Information on privacy policy

at processing of customer data and data of interested parties
pursuant to article 13, 14 and 21 GDPR
Version 1.4 – Status: 19.05.2026

Privacy policy

for

customers and interested parties

CSP Intelligence GmbH
Herrenäckerstraße 11
D – 94431 GroßköllnbachDear customer, dear interested party,

We hereby inform you about the processing of your data as well as your rights related thereto pursuant to article 13, 14 and 21 GDPR. Which data are processed in detail and used in which way depends largely on the requested and/or agreed services.

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1. Responsible authority in the sense of privacy policy

CSP Intelligence GmbH
Herrenäckerstraße 11
D – 94431 Großköllnbach
Telephone: +49 99533006-0
info@csp-sw.de
www.csp-sw.com

2. Contact data of our data protection officer

Kemal Webersohn, LL.M.
WS Datenschutz GmbH
Dircksenstraße 51
10178 Berlin
E-Mail: csp@ws-datenschutz.de

3. Purpose and legal basis for processing

We process your personal data in accordance with the stipulations of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG) for the purpose of entering into, execution or fulfillment of a contract as well as for execution of precontractual measures. Insofar as it is necessary that you provide us with personal information for the initiation or execution of contractual relationships or in the framework of the execution of precontractual measures, a processing of such data is legitimate pursuant to article 6 subparagraph 1 letter b GDPR.

Given that you grant your express permission on us processing your personal data for certain purposes (e.g. Passing of data to third parties, analysis of data for marketing purposes, advertisement), legitimacy of such processing on the basis of your consent exists pursuant to article 6 subparagraph 1 letter a GDPR. A permission granted can be revoked at any time (see section 9 of this privacy policy). Please take note that a revocation is only valid for the future. Processing that has taken place prior to the revocation are not impacted by such revocation.

Given that it is required or permissible by law, we will process your data beyond the original contractual purpose for the fulfillment of statutory obligations (Article 6 subparagraph 1 letter c GDPR). Beyond that, processing may take place for maintaining legitimate interest (article 6 subparagraph 1 letter f GDPR) by us or third parties; we will separately inform you about such event, giving you the grounds of legitimate interest insofar as this is stipulated by law.

Beyond that, we process personal data of business contacts and potential contact persons to identify suitable business contacts, for B2B business initiation, for establishing contact, and for documenting and following up on our sales activities. The processing is based on our legitimate interest in targeted B2B communication, in acquiring suitable business contacts and in building business relationships pursuant to article 6 subparagraph 1 letter f GDPR. Before a contact is added to our customer management system and before contact is made, its business relevance is checked by a person. A solely automated selection or approach does not take place.

4. Categories of personal data

We process data that are connected to the entering into contract and/or the precontractual measures. These data may consists of general data regarding your person or persons of your company (such as name, address, contact data) as well as further data, as the case may be, which you transfer to us in the framework of the entering into contract.

In the course of business initiation, we may additionally process the name, the company, the professional position or function, professional contact data, publicly visible professional profile information, the profile URL, communication content, the contact status as well as information on previous or planned business approaches.

5. Source of the data

We process personal data that we receive from you within the framework of establishment of contact and/or formation of contract or within the framework of precontractual measures and/or data that you provide to us via our website, social networks, newsletter subscription, expositions or customer events.

In addition, we may collect professional contact data from publicly accessible sources, in particular company websites, professional directories and professional networks such as LinkedIn and LinkedIn Sales Navigator. These data are in particular names, companies, professional positions or functions, professional contact data as well as publicly visible professional profile information.

6. Recipients of the data

Within our company, we only transfer your personal information to sections where this data is required for fulfillment of contractual and statutory obligations and/or for execution of our legitimate interest.

We can transfer your personal data to affiliated companies as far as this is permissible in the framework of the purposes and legal basis pursuant to section 3 of the privacy policy.

Your personal data is processed on our behalf on the basis of data processing agreements pursuant to section 28 GDPR. In these cases, we ensure that processing of personal data is done according to the General Data Protection Regulation. In this case, the categories of recipients are host providers as well as providers of newsletter subscription systems, web-design, customer management systems and software.

Within the framework of our sales and business initiation processes, personal data may also be processed by providers of professional networks, sales service providers as well as providers of customer management, data transfer and sales software. These include in particular LinkedIn Sales Navigator, Surfe, HubSpot as well as the sales service provider commissioned by us, Singularity Sales. The service providers are integrated according to their role under data protection law and, where necessary, are bound by data processing agreements pursuant to section 28 GDPR.

