies, web beacons, and similar technologies. For example, you can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies. For more information on "Do Not Track," visit <http://www.allaboutdnt.com>.

## 7. Gaming Application i.e. Product

Our gaming app, currently available in private preview on the Apple Store and Google Play Store, may require you as a parent or guardian to sign up for a free trial or a subscription through your app store account. We will use this information for the purpose of performing a contract with the parent or guardian, and provide access to requested activities within the gaming application.

In addition, the parent or guardian will need to configure the application and select preferred language and specific phonemes (i.e. sounds) the child is required to practice to further personalize the experience. The gaming application configurations remains local to device on which the gaming application is installed and will not be saved in any central repository.

Prior to the gaming application's installation process, you will be requested to provide access permission to your device's storage and microphone. Storage is required to save

the application and related data on the local device. Microphone access is required to play the games.

For articulation practice games specifically, the use of Microsoft's Cloud-based Artificial Intelligence Speech Services is used to analyze in real-time the audio recording of your child and provide a pronunciation quality assessment that delivers an interactive gaming experience. After the real-time analysis is complete no data trace, data storage nor retention is kept. For any questions relating to this service you may refer to [Microsoft's privacy policy on speech to text services](#).

**WE WILL NOT SAVE NOR COLLECT ANY VOICE RECORDS OR ANY PHOTOS ON THE LOCAL DEVICE NOR IN A CENTRAL REPOSITORY.**

Payments are collected by the third-party payment processor (e.g. Stripe) or mobile platform (e.g. iOS Platform, Android Platform, etc.) from which you make your purchase. Chatter Labs does not control or manage the payment process. Please review the relevant privacy policies and terms and conditions of the applicable third-party payment processor or platform provider before signing up for any subscriptions as they will collect, use and process your information, including payment information, in accordance with their privacy policies.

We also collect certain technical non-personal information that relates to your use of the gaming application, including the application performance, crash reports, time spent on the app, etc to improve the user experience and application.

In case we need to collect additional personal information other than the personal information mentioned above, we will send a parent an applicable request and obtain consent prior to the collection, if required under applicable law.

We may use data in an aggregated, non-specific format for analytical purposes. This information is anonymous and will not be linked to any personal information. We may share such statistical information with our partners, without restrictions.

## **8. Surveys and Contests**

From time to time we may conduct an e-mail survey or an online contest and collect personal data, demographic information, usage information and other materials that you voluntarily submit to us for the purposes of internal analysis, marketing and brand development. Participating in a survey or an online contest is completely voluntary. We will use the information to make our services more appealing to users. Collected information gathered via surveys shall be anonymized and aggregated. We may use your information gathered via contests for the purposes of performing the contest and to contact you as per such contest's terms and conditions.

## 9. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the United Kingdom and European legislator or other legislators in laws or regulations to which the controller is subject to. If the storage purpose is no longer applicable, or if a storage period prescribed by the United Kingdom and European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## 10. Rights of the data subject

- a) **Right of confirmation (Art. 15 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact the controller via the contact form on the website.
- b) **Right of access (Art. 15 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:
  - the purposes of the processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
  - the existence of the right to lodge a complaint with a supervisory authority;
  - where the personal data are not collected from the data subject, any available information as to their source;
  - the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. If a data subject wishes to avail



himself of this right of access, he or she may, at any time, contact the controller via the contact form on the website.

- c) **Right to rectification (Art. 16 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact the controller via the contact form on the website.
- d) **Right to erasure (Right to be forgotten, Art. 17 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:
- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
  - The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
  - The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
  - The personal data has been unlawfully processed.
  - The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
  - The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Chatter Labs Limited, he or she may, at any time, contact the controller via the contact form on the website. An employee of Chatter Labs Limited shall promptly ensure that the erasure request is complied with immediately. Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of Chatter Labs Limited will arrange the necessary measures in individual cases.

- e) **Right of restriction of processing (Art. 18 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator to obtain from the controller restriction of processing where one of the following applies:
- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
  - The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
  - The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
  - The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by us, he or she may at any time contact the controller via the contact form on the website. The employee of Chatter Labs Limited will arrange the restriction of the processing.

- f) **Right to data portability (Art. 20 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others. In order to assert the right to data portability, the data subject may at any time contact the controller via the contact form on the website.
- g) **Right to object (Art. 21 GDPR)** Each data subject shall have the right granted by the United Kingdom and European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions. Chatter Labs Limited shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims. If we process personal data for direct marketing purposes,

the data subject shall have the right to object at any time to processing personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the processing for direct marketing purposes, we will no longer process the personal data for these purposes. In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest. In order to exercise the right to object, the data subject may contact any employee of Chatter Labs Limited. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

