

Privacy policy

Name and contact of the responsible person according to Article 4 (7) GDPR

Schreiber & Witt GbR
Gritschstraße 66
85276 Pfaffenhofen
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Security and protection of your personal data

We consider it our primary responsibility to maintain the confidentiality of the personal data you provide to us and to protect it from unauthorized access. Therefore, we apply the utmost care and state-of-the-art security standards to ensure maximum protection of your personal data.

As a company under private law, we are subject to the provisions of the European General Data Protection Regulation (GDPR) and the regulations of the German Federal Data Protection Act (BDSG). We have taken technical and organizational measures to ensure that the regulations on data protection are observed both by us and by our external service providers.

Definitions

The legislator requires that personal data be processed in a lawful manner, in good faith and in a way that is comprehensible to the data subject ("lawfulness, processing in good faith, transparency"). To ensure this, we inform you about the individual legal definitions, which are also used in this privacy policy:

1. Personal data

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2. Processing

"Processing" means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, filing, stor-

age, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

3. Restriction of processing

"Restriction of processing" means the marking of stored personal data with the aim of limiting their future processing.

4. Profiling

"Profiling" means any type of automated processing of personal data that consists of using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects relating to that natural person's job performance, economic situation, health, personal preferences, interests, reliability, behavior, location or change of location.

5. Pseudonymization

"Pseudonymization" means the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures which ensure that the personal data cannot be attributed to an identified or identifiable natural person.

6. File system

"File system" means any structured collection of personal data accessible according to specified criteria, whether such collection is maintained on a centralized, decentralized, or functional or geographic basis.

7. Responsible

"controller" means a natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its designation may be provided for by Union or Member State law.

8. Processor

"Processor" means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the Controller.

9. Receiver

"Recipient" means a natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not a third party. However, public authorities that may receive personal data in the context of a specific investigative task under Union or Member State law shall not be considered as recipients; the processing of such data by the aforementioned authorities shall be carried out in accordance with the applicable data protection rules in accordance with the purposes of the processing.

10. Third party

"Third party" means a natural or legal person, public authority, agency or other body, other than the data subject, the controller, the processor and the persons authorized to process the personal data under the direct responsibility of the controller or the processor.

11. Consent

Consent" of the data subject means any freely given specific, informed and unambiguous indication of his or her wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

Lawfulness of processing

The processing of personal data is only lawful if there is a legal basis for the processing. Legal basis for the processing can be according to Article 6 para. 1

lit. a - f GDPR can be in particular:

1. The data subject has given his/her consent to the processing of personal data concerning him/her for one or more specific purposes;
2. the processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject's request;
3. processing is necessary for compliance with a legal obligation to which the controller is subject;
4. the processing is necessary in order to protect the vital interests of the data subject or another natural person;
5. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

6. processing is necessary for the purposes of the legitimate interests of the controller or of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.

Information about the collection of personal data

(1) In the following, we inform about the collection of personal data when using our website. Personal data are e.g. name, address, e-mail addresses, user behavior.

(2) If you contact us by e-mail or via a contact form, the data you provide (your e-mail address, name and telephone number, if applicable) will be stored by us in order to answer your questions. We delete the data accruing in this context after the storage is no longer necessary, or the processing is restricted if there are legal obligations to retain data.

Collection of personal data when visiting our website

In the case of mere informational use of the website, i.e. if you do not register or otherwise transmit information to us, we only collect the personal data that your browser transmits to our server. If you wish to view our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure stability and security (legal basis is Art. 6 para. 1 p. 1 lit. f GDPR):

- IP address
- Date and time of the request
- Time zone difference from Greenwich Mean Time (GMT)
- Content of the request (concrete page)
- Access status/HTTP status code
- Data volume transferred in each case
- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

Cookies use

(1) In addition to the previously mentioned data, cookies are stored on your computer when you use our website. Cookies are small text files that are stored on your hard drive associated with the browser you are using and through which certain information flows to the body that sets the cookie. Cookies cannot execute programs or transfer viruses to your computer. They are used to make the Internet offer as a whole more user-friendly and effective.

