

Privacy Policy

Privacy Policy – for data management on our websites and in connection with the IncuVersity program application

1. Purpose of the policy

The DO GmbH (Novalisstraße 12, 10115 Berlin, Germany, hereinafter referred to as "The DO" or "we" or "us") manages the personal data of those who apply to participate in the IncuVersity program. Additionally, as the operator of this website and of accounts on different social media platforms, we process your personal data while you use this website or our social media websites or while you use those websites to communicate or interact with us. The purpose of this Privacy Policy is to provide information on how we process your personal data and to inform you about your rights under the General Data Protection Regulation ("GDPR").

This policy covers the IncuVersity admissions and selection process, including the use of an AI system to score and rank applications across six weighted dimensions and a separate video assessment, and the two management calibration sessions at which the actual selection decision is made. No applicant is excluded from IncuVersity by an automated score, a score threshold, or an age check — see Section 5 for full detail.

2. The data controller's name and its data protection officer

The controller (this means the company that is responsible for the data processing) for the data processing operations described within this privacy policy is The DO (Novalisstraße 12, 10115 Berlin, Germany). The DO's data protection officer can be reached under dataprotection@thedo.world.

3. Personal data management when using this website

Within this section, we inform you about different types of data processing activities occurring when you visit this website or interact with our website or provide data to us on the website.

3.1 Logfiles

When you visit our web pages, you transmit data (so called logfiles) to web servers (out of technical necessity) via your internet browser. The following data is processed during a connection for communication between your Internet browser and servers used for websites:

- date and time of the request;
- name of the requested file;
- page from which the file was requested;
- access status;
- web browser;
- used operating system;

- IP address;
- amount of data transferred.

For technical security reasons, especially to defend us against attempted attacks on servers, we store this data for 14 days. In case we find a suspicious activity, we will store the data longer and at least until the suspicion has been fully assessed. The data processing of logfiles is based on our legitimate interests (Art. 6 (1) f GDPR) in processing the technical necessary data and using it for detecting suspicious activities on our website and for the establishment, exercise or defense of legal claims in case we do indeed detect a suspicious activity. We also process logfiles to fulfill our obligation to ensure an appropriate level of security for the data processing (Art. 6 (1) c GDPR in conjunction with Art. 32 (1) GDPR).

Our website is hosted by GoDaddy.com, LLC (100 S. Mill Ave, Suite 1600, Tempe, AZ 85281, USA, "GoDaddy"). As a result, the logfile data described above are transferred to and processed in the United States. Where this occurs, GoDaddy relies on the EU-U.S. Data Privacy Framework (including its UK and Swiss extensions) and, where the Framework does not apply, on the Standard Contractual Clauses. The Standard Contractual Clauses are incorporated into the contract concluded between us and GoDaddy which may be found under the following URL:

<https://www.godaddy.com/legal/agreements/data-processing-addendum>.

More information on GoDaddy's compliance with the Data Privacy Framework may be found under the following URL:

<https://www.godaddy.com/legal/agreements/data-privacy-framework-notice>

. A link to GoDaddy's global privacy policy and the addition for the EU may be found under the following URL:

<https://www.godaddy.com/legal/agreements/european-supplemental-privacy-notice>.

3.2 Contact with us

On our website, you are provided with different options to contact us. When you contact us, we will process the data as part of your communication to answer your question or request. This data processing is either based on pre-contractual necessity in terms of Art. 6 (1) b GDPR (in case your request is aimed at concluding a contract with us in the future) or on our legitimate interest (Art. 6 (1) f GDPR) in answering your questions and requests and using the data needed for this. Mandatory fields in contact forms are marked as such via a "*".

In line with German legal retention periods, we will store communication with you for 6 years if the communication is a so-called "business letter". This is based on our obligation to retain business letters for 6 years (Art. 6 (1) c GDPR in conjunction with Sec. 147 German Federal Tax Code and Sec. 257 German

Federal Commercial Code). In other cases, we store the communication until it is no longer needed for managing our relationship with you.

3.3 Our newsletter

On our website, you may sign up for our newsletter. In case you sign up, we will use the data provided by you for sending you newsletters based on your consent (Art. 6 (1) a GDPR and Sec. 7 German Federal Act Against Unfair Competition). Based on your consent, we also analyze your use of the newsletter regarding opening rates and clicks on content to improve the newsletter. We will keep using the data to send you newsletters and analyze its use until you revoke your consent. After you signed up for the newsletter on our website, we will use a double opt-in approach and request you to confirm that you want to receive the newsletter.

