

PRIVACY NOTICE - SPRIND GMBH (NEXT FRONTIER AI-CHALLENGE)

We appreciate your interest in the Next Frontier AI-Challenge and are pleased that you are visiting our website.

PRIVACY INFORMATION PURSUANT TO ART. 13, 14 OF THE EU GENERAL DATA PROTECTION REGULATION (“GDPR”)

Data protection and security are important to us. We therefore would like to inform you which of your personal data we collect when you visit our website and/or submit your project proposal to us, for what purposes it is used, and what data protection rights you have.

Responsibility for data processing lies with SPRIND GmbH (hereinafter “SPRIND”, “we” or “us”).

NOTE: CHANGES TO THIS PRIVACY NOTICE

Due to changes in statutory or regulatory requirements as well as the further development of technical standards and our services, it may be necessary to adapt this Privacy Notice; it is therefore reviewed regularly for any need for amendments or additions. The Privacy Notice may therefore be changed at any time with effect for the future.

Version of this Privacy Notice: April 2026

TABLE OF CONTENT

- I. CONTROLLER AND DATA PROTECTION OFFICER..... 2
- II. PRINCIPLES; DATA SUBJECT RIGHTS 2
- III. DATA PROCESSING WHEN VISITING OUR WEBSITE..... 7
- IV. PARTICIPATION IN INNOVATION CONTEST („NFAI-CHALLENGE“) / SUBMISSION OF PROJECT PROPOSAL 8
- V. CONTACTING US VIA EMAIL OR CONTACT FORM FOR OTHER REASONS 10
- VI. (VIRTUAL-)EVENTS | PHOTO AND VIDEO RECORDINGS..... 11
- VII. NEWSLETTER18
- VIII. SOCIAL MEDIA20

IX. USE OF COOKIES.....	21
X. ANALYTICS TOOL.....	22
XI. AUTOMATED DECISION-MAKING, PROFILING.....	23

I. CONTROLLER AND DATA PROTECTION OFFICER

1. CONTROLER

The controller within the meaning of the GDPR as well as other national data protection laws of the EU Member States (Federal Data Protection Act for the Federal Republic of Germany, hereinafter “BDSG”) and other data protection provisions is:

SPRIND GmbH, Lagerhofstr. 4, 04103 Leipzig

Management: Ms Berit Dannenberg and Mr Rafael Laguna de la Vera, email: info@sprind.org.

2. DATA PROTECTION OFFICER

If you have questions about data protection, an appointed data protection officer is available at the business address: SPRIND GmbH, Lagerhofstr. 4, 04103 Leipzig, email: datenschutz@sprind.org.

II. PRINCIPLES; YOUR RIGHTS

We take technical and organizational measures to protect your data as comprehensively as possible against unwanted access. We use an encryption method on our website. Your information is transmitted from your computer to our server and back via the Internet using TLS encryption. You can usually recognize this by the closed padlock symbol in the status bar of your browser and the fact that the address line begins with https://.

This Privacy Notice applies to the processing of data in connection with your visit to our website.

If we refer to websites of other providers, the privacy notices and statements of those providers apply.

1. SCOPE OF THE PROCESSING OF PERSONAL DATA

As a rule, we process your personal data only insofar as this is necessary to provide you with our web and service offerings and a functional website, in particular:

- Use of our website by interested parties
- Participation in (online-)events

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- Subscription to our newsletter
- Contacting us via email or a contact form
- Submission of a project proposal / participation in a challenge (NFAI-Challenge)

2. LEGAL BASIS

- Where personal data is processed on the basis of your consent, Art. 6(1)(a) GDPR and Art. 7 GDPR are the legal basis for the processing.
- Where personal data is processed for the performance of a contract or for the implementation of pre-contractual measures to which the data subject is a (contracting) party, Art. 6(1)(b) GDPR is the legal basis.
- Where processing of personal data is necessary for compliance with a legal obligation to which SPRIND is subject, the legal basis is Art. 6(1)(c) GDPR.
- Where vital interests of the data subject or another natural person make processing of personal data by SPRIND necessary, Art. 6(1)(d) GDPR is the legal basis.
- Where the performance of a task is necessary that is carried out in the public interest or in the exercise of official authority vested in SPRIND, the legal basis for the processing of personal data is Art. 6(1)(e) GDPR, e.g. selection of project proposals.
- Where personal data is processed to safeguard our legitimate interests or those of a third party and the interests, fundamental rights and freedoms of the data subject do not override those interests, Art. 6(1)(f) GDPR is the legal basis.

3. POTENTIAL RECIPIENTS OF PERSONAL DATA

In order to provide you with our services and offerings, we sometimes use external service providers. They act on our behalf and in accordance with our instructions when providing their services (so-called processors). In the course of providing their services, these service providers may receive personal data or come into contact with personal data. SPRIND ensures that these service providers demonstrate appropriate technical and organizational measures pursuant to Art. 28 GDPR and that processing by them is carried out in such a way that it complies with relevant data protection provisions and that the protection of the rights of data subjects is ensured.

