

Privacy Notice Whistleblowing Portal

Data protection notices according to the general data protection regulation for the Incident Reporting System

1. Responsibility, Contact details and Data Protection Officer

The responsible within the context of the GDPR is commercetools GmbH, Munich ("[commercetools](https://www.commercetools.com)"). You can contact us at privacy@commercetools.com. Our Data Protection Officer is: Martin Holzhofer, Holzhofer Consulting GmbH, Lochhamer-Str. 31, 82152 Planegg, Federal Republic of Germany, office@holzhofer-consulting.com

2. Purpose of processing and legal basis

The incident reporting system is used to clarify and stop illegal conduct in our group of companies. You can use the incident reporting system to make anonymous reports. In this case we do not process any personal data about you. If you submit a report with your personal data (e.g. name, contact data), this is done voluntarily and on the basis of your consent pursuant to Article 6 para. 1 lit. a GDPR. No automated decision/processing takes place. Your consent is in any case voluntary. You are not obliged to provide any personal data.

3. Data transfer and storage duration

All data will be treated confidentially. Within the commercetools group, only authorised persons and departments receive your data. We may also transfer your data to external parties (e.g. courts or legal advisors) if this is necessary to comply with applicable law or to assert, exercise or defend legal claims. We also use contract processors. Your data will be passed on to them in strict compliance with the obligation of confidentiality and the requirements of the GDPR. The contract processors commissioned by us may process the data only for us and not for their own purposes. In such cases, responsibility for data processing remains with commercetools. After completion of the processing, the notifying person is informed of the result of the check and the notifying person is archived anonymously after 30 days. The transferred data are stored in the European Union.

4. Your Rights

If our company processes your personal data, you have the following rights within the respective legal scope:

- Right of access, especially about the data stored by the responsible person and their intended use (Article 15 GDPR),
- Right to rectification of inaccurate or incomplete data (Article 16 GDPR),
- Right to erasure, e.g. of unlawfully processed or no longer necessary data (Article 17 GDPR),
- Right to restriction of processing (Article 18 GDPR),

- Right to data portability, provided the processing takes place based on consent or to perform a contract or by means of an automated process (Article 20 GDPR).

You can complain to the competent supervisory authority if you believe that your data is being processed unlawfully. The competent authority for us is the [Bavarian State Office for Data Protection](#).

You can revoke your consent at any time with effect for the future by notifying us via the "Follow-up" option in the incident reporting system. The lawfulness of the processing carried out on the basis of the consent until your revocation is not affected by this.

5. Contact person

If you have any questions about data protection at commercetools, we will be pleased to assist you. If you have any complaints or wish to assert your rights, please contact our [data protection officer](#) at privacy@commercetools.com. If you believe that commercetools has not adequately addressed your concerns or complaints, you have the right to file a complaint with the appropriate regulatory authority.

Date: 17.07.23