For sending newsletters, we cooperate with our service provider HubSpot, Inc. (25 First Street, Cambridge, MA 02141, USA, "HubSpot") which is a recipient of the personal data processed in connection with the newsletter. Since HubSpot is located in the USA, data transfers to the USA occur. Those data transfers are based on the adequacy decision of the European Commission and the self-certification under the Data Privacy Framework of HubSpot. In addition, we concluded Standard Contractual Clauses with HubSpot which may be found under the following URL and there within section 11: <https://legal.hubspot.com/dpa>.

4. Our social media profiles

We have profiles on different social media platforms. When you visit such profiles or interact with the profiles or reach out to us while using a social media platform, we and the operator of the respective social media platform process personal data regarding you. In this section, we inform you about the relevant data processing and the responsibilities of social media platform operators and our responsibilities per social media platform separately. For some data processing activities, we and the operator of a social media platform are joint responsible for the processing of personal data (Art. 26 (1) Sentence 1 GDPR). Further details are indicated by profile and social media platform separately below.

4.1 Our LinkedIn profile

We have a website, which is operated on the platform of LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland hereinafter "LinkedIn"), to present ourselves as an organization and, for example, to get in touch with applicants and interested parties. For some types of data processing activities, we and LinkedIn are both jointly responsible under data protection laws (see under "Joint controllership between us and LinkedIn"). Other data processing

we inform you about occurs solely under our responsibility (see under “Data processing by us under our own responsibility”).

The data collected about you will be processed by LinkedIn and transferred by LinkedIn to countries outside the EU and the EEA. LinkedIn provides information about how data is transferred by LinkedIn from the EU, the EEA and Switzerland and the United Kingdom at the following URL and there also mentions its certification under the Data Privacy Framework: https://www.linkedin.com/help/linkedin/answer/62533?trk=microsites-frontend_legal_privacy-policy&lang=de. Data transfers to the U.S. are based on LinkedIn's certification under the Data Privacy Framework and the adequacy decision and on the Standard Contractual Clauses concluded with LinkedIn as part of the data protection agreement, which can be accessed at the following URL: <https://www.linkedin.com/legal/l/dpa>.

Joint controllership between us and LinkedIn (“Page Insights”)

Together with LinkedIn, we are jointly responsible for the processing of so-called "Insights data" in accordance with Art. 26 (1) Sentence 1 GDPR, insofar as such data is used for the creation of so-called "Page Insights". LinkedIn and we have concluded an agreement as part of our joint controllership, which you can access here: <https://www.linkedin.com/legal/l/page-joint-controller-addendum> (so-called "Page Insights Joint Controller Addendum"). The agreement relates to such data processing that is done in connection with a visit to or interaction with our LinkedIn page, but only insofar as this data is also (subsequently) processed for "Page Insights". "Page Insights" includes analysis services that help us to better understand interactions with our pages. The purpose of data processing is to compile aggregated statistics for us as the webpage operator. When you visit our LinkedIn page, follow us or interact with our LinkedIn page in any way, LinkedIn uses information about this to create "Page Insights". Furthermore, information from your LinkedIn profile (position in the company, country, industry, professional experience, company size, employment status) is also used for "Page Insights". LinkedIn informs you under "2.8 Insights That Do Not Identify You" in LinkedIn's privacy policy, which you can access here: <https://www.linkedin.com/legal/privacy-policy>. When you visit our LinkedIn page, LinkedIn collects, among other things, your IP address and other information that is stored on your device.

The processing of the data of visitors of our LinkedIn page is done to provide this page and to statistically evaluate the use of our page. This evaluation is anonymized for us. The legal basis for data processing is Art. 6 (1) f GDPR. The legitimate interests are: communication and interaction with interested parties and applicants; dissemination of information on us as an organization and our

vacancies; anonymized evaluation and presentation of the use of the LinkedIn page in aggregate statistics.

