Privacy policy

Preamble

L TECH Ltd. Şti. (hereinafter: nuno, provider), based in Izmir - TÜRKIYE, operates the website www.mynuno.com (hereinafter: website) and the nuno app, a digital food tracking and fitness app (hereinafter: app, offer, product) for Android and iOS.

The following data protection information provides information on what types of personal data of nuno users are processed for what purposes and to what extent. The data protection information applies to all processing of personal data carried out by nuno, both in the context of the provision of services and in particular on the website and in the nuno app, which users can install on their mobile device.

1) Responsible body and data protection officer

Responsible for the collection, processing and use of personal user data within the meaning of the General Data Protection Regulation (GDPR) is

L TECH Bilişim Teknoloji Sanayi Ticaret Limited Şirketi TUNA MAH. ŞEHİT ÜSTEĞMEN AHMET KONUKSEVER SK. NO: 28 İÇ KAPI NO: 2 KARŞIYAKA/ IZMIR 35600 support@mynuno.com

In addition to the controller, users can also contact nuno's data protection officer if they have any questions about their data or about this privacy policy or the assertion of data subject rights:

Can Lokanoglu TUNA MAH. ŞEHİT ÜSTEĞMEN AHMET KONUKSEVER SK. NO: 28 İÇ KAPI NO: 2 KARŞIYAKA/ IZMIR 35600

2) Encryption

All data, both in communication with the apps and in third-party communication, is transmitted in encrypted form both inbound and outbound. The encrypted connection when using the nuno website can be recognized in the address bar of the browser used by the fact that the browser line begins with "https://" and by the encryption symbol located there. Encryption means that the transmitted data cannot be read by third parties.

3) Collection, processing and use of personal data

3.1) Personal data

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

Personal data (e.g. e-mail address, nutritional data in the app) is only processed by the provider in accordance with the provisions of the applicable data protection law. The following provisions provide information on the type, scope and purpose of the collection, processing and use of personal data

3.2) Collection of data when using the nuno website

When visiting the website www.mynuno.com, the web server automatically records log files on the basis of Nuno's legitimate interests in accordance with Art. 6 para. 1 lit. f GDPR, which cannot be assigned to a specific person if this is necessary for the functionality of the app and does not outweigh the interest in protecting the user's personal data. This data includes, for example, the browser type and version, operating system used, referrer URL (the previously visited page), IP address of the requesting computer, access date and time of the server request and the client's file request (file name and URL). This data is only collected for the purpose of statistical analysis and for security reasons (e.g. to investigate misuse or fraud) and is stored for a period of 7 days and then deleted. If it is necessary to store the data for longer for evidence purposes, it will not be deleted until the respective incident has been finally clarified.

3.2.1) Provision of the website

The provision of information technology infrastructure and related services is provided by the web hosting service of Hetzner Online GmbH Industriestr. 25, 91710 Gunzenhausen - Germany. Hetzner Online GmbH is a cloud service provider and offers a basis for internet-based business processes. For the hosting tools, only the personal data that is collected by nuno is stored on the servers of Hetzner Online GmbH. This primarily includes meta and communication data, contact data such as names and addresses, contract and payment data, as well as content data (completed forms). The data is only processed to the extent necessary to fulfill the hosting contract. The data protection provisions and further information of Hetzner Online GmbH can be accessed here: https://www.hetzner.com/de/legal/privacy-policy/.

3.2.2) Use of cookies

In order to make the use of the websites more user-friendly and effective overall, nuno itself or third parties commissioned by nuno to do so store so-called cookies on the user's hard disk, provided that the user has consented to this in accordance with Art. 6 para. 1 lit. a GDPR.

A cookie is a small text file that is used, among other things, to collect information about the use of a website. These cookies cannot execute programs or transmit viruses to the user's computer. They do not contain any personal data, cannot be assigned to specific persons and, unless otherwise described, are automatically deleted after one year at the latest. This data is not merged with other data sources.

The use of websites operated by the provider is also possible without cookies. In the respective browser, the storage of cookies can be deactivated, restricted to certain websites or the browser can be set so that it notifies the user as soon as a cookie is sent. The user can also delete cookies from the hard disk of their PC at any time.

3.3) Personal data when using the nuno app

3.3.1) Mandatory information when creating a personalized user account

In order to use the app, the user must provide an "e-mail address" and "password" as mandatory information. These are used to identify the user and for communication between the provider and the user. The e-mail address and all other user data cannot be viewed by other users. The data is stored on the basis of the consent of each user in accordance with Art. 6 para. 1 lit. a GDPR.

