Privacy Notice for Meta Business Services

1. Controller

The controller responsible for the processing of personal data in connection with the registration, administration, and provision of Meta Business Services is:

zvoove Group GmbH
Von-Humboldt-Straße 2
49835 Wietmarschen
Germany
E-mail: privacy@zvoove.com

2. Data Protection Officer

zvoove Group GmbH has appointed an external Data Protection Officer.

Dr. Thomas Balzer
Attorney-at-Law / EuroPriSe Certified Privacy Expert
bpc GmbH
Einigkeitstr. 9
45133 Essen
Germany

3. Purpose of Processing

zvoove Group GmbH provides a solution for digital communication and interaction between businesses and their customers, applicants, employees, and other communication partners.

The services may support, in particular, the following activities:

- Connection to the WhatsApp Business Platform
- Sending and receiving messages via the WhatsApp Business Platform
- Management of communication processes
- Handling customer service and support requests
- Automation of recurring communication workflows
- Provision of communication and service functionalities for our customers
- Documentation and tracking of communication activities

4. Categories of Personal Data Processed

In connection with the provision of our services, we may process the following categories of personal data:

- Names and business contact details of our customers' representatives
- Company and contractual data
- Meta Business Account and WhatsApp Business Account information

- Communication and support data
- Usage, log, and diagnostic data
- Technical information relating to the use of our services

5. Legal Basis for Processing

Personal data is processed on the basis of:

- Article 6(1)(b) GDPR (performance of a contract)
- Article 6(1)(c) GDPR (compliance with a legal obligation)
- Article 6(1)(f) GDPR (legitimate interests in the secure and efficient provision of our services)

Where processing is based on Article 6(1)(f) GDPR, we process personal data where necessary for our legitimate interests. These interests include, in particular, the secure and efficient provision of our services, ensuring IT and system security, troubleshooting and improving our products and services, preventing misuse, abuse and fraud, handling customer and support requests, and establishing, exercising or defending legal claims.

6. Processing on Behalf of Our Customers

To the extent that personal data is processed through our customers' use of the WhatsApp Business Platform or other Meta Business Services, zvoove Group GmbH and the respective affiliated companies involved process such data solely on behalf of and in accordance with the instructions of the respective customer pursuant to Article 28 GDPR.

This may include, in particular:

- Name
- Telephone number
- Communication content
- Date and time of communications
- Technical communication and usage data
- Information provided by the customer in connection with the use of Alfred

The respective customer remains the controller within the meaning of Article 4(7) GDPR with regard to the processing of personal data of its customers, prospects, applicants, employees, or other communication partners.

Where consent is required for communications via WhatsApp or similar messaging services, obtaining, documenting, and managing such consent is the responsibility of the respective customer as controller.

7. Recipients of Personal Data

Where necessary for the provision of our services, personal data may be disclosed to:

- Companies within the zvoove Group
- Hosting, infrastructure, and support service providers
- Meta Platforms Ireland Limited and its affiliated companies

8. International Data Transfers

Where personal data is transferred to or processed outside the European Economic Area (EEA), such transfers shall take place only on the basis of appropriate safeguards in accordance with Chapter V GDPR, including adequacy decisions or Standard Contractual Clauses, where applicable.

9. Data Retention

Personal data will be retained only for as long as necessary to fulfill the respective processing purposes or as required by statutory retention obligations.

10. Data Subject Rights

Subject to the applicable requirements of the GDPR, data subjects have the following rights:

- Right of access (Article 15 GDPR)
- Right to rectification (Article 16 GDPR)
- Right to erasure (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to data portability (Article 20 GDPR)
- Right to object (Article 21 GDPR)
- Right to lodge a complaint with a supervisory authority (Article 77 GDPR)

For questions regarding the processing of personal data or the exercise of data protection rights, data subjects may contact zvoove Group GmbH or the Data Protection Officer at: privacy@zvoove.com.

11. Right to Object

Where personal data is processed on the basis of Article 6(1)(f) GDPR, data subjects have the right to object at any time, on grounds relating to their particular situation, to such processing.

If personal data is processed for direct marketing purposes, data subjects have the right to object at any time to such processing, including profiling related to direct marketing.

12. Right to Lodge a Complaint

Pursuant to Article 77 GDPR, data subjects have the right to lodge a complaint with a competent data protection supervisory authority.

The supervisory authority responsible for zvoove Group GmbH is:

The State Commissioner for Data Protection of Lower Saxony
(Die Landesbeauftragte für den Datenschutz Niedersachsen)

Prinzenstraße 5
30159 Hannover
Germany
Telephone: +49 511 120-4500
E-mail: poststelle@lfd.niedersachsen.de
Website: https://www.lfd.niedersachsen.de/

13. Requests for Data Deletion

Requests concerning the deletion of personal data may be submitted to: privacy@zvoove.com. Where zvoove Group GmbH processes personal data solely on behalf of a customer, deletion requests will be forwarded to the respective controller or handled in coordination with that controller. Personal data will be deleted in accordance with applicable legal retention requirements.