Privacy Policy for Website and Administrative Data

This Privacy Policy is a translation of the German original ("Datenschutzerklärung"). In the event of any discrepancy or contradiction between the German and English versions, the German version shall prevail.

Scope of this Privacy Policy

In this Privacy Policy, we inform you about how we process personal data that we collect in connection with visits to our websites fetch.tax and share.fetch.tax, the registration and use of fetchtax, and in the course of our business relationships.

Not covered by this Privacy Policy is the processing of personal data of our customers on behalf of our customers (customer data that our customers process in fetchtax). Such processing is governed by the Data Processing Agreement (DPA) pursuant to Art. 28 GDPR concluded between us and our customers.

1. Controller

The controller responsible for data processing is HeyPragmatic GmbH, Kolonnenstr. 8, 10827 Berlin, Germany.

For data protection matters, you can reach us at: privacy@fetch.tax

2. General Information on Data Processing

2.1 Definitions

This Privacy Policy uses the definitions of the General Data Protection Regulation (GDPR). Personal data means any information relating to an identified or identifiable natural person (Art. 4 No. 1 GDPR).

2.2 Legal Bases for Processing

Where we obtain consent from the data subject for processing operations involving personal data, Art. 6 para. 1 lit. a GDPR serves as the legal basis. For processing that is necessary for the performance of a contract or for the implementation of pre-contractual measures, Art. 6 para. 1 lit. b GDPR serves as the legal basis. Where processing is necessary to fulfill a legal obligation, Art. 6 para. 1 lit. c GDPR serves as the legal basis. If processing is necessary to safeguard a legitimate interest of our company or a third party, and the interests, fundamental rights, and fundamental freedoms of the data subject do not override the former interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis.

2.3 Data Deletion and Storage Duration

We store personal data only for as long as is necessary for the respective processing purpose or as long as statutory retention obligations exist. Once the purpose no longer applies or the retention period has expired, the data is deleted or its processing is restricted. Statutory retention periods arise in particular from Section 147 of the German Fiscal Code (AO) and Section 257 of the German Commercial Code (HGB).

2.4 Transfers to Third Countries

Some of the service providers we use are based outside the European Union or the European Economic Area (EEA), in particular in the United States. For transfers of personal data to a third country without an adequacy decision of the EU Commission, we rely on Standard Contractual Clauses pursuant to Art. 46 para. 2 lit. c GDPR or – where the service provider is certified under the EU-U.S. Data Privacy Framework (DPF) – on the adequacy decision of the EU Commission pursuant to Art. 45 GDPR. Details about the service providers used can be found in the following sections.

3. Visiting Our Website

3.1 Server Log Data

When you visit our website, the following data is automatically transmitted to our hosting provider for technical reasons and stored in server log files: IP address of the requesting device (generally shortened/anonymized), date and time of access, name and URL of the file accessed, volume of data transferred, notification of successful retrieval, referrer URL (the page previously visited), browser used, and operating system.

The processing serves to ensure a smooth connection, a convenient use of our website, the evaluation of system security and stability, and other administrative purposes. The legal basis is our legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR. The data is deleted after no more than 30 days, unless there are specific indications of unlawful use.

3.2 Website Hosting and Backend Infrastructure

Our website and the fetchtax application are operated on the Lovable Cloud platform. The provider is Lovable Labs Incorporated, USA, represented in the EU by Lovable Labs AB, Box 190, 101 23 Stockholm, Sweden.

In addition to hosting our website, Lovable Cloud also provides the backend infrastructure of our application, in particular the database, user authentication (sign-in and password management), file storage, and server-side functions. In this context, the data specified in Sections 3.1 and 4.1 to 4.3 in particular is processed and stored. The technical infrastructure of Lovable Cloud is provided by Supabase, Inc. (USA) as a sub-processor. Data is stored in data centers within the European Union.

When our website is accessed, the log data specified in Section 3.1 is processed by Lovable. We have concluded a data processing agreement with Lovable pursuant to Art. 28 GDPR, which governs the engagement of sub-processors.

