# Privacy Policy (Website)

As of: 08.09.2026

## 1. Service provider and responsible person in terms of the GDPR

Responsible provider in terms of data protection law for the BillMore websites is:

BillMore GmbH
Kolpingstraße 14
73433 Aalen
Register Court: HRB 735402, Ulm
VAT ID: DE313425388
CEO: Steffen Keller

Phone: +49 7361 9992490

The provider is currently not obliged to appoint a data protection officer. You can reach our contact person for data protection matters at privacy@billmore.de, or by mail to the above address with the address suffix "Data Protection".

## 2. General

Your personal data (hereinafter referred to as “data”) will only be processed by the operator (hereinafter also referred to as “BillMore”, “we” or “us”) to the extent necessary and for the purpose of providing the billmore.com, billmore.de and docs.billmore.de websites.

With the following data protection declaration, we inform you in particular about the type, scope, purpose, duration and legal basis of the processing of personal data, insofar as we decide either alone or together with others on the purposes and means of processing. In addition, we inform you below about the third-party components we use for optimization purposes and to increase the quality of use, insofar as other providers process data under their own responsibility.

## 3. Information on the collection of personal data

(1) In the following, we provide information about the collection of personal data when using our website. Personal data is all data that can be related to you personally, e.g. name, address, e-mail addresses, user behavior.

(2) When you contact us by e-mail or via a contact form, we will store your e-mail address and, if provided by you, your name and telephone number in order to answer your questions. We delete the data arising in this context after storage is no longer required or - in the case of statutory retention obligations - restrict processing.

(3) If we use contracted service providers for individual functions of our website or wish to use your data for advertising purposes, we will inform you in detail below about the respective processes. We will also state the specified criteria for the storage period.

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

## 4. Your rights

(1) You have the following rights with respect to the personal data concerning you:

- Right of information,
- Right of correction or deletion,
- Right to limit processing,
- Right to object to the processing,
- Right of data transferability,
- Right to withdraw consent given (Art. 7(3) GDPR).

(2) Insofar as we process your data on the basis of consent, you have the right to withdraw this consent at any time with effect for the future (Art. 7(3) GDPR). Giving consent is always voluntary; you will not suffer any disadvantages if you refuse or withdraw consent. The lawfulness of the processing carried out up to the withdrawal remains unaffected by the withdrawal. For the withdrawal of consents to cookies and similar technologies, see Sections 5 and 6.

(3) You also have the right to complain to a data protection supervisory authority about the processing of your personal data in our company.

## 5. Use of cookies

(1) When using our website, cookies are stored on your device. Cookies are small text files saved in your device's memory. Through cookies, the entity that places the cookie (in this case, us) can receive certain information. Cookies cannot run programs or transmit viruses to your device. They are intended to make our website more user-friendly and efficient overall. This particularly includes session cookies. These store a so-called session ID, which can be used to assign multiple requests from you. This way, your device can be recognized if you use our website again. Session cookies are deleted when you log out.

(2) When you visit our website, a consent banner (see Section 6) asks for your consent to the use of cookies that are not technically necessary. You can withdraw consents you have given at any time with effect for the future and change your selection. To do so, open the cookie settings via the withdrawal icon permanently displayed at the bottom of the page or via the "Cookie settings" link at the end of the page. Alternatively, you can also prevent the transmission of cookies via your internet browser settings and delete cookies that have already been stored.

(3) The legal basis for storing information on your device and accessing such information is, in the case of technically necessary cookies, Section 25(2) no. 2 of the German Telecommunications Digital Services Data Protection Act (TDDDG); the subsequent processing of personal data is based on Art. 6(1) sentence 1 lit. f) GDPR. In the case of cookies that are not technically necessary, the legal basis is Section 25(1) TDDDG in conjunction with your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR.

## 6. Consent management with Cookiebot

(1) To obtain, manage and document your consents, we use the consent management platform "Cookiebot" on our websites, a service of Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark ("Usercentrics"). When you first visit our website, a consent banner is displayed through which you can grant or refuse your consent to the storage of cookies and similar technologies, either in total or separately for the categories "Necessary", "Preferences", "Statistics" and "Marketing". Cookies that are not technically necessary are only set after you have given your express consent (opt-in); non-necessary categories are not pre-selected.