Due to legal requirements, SPRIND may be obliged to make the data we have collected available to public authorities (e.g., tax authorities, the Federal Criminal Police Office, social security authorities). To the extent legally permissible, we also process personal data with cooperation partners.

4. PLACE OF PROCESSING OF PERSONAL DATA

As a rule, your personal data is processed within the European Union (“EU”) and/or the European Economic Area (“EEA”). However, when certain tools or applications are used, information may be transferred to third countries. Third countries are countries outside the EU and/or the EEA in which an adequate level of data protection in accordance with European requirements cannot automatically be assumed. If the

transferred information also includes personal data that cannot be transferred to the recipient in pseudonymized or anonymized form, we ensure that appropriate safeguards are in place. This can be ensured by a so-called “adequacy decision” of the European Commission, by certification under the Data Privacy Framework, or by using the “EU Standard Contractual Clauses” provided by the EU Commission pursuant to Art. 46(2)(c) GDPR.

5. DATA ERASURE AND STORAGE PERIOD

We store your data only for as long as is necessary to achieve the purpose of the processing or to fulfill our contractual or legal obligations, or until the legal basis for storage no longer applies.

European or national legislators provide in Union regulations, laws or other provisions that, instead of erasure, storage with restriction of processing is also possible, in particular in cases of:

- fulfilment of statutory retention obligations: Fiscal Code (Sec. 147 AO) or Commercial Code (Sec. 257 HGB), six to ten years;
- existence of a legitimate interest in storage: limitation periods for the purpose of possible legal defense (Secs. 195 et seq. German Civil Code (BGB)), three to 30 years.

At the latest, data will be erased once a statutory retention period prescribed by the aforementioned provisions expires. This does not apply in exceptional cases if further storage by SPRIND is necessary and a legal basis exists for this.

6. CATEGORIES OF DATA

We essentially distinguish between the types of personal data concerned as follows:

a. Metadata and log files

These include, for example, your IP address, session ID, the browser type used, the operating system and the time of your request.

b. Masterdata

These are data about you and/or your company provided to us, in particular: company, first name, last name, email address and telephone number.

c. Event and marketing data

In the context of (online) events, we may, for example, receive your master data as well as metadata and log files.

7. HOSTING

Our website is hosted by a hosting service provider. Processing takes place on servers in Germany. When you access our website, the hosting service provider processes server log files for technical reasons (in particular IP address, date and time of access, page/file accessed, status code, volume of data transferred, and information about the browser/operating system used and referrer). Processing takes place for the purpose of providing the website and ensuring stability and security (e.g., error analysis and defense against attacks). The legal basis is Art. 6 (1)(f) GDPR (legitimate interest in secure and efficient website operation). The hosting service provider acts as our processor (Art. 28 GDPR). Processing outside the EU/EEA generally does not take place in the context of hosting, unless stated otherwise. Server log files are stored only for as long as necessary for the purposes stated and are then deleted or anonymized.

8. DATA SUBJECT RIGHTS

The GDPR grants you, as a data subject, certain rights in relation to your personal data. These include:

a. Right of access (Art. 15 GDPR)

You have the right to request confirmation as to whether personal data concerning you is being processed. If so, you have the right of access to this personal data and to the information listed in detail in Art. 15 GDPR.

b. Right to rectification (Art. 16 GDPR)

You have the right to request without undue delay the rectification of inaccurate personal data concerning you and, where applicable, the completion of incomplete data.

c. Right to erasure (Art. 17 GDPR)

You have the right to request that personal data concerning you be erased without undue delay, provided that one of the grounds listed in detail in Art. 17 GDPR applies.

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

You have the right to request restriction of processing if one of the conditions set out in Art. 18 GDPR is met, e.g. if you have objected to the processing, for the duration of the controller's assessment.

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

In certain cases listed in detail in Art. 20 GDPR, you have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and/or to request the transmission of this data to a third party.

f. Right to withdraw consent (Art. 7 GDPR)

Where processing is based on your consent, you are entitled under Art. 7 (3) GDPR to withdraw your consent to the use of your personal data at any time. Please note that the withdrawal only takes effect for the future. Processing that took place before the withdrawal is not affected.

g. Right to object (Art. 21 GDPR)

WHERE DATA ARE COLLECTED ON THE BASIS OF ART. 6 (1) (F) GDPR (PROCESSING TO SAFEGUARD LEGITIMATE INTERESTS) OR ON THE BASIS OF ART. 6 (1) (E) GDPR (PROCESSING IN THE PUBLIC INTEREST OR IN THE EXERCISE OF OFFICIAL AUTHORITY), YOU HAVE THE RIGHT TO OBJECT AT ANY TIME, ON GROUNDS RELATING TO YOUR PARTICULAR SITUATION, TO SUCH PROCESSING. UNLESS COMPELLING LEGITIMATE GROUNDS FOR THE PROCESSING CAN BE DEMONSTRATED THAT OVERRIDE YOUR INTERESTS, RIGHTS AND FREEDOMS, OR THE PROCESSING SERVES THE ESTABLISHMENT, EXERCISE OR DEFENSE OF LEGAL CLAIMS, WE WILL NO LONGER PROCESS THE PERSONAL DATA.

