Privacy Policy

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Controller (data protection responsible party):
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1. Overview

This Privacy Policy explains how we process personal data (“data”) when you visit our website, contact us, book or purchase services, participate in trainings/workshops, or interact with our social media pages (collectively the “Services”). We process data in accordance with the EU General Data Protection Regulation (“GDPR”) and applicable German data protection laws.

2. Categories of Data We Process

Depending on the context, we may process the following categories of data: (a) identification and contact data (e.g., name, address, email, phone); (b) contract and payment data (e.g., service booked, billing details, payment status); (c) communication and content data (e.g., messages, documents, images, videos and other materials you provide); (d) usage and device data (e.g., pages accessed, timestamps, browser/device info); (e) log data (e.g., IP address, referrer URL).

3. Purposes and Legal Bases

We process personal data for the following purposes and legal bases (Art. 6 GDPR): (a) to provide our Services and perform contracts or pre-contractual steps (Art. 6(1)(b)); (b) to respond to inquiries and communicate with you (Art. 6(1)(b) or Art. 6(1)(f)); (c) to comply with legal obligations (Art. 6(1)(c)); (d) to maintain security and prevent misuse (Art. 6(1)(f)); (e) to measure reach and run advertising/marketing (Art. 6(1)(a) consent where required; otherwise Art. 6(1)(f) where legally permissible).

4. Special Categories of Data (Art. 9 GDPR)

We do not intentionally request or require special categories of personal data (e.g., health data) to provide our marketing, automation, training, photo or video services. If you nevertheless provide such data voluntarily as part of content or communication, we will process it only to the extent necessary for the agreed purpose and, where required, on the basis of your explicit consent (Art. 9(2)(a) GDPR).

5. Recipients and Processors

We may share data with processors (service providers) who process data on our behalf under Art. 28 GDPR (e.g., hosting providers, email providers, IT service providers). We may also disclose data to third parties where necessary for contract performance, legal obligations, or with your consent (e.g., payment service providers).

6. Hosting and Server Log Files

Our website and email services are hosted with Alfahosting GmbH. In this context, log data may be processed (e.g., IP address, requested page, date/time, browser information) for security and technical operation (Art. 6(1)(f) GDPR). Log files are generally stored for a limited period and then

deleted, unless longer retention is necessary for evidence purposes.

7. Contact and Communication

When you contact us (e.g., by email, phone, contact form or via social media), we process your data to handle your request and communicate with you (Art. 6(1)(b) or Art. 6(1)(f) GDPR). We may store inquiries in a CRM or similar system for efficient processing.

8. Contracts, Service Delivery, Trainings and Workshops

We process customer and participant data to prepare, deliver and document services, trainings, workshops and teaching activities, including scheduling, delivery of materials and invoicing (Art. 6(1)(b) GDPR). Where necessary, this may include processing content materials that you provide.

9. Photo and Video Services

In the context of photo and video services, we process content data (e.g., recordings) and, where applicable, personal data of identifiable persons depicted in the material. The legal basis is typically contract performance (Art. 6(1)(b) GDPR) and/or our legitimate interests in producing the agreed deliverables (Art. 6(1)(f) GDPR). Where required by law (e.g., depending on usage and context), additional permissions or consents from the affected persons may be necessary.

10. Payment Service Providers

If you use payment services, payment-related data is processed by the respective provider. We receive confirmation of payment and necessary transaction details. The legal basis is contract performance (Art. 6(1)(b) GDPR) and our legitimate interest in secure payment processing (Art. 6(1)(f) GDPR).

11. Cookies and Consent Management

Our website uses cookies or similar technologies. Strictly necessary cookies may be used on the basis of legitimate interests (Art. 6(1)(f) GDPR) or where required for the service. Analytics and marketing cookies are used only with your consent where required (Art. 6(1)(a) GDPR). You can manage cookie preferences via your browser settings and, where provided, via a consent banner/settings.

12. Google Ads and Conversion Tracking (Active)

We use Google Ads and conversion tracking. This may involve the use of cookies or similar technologies and the processing of usage data to measure advertising effectiveness (conversions) and to optimize campaigns. In the EU, the use of advertising/marketing cookies generally requires your consent. Accordingly, the legal basis is your consent (Art. 6(1)(a) GDPR), which you can withdraw at any time with effect for the future via the consent settings.

13. Social Media Pages

We maintain social media presences to communicate with interested parties and customers. When you interact with our profiles, the respective platform operators process data under their own responsibility. We process your data (e.g., messages, comments) only to communicate with you (Art. 6(1)(b) or Art. 6(1)(f) GDPR).

14. International Data Transfers

Where data is transferred outside the EU/EEA, we ensure appropriate safeguards under Art. 44 et seq. GDPR, such as an adequacy decision by the European Commission or Standard Contractual Clauses (SCCs). Additional safeguards may be applied where necessary.

15. Future Tools (e.g., Scheduling)

We may introduce additional tools in the future (for example, scheduling/booking tools such as Calendly) to facilitate appointment booking. If and when such tools are implemented, this Privacy Policy will be updated accordingly and, where required, consent mechanisms will be provided.

16. Storage Periods and Deletion

We store personal data only as long as necessary for the stated purposes or as required by law. Contract and billing data may be retained to comply with statutory retention obligations (generally 6 or 10 years under German commercial and tax law). We delete or restrict processing when retention is no longer required.

17. Your Rights

You have the following rights under the GDPR, subject to legal requirements: access (Art. 15), rectification (Art. 16), erasure (Art. 17), restriction (Art. 18), data portability (Art. 20), objection (Art. 21), and the right to withdraw consent at any time (Art. 7(3)). You also have the right to lodge a complaint with a supervisory authority (Art. 77).

18. Right to Object (Art. 21 GDPR)

If we process data based on legitimate interests (Art. 6(1)(f) GDPR), you may object for reasons arising from your particular situation. You may also object at any time to processing for direct marketing purposes.

19. Contact

For privacy-related inquiries, please contact us at: r.kosse@rokinc.de.