- h) **Automated individual decision-making, including profiling** Each data subject shall have the right granted by the United Kingdom and European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent. If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Chatter Labs Limited shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision. If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact the controller via the contact form on the website.
- i) **Right to withdraw data protection consent** Each data subject shall have the right granted by the United Kingdom and European legislator to withdraw his or her consent to processing of his or her personal data at any time. If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact the controller via the contact form on the website.
- j) **Conditions Applicable to Child's Consent in Relation to Information Society Services (Art. 8 GDPR)** Each data subject who is a child under the age of 16 (or 13, as applicable in the United Kingdom) shall have the right to have their personal data processed only with the valid consent of their parent or guardian, as granted by the United Kingdom and European legislator. Where the processing of personal data is based on consent pursuant to Article 6(1) lit. a GDPR, and the data subject is a child below the age of 16, the consent must be provided by the holder of parental or

guardian responsibility over the child. The controller shall make reasonable efforts to verify in such cases that the consent is given or authorized by the parent or guardian, taking into consideration available technology and the measures implemented by the controller to ensure the authenticity of consent. In order to obtain valid parental consent, Chatter Labs Limited may implement the following measures:

- **Age Verification Mechanism:** Chatter Labs Limited may request that the parent or guardian provides their date of birth before accessing the service.
- **Parental Verification Process:** Chatter Labs Limited may request the contact details of the parent or guardian. A parental verification process can include sending a verification link or code via email or mobile phone to the parent or guardian, which must be confirmed before proceeding with data processing.
- **Parental Consent Form:** A digital consent form can be sent to the parent or guardian, outlining the nature of the data processing and requiring an electronic signature or checkbox confirmation to validate consent.
- **Educational Content for Parents:** Providing clear, accessible information for parents or guardians explaining how their child's data will be used, and offering the ability to review or revoke consent at any time.

Furthermore, to assert the right to parental consent and its verification, the parent or guardian may at any time contact the controller via the contact form on the website.

k) **Processing of Special Categories of Personal Data (Art. 9 GDPR)** In accordance with the United Kingdom and European legislator's provisions, the processing of special categories of personal data, such as health data, or biometric data, shall only occur under strict conditions. This includes obtaining explicit consent from the data subject, or where applicable, from their parent or guardian if the data subject is a child under the age of 16 (or 13, as applicable in the United Kingdom). To ensure compliance with Article 9 of the GDPR, Chatter Labs Limited employs the following measures to obtain and document explicit consent:

- **Explicit Consent Form:** For processing special categories of data, we will provide a detailed consent form that explicitly outlines the nature and purpose of the data processing. This form must be signed or digitally agreed to by the data subject, or their parent or guardian, to validate consent.
- **Parental Consent Verification:** In cases where the data subject is a child under the age of 16 (or 13 in the UK), we will implement measures to verify parental consent. This may include sending a confirmation link or code to the parent or guardian, which must be validated before processing the child's special category data.
- **Consent Documentation:** We will maintain detailed records of all explicit consents obtained, including the date, method of consent, and the specific data processing activities for which consent was granted. These records will be securely stored and readily accessible for review.

To assert the right to review or withdraw consent regarding the processing of special category data, or to inquire further about our data processing practices, the data subject, or their parent or guardian, may contact the controller via the contact form on the website at any time.

## **11. Data protection for work applications and the work application procedures**

The data controller shall collect and process the personal data of work applicants for the purpose of the processing of the work application procedure. The processing may also be carried out electronically. This is the case, in particular, if a work applicant submits corresponding work application documents by e-mail or by means of a web form on the website to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the *application documents shall be automatically erased six months after notification of the refusal decision*, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

## **12. Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services.

If our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR.

In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR.

Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by

our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the United Kingdom and European legislator. They considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

### **13. The legitimate interests pursued by the controller or by a third party**

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

### **14. Period for which the personal data will be stored**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. Because these needs can vary for different data types, the context of our interactions with the data subject or their use of products, actual retention periods can vary significantly.

After expiration of that statutory period, the corresponding data is routinely deleted, if it is no longer necessary for the fulfillment of the contract, the initiation of a contract or for other legitimate purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements.

### **15. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data**

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact the controller via the contact form on the website. An employee will clarify to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of data.

## **16. IT-Security**

To protect the security of your data during transmission, we use state-of-the-art encryption methods (such as SSL) via HTTPS.

## **17. Existence of automated decision-making**

Chatter Labs Limited does not perform automatic decision-making or profiling.

## **18. Questions or Complaints**

You can direct any questions or complaints about the use or disclosure of your personal information to the controller via the contact form on the website. We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of personal information within 30 days of receiving your complaint.

You can also contact a supervisory authority with a complaint at any time, e.g. the supervisory authority of the state of your residence or the authority that oversees Chatter Labs Limited which is the [United Kingdom's Information Commissioner's Officer](#).

## **19. Revision of this privacy policy**

We reserve the right to amend this privacy policy so that it always complies with current legal requirements or to implement changes to our services in the privacy policy, e.g. when introducing new services. Your next visit will be subject to the new privacy policy.

Current policy review date is August 13th 2024.

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