

Privacy Policy for JustRelate CX Cloud

For Clients and Users

Status: 2026-02-01

1. Introduction

We at JustRelate take the protection of your personal data very seriously and process your personal data exclusively within the framework of applicable legal provisions for the protection of personal data, in particular the General Data Protection Regulation (“GDPR”).

This Privacy Policy explains whether we process personal data and, if applicable, which personal data we process in connection with the use of our websites (e.g., www.justrelate.com), in particular the use of the JustRelate CX Cloud and its services (collectively, “**JustRelate CX Cloud**”), including to what extent and for what purposes. In addition to this, we shall inform you about your rights under data protection laws.

As we continue to develop the JustRelate CX Cloud and integrate new functions and technologies in order to improve our services for you, our Privacy Policy may have to be amended. We therefore recommend that you reread our Privacy Policy from time to time.

2. Explanation of Terms

The data protection terms used in this Privacy Policy are defined in Article 4 GDPR. The complete text of the GDPR is available [here](#).

3. Who is responsible for data processing and who can I contact?

Owner and Data Controller:

JustRelate Group GmbH

Kitzingstraße 15

12277 Berlin

Germany

Phone +49 30 747 993-0

Fax +49 30 747993-93

Email info@justrelate.com

Data Protection Officer:

Stephan Hartinger
c/o coseco GmbH
Albertus-Magnus-Straße 2-4
86836 Graben
Germany

Phone +49 8232-904850

E-Mail info@coseco.de

You can contact our Data Protection Officer directly at any time if you have any questions or suggestions regarding data protection.

4. Who does this Privacy Policy apply to?

When we process personal data, it means that we collect, store, use, transmit or delete it. This Privacy Policy concerns the personal data of:

- Users of the JustRelate CX Cloud;
- Clients of JustRelate, as well as members of their staff, who use the JustRelate CX Cloud, and service providers, agencies, and other vicarious agents, as well as their staff, who use the JustRelate CX Cloud on behalf of Clients of JustRelate.

5. Which data do we process for you?

We process your personal data when you use the JustRelate CX Cloud. Your Personal Data is

- the data we obtain from you when you use the JustRelate CX Cloud,
- obtained from third parties, and/or
- created by us when you use the JustRelate CX Cloud.

6. What of your data do we use and for what processing purpose, and on what legal basis?

We process the following personal data for the following purposes in accordance with the following provisions of the GDPR:

6.1 Fulfilling contractual and pre-contractual obligations (Article 6 (1) (1) (b) GDPR)

6.1.1 Contract for Testing the JustRelate CX Cloud

If you conclude a contract with us to test the JustRelate CX Cloud, we will process the following data:

- **Contact Data.** Data from contact persons, in particular those responsible for contractual and (cloud and support) technical issues and processes, which can usually be found in email signatures or on business cards (e.g., names of companies or organizations, addresses, personal names, contact persons, email addresses, and telephone numbers).
- **Access Data.** SignUp and SignIn data and other account related contact data required to access the JustRelate CX Cloud and the respective account (s) (e.g., company or organization names, personal names, email addresses, and phone numbers password, domain, and/or similar account details) in order to execute the test.
- **Test Data.** The data processed for testing purposes, which corresponds to the data that would be processed if you had entered into a contract with us for the use of the JustRelate CX Cloud (see Contract Data, Section 6.1.2).

6.1.2 Contract for the use of JustRelate CX Cloud

Within the scope of the contractual relationship(s) or corresponding pre-contractual obligations between you and us for the use of the JustRelate CX Cloud , we process the following data for the following purposes:

Contract Data. The data necessary to enter into, execute, and terminate the contracts and agreements in place relating to the JustRelate CX Cloud, in particular:

- Contact Data and Access Data (see Section 6.1.1).
- Billing Data (e.g., Contact Data for billing issues and processes, and credit card information, banking information, and/or a billing address).
- JustRelate CX Cloud Services Data. To provide the JustRelate CX Cloud and the related services to you, we process the data
 - (i) we obtain from you when you use the JustRelate CX Cloud, including data of your (current and potential) customers;
when we process the data of your customers that they themselves enter or which you submit to us (e.g., users of your websites or recipients of your emails), it is in our legitimate interest to process this data for you in order to fulfill the contract with you (see Section 6.3),
 - (ii) obtained from third parties;
we may, e.g., receive data about organizations, industries, lists of companies, marketing campaigns, events, and other matters relevant to our business from parent corporations, affiliates and subsidiaries, our partners, or other third parties that we use to make our own information more useful. This data may be combined using technologies like AI, and may include

aggregate-level data. For example, information about how well an online marketing or email campaign performed, or to create a business contacts directory, and/or