In any other case, data transfer beyond our company will only take place as far as statutory provisions allow or command it, the transfer is necessary for execution and thus fulfillment of the contract or, upon your request, for execution of precontractual measures, you have agreed or we are authorized to transfer such information. Under these conditions, recipients of personal data may be, for example:

- Public authorities and institutions (e.g. Office of Public Prosecution, Supervisory Authorities, Tax Authority) in case of a statutory or administrative obligation.
- Recipients to which transfer is necessary for initiation of fulfillment of contract, e.g. affiliated companies that provide supplementary hardware.
- Further data recipients could be those for which you have given us your consent for transfer of data.

7. Transfer to a third country

Transfer of personal data to countries outside of the EEA (European Economic Area) or to an international organization will only take place insofar as this is required for execution and thus fulfillment of the contract, or, upon your request, for execution of

precontractual measures, the transfer is stipulated by law or you have given us your consent on such transfer. In this case, local agencies, airlines and hotels might be among the recipients of data.

Within the framework of the use of IT, customer management, sales and communication service providers, personal data may also be transferred to recipients outside the European Union or the European Economic Area or be processed there. This concerns in particular the use of LinkedIn Sales Navigator, Surfe and HubSpot as well as the affiliated companies and subprocessors used by these providers. Transfers to third countries take place in compliance with articles 44 et seqq. GDPR. They are based in particular on an adequacy decision of the European Commission or on the standard contractual clauses of the European Commission and supplementary protective measures.

8. Duration of the storage of data

As far as required, we process and store your personal data for the duration of our business relationship, which might include e.g. the initiation and execution of a contract and/or for our fulfillment of the purpose of contract.

Apart from that, we are subject to several storage and documentation obligations which are derived, among others, from the German Commercial Code (HGB) and the German revenue code (AO). The periods for storage and documentation set forth therein are in between 2 and ten years.

After all, periods for storage are also assessed by statutory periods of limitation, which are usually three years, but might be up to 30 years in some cases pursuant to sections 195 and following of the German Civil Code (BGB).

Data of potential business contacts are only stored for as long as a comprehensible business relation or a realistic possibility of business initiation exists. If no business relationship is established and no further relevant communication takes place, the data are, as a rule, reviewed and deleted after twelve months at the latest. In the event of an objection, active approach is discontinued. A blocking note limited to the necessary minimum may remain stored in order to reliably prevent renewed advertising contact.

9. Your rights

Any affected person has the right of access pursuant to section 15 GDPR, the right of rectification pursuant to section 16 GDPR, the right of erasure pursuant to section 17 GDPR, the right on restriction of processing pursuant to section 18 GDPR, the right of notification pursuant to section 19 GDPR and the right to data portability pursuant to section 20 GDPR.

Moreover, you have the right to complain to the Data Protection Supervisory Authority pursuant to section 77 GDPR if you are of the opinion that processing of your personal data is unlawful. This right to complain exists notwithstanding any other administrative or legal remedy.

Insofar as processing of data is done on the basis of your consent, you are entitled pursuant to section 7 GDPR to revoke your consent on the usage of your personal data at any time and with effect for the future. Please note that we may have to store certain data for a specific period of time in order to fulfill statutory provisions.

Right of objection

Insofar as the processing of personal data affecting you is done pursuant to article 6 subparagraph 1 letter f GDPR for maintaining of our legitimate interest, you have the right pursuant to article 21 GDPR to object at any time against the processing of these data for reasons arising from your own personal situation. We will then discontinue processing these personal data unless we can present compelling and legitimate grounds for the processing that supersede your interest, rights and liberties, or processing serves the purpose of assertion, exertion or defense against any legal claims.

In individual cases, we process your personal data in order to practice direct advertisement. You have the right to object at any time to this processing of personal data relating to you for the purpose of such advertisement; this also applies to profiling insofar as it is connected to such direct advertisement. If you object to the processing for the purpose of direct advertisement, we will no longer process your personal data for this purpose.

For safeguarding your rights, you can contact us at any time using the above mentioned contact information.

10. Necessity of the provision of personal data

The provision of personal data for formation and fulfillment of contract or for execution of precontractual measures is usually stipulated neither by law nor by contract. Thus, you are not obliged to provide your personal data. However, the provision of personal data is normally necessary for the decision on formation of a contract, fulfillment of such contract or precontractual measures. You should and have to provide only the kind of personal data that is absolutely necessary for formation of a contract, for fulfillment and/or precontractual measures. Insofar as you do not provide us with your personal data, we might be unable to make a decision in the framework of contractual measures.

11. Automated decision-making

For initiation or execution of the business relationship as well as for precontractual measures, we generally do not use a fully automated decision-making process pursuant to article 22 GDPR. In case we should implement such process in individual cases, we will separately inform you and/or ask for your consent insofar as this is stipulated by law.