h. Complaint to a supervisory authority

You also have the right under Art. 77 GDPR to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates the GDPR. **The supervisory authority responsible for us is:**

The Federal Commissioner for Data Protection and Freedom of Information ("BfDI")
Graurheindorfer Str. 153, 53117 Bonn

Telephone: +49(0)228 997799-0

Email: poststelle@bfdi.bund.de

De-Mail: poststelle@bfdi.de-mail.de

Contact:

https://www.bfdi.bund.de/DE/Service/Kontakt/kontakt_node.html?logoutReason=restricted

Note: However, you may also lodge your complaint with any other supervisory authority.

i. Exercising your rights

Unless otherwise stated above, please contact the body named in Section I to exercise your data subject rights.

j. Processing when exercising your rights

If you wish to exercise your rights under Articles 15 to 22 GDPR, we will process the personal data you provide to implement these rights and to be able to provide evidence thereof. We will process the data stored for the provision of information and

preparation exclusively for this purpose and for purposes of data protection control, and otherwise restrict the processing in accordance with Art. 18 GDPR.

9. NO OBLIGATION

As a rule, you are under no legal or contractual obligation to provide us with your personal data. However, if you do not provide certain required data, we may be able to provide our services only to a limited extent or not at all. You only need to provide the personal data that are required for establishing the relationship.

III. DATA PROCESSING WHEN VISITING OUR WEBSITE

1. TYPE AND SCOPE OF DATA PROCESSING

Each time our website is accessed, our systems collect data and information from the accessing device that it transmits to us automatically. In particular, the following log files are processed:

- Browser type and browser version
- Operating system used
- Referrer URL
- Hostname of the accessing device
- Date and time of the server request
- IP addresses for backend logs

Information on the processing of other metadata and log files through the use of, for example, Umami, YouTube, Vimeo or social media channels etc. can be found below.

We can only assign these data to you indirectly. These data are not combined with other data sources.

2. PURPOSE AND LEGAL BASIS OF DATA PROCESSING

The temporary storage of the IP address and, where applicable, other log files by the systems each time our websites are accessed is necessary in order to provide the website on your device. The temporary storage is necessary to route communications between users and our services, or is required to enable you to use our services.

The legal bases for this processing—i.e., for the duration of your visit to our website—are Art. 6 (1)(b) and/or (f) GDPR.

Processing and storage of the IP address and log files beyond the communication process take place to ensure the functionality of our services, to optimize these services, and to ensure the security of our information technology systems.

The legal basis for storage of the IP address beyond the communication process for these purposes is Art. 6 (1)(f) GDPR.

3. DURATION OF STORAGE

The data are stored for as long as necessary to achieve the processing purposes stated above. In the case of collection of data to provide our website, this is the case when the relevant session—i.e., the website visit—has ended.

Storage of log files, including the IP address, for the purposes of system security and optimization of our services takes place for a maximum period of 14 days after the user's access to the page has ended.

4. POSSIBILITY TO OBJECT

The collection of log files to provide our website, including their storage within the above limits, is absolutely necessary for its operation and the functions provided there. For this reason, you as a user of the website have no possibility to object.

For processing of log files for analysis purposes, different rules may apply. The possibility to object is governed by Section II of this Privacy Notice and depends on the web analytics tools used and the type of data analysis (anonymous data • pseudonymized data • personal data).

IV. PARTICIPATION IN INNOVATION CONTEST („NFAI-CHALLENGE“) / SUBMISSION OF PROJECT PROPOSAL

1. NATURE AND SCOPE OF THE PROCESSING OF PERSONAL DATA

When submitting a project proposal via the form provided, we will process the data such as name, email address, position, issue / request as well as further information and details concerning the project proposal. In addition, when project proposals are submitted, information published in the internet about the members of the project team - such as biographies and publications - that is relevant to the expertise required for the project proposal (AI expertise) will be processed. To optimize the evaluation of submissions and ensure that a decision can be made within a reasonable period of time, project proposal submissions are subject to AI-assisted evaluation.

2. PURPOSE AND LEGAL BASIS

All personal data is processed for the following purposes only:

- Responding to contact requests and communication;
- Assessing your project proposal;
- Continued retention in order to make contact later and re-assessing your project proposal in case of rejection;
- AI-assisted evaluation of the submitted project documents, including a web search to assess the project team's technical expertise based on their names;
- Selection of experts for assessment of project ideas with the potential to be

breakthrough innovations

- Coordinating and discussing the assessment of project proposals that have the potential to be breakthrough innovations with the SPRIND team, innovators and other experts as well as
- Initiating, establishing, executing and terminating contractual relationships;
- In order to offer support during SPRIND challenges with the SPRIND team, innovators and other experts.

The legal basis for processing your personal data for the above-mentioned purpose is

- Insofar as your consent is required, Article 6(1)(a) of the GDPR. You can withdraw the consent you have granted us at any time by contacting nfai@sprind.org;
- Article 6(1)(b) of the GDPR, if submission of project proposal is made with the aim of establishing or implementing a contract;
- Article 6(1)(e) of the GDPR, if contact is made in relation to questions about possible SPRIND funding or we process the provided data as part of the selection of project proposals;
- Article 6(1)(f) of the GDPR, if contact is made for other purposes. The legitimate interest arises from the need to process your data in order to be able to respond to your query (see also Section V. – “CONTACTING US VIA EMAIL OR CONTACT FORM FOR OTHER REASONS”).