- (iii) created by us when you use the JustRelate CX Cloud, within the framework of the services provided based on the contract for the following purposes:

Create, Engage, and Retain Customers in one Place

The JustRelate CX Cloud helps you manage all your customer interactions in one place. You can reach customers through Websites, landing pages, emails, messaging, and more – on any device, in any region. To the extent that you use the JustRelate CX Cloud in connection with such use, we process this data on your behalf. For example, you can do the following with the JustRelate CX Cloud:

- Build personalized Websites, landing pages, and portals
- Manage email campaigns (mass emails and transactional messages)
- Organize and track customer relationships clearly
- Automate marketing processes to free your team's time
- Develop content with AI assistance for writing, translation, and optimization
- Configure quotes quickly and accurately
- Manage service tasks smoothly

In particular, if you use the JustRelate CX Cloud to create, engage, and retain customers in one place, we process the personal data in connection with the following JustRelate CX Cloud services for the following purposes on your behalf:

- **Create:** Build Websites, landing pages, and customer portals quickly. Design and send emails that reach your audience clearly and effectively.
- **Engage:** Capture leads, automate marketing tasks, and manage customer relationships simply. Provide clear quotes, manage communications, and streamline your sales process.
- **Retain your customers:** Set up self-service portals to simplify after-sales tasks. Make cross-selling and upselling straightforward. Help customers solve issues quickly and independently, day or night.

Types of Personal Data

In this context, we process the following types of your personal data, for example,:

- **Metadata.** Data generated by us to provide additional context in connection with use of the JustRelate CX Cloud.
- **Activity data.** Data about your activities generated when you access or use the JustRelate CX Cloud, recording this data in log files (e.g., IP address, address of the web page visited before using the JustRelate CX Cloud, your browser type and settings, the date and time our

services were used, information about browser configuration and plugins, and language preferences).

- Device data. Data about devices accessing the JustRelate CX Cloud (e.g., type of device, operating system used, device settings, application IDs, unique device identifiers, and crash data).
- Location data. Data that helps us locate your location (e.g., your business address and IP address).
- Marketing and communications data (e.g., preferences in receiving marketing from us and our third parties and your communication preferences).
- Customer support data. When you request support, we use the data you actively transmit to us to provide the requested support.

Cookies. During your use of the JustRelate CX Cloud, cookies are stored and saved on your computer. For a detailed description of the use of cookies, please refer to Section 9 and the **Cookie Policy for JustRelate**.

6.2 Your Consent (Article 6 (1)(1)(a) GDPR)

- **Chat.** If you would like to take advantage of our chat option, we process the data you enter and your message to us, in some cases – if you would like to be contacted – your name, email address, telephone number or other contact information. In addition to the data that you actively transmit to us, we also process personal data transmitted to us in the course of message transmission in the context of the chat (e.g., IP address, date, and time). We use your information to carry out the chat, to provide information and offers requested by you and to improve our services.
- **Contact Form.** If you would like to use our contact form, we process the data you enter (e.g., your name and company or organization, email address) and your message to us. In addition to the data that you actively transmit to us, we also process personal data transmitted to us in the course of message transmission and associated with the message (e.g., IP address, date, and time). We use your data to process and answer your (contact) request.
- **Newsletter.** If you would like to subscribe to our newsletter, we use the data you actively transmit to us to send the newsletter, i.e. your email address and all other personal data allowing us to address you appropriately (e.g., title and name) and, in addition, conversion data to evaluate the objectives of the mailing and to optimize the content and structure of the newsletter.

Double opt-in. Furthermore, we process information that allows us to verify whether you are the owner of the email address provided, and to make sure that you agree to the subscription of the newsletter. To do this, we use the so-called double opt-in process. For this purpose, we send a confirmation email after the subscription is received to the email address provided (for this purpose we store the date and time when the order was sent and the IP address of the sender). This email

provides you with the option to confirm the subscription. Your email address will only be included in our active mailing list after you have completed this confirmation.