As Lovable Labs Incorporated is based in the United States, personal data may be transferred to the United States in the course of maintenance and support. The transfer takes place on the basis of Standard Contractual Clauses pursuant to Art. 46 para. 2 lit. c GDPR.

The legal basis for the processing is our legitimate interest in the stable and secure operation of our website and application (Art. 6 para. 1 lit. f GDPR) as well as the performance of the contract (Art. 6 para. 1 lit. b GDPR) for the use of fetchtax.

Further information: https://lovable.dev/privacy

3.3 Embedding of Vimeo Videos

We embed videos from the Vimeo service on our website. The provider is Vimeo.com, Inc., 330 West 34th Street, 10th Floor, New York, NY 10001, USA ("Vimeo"). Pursuant to Art. 27 GDPR, Vimeo has designated an EU representative: European Data Protection Office (EDPO), Avenue Huart Hamoir 71, 1030 Brussels, Belgium.

Vimeo videos are only loaded once you have consented to the embedding of Vimeo via our cookie notice (Section 3.4). Without your consent, no connection to Vimeo's servers is established.

With your consent and the loading of the video, the following data in particular is transmitted to Vimeo: IP address, date and time of access, URL of the accessed page, browser identifier (user agent), information about the device used, and data relating to playback of the video (e.g., duration played). At the same time, cookies may be set and information may be stored on and read from your terminal equipment.

If you are logged into your Vimeo account at this time, you enable Vimeo to associate the access directly with your personal profile. You can prevent this by logging out of your Vimeo account before playing the video.

The legal basis for the processing is your consent pursuant to Art. 6 para. 1 lit. a GDPR and – for the storage of information on, and access to, your terminal equipment – Section 25 para. 1 TDDDG (German Telecommunications Digital Services Data Protection Act). You can withdraw your consent at any time with effect for the future via the cookie settings in the footer of our website. The lawfulness of the processing carried out until the withdrawal remains unaffected.

Vimeo.com, Inc. is certified under the EU-U.S. Data Privacy Framework. Transfers of personal data to the United States therefore take place on the basis of the adequacy decision of the EU Commission pursuant to Art. 45 GDPR; in addition, Vimeo relies on Standard Contractual Clauses pursuant to Art. 46 para. 2 lit. c GDPR.

Further information: https://vimeo.com/legal/privacy/policy

3.4 Consent Management (Cookie Notice)

On fetch.tax and share.fetch.tax, we use a cookie notice to ask whether you consent to services that require consent. This concerns the embedding of Vimeo videos (Section 3.3), Google Ads conversion tracking (Section 3.5), the Meta Pixel and Conversions API (Section 3.7), and the Crisp support chat (Section 6.2).

We store your choice, together with the time and the version of the notice, in a cookie for the domain fetch.tax including its subdomains (e.g., share.fetch.tax) for up to 12 months. You can change or withdraw your choice at any time via the cookie settings in the footer of our website.

Storing this cookie is strictly necessary pursuant to Section 25 para. 2 no. 2 TDDDG in order to respect your choice. The legal basis for the processing is Art. 6 para. 1 lit. c GDPR in conjunction with Art. 7 para. 1 GDPR (demonstrating consent).

3.5 Google Ads Conversion Tracking

On fetch.tax and share.fetch.tax, we use Google Ads conversion tracking. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

Conversion tracking allows us to measure whether visits via our Google ads lead to a registration with fetchtax. If you reach our website via a Google ad, cookies are set on your terminal equipment and information such as the ad click ID, your IP address, date and time, the page accessed, browser and device information, and the registration event is transmitted to Google. We only receive statistical evaluations from Google. The cookies expire after 90 days.

