

## **Information on the collection and processing of your personal data**

In the following, you have an overview on our personal data collection and processing policy and your related rights. The type of your data that we process and for which purpose depends on the respective contractual relationship.

### **1. Who is responsible for processing data?**

Responsible party:

Freeletics GmbH  
c/o Design Offices München  
Einsteinstraße 174  
81677 Munich, Germany  
CEO: Daniel Sobhani

### **2. How can I reach the data protection officer?**

You can reach our data protection officer at:

Intersoft Consulting Services AG  
Jana Heinze  
Marsstrasse 37  
80335 Munich  
Germany  
Email: [privacy@freeletics.com](mailto:privacy@freeletics.com)

### **3. What types of your personal data do we use?**

If you are interested in the Freeletics Affiliate Program, we will kindly ask you for your personal data so that we can set-up the Freeletics Affiliate Program properly.

In detail, this refers to the following personal data (hereinafter “application data”):

- Full name, E-Mail-address, gender, country
- questions about your experience with content creation and social media activities

### **4. From what sources do we collect data**

We process the personal data, which we receive from you when you apply for our Freeletics Affiliate Program via the published form.

### **5. For what purposes do we process your data and on what legal basis?**

You can apply for the Freeletics Affiliate Program on this website. After you filled in the application form, we will check your application data and contact you directly in order to let you

know about our decision about your application for the Freeletics Affiliate Program. We will contact you about our decision either way.

We process your personal data in particular in compliance with the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG) as well as all other relevant laws.

If you apply for the Freeletics Affiliate Program you consent to us collecting, processing, storing and using your personal data for the sole purpose of setting up and administering the Freeletics Affiliate Program during the communicated time frame. This consent then forms the legal basis for the processing of your data (Art. 6 Para.1 a GDPR)

You can withdraw your declaration of consent at any time. A declared withdrawal does not affect the legality of data processing up to the notice of objection.

This consent includes the following procedures:

- collecting, storing and processing of the application data
- participation in the Freeletics Affiliate Program
- contacting with regards to the Freeletics Affiliate Program

## **6. Where does my data go?**

To comply with our contractual and legal requirements, various public or internal offices, as well as external service providers, have access to your personal data.

### Public offices:

- none

### Internal offices:

List of various internal offices, provided they are involved in the respective business processes

- Marketing Department (Digital Brand Team)

### External service providers:

List of all categories of service providers who work for the responsible parties and receive personal data of affected parties in connection with this.

- E-Mail Marketing Service Tool (most likely Mailchimp and / or Braze, Inc. or Google Mail)
- Form Provider (most likely Google Forms (from Google LLC) or Typeform)

If you have additional questions on the individual recipients, contact us at:

[community@freeletics.com](mailto:community@freeletics.com)

## **7. Is my data sent to countries outside of the European Union (so-called third countries)?**

Data will be sent to a country outside of the European Union (so-called third country) when:

- Complying with contractual obligations
- You have given us consent
- Protecting our legitimate interests
- It is legally required

In connection with this, we send personal data to the following third countries:

- USA

In order to ensure a suitable level of data protection in these third countries, there shall exist either suitability resolutions from the European Commission or suitable and appropriate guarantees in the form of:

- EU standard clauses

If you have additional questions, you can obtain more detailed information on data transfers to third countries from [privacy@freeletics.com](mailto:privacy@freeletics.com).

## **8. How long is my data stored?**

If you have given your consent by filling in the application form, we will store your personal data we received during the Freeletics Affiliate Program Registration for the period in which we evaluate the applications and make the decision about a future cooperation with you as long as you do not object to their use before. After objection your data will be anonymized. But you may, of course, withdraw your consent any time with effect for the future without any consequences by sending a notice to [community@freeletics.com](mailto:community@freeletics.com). After the withdrawal of your consent, your personal data will be deleted.

If you do not object, we will in any case delete your data within the following periods:

- In case of a rejection, we will delete your data within 7 days after sending the rejection to you, but at the latest within 3 months after we received your application.
- In case of an acceptance, we will delete your data within 6 months after sending the acceptance to you. Please note: when working with you, we will most likely use a specific Affiliate Tool for the cooperation, which you will be informed about separately.

In addition, we store your personal data for as long as it is necessary to comply with our legal and contractual obligations.

Should it no longer be necessary to store data to comply with contractual or legal requirements, we will delete your data, unless it is necessary for further processing for the following purposes:

- Compliance with commercial and taxation storage requirements
- Maintenance of evidence within the framework of legal statutes of limitation

## **9. What rights do I have in connection with the processing of my data?**

Each affected person has the right of access in accordance with Art. 15 GDPR, the right to rectification in accordance with Art. 16 GDPR, the right to erasure in accordance with Art. 17 GDPR, the right to restriction of processing in accordance with Art. 18 GDPR, the right to object from Art. 21 GDPR as well as the right to data portability from Art. 20 GDPR. The limitations according to Sections 34 and 35 BDSG apply to the right of access and to the right to erasure.

### **a) Right to object**

#### **What right do you have in case of data processing for your legitimate or public interest?**

According to Art. 21 Abs. 1 GDPR you have the right at any time, for reasons that arise from your particular situation, to raise an objection against the processing of personal data concerning you, which is based on Art. 6 para. 1 e GDPR (Data Processing in the Public Interest) or Art 6 para. 1 f GDPR (data processing for the protection of a legitimate interest), this also applies to a profiling based on this provision.

In the event of your opposition, we will no longer process your personal information unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, pursuing or defending legal claims.

### **b) Right of withdrawal**

Your consent to the processing of personal data can be revoked at any time. Please note that the revocation only works for the future.

### **c) Right to information**

You can request information about whether we have personal information about you stored. If you wish, we will tell you what the data are, what the purpose of the data processing is, to whom this information is disclosed, how long the data is stored and what other rights you have with respect to that data.

### **d) Other rights**

In addition, you have the right to correct incorrect data or to delete your data. If there is no reason for further storage, we will erase your data, otherwise restricting processing. You may also request that we provide any personal information you have provided to us in a structured, common and machine-readable format either to you or to any person or company of your choice.

In addition, there is a right of appeal to the competent data protection supervisory authority (Art. 77 GDPR in connection to § 19 BDSG).

**e) Exercise your rights**

To exercise your rights, you may contact the person responsible or the Privacy Officer at the contact details provided or contact Freeletics at [community@freeletics.com](mailto:community@freeletics.com). We will process your requests promptly and in accordance with legal requirements and inform you of the measures we have taken.

**10. Do I have an obligation to provide my personal data?**

In order to enter into a business relationship, you must provide us with that personal data that is necessary to implement the contractual relationship or that we are required by law to collect. If you do not provide us with this data, then it is not possible for us to develop and implement the contractual relationship (here: [Freeletics Affiliate Program](#)).