(2) This website uses the following types of cookies, the scope and functionality of which are explained below:

- Transient cookies (for this purpose a.)
 - Persistent cookies (for this purpose b.).
1. Transient cookies are automatically deleted when you close the browser. These include in particular the session cookies. These store a so-called session ID, with which various requests of your browser can be assigned to the common session. This allows your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.
 2. Persistent cookies are automatically deleted after a specified period of time, which may differ depending on the cookie. You can delete the cookies in the security settings of your browser at any time.
 3. You can configure your browser settings according to your preferences and, for example, refuse to accept third-party cookies or all cookies. So-called "third party cookies" are cookies that have been set by a third party, consequently not by the actual website you are currently on. We would like to point out that by deactivating cookies you may not be able to use all the functions of this website.
 4. We use cookies to identify you for subsequent visits if you have an account with us. Otherwise, you would have to log in again for each visit.

(3) We use the following cookies:

apai_session

Category: technically necessary

Storage period: as long as you are logged in, maximum 30 days

Content: random string

Purpose: identification of your login status

[Use of local storage](#)

(1) In addition to the use of cookies, we also store information in so-called local storage. Here, data is stored locally in your browser and can be read for subsequent visits. In contrast to cookies, entries in local storage are not automatically transferred to our server with each request.

(2) We use local storage for the following purposes:

- a. technically necessary information (e.g. for login)

(3) We set the following entries in the Local Storage:

loggedIn

Category: technically necessary

Storage period: as long as you are logged in, maximum 30 days

Content: true or false

Purpose: Identification of your login status

auth0AuthString

Category: technically necessary

Storage duration: during the login process

Content: random string

Purpose: to secure your login process

[Other functions and offers of our website](#)

(1) In addition to the purely informational use of our website, we offer various services that you can use if you are interested. For this purpose, you usually have to provide further personal data, which we use to provide the respective service and for which the aforementioned data processing principles apply.

(2) In some cases, we use external service providers to process your data. These have been carefully selected and commissioned by us, are bound by our instructions and are regularly monitored.

(3) Furthermore, we may pass on your personal data to third parties if we offer participation in promotions, competitions, conclusion of contracts or similar services together with partners. You will receive more information about this when you provide your personal data or below in the description of the offer.

(4) If our service providers or partners are located in a country outside the European Economic Area (EEA), we will inform you about the consequences of this circumstance in the description of the offer.

Customer account

(1) To use our services, you must create a customer account. Here, the data you provide will be stored revocably.

(2) For the registration for a customer account we use the so-called double opt-in procedure. This means that after your registration we will send you an e-mail to the specified e-mail address in which we ask you to confirm that you wish to create a customer account. If you do not confirm your registration within 24 hours, your information will be blocked and automatically deleted after one month.

(3) We use the authentication service Auth0 for secure login to our website. The provider is Auth0 Inc, 10900 NE 8th St, Bellevue, Washington 98004.

(4) Your user account data is stored on servers within the EU.

Conclusion of subscriptions

(1) If you wish to take out a subscription for the use of our services, it is necessary for the conclusion of the contract that you provide your personal data, which we require for the processing of your subscription. Mandatory information required for this purpose is marked separately, other information is voluntary. We process the data you provide to process your order. For this purpose, we may pass on your payment data to our house bank. The legal basis for this is Art. 6 para. 1 p. 1 lit. b GDPR.

(2) We are obliged by commercial and tax law to store your address, payment and order data for a period of ten years. However, we will restrict processing after two years, i.e. your data will only be used to comply with legal obligations.

(3) To prevent unauthorized access by third parties to your personal data, especially financial data, the ordering process is encrypted using TLS technology.

Data protection provisions when using external payment service providers

Our order process is conducted by our online reseller Paddle.com. Paddle.com is the Merchant of Record for all our orders. Paddle provides all customer service inquiries and handles returns.

The provider is Paddle.com Market Limited; Judd House; 18-29 Mora Street; London, EC1V 8BT; United Kingdom.

To subscribe, you must agree to Paddle's Terms and Conditions and Privacy Policy. We do not store any payment information from you. You can find Paddle's privacy policy here: <https://www.paddle.com/privacy>

Use of the GPT language model

(1) To generate a response to your requests in the context of the conversation within our application, we use the language model GPT, which is based on so-called artificial intelligence. Therefore, we transfer your entered text or their speech input transferred to text (see "Use of text-to-speech and speech-to-text") to GPT.

(2) The Provider is OpenAI, L.L.C.; 3180 18th St; San Francisco, CA 94110.

