

Privacy Policy

Last updated: November 6, 2023

This Privacy Policy (the "Policy") outlines how Agency for the Future GmbH and its Affiliates ("We" or "us") collects, uses, discloses, and protects your information that identify you or make you identifiable ("Personal Data") in connection with your use of the Service and access to the Site. Please read this Policy carefully before using our services. By accessing or using our services, you consent to the practices described in this Policy. We treat your Personal Data confidentiality and in accordance with the applicable data protection laws, in particular with the EU General Data Protection Regulation (the "GDPR").

This Policy is designed to provide you with information about the collection, storage, processing, usage, and disclosure of your Personal Data, outlining the purposes and legal basis for such actions. Additionally, we'll inform you about your rights concerning your Personal Data. Your Personal Data will be deleted when it is no longer needed for the purposes outlined in this Policy or upon your request, provided that further storage is neither necessary nor allowed by applicable laws.

We would like to point out that data transmission over the Internet (e.g. when communicating by e-mail) may be subject to security vulnerabilities. Complete protection of data against access by third parties is not possible.

Definitions

- "Controller": This refers to the organization or entity that determines the reasons and methods for processing Personal Data. In many jurisdictions, the Controller holds the primary responsibility for ensuring compliance with relevant data protection laws.
- "Data Protection Authority": An independent public authority entrusted by law to oversee compliance with applicable data protection regulations.
- EEA (European Economic Area): A geographical area encompassing European Union (EU) member states and additional countries that have agreed to participate in the EU's internal market.
- "Process, Processing, or Processed": These terms cover all activities related to Personal Data, whether performed manually or by automated means. This includes actions like collecting, recording, organizing, storing, modifying, retrieving, using, sharing, and deleting.
- "Processor": This refers to any individual or entity that handles Personal Data on behalf of the Controller, excluding the Controller's employees.
- "Services": Any offerings provided by our organization.

General information on the legal basis for data processing on this website

If you have consented to data processing, we process your personal data on the basis of Art. 6 para. 1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR, insofar as special categories of data are processed in accordance with Art. 9 para. 1 GDPR. In the event of express consent to the transfer of personal data to third countries, data processing is also carried out on the basis of Art. 49 para. 1 lit. a GDPR. If you have consented to the storage of cookies or access to information in your end device (e.g. via device fingerprinting), the data processing is also carried out on the basis of Section 25 (1) TTDSG. Consent can be revoked at any time. If your data is required to fulfill the contract or to carry out pre-contractual measures, we process your data on the basis of Art. 6 para. 1 lit. b GDPR. Furthermore, we process your data if this is necessary to fulfill a legal obligation on the basis of Art. 6 para. 1 lit. c GDPR and data processing can also be carried out on the basis of our legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR. Information on the relevant legal bases in each individual case is provided in the following paragraphs of this privacy policy.

Name and contact details of the Controller

Agency for the Future GmbH
Köpenicker Chaussee 3a
Berlin 10317
Germany

Email: support@lukso.partners

Personal Data We Process

Automated Data Processing

Whenever you visit our website, our system automatically gathers data and information pertaining to the computer system you utilized to access our website.

The following is collected:

- Browser information (type and version)
- Operating system
- Your internet service provider
- Your IP address
- Device Type
- Date and time of access
- Websites from which your system reaches our website
- Websites accessed by the user's system via our website

This data is likewise recorded in our system's log files. It's important to note that this data isn't stored alongside your other personal data. For data processing regulated by GDPR, the legal basis for the temporary storage of data and log files falls under Art. 6 para. 1 lit. f GDPR.

By creating a profile on our Website we and our data processors might collect the following Personal data:

- Personal details: name, date of birth/age, nationality;
- Contact details: email address, postal address, phone number;
- Technical Information: when you use our services, information of your device.

How We Use Your Information

- Providing Services: We may use your information to provide the services you request and to operate and maintain our platform.
- Communication: We may use your provided contact information to send you links to login and confirmatory notifications.

Insofar as we are required to obtain the consent of the data subject for the processing of personal data, we will obtain your prior consent and Art. 6 para. 1 lit. a GDPR serves as the legal basis for the processing of the corresponding data.

If the processing of personal data required for the performance of a contract to which you are a party, Art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual services or measures.

Insofar as the processing of personal data is required to fulfill a legal obligation to which our company is subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis.