LinkedIn assumes responsibility for the provision of "Page Insights" in accordance with the requirements of the GDPR and fulfills all applicable obligations under the GDPR with regard to the processing of data for the creation of "Page Insights". This means including Art. 12 to Art. 22 GDPR and Art. 32 to Art. 34 GDPR. In particular, LinkedIn ensures that you are informed about the data processed and supports you in exercising your rights as a data subject. If you wish to exercise a data subject right to which you are entitled under the GDPR, we would like to point out that it would certainly be more effective for you to contact LinkedIn directly. Should you nevertheless require assistance, please do not hesitate to contact us. The respective responsibilities, in particular with regard to the protection of data subject rights, between us and LinkedIn can be found in the "Page Insights Joint Controller Addendum" (<https://legal.linkedin.com/pages-joint-controller-addendum>). LinkedIn provides you with more details on exercising these rights under "5.5 Contact information" in LinkedIn's privacy policy.

Data processing by us under our own responsibility

In addition, we are solely responsible for certain data processing on our LinkedIn page. This is the case when our employees communicate with LinkedIn users. We process the following personal data: profile name and data provided by the user in the conversation history and data visible in the LinkedIn profile, e.g. for processing inquiries. The processing is carried out for the purpose of answering your inquiries, communicating with you and publishing information about available job offers and our organization, and our services. The legal basis for processing is, on the one hand, Art. 6 (1) b GDPR if a contract with the LinkedIn user is initiated (e.g. an employment contract or the start of an application process) or such a contract is concluded. In other cases, on the other hand, the legal basis is Art. 6 (1) f GDPR. The legitimate interest consists in the effective provision of information to LinkedIn users, applicants and interested parties and communication with these people.

4.2 Our Facebook and Instagram profiles

We operate a so-called fan page on Facebook and have a website on the "Instagram" platform. These are both platforms of Meta Platforms Ireland Ltd (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, "Meta"). We operate these two websites to present ourselves as an organization and, for example, to get in touch with interested parties and participants of IncuVersity. To offer websites on Facebook and Instagram, we use different services provided by Meta. For some types of data processing activities, we and Meta are both jointly responsible under data protection laws (see under "Joint

controllership between us and Meta"). Other data processing we inform you about occurs solely under our responsibility (see under "Data processing by us under our own responsibility").

The data collected about you will be processed by Meta and transferred by Meta to countries outside the European Economic Area on the basis of the adequacy decision for the USA and Meta Platforms, Inc.'s certification under the Data Privacy Framework. Meta describes in general terms what information it receives, how it is used and how data is transferred in its data policy. There you will also find information on how to contact Meta and on the settings options for advertisements. Meta's data policy, which covers both the Facebook platform and the Instagram platform, is available at the following link: <https://www.facebook.com/about/privacy>.

Joint controllership between us and Meta

Together with Meta, we are jointly responsible for the processing of so-called "Insights data" in accordance with Art. 26 (1) Sentence 1 GDPR, insofar as this data is used for the creation of so-called "Page Insights". We and Meta have concluded an agreement as part of our joint controllership, which can be accessed at the following URL: https://www.facebook.com/legal/terms/page_controller_addendum (so-called "Page Insights Addendum"). The agreement relates to data processing that is done in connection with a visit to or interaction with our Facebook or Instagram page, but only insofar as this data is also (subsequently) processed for "Page Insights". "Page Insights" include analysis services that help us to better understand your interactions with our pages. The purpose of the data processing is to create aggregated statistics that Meta makes available to us in aggregated and anonymized form.

The "Information on data for "Page Insights" (https://www.facebook.com/legal/terms/information_about_page_insights_data) lists the data that is collected and used to create "Page Insights". This is data that is processed in connection with actions you have taken or that relate to your device or your specific use of a service provided by Meta. The processing is carried out to provide the profiles on both platforms and to statistically evaluate the use of our pages. The legal basis for data processing is Art. 6 (1) f GDPR. The legitimate interests are: communication and interaction with interested parties and participants; dissemination of information about us; anonymized evaluation and presentation of the use of the Facebook fan page and Instagram page.

If you wish to exercise a data subject right to which you are entitled under the GDPR, we would like to point out that it would certainly be more effective for you to contact Meta directly. If you still need help, please do not hesitate to contact

us. The respective responsibilities, in particular regarding the protection of data subjects' rights, between us and Meta can be found in the Page Insights supplement

(https://www.facebook.com/legal/terms/page_controller_addendum). Meta assumes primary responsibility for fulfilling the GDPR obligations for the joint processing of "Insights data". This includes the fulfillment of the following data subject rights: the right of access (Art. 15 GDPR); the right to erasure (Art. 17 GDPR); the right to restriction of processing (Art. 18 GDPR); the right to data portability (Art. 20 GDPR); and the right to object (Art. 21 GDPR). Meta provides more details on exercising these rights in the "Information on Page Insights data":

https://www.facebook.com/legal/terms/information_about_page_insights_data.