Withdrawal of consent

You may, at any time, withdraw your consent associated with the contact request and the newsletter.

You do not need to fill out a form in order to do so. You can submit your withdrawal by sending an email to info@justrelate.com or a message to the contact details specified in Section 3.

You can also cancel your newsletter subscription by clicking on the link provided in every newsletter email.

Please note that any withdrawal is only effective for the future. Withdrawal will not affect the legal basis of your consent for any data processing that was carried out prior to the withdrawal.

6.3 Our legitimate interest (Article 6 (1) (1) (f) GDPR)

- **JustRelate website.** During your simple visit to the JustRelate website, as well as during your use of the JustRelate CX Cloud, we process the data transmitted by your internet browser to provide an optimized use of our website (e.g., IP address, address of the web page visited before using the JustRelate CX Cloud, your browser type and settings, date and time our services were used, information about browser configuration and plugins, and language preferences). During your visit, cookies are stored and saved on your computer. For a detailed description of the use of cookies, please refer to Section 9 and the **Cookie Policy for JustRelate**.
- **Data of your (current and potential) customers.** When we process the data of your customers that they themselves enter or which you submit to us (e.g., users of your websites or recipients of your emails), it is in our legitimate interest to process this data for you in order to fulfill the contract with you.
- **Direct marketing.** In addition to this, we use your data (e.g., company or organization names, addresses, personal names, contact persons, email addresses, and telephone numbers) in particular for the purpose of direct marketing. In this context, we also analyze the results of (direct) marketing activities in order to measure the efficiency and relevance of our procedures.

Right to object to processing

You may, at any time, object to any processing of your personal data which takes place based on Article 6(1)(1)(f) GDPR (data processing to safeguard legitimate interests).

For more information on exercising this right and the consequences of exercising it in relation to data processing, see Section 14.

6.4 Legal provisions (Article 6 (1)(1) © GDPR)

- **Compliance with legal requirements.** Legal requirements are, for example, tax and commercial law retention obligations.

6.5 Cookies and Web Analysis and Social Media (Article 6 (1)(1)(a) and (f) GDPR)

During your simple visit to the JustRelate website, as well as during your use of the JustRelate CX Cloud, cookies are stored and saved on your computer, and we use Social Media and Tracking Tools. For a detailed description of the use of

- Cookies, see Section 9 and the **Cookie Policy for JustRelate**,
- Web Analysis Tools, see Section 10,
- Social Media, see Section 11.

7. Who receives your data?

Your data may be transferred to and processed by other companies within the JustRelate Group, insofar as this is necessary for the fulfillment of the purposes described in this Privacy Notice. Such processing is based on Art. 6 (1) (a), (b), ©, or (f) GDPR, as applicable.

The recipient JustRelate Group companies act either as joint controllers or as processors, depending on the specific processing activity, and are contractually bound to process personal data only in accordance with our instructions and applicable data protection law.

In addition, we will transmit your data to the following entities for the following reasons and purposes:

- **Public authorities.** We may transfer personal data to courts, authorities, and other government institutions in accordance with statutory provisions.
- **Chartered accountants, tax consultants, and other professionals.** We may transmit personal data to auditors, tax consultants, lawyers, and other freelancers commissioned by us, to the extent this is legally permissible and necessary in order to comply with applicable laws or to assert, exercise and/or defend legal claims.

- External service providers (i.e., contract processors). In the field of data processing, we cooperate with external service providers in the following areas:
 - JustRelate CX Cloud operation and hosting
 - Software development and operation and maintenance of the JustRelate CX Cloud, including the respective SignUp and SignIn
 - Newsletter dispatch, email dispatch
 - Postal and courier services

These service providers have been carefully selected and commissioned by us and are checked regularly by us. They are contractually bound to process personal data only in accordance with our instructions and applicable data protection law.

8. Is data transferred to a third country or to an international organization?

Within the JustRelate CX Cloud area, data will only be transferred to countries outside the EU or EEA (so-called third countries) if this is deemed necessary in order to fulfil your orders or it is required by law (e.g., tax reporting obligations).

9. Cookies

“**Cookies**” are small text files that are stored and saved on your hard drive and assigned to your browser, and via which certain information is provided to the entity that places the cookie (in this case, us). Cookies cannot execute programs or transmit viruses to your computer. They serve to make our internet presence as a whole more user-friendly and effective.