3. CONTINUED RETENTION FOR LATER CONTACT AND RE-ASSESSING YOUR PROJECT PROPOSAL IN CASE OF REJECTION

If you grant us your consent, we retain your personal data on the basis of Article 6(1)(a) of the GDPR (in particular contact details and project data) beyond the duration of the initial assessment for a maximum of three years, to enable us to contact you in future and perform an assessment again.

You can withdraw your consent at any time by contacting nfai@sprind.org (see also Section II. – “Data Subject Rights”).

4. SOURCES OF PERSONAL DATA

We process the data you have provided to us by email, post, telephone or form submission.

5. RETENTION PERIOD

The data processed by us will be erased or its processing will be restricted as laid down in Articles 17 and 18 of the GDPR. We erase your data once it is no longer required, provided that no statutory retention obligations (ten years pursuant to Section 147(1) of the AO (Tax Code); six years pursuant to Section 257(1) of the HGB (Commercial Code) prevent us from doing so. In principle, data is erased when it is no longer required for responding to your query. Project data for which continued retention has been consented to will be retained beyond the duration of the initial

SPRIND

assessment for a maximum of three years or upon withdrawal of consent; all other project data will be deleted upon completion of the challenge. If the data relates to a contractual relationship, its retention duration will be in line with the term of the contract.

6. POSSIBLE CONSEQUENCES OF NON-PROVISION OF DATA

No legal obligation to provide the data exists. However, if we do not receive this data, we will not be able to consider the project proposal.

7. RECIPIENTS

We would like to inform you that we use a specialized search engine and API for AI agents and LLMs provided by AlphaAI Technologies Inc. ("Tavily") to search the internet for information regarding the project team's technical expertise. A corresponding data processing agreement is in place. Tavily is used specifically to process posts / content provided by Google (Scholar), LinkedIn, GitHub, OpenAlex, Arxiv, DBLP as well as the top search results.

The information obtained in this way is used to assess AI expertise and ultimately contributes to the decision which project proposals will receive funding. The permissibility of this processing is based on Art. 6(1)(e) GDPR (project funding in the exercise of official authority vested in SPRIND) or serves (pre-)contractual measures, Art. 6(1)(e) GDPR.

Tavily's backend and cache are hosted on servers in the United States. The transfer of data to a third country, such as the USA, is permissible under the conditions of Art. 46 GDPR and on the basis of the standard contractual clauses agreed with Tavily. These have been approved by the European Commission and guarantee an adequate level of protection for your personal data. You can access the standard contractual clauses on the [European Commission's website](#). As an additional security measure, we have set up the Tavily configuration so that search queries are not stored by Tavily. You can find Tavily's privacy notice at: <https://www.tavily.com/privacy>.

V. CONTACTING US VIA EMAIL OR CONTACT FORM FOR OTHER REASONS

1. TYPE AND SCOPE OF DATA PROCESSING

If you contact us via the contact form provided or by email, we will store the data provided, such as email address, and, where applicable, first and last name, position and company, telephone number, and details of your request, in order to respond to your questions. The processing serves the purpose of handling your inquiry.

2. PURPOSE AND LEGAL BASIS

The legal basis for processing your personal data for the above purpose are

- as a rule, your consent pursuant to Art. 6 (1)(a) GDPR. You can withdraw the consent you have given us at any time at nfai@sprind.org;

SPRIND

- Art. 6(1)(b) GDPR, insofar as contacting us aims at the conclusion or performance of a contract;
- Art. 6(1)(e) GDPR, insofar as contacting us relates, for example, to questions about SPRIND funding opportunities;
- Art. 6(1)(f) GDPR, insofar as contacting us takes place for other purposes. The legitimate interest arises from the necessity of processing your data in order to be able to respond to your inquiry.

If you contact us directly by email, Art. 6(1)(e) and/or Art. 6(1)(f) GDPR is the legal basis for processing your data.

3. SOURCES OF PERSONAL DATA

We process data that you have provided to us via the contact form, by email, by post or by telephone.

4. STORAGE PERIOD

We delete your data if we no longer need it and no statutory retention obligations (ten years pursuant to Sec. 147(1) AO; six years pursuant to Sec. 257(1) HGB) prevent this. As a rule, data are deleted when they are no longer required to respond to the inquiry. If the data can be assigned to a contractual relationship, the retention period depends on the respective term.

5. POSSIBLE CONSEQUENCES OF NOT PROVIDING THE DATA

There is no legal obligation to provide the data. However, if you choose not to do so, we will not be able to consider your inquiry.

VI. (VIRTUAL-)EVENTS | PHOTO AND VIDEO RECORDINGS

We hold events. We need your data in order to organize and conduct the event. Registration generally takes place online. Depending on the event, different data may be required.