3.3.2) Data provided by the user

When creating a personalized user account, the user can optionally enter their first name, surname and place of residence in addition to the mandatory details (e-mail address and password), which are then recorded by nuno.

nuno also collects data provided by the user via a personalized or anonymous user account, which can be entered when using the app. This includes a user profile consisting of the following, but not exhaustive, body and health data:

- Age/date of birth
- Gender
- Body size
- Diet (e.g. high carb, carnivore diet)
- Goal (e.g. losing weight)
- Type of activity (high/low)
- Registered activities
- Calorie intake & activity calories
- Steps
- Starting weight, weight progress & target weight
- Status of the app user (PRO subscription available: yes/no) coming soon
- Water supply

The data is collected on the basis of the user's consent in accordance with Art. 6 para. 1 lit. a GDPR. The provision of body data is necessary in order to be able to use the functions of the app. In particular, it is necessary to provide the starting weight, target weight, gender, date of birth and height so that nuno can calculate the user's personal calorie target.

Other data, such as the water supply, enables the user to track the amount of drinking water consumed. This data is used exclusively for the stated purposes and cannot be viewed by third parties.

3.3.3) Data collected automatically by nuno

When the app is installed, it is recorded once:

- Date of registration,
- Operating system of the device used (Android/iOS)

The collection of this data serves to improve and personalize our services and is based on our legitimate interests in accordance with Art. 6 para. 1 lit. f GDPR.

3.3.4) Data collected during use of the app

While using the app, nuno also records the respective

- current IP address,
- version of the app used,

current time zone.

The collection of this data serves to improve and personalize the services offered and is based on Nuno's legitimate interests in accordance with Art. 6 para. 1 lit. f GDPR.

3.3.5) Contractual relationship and payment procedure

If a contractual relationship between the user and nuno is to be established, developed or amended, nuno stores personal data of the user on the basis of Art. 6 para. 1 lit. b GDPR (see list of personal data under sections 3.3.5. to 3.3.7.), insofar as this is necessary for the implementation of the contract.

4) Data exchange with third parties

nuno takes the protection of personal user data very seriously. For this reason, nuno treats personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy. nuno therefore only collects and stores data provided by third-party providers on the basis of the respective user consent pursuant to Art. 6 para. 1 lit. a GDPR and transmits corresponding data to them. Subject to legal or contractual permissions, nuno processes or has the data processed in a third country only if the special requirements of Art. 44 et seq. GDPR are met. Processing is carried out, for example, on the basis of special guarantees, such as compliance with officially recognized special contractual obligations ("standard contractual clauses").

If the EU Commission does not consider the third country to have the same level of data protection as the EU, nuno will ensure that the European level of data protection is maintained by using standard contractual clauses (SCC) and binding corporate rules in accordance with Art. 46 para. 1, para. 2 lit. c GDPR. Nevertheless, it is possible under certain circumstances that authorities in a third country may access user data for control and monitoring purposes and that neither effective legal remedies nor data subject rights can be enforced.

The following providers and data are affected:

4.1) Google Health

nuno offers its users the option of connecting the app with Google Health, a health platform of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). Google Health logs the physical activities of the respective user with the help of sensors on the mobile device or activity sensors. The following data may be transmitted to nuno in the event of a link:

- Total activity
- Completed workouts (time, duration, type, calories burned)
- Steps (distance, number of steps)

nuno can access the Google Health data pool directly at any time.

Further data protection information, in particular on the purpose and scope of the data collection and the further processing and use of the data by Google Health as well as the related rights and setting options for data protection can be found at https://policies.google.com/privacy.

The use of information that nuno obtains from Google APIs and its disclosure to other apps is in accordance with the <u>Google API Services User Data Policy</u>, including the requirements for restricted use.