Data processing by us under our own responsibility

We are also solely responsible for certain data processing on the Facebook fan page and Instagram page. This is the case when our employees communicate with Facebook or Instagram users. We process the following personal data: profile name and data provided by the user in the course of the conversation, e.g. to process inquiries. The processing is carried out for the purpose of answering your inquiries, communicating with you and publishing information about our organization. The legal basis for processing is Art. 6 (1) f GDPR. The legitimate interest consists in the effective provision of information to Facebook and Instagram users and interested parties and communication with these people.

4.3 Our TikTok profile

We have an account on TikTok, which is a platform provided by TikTok Technology Limited (10 Earlsfort Terrace, Dublin, D02 T380, Ireland) and TikTok Information Technologies UK Limited (Kaleidoscope, 4 Lindsey St, Barbican, London EC1A 9HP, United Kingdom) which are both hereinafter jointly referred to as "TikTok" and which are joint controllers for some of the processing of personal data when you visit our TikTok account or view videos posted by us.

The data collected about you will be processed by TikTok and transferred by TikTok to countries outside the European Economic Area on the basis of the adequacy decision for the United Kingdom and the Standard Contractual Clauses. Within TikTok's privacy policy, you can find more information on the data processing done by TikTok. The privacy policy is available under the following URL: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>. Within this privacy policy and there under the headline "Our Global Operations and Data Transfers" you can find more information on how TikTok shares personal data relating to you and how data is transferred to third countries.

For some types of data processing activities, we and TikTok are both jointly responsible under data protection laws (see under “Joint controllership between us and TikTok”). Other data processing we inform you about occurs solely under our responsibility (see under “Data processing by us under our own responsibility”).

Joint controllership between us and TikTok

TikTok analyzes your usage of our content and interactions with our accounts and videos and other content (this type of data is called “Engagement Data”). Together with TikTok, we are jointly responsible in accordance with Art. 26 (1) Sentence 1 GDPR for the processing of so-called “Engagement Data” used to generate TikTok Analytics. The joint controllership applies to the creation and collection of Engagement Data, and its aggregation into TikTok Analytics made available to us in our TikTok account.

We and TikTok concluded an agreement as part of our joint controllership, which can be accessed at the following URL: <https://www.tiktok.com/legal/page/global/tiktok-analytics-joint-controller-addendum/en>. The agreement relates to data processing that is done in connection with a visit to or interaction with our TikTok account and our content. The purpose of the data processing is to create aggregated statistics that TikTok makes available to us in aggregated and anonymized form. We use such statistics to get a better picture on how users of TikTok use our content and to optimize our content and marketing activities with TikTok. The data processing is based on our legitimate interest (Art. 6 (1) f GDPR) in providing content on the TikTok platform to present and promote us as an organization and receiving aggregated and anonymized statistics on the usage of our account and content. Under the following URL, TikTok explains which information is considered as Engagement Data and is used for generating TikTok Analytics: <https://www.tiktok.com/legal/page/global/information-about-tiktok-analytics/en>. Under this URL, you may also find information on the responsibilities of TikTok on the one hand and our responsibilities on the other hand.

Your settings with regard to personalized advertisement can be adjusted by you under the following URL: <https://support.tiktok.com/en/account-and-privacy/personalized-ads-and-data>. You can submit any request relating to data protection to TikTok under the following URL: <https://privacytiktok.zendesk.com/hc/en-us/requests/new>. Under the agreement concluded by us with TikTok, TikTok is responsible for enabling you to exercise your data subject’s rights. You may also use this form to request copies of Standard Contractual Clauses entered into by TikTok and service providers of TikTok located in third countries without an adequacy

decision of the European Commission. If you wish to exercise one of your data subject's rights, it is certainly more promising to contact TikTok directly. TikTok has access to all the relevant data. If you still need our help, feel free to reach out to us.