1. EVENTS

a. Type and scope of processing

We process your personal data insofar as this is necessary for the planning and implementation of events as well as for registration and participant management. Processing also serves the purpose of networking participants.

b. Legal basis

Processing of personal data serves the performance of SPRIND's tasks (Art. 6(1)(e) GDPR). There is an increased public interest in receiving information about the

content of the event, the participating persons and the framework conditions. If you participate in an event as a speaker, for example, the legal basis is the contract and/or pre-contractual measures relating to the organization of an event and/or participation in an event pursuant to Art. 6(1)(b) GDPR.

c. Sources of personal data

We process data that you have provided to us via the online form.

d. Categories of personal data

If you register with us for an event, we process your contact details.

e. Storage period

With regard to processing based on Art. 6(1)(e) GDPR, you have the right to object at any time under Art. 21(1) GDPR on grounds relating to your particular situation. We will then no longer process your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims.

In the case of consent, we store your data until you withdraw your consent. You can withdraw your consent by email to nfai@sprind.org or by sending a message to the contact details published above.

f. Possible consequences of not providing the data

There is no legal obligation to provide the data. However, if you choose not to provide the mandatory information required for the event, we cannot register you for the event.

g. Luma – transfer of data to a third country

We use the event management service of Luma Labs, Inc., 3340 Hillview Ave, Palo Alto, CA, 94304, USA (“Luma”) to optimize the preparation and implementation of events. Using Luma makes it possible to reach people better and for our events to be found more quickly and easily. When using Luma, the data you provide to us via the online form are processed. The permissibility of this processing is based on Art. 6(1)(e) GDPR (legitimate interest) or serves (pre-)contractual measures, Art. 6(1)(e) GDPR.

Data is also transferred to the USA. The transfer of data to a third country, such as the USA, is permissible under the conditions of Art. 46 GDPR and on the basis of the standard contractual clauses agreed with Luma. These have been approved by the European Commission and guarantee an adequate level of protection for your personal data. You can access the standard contractual clauses on the [European Commission's website](#).

You can find Luma's privacy notice at: <https://luma.com/privacy-policy>. There you will also find further information about your rights and settings options for protecting your privacy.

2. FILM AND PHOTO RECORDINGS

Film and photo recordings are regularly made at our events. We use them to document and present the event to the public. The recordings we make may be published both in print and in digital form, e.g., on websites, in press and event formats, and on social media.

We organize events that have public impact. The processing of film and photo recordings serves the performance of SPRIND's tasks (Art. 6(1)(e) GDPR). There is an increased public interest in receiving information about the content of the event, the participating persons and the framework conditions. As a rule, both group and individual recordings are made. As a participant, you can leave the recording area at any time.

With regard to the processing of your film and/or photo recordings and their publication in print and online as well as on social media, and with regard to other processing on the legal basis of Art. 6(1)(e), (f) GDPR, you have the right to object at any time under Art. 21(1) GDPR on grounds relating to your particular situation. We will then no longer process your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves the establishment, exercise or defense of legal claims.

If you participate in the event as a speaker and/or contribute to its implementation and, where applicable, portrait photos of you are taken, the legal basis for the processing of your personal data for the purposes mentioned above is your consent pursuant to Art. 6(1)(a) GDPR and Art. 7 GDPR. You can withdraw your consent with effect for the future at nfai@sprind.org.

Film and photo recordings will generally be processed for as long as necessary for the documentation of the event and for public relations purposes.

3. VIRTUAL EVENTS

We use "Zoom" to host virtual events (teleconferences, online meetings, video conferences, and/or webinars). Zoom is a service provided by Zoom Video Communications, Inc., which is headquartered at 55 Almaden Blvd., San Jose, CA 95113, USA.

Note:

- If you visit the Zoom website, Zoom is responsible for data processing. However, visiting the website is only necessary to download the software required to use Zoom.
- You can also use Zoom by entering the relevant meeting ID and, if necessary, additional meeting access credentials directly in the Zoom app.
- If you do not want to or cannot use the Zoom app, the basic functions are also available via a browser version, which you can also find on the Zoom website.

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a. Type and Scope of processing

We process your personal data to the extent necessary for the organization, conduct, and follow-up of virtual events, as well as for registration and participant management. In doing so, we process the data in particular in the context of SPRIND's public relations activities. In addition, the data processing serves to facilitate networking among participants.

To this end, it may be necessary for us to process, among other things, the personal data provided during registration or sign-up in order to provide participants with further information even after the event (e.g., links to recordings, presentation materials, consolidated Q&A documents, and references to additional content).

To facilitate communication and improve webinar outcomes, participants may send chat messages and thus actively participate in virtual events. These chat messages are visible only to us and the sender; they are not visible to other webinar participants and are not included in any recordings.

i. Recordings

We regularly record our webinars so that we can make them available to those who were unable to attend on the day of the event.

The recordings do not contain any personal data of our webinar participants:

We disable the features that enable video and/or audio recording. The chat (question window) is visible only to us and is not included in the recording.

During the webinar, messages from the chat are regularly read aloud and thus also become part of the recording. However, when chat messages are read aloud, we do not mention any data that could identify a specific person.