(2) Cookiebot stores your decision in the technically necessary cookie "CookieConsent" with a lifetime of 12 months on your device. In order to prove consent (Art. 7(1) GDPR), Usercentrics logs your decision for a period of 12 months; the data processed includes in particular your truncated IP address, the date and time of your decision, browser information, the URL from which the decision was sent, an anonymous, random and encrypted key, and your consent status. The processing takes place exclusively within the European Union. We have concluded a data processing agreement with Usercentrics pursuant to Art. 28 GDPR.

(3) The legal basis for storing the "CookieConsent" cookie is Section 25(2) no. 2 of the German Telecommunications Digital Services Data Protection Act (TDDDG), as the cookie is strictly necessary for the consent management requested by you. The legal basis for logging the consent is Art. 6(1) sentence 1 lit. c) GDPR in conjunction with our obligation to demonstrate consent under Art. 7(1) GDPR, as well as Art. 6(1) sentence 1 lit. f) GDPR (legitimate interest in a legally compliant design of our website).

(4) Third-party provider information: Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark. Privacy policy: https://www.cookiebot.com/en/privacy-policy/.

## 7. Creation of Log Files

(1) When you use our website, we automatically collect certain technical data in so-called log files. This data is necessary to ensure the security and stability of our systems and to optimize our services. In particular, the information collected includes:

- IP address of the accessing device
- Date and time of access
- Name and URL of the requested file
- Browser and operating system used
- Amount of data transferred
- Access status/HTTP status code

(2) The processing of this data takes place in accordance with Art. 6(1) sentence 1 lit. f) GDPR to protect our legitimate interest in ensuring technical security and optimizing our services. The stored log data is automatically deleted after no more than 30 days unless a longer retention period is required for error analysis or security reasons.

## 8. Links to other websites

Our service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be taken directly to the respective third party's website, which may involve the transmission of personal data. We strongly recommend that you read the privacy policies of every website you visit.

We have no control over the content, privacy policies, and practices of third-party websites or services and assume no liability in this regard.

## 9. Use of Amazon Web Services (AWS)

We use the services of Amazon Web Services EMEA SARL to ensure technically error-free and highly available services.

Third-Party Provider Information: Amazon Web Services EMEA SARL, 38 avenue John F. Kennedy, L-1855, Luxemburg, Fax: + 352 2789 0057; Terms of Use: https://aws.amazon.com/agreement/, Privacy Policy: https://aws.amazon.com/privacy/, Further Information on GDPR Compliance: https://aws.amazon.com/compliance/gdpr-center/.

In exceptional cases where personal data may be transferred by AWS to third countries and authorities could potentially access the data stored by the provider, we have concluded a data processing agreement with the provider to ensure an appropriate level of protection. The provider also assures that it has concluded contracts

with its subcontractors in non-European countries based on the EU Standard Contractual Clauses in accordance with Art. 46(2)(c) GDPR, in order to maintain the same level of protection.

Furthermore, on July 10, 2023, the European Commission adopted the adequacy decision for the EU-U.S. Data Privacy Framework (DPF). Based on this adequacy decision, data transfers to companies certified under the DPF may be carried out pursuant to Art. 44 and Art. 45 GDPR. AWS is one of those certified companies.

The legal basis for processing is Art. 6(1) sentence 1 lit. b) GDPR, as well as Art. 49(1) sentence 1 lit. b) GDPR for the use of Amazon AWS, including the involvement of subcontractors by Amazon. The use of AWS is necessary for fulfilling the contract to provide a secure and highly available online service.

## 10. Use of the Google Tag Manager

(1) We use the Google Tag Manager on our website, a service of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). The Google Tag Manager serves exclusively to manage and deploy website tags, in particular for the services described in the following sections. It does not itself set any cookies and does not collect personal data for its own purposes; however, when the service is loaded, your IP address is transmitted to Google for technical reasons.

(2) Tags requiring consent are only triggered via the Google Tag Manager after you have given the respective consent via our consent banner (see Section 6).

(3) The legal basis for the use of the Google Tag Manager is our legitimate interest in an efficient, secure and clear integration and management of the services used pursuant to Art. 6(1) sentence 1 lit. f) GDPR.

(4) For the exceptional cases in which personal data is transferred to Google LLC in the USA, the statements in Section 11 apply accordingly; Google LLC is certified under the EU-U.S. Data Privacy Framework (DPF). Privacy policy: https://policies.google.com/privacy?hl=en.

## 11. Use of Google Analytics 4

(1) Provided you have given your consent via our consent banner (category "Statistics"), we use Google Analytics 4, a web analytics service of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). The service is used to measure the reach of our website and to analyze user behavior in order to improve our offering.