Data processing by us under our own responsibility

We process personal data when you follow our account, like a video or otherwise interact with our account or content posted. We use the platform provided by TikTok to provide content on our program and to inform about activities of our organization. If you contact us using a function on the TikTok platform, we also process your profile name and other data which is part of the communication. Such data is used to communicate with you and answer questions or requests. The data processing is based on our legitimate interest (Art. 6 (1) f GDPR) in communication with you and using the data needed to answer questions or requests. We only store data that is kept in our TikTok account. How long we will retain such data depends on the context and purpose of the data processing by us. As a general rule, we will delete data as soon as it is no longer required for the purposes of processing pursued by us.

4.4 Our YouTube profile

We have an account on the platform YouTube, which is provided by Google. If you are accessing YouTube videos from the European Economic Area or Switzerland, the controller for the data processing is Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland), and in case you access a video from the UK, Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) is the controller. Both companies are hereinafter referred to as "Google".

We process personal data when you follow our account, like a video or otherwise interact with our account or content posted. We use the platform provided by Google to provide content on our program and to inform about activities of our organization and to receive statistics on how our content is consumed and how users on YouTube interact with our content and account. Google analyzes your usage of our content and interactions with our accounts and videos and provides us with anonymized and aggregated statistics (the number of profile or content clicks, and the viewing time of a particular video). We use such statistics to get a better picture on how users of YouTube use our content and to optimize our content and marketing activities with Google. The data processing is based on our legitimate interest (Art. 6 (1) f GDPR) in providing content on YouTube and receiving aggregated and anonymized statistics on the usage of our account and content.

If you contact us using a function on YouTube, we also process your profile name and other data which is part of the communication. Such data is used to communicate with you and answer questions or requests. The data processing is based on our legitimate interest (Art. 6 (1) f GDPR) in communication with you and using the data needed to answer questions or requests. We only store data that is kept in our YouTube account. How long we will retain such data depends on the context and purpose of the data processing by us. As a general rule, we will delete data as soon as it is no longer required for the purposes of processing pursued by us.

Within Google's privacy policy, you can find more information on the data processing done by Google when you use YouTube services. The privacy policy is available under the following URL: <https://policies.google.com/privacy?hl=en#infochoices>. Within this privacy policy and there under the headline "Data transfers", you can find more information on how Google shares personal data relating to you and how data is transferred to third countries. Data transfers to the USA take place on the basis of the adequacy decision for the USA and the self-certification of Google under the Data Privacy Framework. Your settings with regard to data privacy can be managed under the following URL: https://myaccount.google.com/intro/privacycheckup?utm_source=pp&utm_medium=Promo-in-product&utm_campaign=pp_intro&hl=en. Within its privacy policy, Google also explains how you can exercise data subject's rights towards Google. If you wish to exercise one of your data subject's rights, it is certainly more promising to contact Google directly. Google has access to all the relevant data. If you still need our help, feel free to reach out to us.

5. The application process

On the website available under <https://doincuversity.ai/>, you may apply to become a participant of IncuVersity via using the relevant form provided on the website. We are the controllers for the data processing occurring on this website and therefore mainly responsible to ensure an adequate level of data protection. However, we provide the application form with the help of our service providers Airtable (Formagrid Inc., 1 Front Street, Fl 28, San Francisco, CA 94111, USA, "Airtable") and Tally BV (Sint-Pietersnieuwstraat 11, 9000 Gent, Belgium). Since Airtable is located in the USA, there are data transfers to this country occurring. These are based on the Standard Contractual Clauses agreed upon between us and Airtable which may be found in section 9 under the following URL: <https://www.airtable.com/company/dpa>.

When you apply to become a participant at IncuVersity, you are asked to answer various questions and to provide information about you and your project and other aspects relevant for evaluating your application. You are also asked to

provide documents. For example, an ID document used for verifying your identity. Mandatory information to be provided by you is marked as such with “*”. Mandatory information to be provided by you is processed by us based on your pre-contractual request to enter into a program contract with us (Art. 6 (1) b GDPR) and our legitimate interest (Art. 6 (1) f GDPR). There are the following legitimate interests: getting to know meaningful information about you and your project and other aspects relevant for evaluating your application and understanding your motives for your application and to verify your identity and to develop the application process in the future based on feedback from applicants.

After evaluating your application, we will reach out to you (using the contact details provided by you) and will inform you about the result of your application. We might also send you a notification reminding you that you still need to provide certain information to us to finalize your application. On the application platform, you are also requested to make and submit a video for your application.

