



PRIVACY POLICY

Prighter GmbH and our affiliates ("we", "us", "our" or "Prighter") value your privacy and are committed to safeguarding your Personal Data, which is a responsibility that we take very seriously.

This Privacy Policy explains how we may use the Personal Data we collect when you visit our website <https://prighter.com/> ("Website"), inquire about our products, purchase or subscribe to a product through our Website, apply for a role within our organisation, or subscribe to our marketing communications. It also explains how we comply with the EU legislation related to data protection (EU General Data Protection Regulation ("GDPR")) and what your rights are under this legal framework.

Controller: Prighter GmbH ("Prighter")
Schellinggasse 3/10
1010 Vienna
Austria

Data Protection Officer: DPO of Prighter GmbH
Email: dpo@prighter.com

1. DEFINITIONS

Unless otherwise indicated, capitalized terms used in this Privacy Policy are defined in Annex 1. Most of the definitions are derived from the EU General Data Protection Regulation.

2. WHAT TYPE OF PERSONAL DATA DO WE COLLECT FROM YOU?

Personal Data means any information relating to you which allows us to identify you, either directly from that data or because we combine that information with other data about you.

When you use our Website, including to create an account with us and purchase products from our Website, subscribe to our marketing communications, or when we interact with you in relation to our products, you may provide us with your Personal Data, or we may obtain Personal Data about you.

We may process the following Personal Data:

- **Contact details and personal identifiers:** such as your name, email address, billing address;
- **Purchase data:** data on the products you have asked us to provide to you, such as date and time of purchase, customer number, order number, invoice number;
- **Payment data:** information relating to your payment and receipt details, tax identification number, refund and details of payment transactions with you;
- **Records of your interactions with us:** such as any feedback, enquiries or complaints you make, questions you have, or content of any other interactions with us;
- **Internet information:** including your use of and movements through our Website, the date and time of your visit or use of our Website, IP addresses, IP location, device information such as



type of browser, type of device, screen size, internet service provider and operating system and other IT system identifying information;

- **Job information:** such as your role and function in the company, employment and business activity;
- **Application information:** information obtained from your CV, photograph, content of your application;

Your marketing preferences: so that we know whether and how we should contact you. You can stop receiving our marketing communications at any time, free of charge, through the methods displayed as part of any communication such as the unsubscribe link in our emails. Or further information on this please see the section below on Direct Marketing.

3. WHERE DO WE COLLECT YOUR PERSONAL DATA FROM?

We may collect Personal Data from several sources. These include the following:

- **Directly from you:** when you use our Website, order our products, provide your feedback or make a complaint, contact us by email, or communicate with us directly in some other way.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our Website. Like many other Websites, we use so-called “cookies”. Cookies are small text files that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our Website. If you have given your consent to our use of cookies, we do so to improve the use of our Website or to analyze our Website. You can revoke your consent to our use of cookies any time. Please find a detailed list of all cookies we use in our Cookie Policy <https://cdn.prighter.com/legal/Prighter-CookiePolicy.pdf>.

If you are providing information regarding other individuals to us, it is your responsibility to ensure that you have the right to provide the information to us.

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4. WHY DO WE COLLECT YOUR PERSONAL DATA AND ON WHAT LEGAL BASIS?

The table below describes the main purposes for which we process your personal data, the categories of your information involved, and our lawful basis for doing so.

Purpose	Personal Data used	Lawful basis
So that we can provide our website to you	IP address, browser type, device ID, IP location	We have a legitimate interest in our website working properly.
To improve our website security, offer IT support and troubleshooting	IP address, website activity, date and time of your visit or use of our website, device information	We have a legitimate interest in ensuring our systems are secure.

To manage your purchases and provide products to you	Name, email address, billing address	This is necessary to fulfil our contract with you.
To create an account with us	Name, email address, telephone number, address, payment data, purchase history and customer number	This is necessary to fulfil our contract with you.
To invoice you and receive payments from you	Name, email address, billing address, customer number, invoice number, tax identification number, and other payment data	This is necessary to fulfil our contract with you.
Marketing products which may be of potential interest to you and offering promotions	Name, email address and marketing preferences	<p>We have a legitimate interest to provide you with information about our products including those that are the same or those similar to the ones you have inquired about.</p> <p>If we cannot rely on legitimate interest as our lawful basis for processing, then we will obtain consent from you.</p>
Provide you with our newsletter	Name, email address, marketing preferences	We only send you newsletters if you gave us your consent.
To deal with inquiries, and other communications from you	Name, email address and customer number	This is necessary to fulfil our contract with you.
To manage and select candidates who applied for a position with us	Name, email address and other information provided in your CV and application	This is necessary to fulfil our contract with you.
For the purpose of complying with any legal and regulatory requirements	Contact details, invoice number and tax identification number	We have a legal obligation to comply with any legal or regulatory requirements.
Storage of records relating to you and also records relating to our business	All the personal information we collect about you	To be able to manage and fulfil our contract with you, we may have a legal and/or regulatory obligation to do so, and we also have a legitimate interest to keep proper records.