(2) For this purpose, Google Analytics 4 sets the cookies "_ga" and "_ga_9EZEP6Y9PH", each with a lifetime of 2 years, on your device in order to recognize your browser on future visits. The data collected includes in particular the pages visited, the duration of the visit, the referring page (referrer), the browser and device type used, and your approximate location. According to Google, IP addresses of users in the European Union are only used for coarse geographic derivation and are not logged or stored.

(3) Data stored at user and event level is automatically deleted from our Google Analytics account after 14 months.

(4) Our Google Analytics account is linked to our Google Ads account. If you have additionally consented to the "Marketing" category, audiences (so-called remarketing audiences) may be created from the analytics data and transferred to Google Ads for advertising purposes (see Section 12).

(5) The legal basis for storing the cookies and reading the information contained in them is Section 25(1) TDDDG; the legal basis for the subsequent processing of personal data is your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR. You can withdraw your consent at any time with effect for the future via the cookie settings (see Sections 5 and 6).

(6) For the exceptional cases in which personal data is transferred to Google LLC in the USA and US authorities may be able to access the data stored by Google, we have concluded a data processing agreement with Google including Standard Contractual Clauses pursuant to Art. 46(2)(c) GDPR. In addition, Google LLC is certified under the EU-U.S. Data Privacy Framework (DPF), so that transfers may take place on the basis of the adequacy decision of the European Commission of July 10, 2023 pursuant to Art. 44, 45 GDPR.

(7) Third-party provider information: Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland. Terms of use: https://marketingplatform.google.com/about/analytics/terms/us/, privacy policy: https://policies.google.com/privacy?hl=en.

## 12. Use of Google Ads

(1) Provided you have given your consent via our consent banner (category "Marketing"), we use the online advertising program "Google Ads" of Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland ("Google") on our website. We use the service for three purposes: to measure the success of our advertisements (conversion measurement), to create audiences for interest-based advertising (remarketing), and for the subsequent server-side import of conversions.

(2) Conversion measurement: If you click on an ad placed by Google, the Google Ads tag sets the cookies "_gcl_au" and "_gcl_aw", each with a lifetime of 90 days, on your device. If you subsequently carry out a certain action (e.g. a registration), we and Google can recognize that the ad was successful. We do not learn your identity, but only the total number of users who responded to an ad.

(3) Remarketing / audience building: The Google Ads tag also records your usage behavior on our website and assigns your browser to so-called remarketing lists. On this basis, interest-based advertising can be displayed to you in the Google advertising network (e.g. in Google Search or on websites of Google partners).

(4) Server-side conversion import: If you reach our website via a Google ad, the URL accessed contains a pseudonymous click identifier (so-called "GCLID" or "GBRAID"/"WBRAID"). If you have consented to the

"Marketing" category and subsequently register in our web application, we store this click identifier together with your documented consent status in our system and subsequently transmit the conversion to Google server-side via the Google Ads API. In this way, events occurring after your website visit (e.g. the conclusion of a subscription) can also be attributed to an ad. The click identifier is deleted as soon as it is no longer required for these purposes, but at the latest 90 days after its collection.

(5) For exceptional cases in which personal data is transferred to the USA to Google LLC, based in California, USA, and where US authorities may access the data stored by Google, the level of protection can be guaranteed through the conclusion of data processing agreements with standard contractual clauses pursuant to Art. 46 (2) (c) GDPR. We have concluded a corresponding data processing agreement with Google.

(6) Furthermore, on July 10, 2023, the European Commission adopted the adequacy decision for the EU-U.S. Data Privacy Framework (DPF). On the basis of this adequacy decision, data may be transferred in accordance with Art. 44, 45 to companies that have been certified under the DPF. This is the case with Google.

(7) The legal basis for storing the cookies and reading the click identifier is Section 25(1) of the German Telecommunications Digital Services Data Protection Act (TDDDG); the legal basis for the associated processing of personal data – including the server-side storage and transmission of the click identifier to Google – is your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR. You can withdraw your consent at any time with effect for the future via the cookie settings (see Sections 5 and 6).

(8) Third-party provider information: Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. Terms of use: https://policies.google.com/terms?hl=en, privacy policy: https://policies.google.com/privacy?hl=en.

