



Data Protection Policy

ISEC7 Mobile Exchange Delegate

ISEC7 Software GmbH

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1 Data Protection Policy

1.1 About this App

This service (hereinafter: the “**App**”) is provided by ISEC7 Software GmbH (hereinafter: “**we**” or “**us**”) as the controller within the meaning of applicable data protection law.

ISEC7 Mobile Exchange Delegate enables you to assist colleagues or supervisors or to respond, as a team member, if adequately authorized, at any time via smartphone and tablet to emails to your supervisor’s emails, to access the messages in shared mailboxes or public folders as well as to confirm and edit scheduled meetings.

- “third party” mailboxes for email, calendar, contacts, notes and tasks
- shared mailboxes and team calendars
- public folders (email, calendar, contacts, notes and tasks folders)
- use of Microsoft Outlook shared calendar
- access to Microsoft Exchange archive
- telephone system integration for voicemail and calls (Exchange integrated)
- read and write access subject to permissions in Outlook
- Outlook-like functions such as
 - create, edit and delete
 - set priorities and categories
 - send in the name of
 - follow-up
 - create and edit meeting series
- day view and agenda view for calendar

You can view this Privacy Policy at any time by selecting the following menu item:

- iOS “Settings/About ISEC7/Privacy Policy”
- Android “Information button (i)/Privacy Policy”

1.2 Controller as per Art. 4 No .7 GDPR

The Controller within the meaning of the General Data Protection Regulation (GDPR) is

ISEC7 Software GmbH
Schellerdamm 16
21079 Hamburg
Tel.: +49 40 325076 0
Email: info@isec7.com

1.3 Contact details of Data Protection Officer

You can contact our Data Protection Officer by sending an email to datenschutz@isec7.com or a letter to our postal address, in each case for the attention of the “Data Protection Officer”.

1.4 What is personal data?

Personal data means all data which relates to you personally, e. g. name, address, email addresses, usage behavior, user-IDs - namely all data from which you could be directly or indirectly identified.

1.5 Information we collect when you download the App

When you download the App, certain information is sent to whichever app store you use (e.g. Google Play or the Apple App Store). In particular, the username, email address, customer number of your account, the date/time of download, payment information and individual device ID number may be processed. The processing of such data is performed exclusively by the relevant app store and is outside our scope of influence.

1.6 General use of the App

Our App can be used via the Google Play store on Android devices and the App Store on Apple devices.

There are two usage modes available:

1.6.1 Free Mode (iOS only)

Where the App is used in Free Mode, no data will be transmitted and no connections will be established except those directly associated with the Apps functionalities.

1.6.2 Company Mode

Where the App is used in Company Mode, we collect the following non-personal data for the purpose of license verification.

- your device identification
 - iOS vendor ID
 - Android (randomly generated ID)
- your operating system version
- version of the App
- Date and time of license verification request
- Notification of successful license verification
- domain of the email address used to check against license

The App does not record location data and does not use any tracking tools.

This data is sent to us automatically every 24 hours. If the request is successful, no other request will be made within that time period. The transmission is encrypted.

The data is collected (1) to enable us to provide you with the service and the associated functionalities; (2) to improve the functionalities and performance of the App and (3) to prevent and eliminate misuse and errors. This data processing is justified because (1) the processing is necessary for the performance of the Usage Agreement concluded between you as the data subject and us, as per Art. 6(1) (b) first sentence of the GDPR, in order to enable you to use the App or (2) we have an overriding legitimate interest in ensuring the functioning and error-free operation of the App and in being able to provide a market and general interest oriented service, Art. 6(1) (f) first sentence of the GDPR.

1.6.3 Analysis of errors

In the event of malfunctions of the App, you can generate log files in order to analyze the fault in question. These log files can only be sent by the user themselves.

You can delete local log files generated for error analysis purposes at any time through the App settings.

1.7 Permissions

When using our App, you can enter, manage and edit a variety of information and/or perform a variety of tasks and activities via a mobile device. For these purposes, ISEC7 Mobile Exchange Delegate requires access to your company's Microsoft Exchange Server and access to your Microsoft Outlook mailboxes via your mobile device, e.g. smartphone or tablet.

This is why the App requires the following permissions:

- Read contacts (iOS / Android)
- Edit contacts (iOS / Android)
- Access to content for attachments (iOS / Android)
- Read content of SD card (Android)
- Full network access: is required in order to establish connections to the internet and your company's Exchange Server as well as our servers (iOS / Android)
- Run on boot (Android)
- Receive data from the internet (iOS / Android)
- Push notifications: the App would like to send you notifications to remind you about meetings or inform you about the receipt of emails etc. (iOS / Android)
- Allow synchronization: in order to continuously synchronize the Information in the App with that on your company's Exchange Server (iOS / Android)
- Background updates (iOS / Android)
- Ignore battery optimization (Android)

Permissions might be added or removed in the course of updates of ISEC7 Mobile Exchange Delegate.

