

Data protection declaration for the CloudLog app and the web interface

1. Section 1- General Information

1.1. Responsible

The person responsible within the meaning of Art. 4 No. 7 GDPR is the person who alone or jointly with others decides on the purposes and means of processing personal data.

The person responsible for the processing of personal data in the context of the app and the web interface or our website is:

CloudLog UG (limited liability)

Bundenweg 31, 60320 Frankfurt, Germany

Phone: +49 69 29801991 - Email: info@cloudlog.aero

Managing Directors: Marco Siciliano, Eric Laufer

Further information on the person responsible can also be found in the imprint of CloudLog UG. You can access this within the app or in the web interface on our website.

1.2. Information collected when downloading the app from the respective app store

When downloading the app, certain information is transmitted to the app store you have selected (e.g. Google Play or Apple App Store). In particular, the user name, the e-mail address, the customer number of your account, the time of the download, payment information and the MAC address (Media Access Control) can be processed. This data is processed exclusively by the respective app store and is beyond our control.

1.3. Provision of the app and creation of log files

When using our app or website, our system automatically collects data and information from the end device used for technical reasons. The following data is collected here:

- **What personal data do we process by providing the app and creating the log files and for what purpose?**

(1) information about the app and the version used;

(2) The operating system, system version and device ID, and the make and model of the retrieval device;

- (3) The IP address and MAC address of the retrieval device;
- (4) date and time of access;
- (5) A unique ID to recognize the user.

This data is stored in the log files of our system. This data is not stored together with the personal data of a specific user, so that individual app users are not identified. After the deletion period has expired, the data is anonymized in such a way that it is no longer possible to draw conclusions about an individual person. The anonymous data allows us to monitor and improve the stability and availability of the app over a longer period of time. The temporary (automated) storage of the data is required for the use of the app in order to enable delivery of the app content.

This personal data is also stored and processed to maintain the compatibility of the app with the respective runtime environments (Android or iOS versions) for as many visitors as possible and to combat misuse and eliminate faults. For this it is necessary to log the technical data of the retrieving end device in order to be able to react as early as possible to display errors, attacks on our IT systems and/or errors in the functionality of the app.

- **What is the legal basis for this processing?**

Article 6 paragraph 1 lit. f GDPR (legitimate interest): Our legitimate interest is to ensure the achievement of the purpose described above. For technical reasons, connection data is generated when the app is provided, which is stored at least temporarily in log files for technical reasons. The app cannot be delivered without created log files, since the data is required to deliver the content, among other things.

- **How long is your data stored?**

The data is deleted when the data is no longer required in order to ensure the compatibility of the app for all visitors. This is the case no later than 3 months after using the app.

- **Possibility of objection and deletion**

You can object to this processing at any time in accordance with Article 21 GDPR and request that your data be deleted in accordance with Article 17 GDPR. You can find out which rights you are

entitled to and how you can assert them in section 3 of this data protection declaration.

1.4. Provision of the website or our CloudLog web interface and creation of log files

Every time the website is called up, our system automatically collects data and information from the device that is called up (e.g. computer, mobile phone, tablet, etc.).

- **What personal data is collected and to what extent is it processed?**

- (1) Information about the browser type and version used;
- (2) The operating system of the retrieval device;
- (3) host name of the accessing computer;
- (4) The IP address of the retrieval device;
- (5) date and time of access;
- (6) Websites and resources (images, files, other page content) accessed on our website;
- (7) Websites from which the user's system reached our website (referrer tracking);
- (8) notification of whether the retrieval was successful;
- (9) Amount of data transferred.

This data is stored in the log files of our system.

This data is not stored together with the personal data of a specific user, so that individual site visitors are not identified.

- **Legal basis for processing personal data**

Article 6 paragraph 1 lit. f GDPR (legitimate interest): Our legitimate interest is to ensure the achievement of the purpose described above. For technical reasons, connection data is generated when the website is provided, which is stored at least temporarily in log files for technical reasons. The website cannot be delivered without created log files, since the data is required to deliver the content, among other things.

