

Privacy Notice in the Context of Using Microsoft Teams

Change History

Version	Date	Responsible	Changes
1.0	27.11.2022	Emanuel Erlewein	Creation of Document
1.1	07.03.2023	Emanuel Erlewein	Formatting of content; no changes to content
1.2	15.09.2025	Emanuel Erlewein; Yannick Pollehn	• Updates and text adjustments: • Data protection officer • Data recipients • Duration of data storage • English version added
1.3	01.05.2026	Emanuel Erlewein	Updated DPO to HeyData
1.3.1	17.08.2026	Emanuel Erlewein	Update and Changes to the Management and removal of Hannes Kober as "Geschäftsführer".

With the following information, we would like to give you an overview of how we process your personal data and your rights under data protection law.

Who is responsible for data processing and whom can I contact?

The responsible party is

NEUGELB Studios GmbH,

a subsidiary of Commerzbank AG.

Contact: it.admin@neugelb.com

You can reach our Data Protection Officer at:

heyData GmbH, Schützenstraße 5, 10117 Berlin

www.heydata.eu

datenschutz@heydata.eu

What sources and data do we use?

We process personal data that we receive from our project partners, customers, or other affected parties in the context of using Microsoft Teams. Relevant personal data includes personal details (name, telephone number, and other contact details) as well as the IP address of your device. Additionally, written communication in the Teams chat function is recorded.

What do we process your data for (purpose of processing) and on what legal basis?

We process personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG):

a. For the fulfillment of contractual obligations (Art. 6(1)(b) GDPR)

Data processing is carried out for the provision and mediation of services as part of the execution of our contracts with Commerzbank AG, their corporate group, our customers, or for the execution of pre-contractual measures carried out upon request. The purposes of data processing are primarily determined by the specific product. Further details on the purposes of data processing can be found in the relevant contract documents and terms and conditions.

b. Within the framework of balancing interests (Art. 6(1)(f) GDPR)

Where necessary, we process your data beyond the actual fulfillment of the contract to safeguard legitimate interests of us or third parties. Examples include: asserting legal claims and defense in legal disputes, ensuring IT security and IT operations of the company, preventing and investigating criminal offenses.

c. Due to legal obligations (Art. 6(1)(c) GDPR) or in the public interest (Art. 6(1)(e) GDPR)

Additionally, as a subsidiary of Commerzbank, we are subject to various legal obligations, i.e., statutory requirements (e.g., Banking Act, Money Laundering Act, Securities Trading Act, tax laws) as well as regulatory requirements (e.g., by the European Central Bank, the European Banking Authority, the Deutsche Bundesbank, and the Federal Financial Supervisory Authority). The purposes of processing include, among other things, fraud and money laundering prevention, fulfilling tax control and reporting obligations, and assessing and controlling risks in the bank and the Commerzbank Group and their corporate group.

Who will receive my data?

Within NEUGELB Studios GmbH, those departments will have access to your data that need it to fulfill our contractual and legal obligations. Service providers or vicarious agents employed by us may also receive data for these purposes, provided they maintain confidentiality, especially the banking secrecy (definition see Commerzbank AG's General Terms and Conditions). These are companies in categories such as IT services, telecommunications, consulting, and sales.

Regarding data transfer to recipients outside NEUGELB Studios GmbH, it should first be noted that we are obliged to maintain confidentiality about all customer-related facts and evaluations. We may only disclose information about our customers or the customers of Commerzbank AG and their corporate group if legal provisions require it or the customer has consented. Under these conditions, recipients of personal data may include:

- other service providers or comparable companies to whom we transfer personal data to conduct the business relationship with you,
- other companies within the Commerzbank Group for project work or due to legal or regulatory obligations,
- service providers we engage within the framework of order processing relationships.

Further data recipients may be those entities for which you have given us your consent to data transfer or for which you have released us from banking secrecy according to agreement or consent, or to which we are authorized to transfer personal data based on a balance of interests.

Will data be transferred to a third country or an international organization?

Data transfer to entities in countries outside the European Union (so-called third countries) takes place if:

- it is required by law (e.g., tax reporting obligations),
- you have given us your consent.

Additionally, data transfer to entities in third countries is foreseen in the following cases:

- If necessary in individual cases, your personal data may be transferred to an IT service provider in the USA or another third country to ensure the IT operations of NEUGELB Studios GmbH, complying with the European data protection level.
- With the consent of the data subject or due to legal regulations to combat money laundering, terrorist financing, and other criminal acts, as well as within the framework of balancing interests, personal data will be transferred in individual cases in compliance with the European Union's data protection level.

How long will my data be stored?

Your personal data will be processed and stored only as long as necessary to fulfill our contractual and legal obligations. It should be noted that our business relationships are long-term obligations designed to last for years. If the data is no longer required for this fulfillment, it is regularly deleted unless further processing is necessary to fulfill legal retention obligations.

- Fulfillment of commercial and tax retention obligations, which may arise from: Commercial Code (HGB), Tax Code (AO), Banking Act (KWG), Money Laundering Act (GwG), and Securities Trading Act (WpHG). The retention and documentation periods specified there are generally two to ten years.
- Preservation of evidence under statutory limitation provisions. According to §§ 195 ff of the Civil Code (BGB), these limitation periods can be up to 30 years, with the regular limitation period being three years.

What data protection rights do I have?

Every data subject has the right to access under Article 15 GDPR, the right to rectification under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR, the right to object under Article 21 GDPR, and the right to data portability under Article 20 GDPR. Additionally, there is a right to lodge a complaint with a competent data protection supervisory authority under Article 77 GDPR in conjunction with § 19 BDSG.

You can withdraw your consent to the processing of personal data at any time. Please note that the withdrawal is effective for the future only. Processing that occurred before the withdrawal is not affected.

Is there an obligation for me to provide data?

As part of our business relationship, you must provide those personal data necessary for establishing, conducting, and terminating a business relationship and fulfilling the associated contractual obligations, or which we are legally obligated to collect. Without this data, we will generally not be able to conclude, execute, and terminate a contract with you.

Is there automated decision-making?

Automated decision-making does not take place in the context of using Microsoft Teams.

Does profiling take place?

Profiling does not take place in the context of using Microsoft Teams.

Information about your right to object under Article 21 GDPR

Individual right to object:

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you, which is based on Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing based on a balance of interests).

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing is for the establishment, exercise, or defense of legal claims.

Recipient of an objection

The objection can be made informally with the subject line "Objection," including your name, address, and date of birth. Please address your objection to:

NEUGELB Studios GmbH

Address: Zeughofstr. 20, 10997 Berlin

Email: it.admin@neugelb.com

Or to:

Data Protection Officer

heyData GmbH

Schützenstraße 5, 10117 Berlin

www.heydata.eu

datenschutz@heydata.eu