Some of these authorizations are automatically activated upon installation of the App. You can activate or deactivate these permissions at any time via the settings of your mobile device and/or the App settings. If you deactivate certain permissions, the functionality of the App may be limited.

Where the App requests consent to a permission prior to use, the legal basis for the related data processing is your consent, Art. 6(1) (a) first sentence of the GDPR. You can revoke a granted consent at any time by changing the settings of the permission.

Where the permission and the respective data processing is essential for the performance of the usage contract, i.e. for the provision of the functions of the App, the legal basis is Art. 6(1) (b) first sentence of the GDPR.

Where the purpose of the permission is to improve your convenience in using the App or help us improve the service, the legal basis for the data processing is our overriding legitimate interest, Art. 6(1) (f) first sentence of the GDPR. An objection may also be registered by changing the permission settings.

1.8 In-app purchases / license management

The iOS version of the App provides you with the option to upgrade from the free version to a premium subscription at any time within the App itself. If you purchase a subscription, this information will be transmitted to your iTunes account, which will then, after purchase confirmation, be debited with the price of the subscription.

The Android version of the App requires your license key prior to activation. The key will be automatically requested upon installation of the App.

1.9 Recipients of data

Any disclosure of your personal data without your prior express consent will only occur in cases other than those explicitly mentioned in this Privacy Policy where it is legally permitted or necessary. This could be the case, for example, if the processing is needed to protect the vital interests of the user or of another natural person.

1.10 Products and accounts provided by your organization

If you are using ISEC7 Mobile Exchange Delegate with an account provided by an organization you are affiliated with, the usage of the ISEC7 Mobile Exchange Delegate application is subject to your company's policies.

1.11 Transfer of data to third countries

The data generated through the use of the App will be processed exclusively on servers in Germany or another EU/EEA Member State.

1.12 Your rights as party affected

1.12.1 Right of access

Under Art. 15 of the GDPR, you have the right to request information from us, at any time, as to whether we are processing personal data concerning you and if so which data. To this end, you may send your request by post or email to the respective address stated above (section 2).

1.12.2 Right to rectification of inaccurate data

Under Art. 16 of the GDPR, you have the right to request from us the immediate rectification of personal data concerning you, to the extent that such data is inaccurate. To this end, please use the relevant contact details above.

1.12.3 Right to erasure

Under the conditions set out in Art. 17 of the GDPR, you have the right to request from us the erasure of the personal data concerning you. These conditions provide, in particular, for a right of erasure if the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed as well as in cases where data is being processed unlawfully, where an objection or an obligation to erase exists under Union law or under the law of the Member State to which we are subject. In order to exercise your right of erasure, please use the relevant contact details above.

1.12.4 Right to restriction of processing

You have the right to request from us the restriction of processing in accordance with Art. 18 of the GDPR. This right exists, in particular, where the accuracy of the personal data is disputed between the user and us, for the period of time necessary to verify the accuracy, as well as where the user has a right to erasure but instead requests restricted processing; this right also exists in cases where the data is no longer necessary for the purposes pursued by us but the user requires it to establish, exercise or defend legal claims as well as where the successful exercise of an objection is still disputed between the user and us. In order to exercise your right to restriction of processing, please use the relevant contact details below.

1.12.5 Right to data portability

You have the right, in accordance with Art. 20 of the GDPR, to receive from us the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format. In order to exercise your right to data portability, please use the relevant contact details above.

1.12.6 Right to object

You have, under Art. 21 of the GDPR, the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6(1) (e) or (f) of the GDPR. We will cease processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defense of legal claims.

1.12.7 Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority regarding our processing of personal data concerning you.

The competent supervisory authority in this respect is:

Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit
Ludwig-Erhard-Str 22, 7. OG
20459 Hamburg
<https://datenschutz-hamburg.de/>

You may, however, also direct your complaint to any other supervisory authority.

1.13 Contact

When you contact us by email, we store the data you provide (your email address, your name (if applicable) and/or other contact details) to enable us to respond to your questions and to process your request. The legal basis in this respect is Art. 6(1) (a) first sentence of the GDPR. To the extent that you provide other contact details to us (for example your telephone number) you automatically give your consent that we use any of the provided contact options in order to respond to your request. Naturally, you may withdraw this consent at any time with effect for the future.

Any data concerning you which we have received in the course of our contact with you will be deleted as soon as it is no longer required to achieve the purpose of its collection, your request has been fully attended to and no further communication with you is necessary or desired by you and any possibly applicable statutory retention periods have expired.

1.14 Amendments to this Privacy Policy

We reserve the right to amend this Privacy Policy from time to time and to modify it in line with changes in our processing of your personal data or in line with the latest available technology. You can view the current version of the Privacy Policy at any time by selecting the following menu item:

- iOS "Settings/About ISEC7/Privacy Policy"
- Android "Information button (i) /Privacy Policy"