- **purpose of data processing**

The temporary (automated) storage of the data is required for the display of the website in order to enable delivery of the website.

Personal data is also stored and processed to maintain the compatibility of our website for as many visitors as possible and to combat abuse and eliminate faults.

For this it is necessary to log the technical data of the accessing computer in order to be able to react as early as possible to display errors, attacks on our IT systems and/or errors in the functionality of our website.

In addition, we use the data to optimize the website and to generally ensure the security of our information technology systems.

- **Duration of storage**

The aforementioned technical data will be deleted as soon as they are no longer required to ensure the compatibility of the website for all visitors, but no later than 3 months after accessing our website.

- **Possibility of objection and deletion**

You can object to the processing at any time in accordance with Article 21 GDPR and request the deletion of data in accordance with Article 17 GDPR.

You can find out which rights you are entitled to and how to assert them at the bottom of this data protection declaration.

1.5. General information on contacting us

Please note that in the case of unencrypted communication by e-mail, complete data security on the transmission path to our IT systems cannot be guaranteed, so that we expressly recommend encrypted communication or the postal service for information with a high need for confidentiality.

The risks associated with unencrypted transmission by e-mail include the following:

- Personal data could be disclosed to third parties without authorization if the e-mail address was not entered correctly;

- You have no information on the recipient side, eg which or how many employees have access to the e-mail;
- the transmission of the data when retrieving or delivering the e-mail via several distributed intermediaries means that unauthorized third parties can access it without encryption.

2. Section 2 - Features of the App

2.1. Registration

- **What personal data is collected and what is it used for?**

Our app can be used with a registered user account. When registering as a user, an e-mail address must be provided and a password assigned.

All mandatory fields must be filled out for registration.

Immediately after registering, you will receive a confirmation link by e-mail, which you must click to activate your user account. With the e-mail address and the password you can later authenticate yourself on our login server.

Registration is necessary in order to be able to create a user account.

- **On what legal basis is the processing based?**

Article 6 paragraph 1 letter b GDPR (implementation of (pre)contractual measures) to enable the implementation of the services you have requested in connection with the terms of use, which can be called up in the app and in our web interface.

- **Who gets access to your registration data?**

The personal data you enter during registration will only be processed by CloudLog UG as the provider of the app to provide the user account. However, if you enter data during registration that is to be transmitted to third parties, such as public bodies, we will transmit the personal data you have stored during registration or in the user profile to the desired body.

- **How long is your data stored?**

The data collected during registration will be stored by us for as long as you maintain a user account with us. Please note, however, that we have to store some data for up to ten years due to legal storage obligations (e.g. in the case of fee-based bookings of our services) as part of tax obligations, even if you delete the corresponding user account. This data will then be deleted immediately as soon as there are no longer any legal retention periods to the contrary.

- **Your rights**

You can find out which rights you are entitled to and how you can assert them at the end of this data protection declaration.

- **Necessity of the information and consequences of not providing the data**

Registration is required to provide a user account. If you want to create a user account, you must at least fill out the fields marked as mandatory during registration and may not object to the data processing. A user account enables you to manage the data you have stored and the services you have booked. However, it is also possible to install the app without registering.

2.2. Login area - user account

- **What personal data do we process when you log in to your user account and what is the purpose of this processing?**

In the app you have the option of using a separate login area, your "user account". In order for us to be able to check your authorization to use the user account, you must enter your login data (email and password) in the relevant login form. If required, we can send you your login data or the option of having your password reset by email upon request.

- **On what legal basis is the processing based?**

Article 6 paragraph 1 letter b GDPR (implementation of (pre)contractual measures): Without the login data, it is not possible to log into the user account due to a lack of access authorization.

- **How long is your data stored?**

The data collected will be stored for as long as you maintain the user account with us. Please note, however, that we have to store some data for up to ten years due to legal storage obligations (e.g. for orders placed) within the scope of tax storage obligations. The data will then be deleted when there are no longer any legal deadlines to the contrary.