Processing only takes place if you have given your consent via our cookie notice (Section 3.4). Without your consent, no cookies are set and no data is transmitted to Google. The legal basis is your consent pursuant to Art. 6 para. 1 lit. a GDPR and – for the storage of information on, and access to, your terminal equipment – Section 25 para. 1 TDDDG. You can withdraw your consent at any time with effect for the future via the cookie settings in the footer of our website. The lawfulness of the processing carried out until the withdrawal remains unaffected.

Google may also transfer data to Google LLC in the United States. Google LLC is certified under the EU-U.S. Data Privacy Framework; transfers therefore take place on the basis of the adequacy decision of the EU Commission pursuant to Art. 45 GDPR.

Further information: https://business.safety.google/privacy/

3.6 Web Analytics with Plausible Analytics

On fetch.tax and share.fetch.tax, we use the web analytics service Plausible Analytics to evaluate the use of our website statistically and to improve our services. The provider is Plausible Insights OÜ, Västriku tn 2, 50403 Tartu, Estonia ("Plausible").

Plausible does not set cookies and does not store information on, or read information from, your terminal equipment, including local storage. During your visit, the following data is processed: page accessed (URL), referrer URL, browser, operating system and device type, approximate location derived from the IP address (country, region, city), date and time, and time spent on the page. Your IP address and the full browser identifier (user agent) are not stored. To count visitors within a single day, Plausible generates a cryptographic hash from the IP address, user agent, domain, and a random value (salt) that changes daily; the salt is deleted every 24 hours. This means visitors cannot be recognized across multiple days, websites, or devices. We only receive aggregated statistics that do not allow conclusions to be drawn about individual persons.

Data is processed and stored on servers of Hetzner Online GmbH in Germany; no transfer to third countries takes place. We have concluded a data processing agreement with Plausible pursuant to Art. 28 GDPR.

The legal basis is our legitimate interest in the statistical evaluation and optimization of our website (Art. 6 para. 1 lit. f GDPR). As Plausible does not store or read information on your terminal equipment, no consent pursuant to Section 25 para. 1 TDDDG is required. You may object to the processing at any time pursuant to Art. 21 GDPR (Section 9).

Further information: https://plausible.io/data-policy

3.7 Meta Pixel and Conversions API

On fetch.tax and share.fetch.tax, we use the Meta Pixel and the Meta Conversions API. The provider is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland ("Meta").

We use these tools for two purposes. First, we measure whether visits via our ads on Facebook and Instagram lead to a registration with fetchtax (conversion tracking). Second, we show our ads on Facebook and Instagram to people who have previously visited our website (retargeting via custom audiences).

When you visit our website, the Meta Pixel sets cookies on your terminal equipment and transmits information such as your IP address, browser and device information, the page accessed, the referrer URL, date and time, the ad click ID, and events such as page views and the registration to Meta. When you register, we additionally transmit the registration event from our server to Meta via the Conversions API, together with your email address in hashed (pseudonymized) form, your IP address, the browser identifier (user agent), and the identifiers stored in the Meta cookies. Meta can associate this information with your Facebook or Instagram account if you have one. We only receive statistical evaluations from Meta and cannot identify individual persons in the custom audiences. The cookies expire after 90 days.

Processing via the Meta Pixel and via the Conversions API only takes place if you have given your consent via our cookie notice (Section 3.4). Without your consent, no cookies are set and no data is transmitted to Meta. The legal basis is your consent pursuant to Art. 6 para. 1 lit. a GDPR and – for the storage of information on, and access to, your terminal equipment – Section 25 para. 1 TDDDG. You can withdraw your consent at any time with effect for the future via the cookie settings in the footer of our website. The lawfulness of the processing carried out until the withdrawal remains unaffected.

For the collection of the data on our website and its transmission to Meta, we and Meta are joint controllers pursuant to Art. 26 GDPR. We have concluded an agreement with Meta on joint controllership (Meta Controller Addendum), which sets out how responsibility for compliance with the GDPR is divided between us and Meta: https://www.facebook.com/legal/controller_addendum. The subsequent processing, in particular the delivery of ads, is carried out by Meta under its sole responsibility.

