



## **Data Security Policy**

Organizations need to keep their data and information safe—safe from theft, loss, abuse and prying eyes. Users have a reasonable expectation of (and in some places a legal claim to) data privacy and data security.

Sharpe Group takes a comprehensive approach to security, helping protect organizations, users, files and folders. Our approach encrypts data at rest and in transfer, and our Privacy-by-Design, Zero-Knowledge-Architecture as well as optional on-premises hosting make Sharpe Group the safe choice for at-risk data. Further, our approach authenticates using multiple auth factors and can integrate with existing identity providers. Thorough permissions management and policy enforcement as well as extensive logging make sure access is traceable and limited to eligible users.

When sharing files or folders with Sharpe Group, these do not leave your organization's private, encrypted, hosted cloud. Instead, recipients must authenticate so your organization knows who accessed which file and when. If sending out public links, you can optionally set an expiration date and a password. For collaborating in real time while also making sure documents stay within your organization's data center, Sharpe Group integrates with on-premises installations of ONLYOFFICE, Collabora and Microsoft Office Online Server. Using Secure View, office documents and PDFs can be provided as "read-only" with comprehensive restrictions and watermarks to create a virtual data room.

You retain the right to request information about your stored data, its origin, its recipients and the purpose of its collection at no additional cost to you. You also have the right to request that it be corrected, blocked or deleted. You can contact us at any time using the address given in the legal notice if you have further questions about the issue of privacy and data protection.

### **Data protection**

Sharpe Group takes the protection of your personal data very seriously. We treat your personal data as confidential and in accordance with the statutory data protection regulations and this privacy policy.

If you use this website, various pieces of personal data will be collected. Personal information is defined as "any data with which you could be personally identified." This privacy policy explains what information we collect and what we use it for. It also explains how and for what purpose this happens.

Please note that data transmitted via the internet (e.g., via email communication) may be subject to security breaches; therefore, complete protection of your data from third-party access is not possible.

## **SSL or TLS encryption**

This site uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon is displayed in your browser's address bar.

If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties.

## **Information, blocking, deletion**

As permitted by law, you have the right to be provided at any time with information free of charge about any personal data that is stored as well as its origin, the recipient and the purpose for which it has been processed. You also have the right to have this data corrected, blocked or deleted.

## **Cookies**

Some of our web pages use cookies, which make our website more user-friendly, efficient and secure. Cookies do not harm your computer and do not contain any viruses. They are small text files stored on your computer and saved by your browser.

Most of the cookies we use are so-called "session cookies." They are automatically deleted after your visit. Other cookies remain in your device's memory until you delete them. These cookies make it possible to recognize your browser when you next visit the site.

You can configure your browser to inform you about the use of cookies, so you decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions, or to always reject them or to automatically delete cookies when closing your browser. Disabling cookies, however, may limit the functionality of this website.

Cookies which are necessary to allow electronic communications or to provide certain functions you wish to use (such as the shopping cart) are stored pursuant to Art. 6 paragraph 1, letter f of DSGVO. The website operator has a legitimate interest in the storage of cookies to ensure an optimized service provided free of technical errors. If other cookies (such as those used to analyze your surfing behavior) are also stored, they will be treated separately in this privacy policy.

## **Server log files**

Sharpe Group automatically collects and stores information that your browser automatically transmits to us in "server log files." These are:

- Browser type and browser version.
- Operating system used.
- Referrer URL.
- Host name of the accessing computer.
- Time of the server request.
- IP address.

The basis for data processing is Art. 6 (1) (f) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

## **Processing of data (customer and contract data)**

We collect, process and use personal data only insofar as it is necessary to establish or modify legal relationships with us (master data). This is done based on Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract. We collect, process and use your personal data when accessing our website (usage data) only to the extent required to enable you to access our service or to bill you for the same.

Collected customer data shall be deleted after completion of the order or termination of the business relationship. Legal retention periods remain unaffected.

## **Data transferred when signing up for services and digital content**

We transmit personally identifiable data to third parties only to the extent required to fulfill the terms of your contract with us. In such cases, the data are transmitted in compliance with the Data Privacy Act. The amount of data transmitted is restricted to the minimum required, for example, synchronizing form submissions or lead augmentation data back to your CRM API.

Your data will not be transmitted for any other purpose unless you have given your express permission to do so. Your data will not be disclosed to third parties for advertising purposes without your express consent.

The basis for data processing is Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

## **Newsletter data**

For those receiving our newsletters, we require a valid email address as well as information that allows us to verify the owner of the specified email address. No additional data is collected or is only collected on a voluntary basis. We only use this data to send the requested information and do not pass it on to third parties.

We will, therefore, process any data you entered onto contact forms only with your consent per Art. 6 (1) (a) DSGVO. You can revoke consent to the storage of your data and email address as well as their use for sending the newsletter at any time, e.g., through the "unsubscribe" link in the newsletter. The data processed before we receive the request may still be legally processed.

The data provided when registering for the newsletter will be used to distribute the newsletter until the subscription has been cancelled. Data we have stored for other purposes (e.g., email addresses for a members' area) remain unaffected.