- **Your rights**

You can find out which rights you are entitled to and how you can assert them at the end of this data protection declaration.

- **Necessity of the information and consequences of non-provision**

The user account can only be used after successful registration. The provision and processing of personal data is absolutely necessary for this. If you enter the data incorrectly or not at all, you cannot use your user account. In your user account you can view your previous entries and booked services and manage the data you have entered. The entered data then does not have to be entered again for future bookings.

2.3. Push notifications :

- **Which of your personal data do we process in the context of push notifications and what is their purpose ?**

Depending on the operating system (Apple or Android), we will assign an ID to the device and save it. If the app sends a push notification to this ID, the message is automatically sent to the end device used.

The transmission of push messages serves to facilitate communication with the user of the app and to display activities and communication within the app.

For the purpose of sending push notifications, we use the provider Google Firebase Cloud Messaging.

- **On what legal basis is the processing based?**

Article 6 paragraph 1 lit. a GDPR (consent): Consent is given when installing the app, in the app or in the settings of the mobile device.

- **How long will your data be stored?**

The personal data will be deleted immediately after a push notification has been sent, provided there are no statutory retention periods. We do not store the push notifications on the server side.

- **your rights**

You can deactivate the sending of push notifications at any time by either completely deactivating push notifications via the app settings or by revoking the corresponding authorization for the app via the operating system functions provided for this purpose.

You can object to the processing of personal data for sending push notifications at any time in accordance with Article 21 GDPR by using the deactivation functions shown above and request that your data be deleted in accordance with Article 17 GDPR. You can find out which rights you are entitled to and how you can assert them at the end of this data protection declaration.

- **Necessity of the information and consequences of non-provision**

The provision of personal data for sending push notifications is not required by law or contract and is not required for the conclusion of a contract. However, the use of the ID for the purpose of using push notifications must take place if you wish to receive push notifications. Deactivating this function will therefore mean that you will no longer receive any push notifications from the app.

2.4. error reporting

- **What personal data is processed as part of error reporting and what is it for?**

The data recorded as part of our error reporting (model and operating system of the accessing device, version number of the app, a time specification and crash reporter key) serve to guarantee the function of the app and to optimize the functionality of the app. The detection and processing of errors in the app is required in order to be able to provide the app permanently and to be able to react to security problems with the required speed. We receive the error reports through the Google Play Console, which we used to set up and publish our app. For more information on how to handle the transmitted data, see Google's privacy policy at <https://policies.google.com/privacy>.

- **On what legal basis is the processing for the purpose of error reporting based?**

Article 6 paragraph 1 lit. f GDPR (legitimate interest): Our legitimate interest is to ensure the achievement of the purpose described above.

- **How long is your data stored?**

Your personal data will be deleted immediately after the relevant error has been rectified, provided there are no statutory retention periods.

- **Your rights**

You can find out which rights you are entitled to and how you can assert them at the end of this data protection declaration.

- **Necessity of the information and consequences of non-provision**

The provision of your personal data is not required by law or contract and is not required for the conclusion of a contract. Failure to provide it may result in the app not working correctly for a long time, since we cannot eliminate errors in the app.

2.5. Access to functions of your end device

In order for all functions of our app to be used, the app on mobile devices requires access to certain functions of your end device:

- **Storage**

This access is required so that the app can cache data offline on the end device. By using the memory z. B. Your invoices are saved.

- **Access to all networks**

By accessing the networks, we can use an existing internet connection (WLAN or mobile network) to transfer data.

- **Get internet data :**

assigned to the usage device by the corresponding provider of the push service . It is used to send push messages to your device, e.g. to display notifications.

- **Location**

With the location function, you can have the respective location determined automatically by your mobile device and automatically taken into account when entering logbook contents through the app. With the location function, you can decide in the app how you want to allow the app to access the location and take it into account when processing data.