Some of your Personal Data may be required due to legal, contractual, or other obligations. Failure to provide this data may impact our ability to fulfil our contract with you or comply with relevant legal obligations. For other Personal Data, whilst you may not be under an obligation to provide it to us, if you do not provide it, we may not be able to properly perform our services for you. Without your Personal Data, you may be unable to complete purchases or register an account on our Website.



Providing Personal Data for marketing and newsletters is optional. Refusal to provide this data has no negative consequences but means that we cannot offer personalised marketing messages or promotional offers. If you provide us your consent for marketing purposes, you can revoke your consent or object the processing at any time by utilizing the following website: [link to Prighter page] or by following the information in section “Contact Information”.

5. WHO WE SHARE YOUR PERSONAL DATA WITH?

In order to operate our Website and provide you with the products you have purchased we may need to share your Personal Data with third parties. This includes sharing your Personal Data with companies engaged by us to manage our relationship with you and provide you the services described above.

We may share your personal data with the following recipients:

- **Sub-contractors:** such as our marketing and service technology providers, direct marketing brokers, cloud service providers, payment service providers and other sub-contractors. For a detailed list of engaged sub-contractors please see Annex II.
- **Consultants and accountants:** such as legal or tax consultants and accountants.
- **Government and law enforcement agencies:** where we are required to do so by law or to assist with their investigations or initiatives.

We do not disclose Personal Data to anyone else except as set out above unless we have your consent, or we are legally obliged to do so. These recipients will only process your Personal Data to perform tasks and duties on our behalf and in compliance with this Privacy Policy and governing data protection laws.

6. DIRECT MARKETING

From time to time, we may contact you by email with information about products we believe you may be interested in.

Marketing emails and newsletters will only be sent to you based on the preferences you set when you create your account, tell us that you wish to receive marketing related messages or when you have purchased similar products from us previously.

You can opt out any time if you do not wish to receive any marketing messages by clicking on the unsubscribe link in any marketing email you receive to unsubscribe from future marketing communications.

7. INTERNATIONAL DATA TRANSFERS

In the course of our operations, it may be necessary to transfer your Personal Data to recipients located outside the European Union (EU), European Economic Area (EEA), or the United Kingdom (UK). These transfers may be to our Clients, partners, or service providers who are located in regions with differing data protection laws than those in your country. When transferring your Personal Data



internationally we implement appropriate safeguards to ensure the security and confidentiality of your data. These safeguards may include for example Standard Contractual Clauses (SCCs) approved by the European Commission or applicable supervisory authority.

8. HOW LONG DO WE KEEP PERSONAL DATA FOR?

Generally, we will retain your Personal Data for as long as we need it for the purposes for which it was collected. The duration for which we retain your Personal Data will differ depending on the type of information and the reason why we collected it from you. However, in some cases Personal Data may be retained on a long-term basis: for example, Personal Data that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

In addition, we may be allowed to retain Personal Data whenever you have given consent to such processing (e.g. subscription to our newsletter), as long as such consent is not withdrawn.

9. DATA SECURITY

We take the security of your information very seriously and only handle Personal Data as permitted by data protection regulations. We use a variety of technical and organizational measures to help protect your Personal Data from unauthorized access, disclosure, modification, loss or destruction in accordance with applicable data protection laws. When handling Personal Data, our employees are obliged to comply with the regulations of the GDPR.

10. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You have the following rights in relation to your Personal Data:

Right of Access - you have the right to be informed about how we are using your Personal Data and the right to access that data that we hold about you.

Right to Erasure or "Right to be Forgotten" – You have the right to ask us to delete your Personal Data provided that there are no valid grounds for us to keep it, for example we may have to keep some or all of the Personal Data to comply with legal obligation or in respect of any legal claims.

Right to Data Portability – You have the right to receive the Personal Data you have provided to us in a digital format or in certain circumstances and where technically feasible the right to ask us to transmit the data to another organization.