### 13. Use of Microsoft Advertising (UET)

(1) Provided you have given your consent via our consent banner (category "Marketing"), we use Microsoft Advertising with the "Universal Event Tracking" (UET) feature on our website, a service of Microsoft Ireland Operations Ltd., One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland ("Microsoft"). The service is used to measure the success of our advertisements in Microsoft Search (Bing) and the Microsoft advertising network (conversion measurement) and to create audiences for interest-based advertising (remarketing).

(2) For this purpose, the UET tag sets the cookies "_uetsid" (lifetime 1 day) and "_uetvid" (lifetime approx. 390 days) on your device. In addition, Microsoft may set or read the "MUID" cookie, which serves to recognize your browser across Microsoft services.

(3) Server-side conversion import: If you reach our website via a Microsoft ad, the URL accessed contains a pseudonymous click identifier (so-called "msclkid"). If you have given your consent and subsequently register in

our web application, we store this identifier and subsequently transmit the conversion to Microsoft server-side. Section 12(4) applies accordingly, including the retention period stated there.

(4) The legal basis for storing the cookies and reading the click identifier is Section 25(1) TDDDG; the legal basis for the associated processing of personal data – including the server-side storage and transmission of the click identifier to Microsoft – is your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR. You can withdraw your consent at any time with effect for the future via the cookie settings (see Sections 5 and 6).

(5) For the exceptional cases in which personal data is transferred to Microsoft Corporation in the USA and US authorities may be able to access the data stored by Microsoft, we have agreed Standard Contractual Clauses with Microsoft pursuant to Art. 46(2)(c) GDPR. In addition, Microsoft Corporation is certified under the EU-U.S. Data Privacy Framework (DPF), so that transfers may take place on the basis of the adequacy decision of the European Commission of July 10, 2023 pursuant to Art. 44, 45 GDPR.

(6) Third-party provider information: Microsoft Ireland Operations Ltd., One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Privacy policy: https://privacy.microsoft.com/en-us/privacystatement.

## 14. Use of the Meta Pixel and the Meta Conversions API

(1) Provided you have given your consent via our consent banner (category "Marketing"), we use the Meta Pixel and the Meta Conversions API on our website, services of Meta Platforms Ireland Ltd., Merrion Road, Dublin 4, Ireland ("Meta"). The services are used to measure the success of our advertisements on Facebook and Instagram (conversion measurement) and to create audiences for interest-based advertising (so-called custom audiences / remarketing).

(2) For this purpose, the Meta Pixel sets the cookies "_fbp" and "_fbc", each with a lifetime of 90 days, on your device and records events such as page views and registrations. In addition, we transmit the same events to Meta server-side via the Meta Conversions API, including the pseudonymous click identifier ("fbclid") and technical details of your visit.

(3) Joint controllership: For the collection of data on our website and its transmission to Meta, we and Meta are joint controllers within the meaning of Art. 26 GDPR. We have set out our respective obligations in an agreement on joint processing with Meta; the essence of this agreement is available at https://www.facebook.com/legal/controller_addendum. According to this agreement, Meta is responsible in particular for providing you with the information pursuant to Art. 13, 14 GDPR regarding the joint processing and for enabling you to exercise your data subject rights under Art. 15–20 GDPR with regard to the data stored by Meta. You may nevertheless also assert your rights against us (Art. 26(3) GDPR). The subsequent processing of the data by Meta for its own purposes is carried out under Meta's sole responsibility under data protection law.

(4) The legal basis for storing the cookies and reading the click identifier is Section 25(1) TDDDG; the legal basis for the associated processing of personal data – including the server-side transmission via the Conversions API – is your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR. You can withdraw your consent at any time with effect for the future via the cookie settings (see Sections 5 and 6).

(5) For the exceptional cases in which personal data is transferred to Meta Platforms, Inc. in the USA and US authorities may be able to access the data stored by Meta, Meta has concluded Standard Contractual Clauses pursuant to Art. 46(2)(c) GDPR. In addition, Meta Platforms, Inc. is certified under the EU-U.S. Data Privacy Framework (DPF), so that transfers may take place on the basis of the adequacy decision of the European Commission of July 10, 2023 pursuant to Art. 44, 45 GDPR.

(6) Third-party provider information: Meta Platforms Ireland Ltd., Merrion Road, Dublin 4, Ireland. Privacy policy: https://www.facebook.com/privacy/policy.