In the event that the vital interests of the data subject or another natural person require the processing of personal data, Article 6 para 1 lit. d GDPR serves as the legal basis.

If processing is necessary to safeguard a legitimate interest of us or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis

Sharing Your Information

We may share your information with third-party service providers who help us deliver our services.

a. Google Analytics

Our website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses "cookies," which are text files placed on your computer, to help analyze how users interact with our website. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this, you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Make sure to adjust the clause to reflect your specific use of Google Analytics, including any additional details or customization required for your website's practices.

b. Legal Compliance

We may share your information when required by law or to protect our rights and the rights of others.

Cookies

We use cookies to collect data about your interactions with our services. For more information on how you can control or delete cookies through your browser settings, please refer to our separate cookie policy.

Your rights when we process your Personal Data

You have the following rights if the legal conditions of such rights are met. You may exercise them at any time.

Right of access

You have the right at any time to demand information on if we process your Personal Data.

Information, deletion and correction

Within the scope of the applicable legal provisions, you have the right at any time to get free of charge information about your stored personal data, their origin and recipient and the purpose of the data processing and, if applicable, a right to correction or deletion of this data free of charge. For this as well as other questions on the subject of personal data, you can contact us at any time.

Rights of the data subject

If the legal requirements are met, you have the following rights according to Artt. 15 to 20 GDPR: right to information, to correction, to deletion, to restriction of processing, to data portability.

In addition, according to Art. 21 para.1 GDPR, you have the right to object to processing based on Art. 6 para.1 lit. f GDPR and to processing for the purposes of direct marketing. Feel free to contact us under support@lukso.partners.

Right of erasure

You may demand your personal data to be deleted if

- a. the personal data concerning you, are no longer necessary for the purposes for which they were collected or otherwise processed;

- b. you revoke your consent to the processing and there is no other legal basis for the processing;
- c. your personal data has been processed illegally;
- d. the deletion of your personal data is necessary to fulfill a legal obligation under Union law or the law of the Member States to which we are subject.

Right to data portability

You have the right to obtain your personal data in a structured, commonly used and machine-readable format. You have the right to transmit your data to another Controller. Where technically feasible, you have the right to have your data transmitted directly from us to another Controller.

Right to Restriction of Processing

You have the right to request the restriction of the processing of your personal data. For this purpose, you can contact us at any time. The right to restriction of processing exists in the following cases:

- If you dispute the accuracy of your personal data stored by us, we usually need time to verify this. For the duration of the review, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data happened/is happening unlawfully, you can request the restriction of data processing instead of deletion.
- If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request restriction of the processing of your personal data instead of erasure.
- If you have lodged an objection pursuant to Art. 21 para.1 GDPR, a balancing of your and our interests must be carried out. As long as it has not yet been determined whose interests prevail, you have the right to request the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, this data - apart from its storage - may only be used with your consent or for the assertion, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State are processed.

Right to object

Many data processing operations are only possible with your express consent. You can object to already given consent at any time. The legality of the data processing carried out until the objection data processing remains unaffected by the objection.

If the personal data processing listed here is based on our legitimate interest pursuant to Art. 6 para.1 lit. f GDPR, you have the right to object to this processing with effect for the future at any time for reasons arising from your particular situation. The respective legal basis on which processing is based can be found in this Privacy Policy. 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 purpose of asserting, exercising or defending legal claims (Objection according to Art. 21 para. 1 GDPR).

If your personal Data are processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing. If you object, your personal data will subsequently no longer be used for the purpose of direct marketing (Objection according to Art. 21 para. 2 GDPR).

After the objection has been made, the processing of the data concerned will be terminated, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or if the processing serves the assertion, exercise or defense of legal claims.

Right of complaint to the supervisory authority

In accordance with Art. 77 GDPR, you have the right to complain to the supervisory authority, in particular in the Member State of their habitual residence, their place of work or the place of the alleged infringement, if you believe that the processing of your personal data is not lawful.

Changes to This Policy

This Policy was lastly updated on the effective date noted above. We may update this Policy to reflect changes in our privacy practices related to the processing of Personal Data or shifts in relevant legal requirements. Any revisions will be posted on our website. Continued use of our services constitutes acceptance of the revised Policy.

Contact Information

If you have any questions about this Policy or your personal information, please contact us at support@lukso.partners.

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