In case you do not get accepted, we will store data provided by you within the application process for 2 years and use the data within this time frame to allow you to apply for the next program without the need to provide us all data again. If you are selected as a participant, we will continue using information you provided for the management of the program. As a participant, you enter into a contract with us. In “Annex to the Program Agreement – Privacy Policy” you are provided with further information on how information from your application is used during and after your participation in the program.

5.1 How your application is evaluated with the help of AI

Your written application is scored by an AI system across six weighted dimensions: Entrepreneurial Spirit, Idea and Challenge Clarity, Learning and Maker Disposition, Impact Orientation, English Language Command, and Market and Commercial Instinct. Your recorded video is separately assessed for content. The legal basis for the AI-assisted scoring is our pre-contractual necessity in evaluating your application (Art. 6 (1) b GDPR) and our legitimate interest (Art. 6 (1) f GDPR) in running a fair, consistent, and scalable selection process. Additionally, we have a legitimate interest in lowering the amount of time required for review of applications and automating the review process done prior to human review.

These scores, and the resulting ranking, are used only as additional information source for the selection process. No score, combination of scores, or personal characteristics such as age results in your application being automatically rejected. Every application is reviewed by members of our management team at

two dedicated calibration sessions — one before shortlisting decisions are made, and one before any program contract is offered — and the actual decision on your application is made by these reviewers, having regard to your ranking and the number of places and scholarships available for the cohort, not by the AI system directly. If you indicate financial need as part of your application, the information you provide (questions covering household income, dependents, expected change in income during the program, and access to alternative funding) is used to calculate a need score that informs scholarship allocation. Applications with borderline need scores, or where you have provided additional context in free text, are reviewed individually by a member of our team before a scholarship decision is made. The data processing done during the human reviews described here is based on our legitimate interests (Art. 6 (1) f GDPR) in evaluating the result from the automated review and preventing discrimination and ensuring correctness and making decision regarding the application. In addition, we have a legitimate interest in using data provided by you to calculate a need score which is used to make decisions relating to covering tuition fees.

For the AI-scored dimensions described above and the interview cross-check, we use the Claude API provided by Anthropic Ireland, Limited (6th Floor, South Bank House, Barrow Street, Dublin 4, Ireland, “Anthropic”). Anthropic, which is a recipient of the relevant application data for this purpose. Where this involves a transfer of data outside the European Economic Area, Anthropic relies on Standard Contractual Clauses which Anthropic concludes with other recipients located outside the EEA. These recipients may be found under the following URL: <https://trust.anthropic.com/subprocessors>.

5.2 If your application is unsuccessful: requesting feedback

You may request general information from us about how your application was scored and ranked, and about the general criteria applied during the calibration sessions described above. Please contact us using the details in Section 7. We are not able to share other applicants' data or the specific scores of other candidates. The data processing done in connection with receiving and answering your requested feedback is our legitimate interest (Art. 6 (1) f GDPR) in using the data needed to respond to your request for feedback regarding your unsuccessful application.

6. Services based on cookies and similar technologies

Within this section, we are informing you about the processing of personal data occurring when we use service (based on your consent) to analyze your user experience (category “Statistics”) or to store preferences (category “Preferences”) or for our marketing activities (category “Marketing”). These services are based on cookies and similar technologies. For details on the use of

cookies please see our Cookie Policy. In the following, we are informing you about each service used separately.

6.1 Consent management platform and necessary HubSpot cookies

The cookie banner on our website and the associated sub-pages and options to choose are integrated by us with the help of our service provider HubSpot inc. (25 First Street, Cambridge, MA 02141, USA, "HubSpot". Since HubSpot is located in the USA, data transfers to the USA occur. Those data transfers are based on the adequacy decision of the European Commission and the self-certification under the Data Privacy Framework of HubSpot. In addition, we concluded Standard Contractual Clauses with HubSpot which may be found under the following URL and there within section 11: <https://legal.hubspot.com/dpa>.