4.2) Apple Health

Users also have the option of connecting their app to Apple Health, a mobile app from the technology company Apple Inc, One Infinite Loop, 95014 Cupertino, USA. The following data can be transmitted to nuno in the process:

- Total activity
- Steps (distance, number of steps)
- Workouts (time, duration, type, calorie consumption)
- Weight, waist circumference
- Blood pressure systolic, blood pressure diastolic, blood glucose value
- Body fat percentage
- Menstrual cycle

In addition, the following data may be transmitted by nuno to Apple:

- Total activity
- Body values (weight, waist circumference, blood sugar, systolic and diastolic blood pressure, blood glucose level, body fat percentage)
- Food energy, macronutrients, micronutrients, vitamins

nuno has the option of accessing the Apple Health data pool directly at any time if the user has granted the corresponding permissions. Apple Health collects health-related user data and displays it in the app. Further data protection information can be found at https://www.apple.com/privacy/

4.3) Samsung Health

Furthermore, health, nutrition and fitness data of users of Samsung Health, a platform of Samsung Electronics, Ltd, 129, Samsung-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do 16677, Republic of Korea and Samsung Medison, Pangyogeok-ro, 145, Bundang-gu, Republic of Korea, can be transmitted to nuno if the user uses the linking option in the nuno app:

- Total activity
- Completed trainings
- Steps (distance, number of steps)
- Weight

Samsung Health manages the aforementioned user data to support its users on the path to greater fitness and well-being. nuno can access the Samsung data pool directly at any time. Further information is available at https://privacy.samsung.com/privacy/samsung.

5) Contact & customer support

nuno uses the customer service platform "Helpy" from Helpy.io Inc., 2701 North Thanksgiving Way, Suite 100, Lehi, Utah 84043 USA, +1 801.999.0058, hello@helpy.io. Users manually enter their data (name, email address, iOS or Android version, description of the problem) in the contact form provided on the website and the app. Based on this information, the nuno support team knows the user data stored in the user's app.

This personal data, which the user provides to nuno in the context of this contact request, is only required to answer the user request or contact and is used for the associated technical administration. It will not be passed on to third parties.

If the user has consented to the storage of their data, they have the right to revoke their consent at any time with effect for the future. In this case, their personal data will be deleted immediately. The user's personal data will also be deleted without revocation if nuno has processed the user's request or the user has revoked the consent given here for storage. This also occurs if storage is not permitted for other legal reasons.

Helpy is used on the basis of the user's consent pursuant to Art. 6 para. 1 lit. a GDPR and an order processing contract pursuant to Art. 28 para. 3 sentence 1 GDPR.

Helpy's privacy policy can be viewed here: https://helpy.io/privacy/

6) Surveys and feedback

6.1) SurveyMonkey

For online surveys in the nuno app, nuno uses the service of SurveyMonkey, Momentive Europe UC, 2nd Floor, Shelbourne Buildings, Shelbourne Rd, Dublin, Ireland. The surveys provided by nuno are used to analyze the subjective user experience, opinions and wishes of the users of the nuno app and the nuno offer. Participation in an online survey is voluntary. User data is anonymized and the IP address of the requesting computer is not stored. When answering an online survey, nuno collects the following personal data: Age group, gender, net household income group, number of people over 18 in the household. The user's details are stored for evaluation and analysis until the survey is deleted via SurveyMonkey. The legal basis for the use of the SurveyMonkey service is Art. 6 para. 1 sentence 1 lit. a GDPR.

Further information can be found at https://www.surveymonkey.com/mp/legal/privacy/.

7) Newsletter, mailings

nuno regularly informs its users by e-mail about the latest functional news, as well as other interesting offers and tips from the areas of nutrition, weight reduction, etc. Registration is voluntary and takes place via the so-called double opt-in procedure. During the registration process, the user receives an e-mail asking them to confirm their registration by entering a security code. This is necessary so that a third party cannot register without authorization using an e-mail address that is not their own. In order to be able to prove the registration in accordance with the legal requirements, it is logged on the basis of Nuno's legitimate interests pursuant to Art. 6 para. 1 lit. f GDPR.

When registering via the website or in the app, the user consents to the processing of the data provided for sending or receiving the emails, Art. 6 para. 1 lit. a GDPR. Furthermore, the user consents to nuno collecting and processing data about their usage behavior (namely the opening and clicking of links in the email) in order to tailor the content of the mailings to the respective needs, e.g. if a user repeatedly clicks on links to topic A but not to topic B, they will only receive links to topic A in future mailings.

The consent given by the user to receive these e-mails can be revoked at any time and without giving reasons with effect for the future by sending an e-mail to help@mynuno.com.

Furthermore, you can unsubscribe via a link at the end of each newsletter. nuno may store the unsubscribed e-mail addresses and the data stored as part of the registration log for up to three years on the basis of its legitimate interests in order to be able to prove that consent was previously given.

The processing of this data is limited to the purpose of a possible defense against claims. An individual request for deletion is possible at any time, provided that the former existence of consent is confirmed at the same time.

