

# **Privacy Policy #SOPHYGRAY**

## **1. Overview**

The following data protection information informs you about the processing of so-called personal data by #SOPHYGRAY in connection with the use of the #SOPHYGRAY App. Personal data is information that can be directly or indirectly attributed to you or can be attributed to you.

## **2. Name and contact details of the person responsible and contact in case of data protection questions.**

This data protection information applies to data processing by #SOPHYGRAY. We are not obliged to appoint a data protection officer. Please contact us at [nadja@kunstraumllc.com](mailto:nadja@kunstraumllc.com) if you have any questions regarding data protection.

## **3. Purposes of data processing, legal basis and legitimate interests pursued by #SOPHYGRAY or a third party as well as categories of recipients.**

### **3.1 Calling up the #SOPHYGRAY app.**

When downloading the app, certain required information is transmitted to the app store selected by you (e.g., Google Play or Apple App Store), specifically the username, the e-mail address, the customer number of your account, the time of the download and the individual device identification number may be processed. The processing of this data is carried out exclusively by the respective app store and is beyond our control. We only receive anonymized information about the time of your download. A traceability to natural persons is not possible for us.

### **3.2 Functions of the #SOPHYGRAY-App**

#### **Voice recording:**

Voice recordings are made as integral part of the app. These are sent to Dialogflow and transcribed there. The response is then sent to the chatbot.

The chatbot software Dialogflow, a service of Google LLC ("Google"), uses machine learning to better understand and respond to user input. For this purpose, the inputs are sent to external servers and evaluated there. This is the only way to enable the function of the chatbot. No personal data is requested or required at any point within the chatbot. Users are therefore not identifiable if they do not enter any personal data into the chat. The non-personal data entered is used for learning and stored for training purposes.

#### **Screensavers:**

The app will play screensavers as you swipe through its screens.

These are hosted and served through Vimeo. No personally identifiable information is given to Vimeo as part of this request. For more information on the information Vimeo processes and what rights you have related to the data, see their privacy policy: <https://vimeo.com/privacy#introduction>

### **3.3 Contact**

If you contact us by e-mail or via our contact form, we also process your personal data such as name, e-mail address, telephone number and the content of the message. This information is processed exclusively for the purpose of being able to correctly process your request. Your data will only be used to the extent necessary for this purpose. The legal basis for the processing of the data described above is Art. 6 (1) lit. f) DSGVO. The communication data will be deleted as far as they are no longer necessary for the exchange with you and any legal retention periods have expired.

## **4. Transmission of data to third parties**

Insofar as we have commissioned external service providers with the processing of personal data within the scope of the app, they will process your data in compliance with the applicable legal basis and our agreement.

We make a point of only processing your data by means of service providers within the EU / EEA. However, we may use service providers that process data outside the EU / EEA. In these cases, we ensure that an adequate level of data protection comparable to the standards within the EU is established at the recipient prior to the transfer of your personal data. This can be achieved, for example, via EU standard contracts or Binding Corporate Rules or special agreements to whose regulations the company may be subject.

## **5. Your rights**

- **Right to information about your personal data stored by us according to Art. 15 DSGVO,**
- **Right to correct incorrect data or to complete correct data according to Art. 16 DSGVO,**
- **Right to delete your data stored by us according to Art. 17 DSGVO as far as no legal or contractual retention periods or other legal obligations or rights for further storage are to be observed,**
- **Right to restrict the processing of your data according to Art. 18 DSGVO,**
- **Right to data portability according to Art. 20 DSGVO,**
- **Right to lodge a complaint with a supervisory authority,**
- **Right to object to processing on the basis of legitimate interest pursuant to Article 21 (1) DSGVO.**

## **8. Amendments to this declaration**

We revise this data protection information when changes are made to this app or on other occasions that make this necessary. You will always find the current version under this menu item. Therefore, you should call up this information regularly to find out about the status of the privacy policy.

**Status:** December 2022