## 15. Use of the OpenAI Ads Pixel and the OpenAI Conversions API

(1) Provided you have given your consent via our consent banner (category "Marketing"), we use the OpenAI Ads measurement pixel and the OpenAI Conversions API on our website, services of OpenAI Ireland Ltd., 1st Floor, The Liffey Trust Centre, 117-126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland ("OpenAI"). The services are used to measure the success of our advertisements in ChatGPT (conversion measurement). We do not use these services to create audiences for interest-based advertising (remarketing).

(2) If you click on one of our ads in ChatGPT, the URL accessed contains a pseudonymous click identifier (so-called "oppref"). The pixel, which is loaded via the Google Tag Manager (Section 10), stores this click identifier and a randomly generated browser identifier in cookies on your device (lifetime no more than 1 year) and records page views and clicks on links to our web application. These events are transmitted to OpenAI together with the identifiers, the address of the page visited, your IP address and technical information about your browser and device. The cookies currently set and their lifetimes are listed in our cookie declaration, which you can access via the cookie settings (Sections 5 and 6).

(3) Server-side conversion import: If you have given your consent and subsequently register in our web application, we store the click identifier "oppref" and subsequently transmit the start of the free trial and the conclusion of a paid subscription to OpenAI server-side via the OpenAI Conversions API. The data transmitted comprises the click identifier, the type of event, the time, the amount in the case of a subscription, and an event identifier assigned by us that prevents double counting. We do not transmit your name, e-mail address or other contact details. Section 12(4) applies accordingly, including the retention period of no more than 90 days stated there.

(4) Responsibility: We are responsible for the collection of the data on our website and its transmission to OpenAI. OpenAI processes the data received as an independent controller to measure and optimize the delivery

of ads in ChatGPT and for its own purposes as set out in its privacy policy. You may exercise your rights under Art. 15 et seq. GDPR with regard to the data stored by OpenAI directly against OpenAI.

(5) The legal basis for storing the cookies and reading the click identifier is Section 25(1) TDDDG; the legal basis for the associated processing of personal data – including the server-side storage and transmission of the click identifier to OpenAI – is your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR. You can withdraw your consent at any time with effect for the future via the cookie settings (see Sections 5 and 6).

(6) OpenAI also processes the data in the USA, in particular through OpenAI OpCo, LLC, San Francisco, and through the infrastructure providers used by OpenAI. For these transfers, we have agreed the European Commission's Standard Contractual Clauses (Module 1: controller-to-controller transfers) pursuant to Art. 46(2)(c) GDPR with OpenAI as part of the OpenAI Ad Tools Data Processing Addendum.

(7) Third-party provider information: OpenAI Ireland Ltd., 1st Floor, The Liffey Trust Centre, 117-126 Sheriff Street Upper, Dublin 1, D01 YC43, Ireland. Privacy policy: https://openai.com/policies/eu-privacy-policy/, information on data processing via the advertising tools: https://openai.com/policies/ad-tools-dpa/.

### 16. Transfer of click identifiers to our web application

(1) Our websites link to our web application app.billmore.com, which is subject to its own privacy policy. If you have consented to the "Marketing" category and your visit results from a click on one of our advertisements, we append the respective pseudonymous click identifier as URL parameters to these links. These parameters are not stored on your device.

(2) The click identifier is used in our web application exclusively for the conversion attribution described in Sections 12 and 13. If you have not given your consent, no click identifiers are passed on and no conversion attribution takes place.

(3) The legal basis is your consent pursuant to Art. 6(1) sentence 1 lit. a) GDPR.

### 17. Use of Vercel

We use services from Vercel Inc. to host our website. By using a Content Delivery Network (CDN), website content can be retrieved quickly and efficiently. For this purpose, your IP address is transmitted to the CDN, and log files are created (see Section 7). This service is necessary to provide technically error-free and highly available services.

Third-Party Provider Information: Vercel Inc.,440 N Barranca Avenue #4133, Covina, CA 91723, United States. Terms of Use: https://vercel.com/legal/terms, Privacy Policy: https://vercel.com/legal/privacy-policy, Additional Information on Data Processing Agreements: https://vercel.com/legal/dpa.

If data is processed via "Vercel Functions," the Frankfurt region is used. In exceptional cases where personal data may be transferred to Vercel in the USA and U.S. authorities could potentially access the data stored by the provider, we have concluded a data processing agreement with the provider based on the EU Standard Contractual Clauses pursuant to Art. 46(2)(c) GDPR, to ensure an adequate level of protection.