Newsletters and transactional emails are sent via the mailing service provider "Google". Google is an email delivery platform of Google Ireland Ltd ("Google"), Google Building Gordon House, Barrow Street, Dublin 4, Ireland. The privacy policy of the shipping service provider can be viewed here: https://policies.google.com/privacy?hl=en-US. The mailing service provider may use the recipient's data in pseudonymous form, i.e. without allocation to a user, to optimize or improve its own services, e.g. to technically optimize the mailing and presentation of the newsletter or the transactional email or for statistical purposes. However, the mailing service provider does not use the data of nuno mailing recipients to write to them itself or to pass the data on to third parties.

The aforementioned service providers are used on the basis of nuno's legitimate interests pursuant to Art. 6 para. 1 lit. f GDPR and an order processing contract pursuant to Art. 28 para. 3 sentence 1 GDPR.

8) Use by children

nuno is aware of the importance of additional measures to protect the privacy of children. Persons under the age of 18 may not open accounts unless a parent has consented to this in accordance with applicable law. If nuno learns that personal information about a child under the applicable minimum age has been collected without parental consent, nuno will take steps to delete that information immediately. Parents who believe that their child has provided us with personal data and wish to have it deleted should contact nuno using the contact details provided in section 1.

9) Use of web analysis, remarketing and retargeting tools

Based on the user's consent within the meaning of Art. 6 para. 1 lit. a GDPR, nuno uses various tools or plugins for web analysis, remarketing and retargeting. Cookies are used, the IP address is forwarded and/or different types of data are collected and analyzed. This includes, for example, the number of website visitors, visit duration, average page load time, origin of visitors. The purpose of using these cookies is to be able to put together more targeted offers for nuno users.

In detail:

9.1) Google Tag Manager/Google Analytics/Google Optimize/Google Analytics by Firebase

nuno uses Google Tag Manager on its website. The provider is Google Ireland Ltd ("Google"), Google Building Gordon House, Barrow Street, Dublin 4, Ireland. Google Tag Manager is a tool that can be used to integrate tracking or statistical tools and other technologies on the website. The Google Tag Manager itself does not create any user profiles, does not store any cookies and does not carry out any independent analyses. It is only used to manage and display the tools integrated via it. For this purpose, however, Google Tag Manager collects certain aggregated data to diagnose the display of the tracking and statistics tools. This data does not contain any IP addresses or IDs that are linked to a specific person.

nuno uses Google Analytics and Google Optimize on the website and in the app to analyze website usage. The provider of the two web analysis services is Google Ireland Ltd ("Google"), Google Building Gordon House, Barrow Street, Dublin 4, Ireland.

Google Optimize is a tool integrated into Google Analytics. This enables the provider to make targeted adjustments and improvements to parts of their website, adapted to user behavior.

Firebase provides app developers with technical infrastructure and a variety of tools, including Google Analytics by Firebase. This enables nuno to record and analyze user behavior in the app in order to adapt the app to the needs of users and to better control functions and events. Google Analytics and Google Optimize use cookies that enable an analysis of the use of the website by the user. The information generated by the cookie about user activity on this website is usually transferred to a Google server in the USA and stored there. Google will use this information on behalf of nuno for the purpose of evaluating user activity on the website, compiling reports on website activity for nuno and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

The user can obtain further information on the use of data for marketing purposes by Google at https://www.google.com/policies/technologies/ads. If the user wishes to object to interest-based advertising by Google marketing services, they can use the settings and opt-out options provided by Google at http://www.google.com/ads/preferences.

Google's privacy policy is available at https://www.google.com/policies/privacy.

9.2) Google Ads remarketing/conversion tracking

The provider uses Google AdsRemarketing, an online advertising program of Google Ireland Ltd ("Google"), Google Building Gordon House, Barrow Street, Dublin 4, Ireland, on the website and in the app. As part of Google AdsRemarketing, nuno uses conversion tracking. When the user clicks on an ad placed by Google, a cookie is set for conversion tracking. These cookies lose their validity after 30 days and are not used to personally identify the user. If the user visits certain pages of this website and the cookie has not yet expired, Google and the provider can recognize that the user clicked on the ad and was redirected to this page.