Meta may also transfer data to Meta Platforms, Inc. in the United States. Meta Platforms, Inc. is certified under the EU-U.S. Data Privacy Framework; transfers therefore take place on the basis of the adequacy decision of the EU Commission pursuant to Art. 45 GDPR.

Further information: https://www.facebook.com/privacy/policy

4. Registration and Use

4.1 Registration

Registration is required in order to use fetchtax. As part of the registration, we collect the following data:

Free plan: Name, name of the company, email address, password (cryptographic hash).

Paid subscriptions additionally: Address of the company, VAT identification number, payment method (processed by Stripe, see Section 5).

Providing this data is necessary for the conclusion of the contract and the use of the Software. The legal basis is Art. 6 para. 1 lit. b GDPR (performance of a contract or pre-contractual measures).

4.2 Use of the Software

In the course of your use of fetchtax, we process access and usage data (e.g., login times, actions performed, error messages) insofar as this is necessary for the operation, security, and further development of the Software. The legal basis is Art. 6 para. 1 lit. b GDPR (performance of a contract) and Art. 6 para. 1 lit. f GDPR (legitimate interest in the secure and stable operation).

4.3 Invited Users

Licensees may invite additional users to their workspace. For these invited users, we process their name, email address, and access and usage data. The legal basis is Art. 6 para. 1 lit. b GDPR (performance of the contract with the Licensee) and our legitimate interest in proper provision of the services (Art. 6 para. 1 lit. f GDPR).

4.4 Storage Duration

Account data (name, company data, email address, access credentials) is stored for the duration of the contractual relationship and deleted within 100 days after its termination, unless statutory retention obligations (in particular Section 147 AO, Section 257 HGB) require longer storage. Usage data and server logs are deleted in accordance with the periods specified in the respective sections of this Privacy Policy.

The deletion of personal data that you process as a Licensee via fetchtax under your own responsibility (customer data of your own customers, clients, etc.) is governed by the Data Processing Agreement (DPA) concluded between us and you.

5. Payment Processing

Payment processing for paid subscriptions takes place via the payment service provider Stripe. The provider in the EU is Stripe Payments Europe, Ltd., 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland.

Your payment data (e.g., credit card number, bank details) is transmitted exclusively to Stripe and processed there. We ourselves do not receive complete payment data, but only status information regarding payments (e.g., successful debit, return debit).

Stripe processes the data as an independent controller within the meaning of the GDPR. The legal basis for the forwarding of data to Stripe is Art. 6 para. 1 lit. b GDPR (performance of a contract) and our legitimate interest in efficient payment processing (Art. 6 para. 1 lit. f GDPR).

Further information: https://stripe.com/privacy

5.1 Coupon Codes for Source Analysis

In the course of payment processing, we use Stripe coupon codes to analyze the origin of our customers (e.g., marketing channel, campaign). The coupon code itself is not personal data, but its assignment to your account enables us to analyze acquisition data on a channel-by-channel basis. The legal basis is our legitimate interest in analyzing and optimizing our marketing activities (Art. 6 para. 1 lit. f GDPR).

6. Customer Communication

6.1 Transactional Emails

In connection with your use of fetchtax, we send transactional emails (e.g., registration confirmation, password reset, invoice delivery, security-related notifications). Emails are sent via our Lovable platform (see Section 3.2) and via the email delivery service Mailgun. The provider of Mailgun is Mailgun Technologies, Inc., 112 E Pecan St, Ste 1135, San Antonio, TX 78205, USA, a company of the Sinch group (Sinch AB (publ), Sweden).

In the course of delivery, Mailgun processes your email address, the recipient's name, the content of the email, and technical metadata (e.g., time of dispatch, delivery status, bounce and error messages, log data). We use Mailgun's EU region; processing therefore takes place in data centers within the European Union.