(3) OpenAI's privacy policy can be found here: <https://openai.com/policies/privacy-policy>

Use of text-to-speech and speech-to-text

(1) We use Microsoft Azure services to transfer speech to text and text to speech. For this purpose, your voice input and the text output of GPT are transferred to Microsoft Azure servers. The server location is within the EU.

(2) The Provider is Microsoft Corporation; Redmond, WA 98052-6399; USA.

(3) Microsoft's privacy policy can be found here: <https://privacy.microsoft.com/privacystatement>

Newsletter

(1) With your consent, you can subscribe to our newsletter, with which we inform you about our current interesting offers. The advertised goods and services are named in the declaration of consent.

(2) For the registration to our newsletter we use the so-called double opt-in procedure. This means that after your registration we will send you an e-mail to the specified e-mail address in which we ask you to confirm that you wish to receive the newsletter. If you do not confirm your registration within 24 hours, your information will be blocked and automatically deleted after one month. In addition, we store your respective IP addresses used and times of registration and confirmation. The purpose of this procedure is to be able to prove your registration and, if necessary, to clarify a possible misuse of your personal data.

(3) The only mandatory information for sending the newsletter is your e-mail address. The provision of further, separately marked data is voluntary and will be used to address you personally. After your confirmation, we store your e-mail address for the purpose of sending the newsletter. The legal basis is Art. 6 para. 1 p. 1 lit. a GDPR.

(4) You can revoke your consent to the sending of the newsletter at any time and unsubscribe from the newsletter. You can declare the revocation by clicking on the link provided in each newsletter e-mail, by e-mail to info@goaccesspoint-ai.com or by sending a message to the contact details provided in the imprint.

Children

Our offer is basically directed at adults. Persons under the age of 18 should not transmit any personal data to us without the consent of their parents or legal guardians.

Rights of the data subject

(1) Revocation of consent

If the processing of personal data is based on a granted consent, you have the right to revoke the consent at any time. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

To exercise the right of withdrawal, you can contact us at any time.

(2) Right to confirmation

You have the right to request confirmation from the controller as to whether we are processing personal data relating to you. You can request the confirmation at any time using the contact details above.

(3) Right to information

If personal data is processed, you can request information about this personal data and about the following information at any time:

1. the purposes of processing;
2. the categories of personal data that are processed;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular in the case of recipients in third countries or international organizations;
4. if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration;
5. the existence of a right to rectification or erasure of personal data concerning you or to restriction of processing by the controller or a right to object to such processing;

6. the existence of a right of appeal to a supervisory authority;
7. if the personal data are not collected from the data subject, any available information on the origin of the data;
8. the existence of automated decision-making, including profiling, pursuant to Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved and the scope and intended effects of such processing for the data subject.

If personal data is transferred to a third country or to an international organization, you have the right to be informed about the appropriate safeguards pursuant to Article 46 of the GDPR in connection with the transfer. We will provide a copy of the personal data that is the subject of the processing. For any additional copies you request person, we may charge a reasonable fee based on the administrative costs. If you make the request electronically, the information shall be provided in a commonly used electronic format, unless it specifies otherwise. The right to receive a copy under paragraph 3 shall not interfere with the rights and freedoms of other persons.

(4) Right to rectification

You have the right to request that we correct any inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data - also by means of a supplementary declaration.

(5) Right to erasure ("right to be forgotten")

You have the right to request the controller to delete personal data concerning you without undue delay, and we are obliged to delete personal data without undue delay, if one of the following reasons applies:

1. The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
2. The data subject revokes the consent on which the processing was based pursuant to Article 6(1)(a) or Article 9(2)(a) of the GDPR and there is no other legal basis for the processing.
3. The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
4. The personal data have been processed unlawfully.
5. The deletion of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject.
6. The personal data was collected in relation to information society services offered pursuant to Article 8(1) GDPR.

If the controller has disclosed the personal data to the public and is obliged to erase it pursuant to paragraph 1, it shall take reasonable measures, including technical measures, having regard to the available technology and the cost of implementation, to inform data controllers which process the personal data that a data subject has requested that they erase all links to or copies or replications of such personal data.