During your simple visit to the JustRelate Website, as well as during your use of the JustRelate CX Cloud, Cookies will be stored and saved on your computer. We use various types of cookies, the scope and function of which are explained below:

- Temporary cookies. Temporary cookies are automatically deleted when you close your browser. This includes session cookies in particular. They save a session ID, which can be used to link various requests from your browser to the shared session. This allows the system to recognize your computer again when you return to the JustRelate Website and the JustRelate CX Cloud.
- Persistent cookies. Persistent cookies are automatically deleted after a specified period, which may vary depending on the cookie. You can delete the cookies in the security settings of your browser at any time. You can configure your browser settings according to your preferences, including refusing to accept cookies. Furthermore, cookies that have already been set can be deleted at any time via an internet browser or other software programs. All conventional internet browsers allow you to do this. If the person concerned deactivates the setting of cookies in the internet browser used, not all

functions of the JustRelate Website and the JustRelate CX Cloud may be fully usable under certain circumstances.

Our contract (Article 6 (1) (1) (b) GDPR), your consent (Article 6 (1) (1) (a) GDPR), or our legitimate interest (Article 6 (1) (1) (f) GDPR) is the legal basis for this.

For a detailed description of the use of cookies, please refer to the **Cookie Policy for JustRelate**.

10. Web Analysis Tools

We use the web analysis tools described below to analyze the use of the JustRelate website and the JustRelate CX Cloud. This enables us to improve our offer for you and to make it more interesting for our users – based on the statistics and other findings obtained.

10.1 etracker

We use services of etracker GmbH from Hamburg, Germany, to analyze usage data. We do not use cookies for web analysis by default. If we use analysis and optimization cookies, we will obtain your explicit consent separately in advance. If this is the case and you give your consent, cookies are used to enable a statistical analysis of the reach of this website, a measurement of the success of our online marketing measures and test procedures, e.g., to test and optimize different versions of our online offering or its components. etracker cookies do not contain any information that enables a user to be identified.

The data generated with etracker is processed and stored by etracker on behalf of the provider of this website exclusively in Germany and is therefore subject to the strict German and European data protection laws and standards. etracker has been independently audited and certified in this respect and has been awarded the ePrivacyseal data protection seal of approval.

Data processing is carried out on the basis of the legal provisions of Article 6 (1) (1) (f) GDPR (legitimate interest). Our concern within the meaning of the GDPR (legitimate interest) is the optimization of our online offering and our services. As your privacy is important to us, the data that may allow a reference to an individual person, such as the IP address, login or device identifiers, are anonymized or pseudonymized as soon as possible. No other use, combination with other data or transfer to third parties takes place.

11. Social Sign-In

We offer users the option to register and log in to our platform using accounts from third-party identity providers (“Social Sign-In”). Currently, this includes services provided by Google, Microsoft, and LinkedIn.

If you choose this login method, you will be redirected to the authentication page of the respective provider. After successful authentication, the provider may transmit certain profile information to us, depending on the permissions granted. This may include your name, email address, and a unique user identifier.

Your login credentials remain with the respective provider. In particular, we do not receive or store your password for the external account.

We process the transmitted data solely for the purpose of authenticating your identity and creating or granting access to your user account on our platform.

The legal basis for this processing is Art. 6(1)(b) GDPR (processing necessary for the performance of a contract or for pre-contractual steps) and Art. 6(1)(f) GDPR (our legitimate interest in providing a secure and convenient login process).

Further information about how these providers process personal data can be found in their respective privacy policies.

12. Data security

Within our technical infrastructure, the data processed by us is protected from external interference with state-of-the-art firewalls, etc.

The transfer of data between you and us takes place via SSL/TSL encryption as soon as you access the JustRelate CX Cloud.

13. How long will my data be stored for?

We will process and store your data for as long as is necessary to achieve the purpose for which it was collected. If the data is no longer required in order to achieve the purpose for which it was collected, it will be deleted, unless temporary additional processing is necessary for the following purposes:

- Legal retention periods. To comply with the (commercial and tax) statutory periods for storage and documentation in the German Commercial Code (HGB) or Fiscal Code (AO). These periods last up to ten years.
- Evidence. To preserve evidence within the scope of the statutory limitation periods if there are concrete indications that evidence is required. According to Section 195 et seq. of the German Civil Code (BGB), these limitation periods can last up to thirty years, though the regular limitation period is three years.