Each Google AdsRemarketing customer receives a different cookie. The cookies cannot be tracked via the websites of AdsRemarketing customers. The information collected using the conversion cookie is used to generate conversion statistics for AdsRemarketing customers who have opted for conversion tracking. Customers are told the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information that can be used to identify the user. If a user does not wish to participate in tracking, they can object to this use by deactivating the Google Conversion Tracking cookie via their Internet browser under user settings. Users can also prevent Google from collecting the data generated by the cookie and relating to their use of the website (including their IP address) and from processing this data by Google by downloading and installing the browser plug-in available at the following link: tools.google.com/dlpage/gaoptout. The user will then not be included in the conversion tracking statistics. However, this may limit the functionality of this website.

The information generated by the cookie about the user's use of this website is transmitted to a Google server in the USA and stored there. However, if IP anonymization is activated on this website, the user's IP address will be shortened by Google beforehand within member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there. On

behalf of the operator of this website, Google will use this information to evaluate the user's activity on the website, to compile reports on website activity and to provide other services relating to website activity and internet usage to the website operator.

Users can find more information about Google Ads remarketing and conversion tracking in the privacy policy at https://safety.google/privacy/ads-and-data/.

9.3) AppsFlyer

The AppsFlyer tool is used both on the website and in the app. AppsFlyer is an analytics service provided by AppsFlyer Inc, 111 New Montgomery Street, San Francisco, CA 94105. nuno uses the AppsFlyer tracking software to measure the success of its marketing campaigns. With the help of AppsFlyer, nuno collects and stores data about the use of its website using a pseudonym. The usage profiles created in this way are used to analyze visitor behavior and are evaluated to improve and tailor our offer. Cookies may be used for this purpose. The pseudonymized user profiles are not merged with other personal data about the bearer of the pseudonym without the express consent of the user, which must be given separately.

The user can object to the collection and storage of data by AppsFlyer at any time with effect for the future by following the instructions at https://www.appsflyer.com/legal/opt-out/. Further data protection information can be found at https://www.appsflyer.com/legal/services-privacy-policy/.

9.4) AppleSearchAds

AppleSearchAds is used by nuno in the app. AppleSearchAds is an online advertising program of the technology company Apple, One Infinite Loop, 95014 Cupertino, USA. AppleSearchAds displays the provider's app at the top of the user's search results in the Apple Store.

Users can view and restrict the personal data that Apple uses to show them relevant advertising. Users can also prevent location-based information from being used to find out which ads they can see. Further information on data protection can be found at https://searchads.apple.com/privacy.

9.5) Outbrain

The provider also uses "Outbrain" on its website, a native advertising platform from Outbrain Inc, 39 West 13th Street, 3rd floor, New York, NY 10011, USA. Outbrain specializes in the integration of content recommendations on websites according to editorial content. The recommendations automatically controlled and delivered by Outbrain in terms of content and technology appear in the so-called "Discovery Feed" and point the user to content within the provider's website or on third-party websites that may also be of interest to them.

Reading recommendations, which usually appear below an article, are determined by the content previously read by the user. Outbrain uses cookies to display interest-based content, which are stored on the user's device. The information generated by the cookie about the device source, the browser type and the user's IP address is usually transferred to an Outbrain server in the USA and stored there, whereby the last octet is deleted for anonymization.

The user can prevent tracking for the display of content recommendations by Outbrain at any time at https://my.outbrain.com/recommendations-settings/home by clicking on the "Decline" (opt-out) field. The user can find more information on data protection at: https://www.outbrain.com/privacy/.

9.6) Taboola

Nuno also uses Taboola on its website. Taboola is a native advertising platform of Taboola Inc, 16 Madison Square West, 7th Floor, New York, NY 10010, USA. The provider uses cookies from Taboola

on its website. Taboola integrates content recommendations on websites according to editorial content. The recommendations automatically controlled and delivered by Taboola in terms of content and technology appear in the so-called "Discovery Feed" and refer the user to content within the provider's website or on third-party websites that may also be of interest to them. Taboola's cookies enable the provider to target visitors to its website with individualized advertisements.

For this purpose, Taboola stores a small file with a sequence of numbers in the website visitor's browser, which is used to record the website visitor and anonymized data on the use of the website. Taboola also uses cookies to evaluate and support online marketing measures to record the effectiveness of advertisements for statistical and market research purposes.

No personal data is stored for either retargeting or conversion tracking. Further data protection information can be found at https://www.taboola.com/policies/privacy-policy.

9.7) Sentry

nuno uses the error management tool "Sentry" from Functional Software Inc, 45 Fremont St, San Francisco, CA 94105, USA, both on the website and in the app. Sentry monitors the system stability of nuno and is intended to improve the detection of code errors.