Since the recording does not contain any personal data of participants, we are able to conduct a recording and publish it without a legal basis that would otherwise be required.

We do not publish the recordings on our websites. The recordings are shared exclusively upon request.

ii. Recording of chat content

Regardless of whether the webinar is recorded, we will log the chat content of the webinar if it is necessary for the purpose of documenting the results of the webinar. However, this is generally not the case.

iii. White paper

Participants may also receive a white paper from us containing the webinar content. If we consider chat content to be noteworthy, interesting, or important, it will be included in the white paper. The chat messages included do not contain any personal data. No data will be published in the white paper that would allow conclusions to be drawn about the senders of the chat messages. Nor will any other personal data of our webinar participants be included in the white paper.

b. Legal basis

We generally process your data in the context of virtual events on the basis of Article 6(1)(b) of the GDPR, provided that the meetings are conducted within the framework of (pre-)contractual relationships.

For example, if you participate in a virtual event as a speaker, the legal basis is the contract or pre-contractual measures regarding the organization of a virtual event or participation in a virtual event pursuant to Article 6(1)(b) of the GDPR.

If no (pre-)contractual relationship exists, we process your data on the basis of Article 6(1)(e) of the GDPR. The processing of personal data serves to fulfill SPRIND's tasks. There is a heightened public interest in receiving information about the framework conditions and content of SPRIND's funding initiatives (e.g., so-called "Funken" and "Challenges") provided in the context of virtual events, as well as SPRIND's interest in achieving well-attended virtual events.

The legal basis for the processing of your personal data in connection with chat messages is the consent you have provided by voluntarily writing and sending the message, in accordance with Article 6(1)(a) of the GDPR. You may revoke your consent at any time with future effect by ceasing to send further chat messages.

We use audio or video recording functions, as well as features that are not necessary for a virtual event, solely on the legal basis of the data subjects' consent pursuant to Article 6(1)(a) of the GDPR. The consent form is obtained in advance, if required.

To ensure the smooth operation of our IT systems, as well as to properly maintain them and ensure their IT security, Article 6(1)(f) of the GDPR serves as the legal basis for our legitimate interest in protecting our systems and ensuring their availability and functionality.

c. Source of personal data

We process the data you have provided to us via the form provided for registration or login.

d. Categories of personal data

If you register with us for a virtual event, we process the following data, among other things:

- When using Zoom (specifically for registration, login, and hosting), various types of data are processed. The scope of the data also depends on what information you provide before or during your participation in a virtual event.
- The following personal data may be subject to processing:

Note: To participate in a virtual event or enter the "meeting room," you must provide at least your name.

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As part of the registration process:

Applicant Information	First name, surname, telephone number (optional); valid email address (work / personal); Professional details (job title, company, public reference link, area of expertise and LinkedIn profile (optional)); Analytics data (sources through which you found us)
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As part of the virtual event

User information	Displayed username Email address (if applicable) Profile picture (optional); Preferred language (if applicable);
Meeting-metadata	Description (optional); Participant IP addresses; Device/hardware information; Location, time, meeting ID, duration
For recordings (optional):	MP4 file containing all video, audio, and presentation recordings; M4A audio file containing all audio recordings, and a text file of the online meeting chat
When dialing in by phone:	Information regarding the incoming and outgoing phone numbers, country name, start and end times; if applicable, additional connection data, such as the device's IP address, may be stored
Text, audio, and video data:	You might have the option to use the chat, Q&A, or poll features during a virtual event.

	<p>In this context, the text you enter will be processed in order to display it in the “online meeting” and, if necessary, to log it</p> <p>(Optional, if enabled) To enable video display and audio playback, data from your device’s microphone and, if applicable, its video camera may be processed during the meeting.</p> <p>In this case, you can disable or mute the camera or microphone yourself at any time via the Zoom application.</p>
When using the chat	Your message(s)
When participating in a poll	Your response(s) to the poll

e. Storage period

Your data will be processed for the specific purpose of organizing and administering a virtual event and will be deleted as soon as the purpose for processing no longer applies. Data deletion will be carried out in accordance with statutory retention periods: six years for correspondence and ten years for any invoices issued.

With regard to data processing based on the legal basis of Article 6(1)(e) of the GDPR, you have the right to object at any time pursuant to Article 21(1) of the GDPR for reasons arising from your particular situation. We will then no longer process your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

If you have consented to the further use of your data for marketing purposes or, for example, to receive email newsletters, we will store your data until you withdraw your consent. You may withdraw your consent by sending an email to nfai@sprind.org or by contacting us using the contact details provided above.

f. Recipients

Unless specifically intended for disclosure, personal data processed in connection with participation in webinars is generally not disclosed to third parties.

Zoom necessarily becomes aware of the aforementioned data to the extent provided for in the data processing agreement concluded with the service provider.

g. Possible consequences of not providing the data

There is no legal obligation to provide this information. If you do not provide the required information marked on the form, which is necessary for the event, we will not be able to register you for the virtual event.

h. Zoom – transfer of data to a third country

We use the video conferencing and communication software provided by Zoom Video Communications, Inc., headquartered at 55 Almaden Blvd., San Jose, CA 95113, USA, to host virtual events. When using Zoom's service, the data you have provided to us via the online form is processed. The lawfulness of this processing is generally based on Article 6(1)(f) of the GDPR (legitimate interest) or serves (pre-)contractual measures, Article 6(1)(b) of the GDPR, unless consent is required, in which case we will obtain it separately.