Right of Rectification – You have the right to ask us to amend the Personal Data that we hold about you where you believe it is inaccurate or incomplete.

Right to Object - In certain circumstances, you have the right to object to the processing of your Personal Data and to ask us to block, erase and restrict our use of your personal data.

Automated Decision Making – We may process your Personal Data by solely automated means (without human intervention), including for profiling. Where such processing may have a legal or similarly significant effect on you, you have the right not to remain subject to any decisions based on such automatic processing, except as otherwise provided by law. You have the right to understand when and how automated decisions are made about you, and the factors involved and you have the

right to challenge these decisions, request human intervention, express your point of view, and seek a review of the decision.

Right to Withdraw Consent or Right of Opposition – If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there is another legal ground for the processing.

Right of Limitation - You have the right to request the limitation of the Processing of your Personal Data, in the form of: (i) suspension of Processing or (ii) limitation of the scope of Processing to certain categories of Personal Data or purposes of Processing.

Right to complain – You have the right to complain to the supervisory authority, in addition to us.

The period for handling a request is 30 days unless it is a particularly complex request.

Once our specified retention period expires, we shall delete the relevant Personal Data. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of such retention period.

11. PROCESSING DATA IN RELATION TO CHILDREN

Our products and services are not intended for and shall not be used by individuals under the age of 18. Prighter does not knowingly collect Personal Data from persons under 18 or allow them to register. If it comes to our attention that we have collected or processed Personal Data from such a person, we may delete this information without notice. If you have reason to believe that this has occurred, please contact us using the following email: support@prighter.com

12. CHANGES TO OUR DATA PROTECTION PROVISIONS

We may need to make changes to this Privacy Policy to ensure that it complies with current legal requirements or to implement changes to the services detailed in the Privacy Policy, e.g., when introducing new services and products. In this case, your future visits to our Website will be subject to the updated Privacy Policy.

13. CONTACT INFORMATION

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such use please do not hesitate to contact us by:

Email at: support@prighter.com

Post to: Schellinggasse 3/10, 1010 Vienna, Austria

This Policy was last updated: August 2025

ADM	means Automated decision-making;
Consent of the Data Subject	means any freely given, specific, informed and unambiguous indication of the Data Subject's 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;
Contract Performance	means concluding, maintaining, and completing of a contract concluded between the Controller and a Data Subject, including Processing activities which take place at the request of the Data Subject before entering into a contractual relation;
Controller	means 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;
Data Subject	is any natural person whose Personal Data is being collected, held or processed. Examples of a Data Subject can be an individual, a customer, a prospect, an employee, a contact person, etc;
Direct Marketing	means personal data processed to communicate a marketing or advertising message. This definition includes messages from commercial organisations, as well as from charities and political organisations;
General Data Protection Regulation (GDPR)	is a regulation in EU law on data protection and privacy in the European Union (EU) and the European Economic Area (EEA); 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, and repealing Directive 95/46/EC (General Data Protection Regulation) https://eur-lex.europa.eu/eli/reg/2016/679/oj ;
Legitimate Interest	means the Controller's interest to process Personal Data in order to carry out tasks related to the Controller's business activities. The processing of Personal Data in that context may not necessarily be justified by a legal obligation or carried out to execute the terms of a contract with a Data Subject;
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.
Processing	means 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;
Processor	means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller;
Recipient	means 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 Personal Data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the Processing;

List of Sub-Processors

Our processors reported the following sub-processors:

	Sub-Processor	Registered Office (Country)	Basis for transfer to third party country
1	DigitalOcean LLC	USA	EU-U.S. Data Privacy Framework
2	Microsoft (Ads, Entra, Office 365)	USA	EU-U.S. Data Privacy Framework
3	Google LLC/ Google Ads	USA	EU-U.S. Data Privacy Framework
4	Hetzner Online	Data center within EEA	n/a
5	The Rocket Science Group, LLC d/b/a Mailchimp	USA	EU-U.S. Data Privacy Framework
6	Salesforce, Inc.	USA	EU-U.S. Data Privacy Framework
7	Sentry	USA	EU-U.S. Data Privacy Framework
8	Strato	Germany	n/a
9	Stripe Inc	USA	EU-U.S. Data Privacy Framework
10	Storyblok	Austria	n/a
11	Twilio Inc	USA	EU-U.S. Data Privacy Framework
12	Typeform	Spain	n/a
13	ZenLeads Inc (Apollo.io)	USA	EU-U.S. Data Privacy Framework
14	Zoom	USA	EU-U.S. Data Privacy Framework