User data is collected anonymously. The data is not used for personal purposes. Further information on data protection can be found at https://sentry.io/privacy/.

9.8) Awin

nuno uses the affiliate marketing platform "Awin" from Awin AG, Eichhornstraße 3, 10785 Berlin, to promote its app on the network. As an affiliate network, Awin forms an interface between merchants and sales partners. So-called "publishers" can apply to nuno via the platform and subsequently also advertise the nuno app on their platforms. The platform thus supports nuno in attracting new "publishers" and "affiliates". All sales-related information of the "publisher" is tracked with the help of Google Analytics; user (end user) data is not documented. You can find out more about Awin's privacy policy at https://www.awin.com/privacy.

9.8) Cloudflare

For the purpose of enhancing the security and performance of our website, we employ the services of Cloudflare, Inc. Cloudflare assists us in protecting our website from security threats and in reducing load times by acting as a reverse proxy for our web content. When you visit our website, Cloudflare may collect certain information about your browser and interaction with the website to enable these security and performance features. Cloudflare processes data in accordance with privacy standards and is certified under the EU-US Privacy Shield framework, ensuring that Cloudflare maintains an adequate level of data protection in line with European privacy regulations. For more information on how Cloudflare uses data and your privacy rights, please visit Cloudflare's privacy policy at https://www.cloudflare.com/privacypolicy/. We use Cloudflare as a crucial part of our efforts to ensure that our website remains secure and as efficient and accessible to you, the user, as possible. The use of Cloudflare is an integral component of our commitment to maintaining a secure online environment for all our users.

10) Deletion of user data

nuno stores the user's personal data for the duration of use of the app. If the user account is deleted, the e-mail address, first name, surname, profile picture and links to third-party providers are permanently and irretrievably deleted.

11) Rights of users

The user has the following rights, which - with the exception of Section 14.9 - can be asserted with the controller or the data protection officer. The contact details can be found in Section 1.

11.1) Right to information (Art. 15 GDPR)

The user has the right to request information free of charge at any time about their personal data stored by nuno, its origin and recipients, the purpose of the data processing, the planned duration of the data storage, including a copy of the personal data that is the subject of the processing.

11.2) Right to rectification (Art. 16 GDPR)

In addition, the user has the right to have incorrect or incomplete personal data corrected or completed without delay at any time.

11.3) Right to withdraw consent (Art. 7 (3) GDPR)

The user has the right to revoke his consent to data processing at any time and with effect for the future, without the need for a reason for revocation.

11.4) Right to erasure (Art. 17 GDPR)

Under the conditions of Art. 17 GDPR, users can request the erasure of their personal data. Their right to erasure depends, among other things, on whether the data concerning them is still required by nuno to fulfill its legal obligations.

11.5) Right to restriction of processing (Art. 18 GDPR)

Under the conditions of Art. 18 GDPR, the user may request the restriction of the processing of personal data concerning him/her.

11.6) Right to data portability (Art. 20 GDPR)

The user has the right to receive the personal data provided by him/her in a structured, commonly used and machine-readable format or to transmit that data to another controller, provided that the processing is based on consent and the processing is carried out by automated means.

11.7) Right to object (Art. 21 GDPR)

Users can exercise their right to object to the creation of user profiles and the processing of their personal data at any time, provided that the processing is based on Art. 6 para. 1 lit. e or f GDPR. The personal data will no longer be processed unless there are compelling legitimate grounds that override the interests, rights and freedoms of the user. If a user's personal data is used for the purpose of direct advertising, the user naturally has the right to object to such processing at any time.

11.8) Right not to be subject to an automated decision (Art. 22 GDPR)

The user has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

11.9) Right to lodge a complaint (Art. 77 GDPR)

Furthermore, the user has the right to lodge a complaint with a supervisory authority at the supervisory authority responsible for the provider:

State Commissioner for Data Protection of the Free State of Bavaria

House address: Wagmüllerstraße 18, 80538 Munich Postal address: Postfach 22 12 19, 80502 Munich

Phone +49 89 212672-0 Fax +49 89 212672-50 poststelle@datenschutz-bayern.de www.datenschutz-bayern.de

12) Topicality and updating of this privacy policy

This privacy policy is currently valid and is dated February 2024.

Due to the further development of our website and our product or due to changes in legal requirements, it may become necessary to amend this privacy policy. The current privacy policy can be accessed and printed out at any time on the website at https://s3.mynuno.com/uploads/nuno-privacy.pdf