Furthermore, on July 10, 2023, the European Commission adopted the adequacy decision for the EU-U.S. Data Privacy Framework (DPF). Under this adequacy decision, data can be transferred pursuant to Art. 44 and Art. 45 GDPR to companies certified under the DPF. Vercel is one of those certified companies.

The legal basis for processing is Art. 6(1) sentence 1 lit. b) GDPR, as well as Art. 49(1) sentence 1 lit. b) GDPR for the use of Vercel, including the involvement of Vercel's subcontractors. The use of Vercel is necessary for contract fulfillment to reliably provide the online services.

Vercel Web Analytics: For the statistical analysis of the use of our website, we also use Vercel Web Analytics, a service of Vercel Inc. The service works without cookies; no information is stored on your device and no information stored there is accessed. Your device is not recognized beyond the individual visit. Only aggregated information is collected, such as pages visited, referrer URL, browser and device type, operating system and approximate country of origin; your full IP address is not stored permanently.

The legal basis for this reach measurement is Art. 6(1) sentence 1 lit. f) GDPR; our legitimate interest lies in the statistical analysis and optimization of our online offering. Consent pursuant to Section 25(1) TDDDG is not required, as no information is stored on or read from your device. You have the right to object to this processing at any time on grounds relating to your particular situation (Art. 21(1) GDPR).

### 18. Use of Zendesk

We use the Zendesk ticketing system for the efficient handling of customer inquiries. When you use this system, incoming emails, their content, and any additional data you voluntarily provide will be forwarded to Zendesk in order to record, process, and respond to your inquiry promptly. The data is processed in a data center in Ireland.

Third-Party Provider Information: Zendesk, Inc.,1019 Market Street, Suite 600, San Francisco, CA 94103 United States; Terms of Use: https://www.zendesk.com/company/agreements-and-terms/main-services-agreement/, Privacy Policy: https://www.zendesk.com/company/agreements-and-terms/privacy-notice/.

In exceptional cases where personal data may be transferred by Zendesk to third countries and authorities could potentially access the data stored by the provider, we have concluded a data processing agreement with the provider to ensure an appropriate level of protection. The provider also assures that it has concluded contracts with its subcontractors in non-European countries based on the EU Standard Contractual Clauses in accordance with Art. 46(2)(c) GDPR, in order to maintain the same level of protection.

Furthermore, on July 10, 2023, the European Commission adopted the adequacy decision for the EU-U.S. Data Privacy Framework (DPF). Under this adequacy decision, data can be transferred pursuant to Art. 44 and Art. 45 GDPR to companies certified under the DPF. Zendesk is one of those certified companies.

The legal basis for this processing is the performance of a contractual relationship pursuant to Art. 6(1) sentence 1 lit. b) GDPR, as well as our legitimate interests in optimizing our customer service pursuant to Art. 6(1) sentence 1 lit. f) GDPR.

### 19. Use of GitBook

(1) We use the service GitBook to provide our online documentation at https://docs.billmore.de. GitBook enables us to present guides and technical documentation in a clear and user-friendly manner. When you access our documentation pages, your IP address is transmitted to GitBook and log files are created (see Section 7). GitBook stores and processes data on servers in the USA.

(2) When using our documentation pages, GitBook sets cookies on your device. In addition to technically necessary cookies (e.g. session cookies), GitBook uses cookies to analyze web traffic. Technically necessary cookies serve to provide and ensure the functionality of the service; the legal basis for this is Art. 6(1)(f) GDPR. Cookies for the analysis of web traffic are only set with your explicit consent; the legal basis for this is Art. 6(1)(a) GDPR.

(3) Third-party provider information: GitBook Inc., a Delaware corporation, USA. Terms of Service: https://policies.gitbook.com/terms, Privacy Policy: https://policies.gitbook.com/privacy-and-security/statement.

(4) In cases where personal data is transferred to GitBook in the USA, and US authorities may potentially access the data stored by the provider, a data processing agreement based on EU Standard Contractual Clauses pursuant to Art. 46(2)(c) GDPR has been concluded with the provider to ensure an adequate level of data protection.

(5) Data collected by GitBook in connection with the use of our documentation pages will be deleted as soon as it is no longer required for the purposes for which it was collected. Further information on data retention periods can be found in GitBook's privacy policy at the link provided above.

(6) The legal basis for providing the documentation via GitBook is our legitimate interest in the technically sound and user-friendly provision of our documentation pursuant to Art. 6(1)(f) GDPR.