Under applicable German laws, we are required to ask for consent for the use of cookies to the extent they are not necessary for the provider of a website to provide a website service expressly requested by a user. To request consent and store the information on consents provided and denied, we use the services offered by HubSpot. With the help of this service, we store information on the options you have chosen. The processing of personal data and use of cookies is based on our obligation to ensure that we have consent for the cookie tools which are not strictly necessary to provide this website or a function explicitly requested by a website visitor (Art. 6 (1) c GDPR in conjunction with Sec. 25 German Federal Telecommunications Telemedia Data Protection Act). Additionally, the data processing is done to ensure we can fulfill our obligation to be able to demonstrate that consent was provided (Art. 6 (1) c GDPR in conjunction with Art. 7 (1) GDPR) and to pursue our legitimate interest (Art. 6 (1) f GDPR) in being able to establish, exercise and defend legal claims associated with our cookie usage on our website. With the help of HubSpot, we also protect our website from bots and fulfill our obligation to ensure an adequate level of data protection on our website (Sec. 25 (2) No. 2 German Federal Telecommunications Telemedia Data Protection Act and Art. 6 (1) c GDPR in conjunction with Art. 32 (1) GDPR).

We store information on your consent provided for as long as the consent is valid and after that for 3 years to pursue our legitimate interest (Art. 6 (1) f GDPR) in being able to establish, exercise and defend legal claims associated with our cookie usage on our website. The cookies used for storing your chosen options have a lifetime of 6 months. Under the following URL and there under the headline "Necessary cookies", HubSpot explains how cookies are set on our website in connection with the consent management services HubSpot provides to us:

<https://knowledge.hubspot.com/privacy-and-consent/what-cookies-does-hubspot-set-in-a-visitor-s-browser>.

6.2 HubSpot Analytics

Based on the consent (Art. 6 (1) a GDPR and Sec. 25 (1) German Federal Telecommunications Telemedia Data Protection Act) you provide within the cookie banner, we use analytics tracking services provided by HubSpot, Inc. (25 First Street, Cambridge, MA 02141, USA, "HubSpot"). Via the help of HubSpot analytics cookies, we count how many times you have visited our website and keep track of your identity while you use our website. We store a user token, a user ID, the first timestamp of the first visit, the last timestamp of the last visit, the current timestamp for the current visit and the number of page views. This helps us to understand how you are using our website. The cookies set in connection with tracking service have a maximum duration of 6 months. You may revoke your consent by deleting the cookies from your browser and restarting the browser session. More information on HubSpot may be found in section 6.1 of this Privacy Policy.

6.3 GoDaddy Analytics

Based on the consent (Art. 6 (1) a GDPR and Sec. 25 (1) German Federal Telecommunications Telemedia Data Protection Act) you provide within the cookie banner, we use analytics services offered by our website host GoDaddy.com, LLC (100 S. Mill Ave, Suite 1600, Tempe, AZ 85281, USA, "GoDaddy"). With the help of GoDaddy analytics cookies, we analyze our website traffic to better understand how website visitors are using our website. With the help of GoDaddy, we can also collect information on the fact that someone first clicked on a link to our website on a social media website before visiting our website. Additionally, we use GoDaddy analytics cookies to improve the performance of our website (e.g., page load time). The analytics cookies used have a maximum duration of 1 year. More information on GoDaddy may be found in section 3.1 of this Privacy Policy.

6.4 Google Analytics

If you have given us your consent (Art. 6 (1) a GDPR and Sec. 25 (1) German Federal Telecommunications Telemedia Data Protection Act), this website uses Google Analytics, a web analytics service provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, D04 E5W5, Ireland, "Google Ireland"). Google Analytics uses cookies.

Google Analytics tracks which keywords our website ranks for in search results, where visitors were coming from before visiting our website, and how visitors navigate on our website. We review these trends over time to make decisions about how to improve our website. Google Analytics enables the creation of

statistics on website usage and its sources. Google Ireland will use this information to evaluate the use of our online offer to compile reports about the activities within this online offer. In doing so, pseudonymous user profiles are created. The maximum retention period agreed with Google Ireland for user and event data linked to cookies, user IDs and advertising IDs is up to 14 months from the time you give your consent. We use Google Analytics for statistical purposes, such as tracking how many users clicked on a particular item or piece of information. Furthermore, with the help of Google Analytics, we also set a cookie that remembers whether and, if so, when you have given consent for collection by Google Analytics. The information generated by Google Analytics cookies about your use of this website is usually transmitted to a Google server in the USA and stored there. Since we are using Google Analytics 4 on this website, your IP address will be shortened by Google Ireland. Google Ireland provides further information on Google Analytics 4 under the following URL: https://support.google.com/analytics/answer/12017362?hl=en&ref_topic=2919631&sjid=12422493986519619859-EU. Data transfers to the USA take place on the basis of the adequacy decision for the USA and the self-certification of Google under the Data Privacy Framework.