- **What personal data do we process and what is it for?**

We process all personal data collected from you in the app and aggregation data that we receive from your interactions with the app in order to be able to provide you with the functions of the app.

- **Legal basis for processing personal data**

The use of the storage functions, network access and the use of Internet data is based on Article 6 Paragraph 1 Letter b GDPR (fulfilment of contract). The functions are necessary so that you can provide the corresponding functions of the app in connection with the terms of use, which are available in the app and in our web interface.

- **How long is your data stored?**

Access to the respective device functions is required while using the app. If data is also collected, for example when files are exported or downloaded to the storage space of your end device, these files are generally stored until you delete the files manually.

- **Possibility of objection and elimination**

You can revoke your consent at any time or object to the use of permissions by withdrawing the relevant permissions from the app in the app settings of your operating system. You can switch access to the authorizations of your end device on or off for most end devices in the "Settings" under "Apps". Please note that switching off access rights may have a negative impact on the functionality of the app. You can find out which rights you are entitled to and how you can assert them at the end of this data protection declaration.

2.6. Statistical evaluation of visits to this app and web services

- **Google**

On our site and in our app we use the Google service from Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland, email: support-deutschland@google.com, website: <http://www.google.com>. Processing also takes place in a third country for which there is no adequacy decision by the Commission. Therefore, the level of protection customary for the GDPR cannot be guaranteed during transmission, since it cannot be ruled out that

authorities in third countries, for example, can access the data collected.

The legal basis for the transmission of personal data is your consent in accordance with Article 6 Paragraph 1 Letter a GDPR or Article 9 Paragraph 2 Letter a GDPR, which you have given on our website or in the app.

We use Google to be able to download additional Google services on the website or in our app. The service is used to provide additional Google services, such as the data processing required to provide streams and fonts and relevant Google search content. It is technically required in order to be able to exchange the information already available to Google about the site visitor between the Google services and to be able to provide the site visitor with individual content adapted to their Google account.

For the processing itself, the service or we collect the following data: background data stored in the Google user account or in other Google services about the site visitor, background data for the provision of Google services such as streaming data or advertising data, data about the handling of the site user with the Google search, information on the end device used, the IP address and the browser of the user and other data from Google services for the provision of Google services related to our website.

If the service is activated on our website, our website establishes a connection to the servers of Google Ireland Limited and transmits the required data. As part of order processing, personal data may also be transmitted to the servers of Google LLC, 1600 Amphitheater Parkway, 94043 Mountain View, United States. The processing then also takes place in a third country for which there is no adequacy decision by the Commission. Therefore, the level of protection customary for the GDPR cannot be guaranteed when the data is transmitted, since it cannot be ruled out that authorities in third countries, for example, may have access to the data collected. When using the Google service on our website, information from other Google services may be transmitted and processed by Google in order to provide background services for the display and data processing of the services provided by

Google. For this purpose, data may also be transmitted to the Google services Google Apis, Doubleclick, Google Cloud, and Google Ads and Google Fonts in accordance with the Google data protection declaration.

You can revoke your consent at any time. You can find more detailed information on how to revoke your consent either with the consent itself or at the end of this data protection declaration.

Further information on the handling of the transmitted data can be found in the provider's data protection declaration at <https://policies.google.com/privacy>.

also offers an opt-out option at <https://support.google.com/My-Ad-Center-Help/answer/12155451?hl=de>.

- **Gstatic**

On our site and in our app we use the Gstatic service from Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland, email: support-deutschland@google.com, website: <https://www.google.com>. Processing also takes place in a third country for which there is no adequacy decision by the Commission. Therefore, the level of protection customary for the GDPR cannot be guaranteed during transmission, since it cannot be ruled out that authorities in third countries, for example, can access the data collected.

The legal basis for the transmission of personal data is your consent in accordance with Article 6 Paragraph 1 Letter a GDPR or Article 9 Paragraph 2 Letter a GDPR, which you have given on our website.

Gstatic is a background service used by Google to fetch static content to reduce bandwidth usage and preload needed catalog files. In particular, the service loads background data on Google Fonts and Google Maps.