- Direct marketing. Your data that we use for the direct marketing purposes is stored only for as long as necessary to achieve the marketing purpose. Data will only be deleted in the following cases:
 - You withdraw your consent. For more details on exercising this right, see Section 6.2.
 - You file an objection. For more information on exercising the right to object, see Section 14.
 - When there has been no meaningful interaction for a reasonable period of time, in accordance with applicable data protection laws.

In addition to this, subject to the purposes/periods described above, the following applies to storage with regard to individual processes:

- Simple visit to JustRelate website. Your data will be deleted once the respective session is finished. Log files are deleted after 1 month at the latest. Extended storage is possible in exceptional cases. In this case, however, user IP addresses are regularly deleted or anonymized so that the user who accessed the page is no longer identifiable.
- Contact before and during the course of pre-contractual measures. Your data will be deleted when the respective communication has ended unless a contract is concluded. The communication ends when the circumstances indicate that the matter has been conclusively resolved. Any additional personal data collected in connection with the communication (e.g., IP address) will be deleted after 1 month at the latest.
- Newsletter. Personal data used to send the newsletter will be deleted when you unsubscribe from the newsletter.
- Contracts for the use of the JustRelate CX Cloud. Your personal Data collected for purposes related to the performance of a contract shall be retained until such contract has been fully executed and performed. The data will be deleted as soon as the respective contract is terminated and all obligations are fulfilled.

14. What data protection rights do I have?

As a data subject of data processing, you have the following rights under the GDPR:

- Right of access. In accordance with Article 15 GDPR, you can obtain confirmation from us as to whether we process your personal data and what that data is.
- Right to rectification. If your information is incorrect, you can obtain rectification in accordance with Article 16 GDPR. If your data is incomplete, you can demand that it be completed. If we have passed your data on to third parties, these third parties shall be informed of your rectification, insofar as this is required by law.
- Right to erasure. You have the right to have your data erased by us, provided that the requirements of Article 17 GDPR are met (especially in cases where the purpose of data collection or processing no longer applies).

- Right to restriction of processing. You have the right to restrict the processing of your data, provided that the requirements of Article 18 GDPR are met.
- Right to data portability. Furthermore, if requested, we will make your data available to you for further use or transmit it to a recipient designated by you.
- Right to withdraw consent (for more details on exercising this right, see Section 6.2). If you have consented to the processing of your personal data, you have the right to withdraw your consent at any time with effect for the future, i.e., the withdrawal will not affect the legality of the processing carried out on the basis of the consent that existed prior to the withdrawal. Following a withdrawal, we may only process the personal data to the extent that the processing is still necessary for us due to legal requirements.
- Right to object to processing. Pursuant to Article 21 (1) GDPR, you have the right to object at any time to any processing of your personal data which takes place on the basis of Article 6 (1) (1) (f) GDPR (data processing to safeguard legitimate interests).

If you file an objection, we will no longer process your personal data for the purposes covered by the objection, except in the following cases:

- If we can prove compelling legitimate grounds which outweigh the interests, rights, and freedoms of the data subject; or
- if the processing is for the purpose of asserting, exercising, or defending legal claims.

Insofar as the objection only relates to data processing in connection with direct advertising, then we will no longer process your personal data for this purpose.

You do not need to fill out a form in order to submit an objection. You can submit an objection by sending an email to info@justrelate.com or a message to the contact details specified in Section 3.

- Right to lodge a complaint. In addition, you have the right to lodge a complaint with a data protection supervisory authority. We encourage you to contact our data protection officer first (see contact details in section 3).

15. Effect of Non-Notification

In connection with your contractual obligations as our Client, you must provide us with the personal data that is required for contract acceptance and execution as well as fulfilment of the associated obligations. Without this data, we will not be able to conclude or execute a contract. In conjunction with the use of the JustRelate CX Cloud, you must provide us with the personal data required for the use of the JustRelate CX Cloud (e.g., SignUp and SignIn data). Without this data, we will not be able to provide you with the corresponding services. If you fail to provide us with the data required, we will not be able to fulfil the individual purposes as described.

16. No automated decision-making

We do not use fully automated decision-making as described in Article 22 GDPR in order to establish or conduct contractual relationships.