Data is also transferred to the United States. Data transfers to a third country, such as the United States, are permitted under the conditions set forth in Article 46 of the GDPR and on the basis of appropriate safeguards. An adequate level of data protection is guaranteed, on the one hand, by the conclusion of the so-called EU Standard Contractual Clauses. These have been approved by the European Commission and guarantee you an adequate level of protection for your personal data. You can access the Standard Contractual Clauses on the European Commission's website (https://commission.europa.eu/publications/publications-standard-contractual-clauses-sccs_de). The provider of Zoom is also certified under the so-called EU-U.S. Data Privacy Framework (DPF). We have entered into a data processing agreement with the provider of "Zoom" that complies with the requirements of Article 28 of the GDPR. As additional safeguards, we have also configured our Zoom settings so that only data centers located in the EU, the EEA, or safe third countries such as Canada or Japan are used for conducting virtual events.

You can find Zoom's privacy notice at: <https://www.zoom.com/de/trust/privacy/privacy-statement/>. There you will also find more information about your rights and privacy settings.

VII. NEWSLETTER

1. TYPE AND SCOPE OF PROCESSING

You have the option to subscribe to our newsletter on our website, with which we inform you about current developments.

We use the double opt-in procedure to register you for our newsletter. After you have signed up for the newsletter, you will receive an email to the email address provided in which we ask you to confirm the subscription and to confirm that you are the owner of the relevant email address. If we do not receive your confirmation within one month, we will block your information and delete it. If you confirm your email address, we store your IP address as well as the time of registration and confirmation in order to be able to prove your registration and to clarify possible misuse of your personal data.

The only mandatory information required to receive the newsletter is your email address. Providing additional personal data, which is separately marked, is voluntary and will be used to address you personally. After you have confirmed your subscription, we will store your email address and, where applicable, any additional voluntary information for the purpose of sending the newsletter and optimising the newsletter service.

2. PURPOSE AND LEGAL BASIS

To send the newsletter, we require your email address, which we store for this purpose. You may also provide additional data for personalized addressing if you wish.

The legal basis for data processing is your consent pursuant to Art. 6(1)(a) GDPR and, with regard to the storage of information on your terminal equipment and/or access to information already stored on your terminal equipment, Sec. 25(1) TDDDG.

3. SOURCES OF PERSONAL DATA

We process data that you have provided to us via the online form.

4. CATEGORIES OF PERSONAL DATA

If you subscribe to our newsletter, we process your email address and, where applicable, other data.

5. STORAGE PERIOD

We store your data until you withdraw your consent.

You can withdraw your consent by clicking the link provided in every newsletter email, by sending an email to nfai@sprind.org, or by sending a message to the contact details published above.

6. POSSIBLE CONSEQUENCES OF NOT PROVIDING THE DATA

There is no legal obligation to provide the data. However, if you choose not to provide your email address, we cannot send you a newsletter.

7. RECIPIENTS

We would like to inform you that our email newsletters are sent via the technical service provider CleverReach GmbH & Co. KG, Schafjückenweg 2, 26180 Rastede ("CleverReach"), to whom we forward the data provided by users when signing up for the newsletter. A corresponding data processing agreement is in place. The data entered by users for the purpose of receiving the newsletter (e.g., email address) are stored on CleverReach servers in Germany or Ireland. CleverReach uses this information to send the newsletter and to perform statistical analysis of the newsletters on our behalf. For evaluation purposes, the newsletters sent contain so-called web beacons or tracking pixels, which are one-pixel image files stored on our website. This makes it possible to determine whether a newsletter message was opened and which links were clicked, if any. Technical information is also collected (e.g., time of retrieval, IP address, browser type and operating system).

Using the data obtained in this way, we may create a user profile in order to tailor the newsletter in the future to the interests of newsletter subscribers. In doing so, we record whether and when you read our newsletters and which links you click in these

newsletters. This data is used exclusively for the statistical analysis of newsletter campaigns. The results of these analyses can be used to better adapt future newsletters to the interests of recipients.

Such tracking is not possible if you have deactivated the display of images by default in your email program. In this case, the newsletter will not be displayed in full and you may not be able to use all functions. If you display the images manually, the tracking described above will take place.

VIII. SOCIAL MEDIA

As part of our public relations work, SPRIND maintains online presences within the following social networks:

- X, operated by X Corp., 1355 Market Street, Suite 900 San Francisco, CA 94103, USA, with a branch office at One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland
- LinkedIn, operated by LinkedIn Ireland Unlimited Company (Wilton Place, Dublin 2, Ireland),
- Instagram, operated by Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland),
- YouTube, LLC, 901 Cherry Ave. San Bruno, CA 94066, USA;
- Vimeo.com, Inc., 330 West 34th Street, 10th Floor, New York, NY 10001

in order to inform users active there about SPRIND and to engage in an exchange with users. The references are identifiable on our website, among other things, by links to our presence on the respective social networks.