You can revoke the consents you have given (pursuant to Sec. 25 (1) German Federal Telecommunications Telemedia Data Protection Act and Art. 6 (1) a GDPR) at any time with effect for the future by downloading and installing the plugin available at the following link: tools.google.com/dlpage/gaoptout. In addition, you can change your settings at (<https://adssettings.google.com/anonymous?hl=en-GB&sig=ACi0TCgjQOtZZmsnhor-F-jUaLKUXPozB-azrbC60GInIid6ZBXp9mJfsSLCyW2C06i4JsWleRrQw2CyV7laWP2gtjISjDTv8QM7RXXbZBM5xM64aIuc>) or via the NAI (Network Advertising Initiative) deactivation page <https://optout.networkadvertising.org/?c=1>. Alternatively, you can also disable cookies via the Digital Advertising Alliance website by using the following link <http://optout.aboutads.info/?c=2#!/>.

6.5 YouTube videos

On our website, we integrated videos via services of YouTube. YouTube is operated by Google. If you are accessing YouTube videos from the European Economic Area or Switzerland, the controller for the data processing is Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland), and in case you access a video from the UK, Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) is the controller. Both companies are hereinafter referred to as "Google".

Before you can view a YouTube video embedded on our website, we ask you if you agree to the use of cookies for marketing purposes with a message shown

before you click on the video. If you view videos embedded via YouTube, Google sets cookies that are used to show the video and used for marketing purposes. The cookie used to show the video is a session cookie that expires after you close the window in your browser in which you visited our website. The cookie used for marketing purposes expires after 6 months. In case you are logged into your Google account, Google will attribute your view of the video on our website to your Google account. Via clicking on the video after having been shown the consent notice, you consent (Art. 6 (1) a GDPR and Sec. 25 (1) German Federal Telecommunications Telemedia Data Protection Act) to the use of marketing cookies provided by Google. You may revoke your consents provided with affect for the future by deleting the cookies in your browser and reloading the website.

Within Google's privacy policy, you can find more information on the data processing done by Google when you use YouTube services. The privacy policy is available under the following URL: <https://policies.google.com/privacy?hl=en#infochoices>. Within this privacy policy and there under the headline "Data transfers", you can find more information on how Google shares personal data relating to you and how data is transferred to third countries. Data transfers to the USA take place on the basis of the adequacy decision for the USA and the self-certification of Google under the Data Privacy Framework. Your settings with regard to data privacy can be managed under the following URL: https://myaccount.google.com/intro/privacycheckup?utm_source=pp&utm_medium=Promo-in-product&utm_campaign=pp_intro&hl=en. Within its privacy policy, Google also explains how you can exercise data subject's rights towards Google. If you wish to exercise one of your data subject's rights, it is certainly more promising to contact Google directly. Google has access to all the relevant data. If you still need our help, feel free to reach out to us.

7. Data protection rights

As a data subject, you are entitled to certain data protection rights under the GDPR if certain conditions are met. There are the following data protection rights:

- Art. 15 GDPR: right to access to data;
- Art. 16 GDPR: right to rectification;
- Art. 17 GDPR: right to erasure;
- Art. 18 GDPR: right to restriction of processing;
- Art. 20 GDPR: right to data portability;
- Art. 21 GDPR: right to object;
- Art. 7 Para. 3 GDPR: right to withdraw consent given at any time without affecting the legitimacy of processing based on consent before its withdrawal;
- Art. 77 GDPR: right to lodge a complaint with a supervisory authority.

In case we process data relating to you for direct marketing purposes and based on our legitimate interests (Art. 6 Para. 1 f GDPR), you may **object** to the processing and, as a result of your objection, we will not process the data for direct marketing purposes anymore. To make use of one of these rights, please contact our data protection officer under dataprotection@thedo.world and indicate that you are an applicant and whether or not you were chosen as a participant of the program.

8. CHANGE OF THIS PRIVACY POLICY

This privacy policy may be changed from time to time in accordance with the factual circumstances of the data processing activities.

September 2026