The right to erasure ("right to be forgotten") does not exist insofar as the processing is necessary:

- to exercise the right to freedom of expression and information;
- for compliance with a legal obligation which requires processing under Union or Member State law to which the controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the field of public health pursuant to Article 9(2)(h) and (i) and Article 9(3) of the GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of the GDPR, insofar as the right referred to in paragraph 1 is likely to render impossible or seriously prejudice the achievement of the purposes of such processing, or
- for the assertion, exercise or defense of legal claims.

(6) Right to restriction of processing

You have the right to request us to restrict the processing of your personal data if one of the following conditions is met:

1. the accuracy of the personal data is contested by the data subject for a period enabling the controller to verify the accuracy of the personal data,
2. the processing is unlawful and the data subject refuses the erasure of the personal data and instead requests the restriction of the use of the personal data;
3. the controller no longer needs the personal data for the purposes of processing, but the data subject needs them for the establishment, exercise or defense of legal claims, or
4. the data subject has objected to the processing pursuant to Article 21(1) of the GDPR, as long as it is not yet established whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted in accordance with the above conditions, such personal data shall - apart from being stored - only be processed with the consent of the data subject or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of substantial public interest of the Union or a Member State.

In order to exercise the right to restrict the processing, the data subject may contact us at any time using the contact details provided above.

(7) Right to data portability

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, and you have the right to transfer this data to another controller without hindrance from the controller to whom the personal data was provided, provided that:

1. the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) or on a contract pursuant to Article 6(1)(b) GDPR and
2. the processing is carried out with the help of automated procedures.

When exercising the right to data portability pursuant to paragraph 1, you have the right to obtain that the personal data be transferred directly from one controller to another controller, where technically feasible. The exercise of the right to data portability does not affect the right to erasure ("right to be forgotten"). This right does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

(8) Right of objection

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(e) or (f) GDPR; this also applies to profiling based on these provisions. The controller shall no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

If personal data are processed for the purpose of direct marketing, you have the right to object at any time to processing of personal data concerning you for such marketing; this also applies to profiling insofar as it is related to such direct marketing. If you object to the processing for direct marketing purposes, the personal data will no longer be processed for these purposes.

In connection with the use of information society services, notwithstanding Directive 2002/58/EC, you may exercise your right to object by means of automated procedures using technical specifications.

You have the right to object, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1), unless the processing is necessary for the performance of a task carried out in the public interest.

You can exercise the right to object at any time by contacting the respective person responsible.

(9) Automated decisions in individual cases including profiling

You have the right not to be subject to a decision based solely on automated processing - including profiling - which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision:

1. is necessary for the conclusion or performance of a contract between the data subject and the controller,
2. is permitted by Union or Member State legislation to which the controller is subject and that legislation contains appropriate measures to safeguard the rights and freedoms and legitimate interests of the data subject, or
3. takes place with the express consent of the data subject.

The controller shall take reasonable steps to safeguard the rights and freedoms as well as the legitimate interests of the data subject, which shall include, at least, the right to obtain the intervention of a person on the part of the controller, to express his or her point of view and to contest the decision.

The data subject may exercise this right at any time by contacting the respective data controller.

(10) Right to complain to a supervisory authority

They shall also have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular in the Member State of their residence, place of work or the place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

(11) Right to effective judicial remedy

Without prejudice to any available administrative or non-judicial remedy, including the right to lodge a complaint with a supervisory authority pursuant to [Article 77](#) GDPR, you shall have the right to an effective judicial remedy if it considers that your rights under this Regulation have been infringed as a result of the processing of your personal data not in compliance with this Regulation.

Existence of automated decision making

We do not use automated decision-making or profiling.

Data Processors

We use external service providers (order processors), e.g. for payment processing. A separate order data processing agreement has been concluded with the service provider to ensure the protection of your personal data.

We cooperate with the following service providers:

User authentication

Auth0 Inc.
10900 NE 8th St
Bellevue, Washington 98004
USA

Online reseller / Merchant of Record

Paddle.com Market Limited
Judd House, 18-29 Mora Street
London, EC1V 8BT
United Kingdom

Text-to-Speech / Speech-to-Text / Web Hosting

Microsoft Corporation
Redmond, WA 98052-6399
USA

Language model

OpenAI, L.L.C..
3180 18th St
San Francisco, CA 94110
USA

Customer relations management

HubSpot, Inc.
25 First Street
Cambridge, MA 02141
USA