No social plugins are used.

We would like to point out that the terms of use of the services mentioned and linked on our website, and those of their operators, are not subject to SPRIND's control and that you use them at your own responsibility. These services and their operators store and process personal data of their users (including IP address, the application used, details of the device you use including device ID and application ID, information about websites accessed, your location and your mobile network provider).

The data collected about you when using the services are processed in accordance with their own policies and may be transferred to countries outside the European Union. If you have created an account/profile, these data are assigned to the data of your respective account/profile. SPRIND has no influence on data collection and the further use of the data by the social networks. Therefore, we have no knowledge of the extent, location and duration of data storage, the extent to which the networks comply with existing deletion obligations, what evaluations and links are made with the data, and to whom the data are disclosed.

Please refer to the respective privacy notices for information about your rights and settings options for protecting your privacy:

- <https://x.com/de/privacy>
- <https://www.linkedin.com/legal/privacy-policy>
- https://help.instagram.com/581066165581870/?helpref=hc_fnav
- <https://policies.google.com/privacy?hl=de&gl=de>

- <https://vimeo.com/legal/privacy/policy>

The services disclose your personal data to their processors and third-party service providers, some of whom are located outside the European Economic Area (EEA). These process the personal data obtained in this way for their own purposes, e.g., analysis and marketing, and your usage behavior on external and their own websites of third-party providers. Profiling cannot be excluded either.

The personal data collected from you and data from third-party providers are transmitted to servers that are mostly located in the USA. If the service is certified under the Data Privacy Framework, transfer of data to the USA can be based on the agreement.

The following services we use are certified:

- X Corp.
- LinkedIn
- Meta
- Google
- Vimeo

Nevertheless, it cannot be ruled out that US security authorities vested with extensive powers may access your personal data at any time and without cause. This applies even if the servers are located in Europe. You have no effective legal remedies against this.

You can restrict the processing of your data in the general settings of your user accounts. In addition, on mobile devices you can restrict the services' access to contact and calendar data, photos, location data, etc. in the settings options there. However, this depends on the operating system used.

IX. USE OF COOKIES

We use cookies on our website. Cookies are small text files that are assigned and stored on your hard drive by the browser you use via a characteristic string of characters and through which certain information flows to the entity that sets the cookie. Cookies cannot run programs or transmit viruses to your computer and therefore cannot cause any damage. They serve to make the Internet offering overall more user-friendly and effective, i.e., more pleasant for you.

Cookies may contain data that make it possible to recognize the device used. However, some cookies only contain information about certain settings that are not personally identifiable. Cookies cannot directly identify a user.

A distinction is made between session cookies, which are deleted when you close your browser, and persistent cookies, which are stored beyond the individual session. With regard to their function, cookies are further distinguished between:

- Technical cookies: These are strictly necessary to navigate the website, use basic functions and ensure the security of the website; they neither collect information about you for marketing purposes nor store which websites you have visited;

SPRIN-D

- Performance cookies: These collect information about how you use our website, which pages you visit and, for example, whether errors occur when using the website; they do not collect any information that could identify you – all collected information is anonymous and is only used to improve our website and to find out what interests our users;
- Advertising cookies, targeting cookies: These serve to offer the website user advertising tailored to their needs on the website or offers from third parties and to measure the effectiveness of these offers; advertising and targeting cookies are stored for a maximum of 13 months;
- Sharing cookies: These serve to improve the interactivity of our website with other services (e.g., social networks); sharing cookies are stored for a maximum of 13 months.

By using cookies, we ensure that our website functions properly. In addition, this enables us to optimize the website experience. These are the purposes of the data processing.

Any use of cookies that is not strictly technically necessary constitutes data processing that is permitted only with your consent pursuant to Art. 6(1)(a) GDPR. This applies in particular to the use of advertising, targeting or sharing cookies.

These cookies are not used on our website; we use only technically necessary cookies.

X. ANALYTICS TOOL

We use “UMAMI” on our website, an open-source software by Umami Software, Inc., Delaware, USA, for the statistical evaluation of visitor access. Based on the statistics obtained, we can improve our offering and make it more interesting for you as a user. We use Umami because we explicitly want to avoid the otherwise common external analysis through Google Analytics.

Using Umami, we analyze where visitors to our website come from, which content is relevant to you, and where there may be problems on our website. We do not monitor our users as identifiable persons. All data, including the IP address, are stored exclusively in anonymized form.

We operate Umami in a version that does not require cookies. No Umami cookies are stored on your computer for the purpose of web analysis. For the analysis of website usage, your IP address and information such as timestamps, visited web pages and your language settings are collected. We store the information collected in this way on our server.

Due to the purposes described, the legal basis for the processing of personal data is Art. 6(1)(f) GDPR.

Further information on Umami’s terms of use and data protection provisions can be found at: <https://umami.is/privacy>.

SPRIN-D

XI. Automated Decision-Making, Profiling

SPRIND does not use tools for automated decision-making, including profiling, as defined in Article 22 of the GDPR.