As part of order processing, personal data may also be transmitted to the servers of Google LLC, 1600 Amphitheater Parkway, 94043 Mountain View, United States.

You can revoke your consent at any time. You can find more detailed information on how to revoke your consent either with the consent itself or at the end of this data protection declaration.

Further information on the handling of the transmitted data can be found in the provider's data protection declaration at <https://policies.google.com/privacy>.

also offers an opt-out option at <https://support.google.com/My-Ad-Center-Help/answer/12155451?hl=de>.

- **pusher**

We use the Pusher service from Pusher Ltd., 160 Old Street, EC1V 9BW London, UK on our website and in our app. Processing also takes place in a third country outside the EU. The Commission has made an adequacy decision for this third country. You can find an up-to-date list on the EU Commission website (Link: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_de). all adequacy decisions.

The legal basis for the transmission of personal data is your consent in accordance with Article 6 Paragraph 1 Letter a GDPR or Article 9 Paragraph 2 Letter a GDPR, which you have given on our website or in our app.

The service is a plugin that we need in order to be able to show you all the content of our website or app. The service may also be used for tracking and/or advertising.

You can revoke your consent at any time. You can find more detailed information on how to revoke your consent either with the consent itself or at the end of this data protection declaration.

Further information on the handling of the transmitted data can be found in the provider's data protection declaration at <https://pusher.com/legal/privacy-policy>.

The provider also offers an opt-out option at <https://pusher.com/legal/privacy-policy>.

- **map box**

We use the Mapbox service from Mapbox, Inc., 740 15th Street NW, 5th Floor, 20005 Washington DC, United States, email:

copyright@mapbox.com, website: <https://www.mapbox.com>. Processing also takes place in a third country for which there is no adequacy decision by the Commission. Therefore, the level of protection customary for the GDPR cannot be guaranteed during transmission, since it cannot be ruled out that authorities in third countries, for example, can access the data collected.

The legal basis for the transmission of personal data is our legitimate interest in processing in accordance with Article 6 Paragraph 1 Letter f GDPR. Our legitimate interest lies in the achievement of the purpose described below.

A map service is integrated on our website via Mapbox, which enables navigation and the display of flight-related data.

With regard to the processing, you have the right to object as set out in Art. 21. You can find more information at the end of this data protection declaration.

Further information on the handling of the transmitted data can be found in the provider's data protection declaration at <https://www.mapbox.com/legal/privacy>.

2.7. Payment methods and credit check

Credit card

As part of the payment by credit card, we will transfer the data required for payment processing to the bank or credit card provider you have selected due to a payment associated with a purchase of a service in accordance with Article 6 (1) (b) GDPR. In addition, the respective data protection regulations of your provider apply.

PayPal

- **What personal data is collected and to what extent is it processed?**

If you have selected "PayPal" as the payment method, we will forward your personal customer data collected as part of the order to PayPal (Europe) S.à rl et Cie, SCA, 22-24 Boulevard Royal, L-2449 Luxembourg as part of payment processing (hereinafter "PayPal"), continue. If you confirm the payment method in the

selection, the following data is affected by the data transfer: first and last name, street, house number, postal code, city, date of birth, telephone number and data related to your order.

- **Legal basis for processing personal data**

Article 6 paragraph 1 letter b GDPR (implementation of (pre)contractual measures) within the framework of the contract to be concluded with PayPal for the implementation of the payment for the remuneration of our services.

- **purpose of data processing**

PayPal carries out a credit check when you select the "PayPal" payment method. Mathematical-statistical methods are used to calculate a rating with regard to the probability of a payment default (so-called calculation of a scoring value). PayPal bases its decision on the provision of the respective payment methods on the calculated scoring value. A scoring value is calculated using recognized scientific methods. Reference is also made to PayPal's data protection declaration: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

- **Duration of storage**

We will store the relevant data for processing the payment for as long as it is necessary to carry out the transaction. Insofar as the data is subject to statutory storage obligations, it will be deleted after the storage obligation has expired. The duration of the storage of the data by PayPal results from PayPal's data protection declaration: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

- **Your rights**

You can find out which rights you are entitled to and how you can assert them at the bottom of this data protection declaration or in the data protection declaration of the provider.