We have concluded a data processing agreement with Mailgun pursuant to Art. 28 GDPR. Insofar as personal data is transferred to the United States in the course of maintenance, support, or abuse prevention, such transfer takes place on the basis of the certification of Mailgun Technologies, Inc. under the EU-U.S. Data Privacy Framework (adequacy decision of the EU Commission pursuant to Art. 45 GDPR) and, additionally, on the basis of Standard Contractual Clauses pursuant to Art. 46 para. 2 lit. c GDPR.

The legal basis is Art. 6 para. 1 lit. b GDPR (performance of a contract) and our legitimate interest in the reliable and secure delivery of our emails (Art. 6 para. 1 lit. f GDPR).

Further information: https://www.mailgun.com/legal/privacy-policy/

6.2 Support and Live Chat

For handling support requests and for the live chat on our website, we use Crisp. The provider is Crisp IM SAS, 2 Boulevard de Launay, 44100 Nantes, France.

If you contact us via the live chat, by email, or via our contact form, we process your contact data (name, email address), the content of your message including any files transmitted, and technical data (in particular IP address, browser and device information, pages accessed, and date and time). The conversation history is stored so that we can follow up on earlier requests.

For this purpose, the chat window stores information on your terminal equipment (cookies or comparable technologies in local storage) in order to associate your session and the conversation history.

Crisp stores the data on servers within the European Union (Netherlands). We have concluded a data processing agreement with Crisp pursuant to Art. 28 GDPR.

The chat window is only loaded if you have given your consent via our cookie notice (Section 3.4). The legal basis for loading the chat window and the associated storage of information on, and access to, your terminal equipment is your consent pursuant to Art. 6 para. 1 lit. a GDPR and Section 25 para. 1 TDDDG. You can withdraw your consent at any time with effect for the future via the cookie settings in the footer of our website. The legal basis for handling your request (including by email or contact form) is Art. 6 para. 1 lit. b GDPR (performance of a contract or pre-contractual measures) and our legitimate interest in the efficient handling of requests (Art. 6 para. 1 lit. f GDPR).

Requests are stored for the duration of processing and subsequently within the scope of our retention obligations or for documentation purposes.

Further information: https://crisp.chat/en/privacy/

6.3 Appointment Booking (Onboarding and Demos)

For booking appointments (e.g., onboarding, consultations), we use Calendly. The provider is Calendly, LLC, 3340 Peachtree Road NE, Suite 1400, Atlanta, GA 30326, USA.

When an appointment is booked, the following data is collected and transmitted to Calendly: name, email address, preferred appointment, and any other information you provide. Calendly is certified under the EU-U.S. Data Privacy Framework; transfers to the United States take place on the basis of the adequacy decision of the EU Commission (Art. 45 GDPR).

The legal basis is Art. 6 para. 1 lit. b GDPR (implementation of pre-contractual measures) and our legitimate interest in efficient appointment coordination (Art. 6 para. 1 lit. f GDPR). We have concluded a data processing agreement with Calendly.

Further information: https://calendly.com/legal/privacy-notice

As an alternative, we use Notion Calendar Scheduling for booking appointments. The provider is Notion Labs, Inc., 500 Delaware Ave, Ste 500 #20, Wilmington, DE 19801, USA. When an appointment is booked, name, email address, and appointment information are transmitted to Notion.

The legal basis is Art. 6 para. 1 lit. b and lit. f GDPR. Transfers to the United States rely on Standard Contractual Clauses or – where certified – on the EU-U.S. Data Privacy Framework.

Further information:
https://www.notion.so/notion/Privacy-Policy-3468d120cf614d4c9014c09f6adc9091

The actual onboarding meetings take place via Google Meet. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. During the video conference, image and audio data as well as metadata (e.g., participants, duration of the conversation) are processed. We do not record conversations unless this has been expressly agreed and documented.

The legal basis is Art. 6 para. 1 lit. b GDPR (performance of a contract or pre-contractual measures).

Further information: https://policies.google.com/privacy

7. Newsletter

We send our newsletter via the Brevo service. The provider for customers based in the EU is Brevo SAS, 106 Boulevard Haussmann, 75008 Paris, France.

