## **Privacy Policy**

Last updated: 08/18/2025

We value your privacy and are committed to protecting your personal data. This Privacy Policy explains how we collect, use, and protect your personal information when you subscribe to our newsletter or interact with our website. We align our practices with the principles described in MailerLite's own Privacy Policy, as they are our email marketing service provider.

### 1. Roles and Responsibilities

For the purposes of data protection laws, AceFinder GmbH is the Data Controller of your personal data. MailerLite acts as our Data Processor, handling data strictly in accordance with our instructions and under a Data Processing Agreement.

#### 2. What Data We Collect

When you subscribe to our newsletter, we may collect:

- Name (if provided)
- Email address
- Date and time of subscription
- IP address and device information (collected automatically for security and consent verification)

## 3. Legal Basis for Processing

We process your data under the following legal bases:

- Consent (Art. 6(1)(a) GDPR) when you subscribe to receive newsletters.
- Contract (Art. 6(1)(b) GDPR) when processing is necessary to provide the service you requested (newsletter delivery).
- Legal obligations (Art. 6(1)(c) GDPR) where processing is necessary to comply with statutory requirements.

# 4. Purpose of Processing

We use your data to:

- Send newsletters and updates
- Monitor subscription performance (open rates, click rates)
- Improve communication and content relevance
- Ensure compliance with data protection and anti-spam regulations

#### 5. Use of Service Providers

We use MailerLite as our newsletter service provider. MailerLite processes your data in accordance with their Privacy Policy (https://www.mailerlite.com/legal/privacy-policy).

Depending on your billing region, the relevant MailerLite entity is:

- If your billing address is in the European Economic Area (EEA), United Kingdom or

Switzerland: MailerLite Limited, 88 Harcourt Street, Dublin 2, D02 DK18, Ireland. - If your billing address is elsewhere: MailerLite, Inc., 548 Market St, PMB 98174, San Francisco, CA 94104-5401, USA.

MailerLite may use subprocessors (such as analytics, AI-assisted tools, payment processors, or customer service providers). Where applicable, these subprocessors are bound by contracts ensuring data protection safeguards.

## 6. Data Storage and Retention

We retain your data for as long as you are subscribed to our newsletter. If you unsubscribe, we delete or anonymize your data unless legal obligations require longer storage. Inactive accounts may be deleted after a defined retention period.

## 7. Data Sharing and Transfers

We do not sell your personal data. We may share data with trusted providers (such as MailerLite and subprocessors) for operational purposes. Data may be transferred internationally; safeguards such as Standard Contractual Clauses and the EU-U.S./UK-U.S./Swiss-U.S. Data Privacy Frameworks apply.

### 8. Your Rights

Depending on your jurisdiction, you may have the right to:

- Access your data
- Rectify inaccurate information
- Request erasure ('right to be forgotten')
- Restrict processing
- Data portability
- Withdraw consent at any time
- Lodge a complaint with a supervisory authority

## 9. Data Security

We and our processors implement appropriate technical and organizational measures to protect your data from unauthorized access, loss, misuse, or disclosure.

#### 10. International Users

Our office and primary operations are located in Germany and our data processing is governed by the General Data Protection Regulation (GDPR). We welcome subscribers from around the world. If you reside outside the European Union, the United Kingdom, or Switzerland, your rights may differ depending on your local law, but we will handle your personal data with care and apply safeguards consistent with GDPR standards. Where required by applicable law, we will respect and uphold your local privacy rights.

### 11. Changes to this Policy

We may update this Privacy Policy to reflect changes in law, technology, or our services. The current version will always be available on our website.

# **12. Contact Information**

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