3. Section 3 - Your Rights

3.1. right to information

You have the right to request confirmation as to whether we are processing your personal data. If this is the case, you have a right to

information about the information specified in Art. 15 Para. 1, 2 DSGVO. We are also happy to provide you with a copy of the data, provided that the rights and freedoms of other persons are not affected (cf. Art. 15 Para. 4 GDPR).

3.2. right to rectification

In accordance with Article 16 GDPR, you have the right to have any incorrectly stored personal data (e.g. address, name, etc.) corrected at any time. You can also request that the data we have stored be completed at any time. A corresponding adjustment will be made immediately. As a registered customer, you can adjust some data such as your address data, billing address, registration data, etc. in your user profile at any time.

3.3. Right to Erasure

According to Art. 17 Para. 1 DSGVO you have the right that we delete the personal data collected about you if

- the data is no longer needed;
- due to the revocation of your consent, the legal basis for processing no longer applies;
- you have objected to the processing and there are no overriding legitimate grounds for the processing;
- your data are processed unlawfully;
- a legal obligation requires it;
- a survey pursuant to Art. 8 (1) GDPR has taken place.

According to Art. 17 (3) GDPR, the right does not exist if

- the processing is necessary to exercise the right to freedom of expression and information;
- your data has been collected on the basis of a legal obligation;
- the processing is necessary for reasons of public interest;
- the data is required to assert, exercise or defend legal claims.

3.4. Right to restriction of processing

In accordance with Art. 18 Para. 1 GDPR, you have the right in individual cases to demand the restriction of the processing of your personal data.

This is the case, for example, if

- the accuracy of the personal data is contested by you;
- the processing is unlawful and you do not consent to erasure;
- the data is no longer required for the purpose of processing, but the data collected is used to assert, exercise or defend legal claims;
- an objection to the processing pursuant to Art. 21 (1) GDPR has been filed and it is still unclear which interests prevail.

3.5. right of revocation

If you have given us your express consent to the processing of your personal data (Art. 6 Para. 1 lit. a GDPR), you can revoke this at any time. Please note that this does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

3.6. right to object

You have the right to object at any time to the storage and processing of your data, which we have collected on the basis of Article 6 (1) (f) GDPR (legitimate interest) in accordance with Article 21 GDPR, for reasons of a special situation.

3.7. Right to data portability

Upon request, we will provide you or a person responsible named by you in accordance with Article 20 (1) GDPR the following data in a common machine-readable format:

- Data collected on the basis of express consent in accordance with Article 6 Paragraph 1 Letter a GDPR or Article 9 Paragraph 2 Letter a GDPR;
- Data that we have received from you in accordance with Article 6 (1) (b) GDPR as part of existing contracts;

insofar as the data has been processed as part of an automated procedure.

3.8. How do you exercise your rights?

You can exercise your rights at any time by using the contact details below:

CloudLog UG (limited liability)

Bundenweg 31, 60320 Frankfurt, Germany

Phone: +49 69 29801991 - Mail: info@cloudlog.aero

3.9. Right of appeal to the supervisory authority in accordance with Article 77 (1) GDPR

If you suspect that your data is being processed unlawfully on our site, you can of course seek judicial clarification of the problem at any time. In addition, you have every other legal option. Irrespective of this, you have the option of contacting a supervisory authority in accordance with Article 77 (1) GDPR. You have the right to lodge a complaint pursuant to Art. 77 GDPR in the EU member state where you live, where you work and/or where the alleged infringement took place, i.e. you can choose the supervisory authority you contact from the above locations. The supervisory authority to which the complaint was lodged will then inform you of the status and the results of your submission, including the possibility of a judicial remedy in accordance with Article 78 GDPR.