For subscribing to our newsletter, we use the double opt-in procedure: after your registration, you will receive an email with a confirmation link. You will only be added to the distribution list after clicking this link. This ensures that no one can register using your email address without your authorization.

When you subscribe to the newsletter, we process the following data: email address, name (if provided), date and time of registration and confirmation, IP address at the time of registration (for logging purposes).

The legal basis is your consent pursuant to Art. 6 para. 1 lit. a GDPR. You may withdraw your consent at any time, e.g., by clicking the unsubscribe link in any newsletter email or by message to privacy@fetch.tax. The lawfulness of the processing carried out until the withdrawal remains unaffected.

As part of sending the newsletter, Brevo analyzes how you interact with our emails (e.g., whether an email was opened or which links were clicked) in order to optimize dispatch and our content. The legal basis for this is your consent (Art. 6 para. 1 lit. a GDPR).

We have concluded a data processing agreement with Brevo.

Further information: https://www.brevo.com/legal/privacypolicy/

8. Social Media Presences

We operate or plan to operate presences on the following social networks in order to communicate with prospects and customers:

YouTube (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland)

Facebook (Meta Platforms Ireland Ltd., Merrion Road, Dublin 4, Ireland)

Instagram (Meta Platforms Ireland Ltd., Merrion Road, Dublin 4, Ireland)

TikTok (TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland)

LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland)

When you visit our social media profiles, the respective providers process personal data about you. We have only limited influence on this. Insofar as we ourselves collect data via our profiles (e.g., through direct messages), we process such data to communicate with you.

The legal basis is our legitimate interest in an effective external presence (Art. 6 para. 1 lit. f GDPR). For fan pages on Facebook, we are joint controllers with Meta within the meaning of Art. 26 GDPR.

Information on data processing by the respective providers can be found in their privacy policies:

YouTube/Google: https://policies.google.com/privacy

Facebook/Instagram/Meta: https://www.facebook.com/privacy/policy

TikTok: https://www.tiktok.com/legal/privacy-policy

LinkedIn: https://www.linkedin.com/legal/privacy-policy

9. Your Rights as a Data Subject

You have the right:

pursuant to Art. 15 GDPR, to request information about the personal data we process about you;

pursuant to Art. 16 GDPR, to request without undue delay the rectification of inaccurate personal data or the completion of personal data stored by us;

pursuant to Art. 17 GDPR, to request the erasure of personal data stored by us, unless processing is necessary for exercising the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise, or defense of legal claims;

pursuant to Art. 18 GDPR, to request restriction of the processing of your personal data;

pursuant to Art. 20 GDPR, to receive the personal data that you have provided to us in a structured, commonly used, and machine-readable format or to request its transmission to another controller;

pursuant to Art. 7 para. 3 GDPR, to withdraw any consent you have given at any time with effect for the future;

pursuant to Art. 77 GDPR, to lodge a complaint with a supervisory authority. Generally, you may contact the supervisory authority of your usual place of residence, your workplace, or our company's registered office. The competent supervisory authority for us is Berliner Beauftragte für Datenschutz und Informationsfreiheit, Alt-Moabit 59–61, 10555 Berlin, Germany.

Right to Object

Where we process personal data on the basis of Art. 6 para. 1 lit. f GDPR (legitimate interest), you have the right pursuant to Art. 21 GDPR to object to such processing at any time for reasons arising from your particular situation. An objection may be made informally and should, where possible, be sent to: privacy@fetch.tax

10. Data Security

We take appropriate technical and organizational measures to protect your personal data against accidental or intentional manipulation, partial or total loss, destruction, or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

Data transmission on our website and during the use of fetchtax is encrypted via SSL/TLS.

11. Changes to this Privacy Policy

We reserve the right to adapt this Privacy Policy so that it always complies with current legal requirements or to reflect changes to our services in the Privacy Policy, e.g., when introducing new services. The new Privacy Policy will then apply to your next visit.