



xalution

YOUR EXPERTS FOR AGILE SOLUTIONS

Information Obligation
Customers

26.03.2026

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Information Obligation pursuant to Art. 13 and Art. 14 GDPR for Customers

The protection of your data and transparency regarding its processing are of great importance to us. Therefore, we hereby fulfill our obligation to provide information about the circumstances of processing in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR).

As a result of the processing of your personal data, you have the following rights:

- a. Right of access (Art. 15 GDPR)
- b. Right to rectification (Art. 16 GDPR)
- c. Right to erasure (Art. 17 DSGVO)
- d. Right to restriction of processing (Art. 18 DSGVO)
- e. Right to object (Art. 21 DSGVO)
- f. Right to data portability (Art. 20 DSGVO)

Right of withdrawal: If the processing is based on Art. 6 (1) lit. a GDPR or Art. 9 (2) lit. a GDPR, you have the right to withdraw your consent at any time. Processing carried out prior to the withdrawal remains unaffected.

Contact details of the Data Protection Officer: Jasmin Muhmenthaler-Sturm;
Datenbeschützerin GmbH; Unterer Sand 9, 94209 Regen; Phone: +49 9921 88 22 9000;
Email: xalution.dsb@datenbeschuetzerin.de

You have the right to lodge a complaint with a supervisory authority if you believe that your personal data is being processed unlawfully.

Bavarian State Office for Data Protection Supervision (BayLDA)
Promenade 18
91522 Ansbach
Phone: +49 (0) 981 180093-0

Fax: +49 (0) 981 180093-800
Email: poststelle@lda.bayern.de

Controller responsible for data processing:

xalution group GmbH; Represented by: Tobias Endl, Eike Fischer
Weinmarkt 4

90403 Nuremberg
Germany

Phone: +49 911 148 869 19

Email: info@xalution.com

The controller is the natural or legal person who determines the purposes and means of processing personal data.

A transfer of data to third countries (outside the European Economic Area) only takes place if necessary for contract performance, based on your consent, or otherwise permitted by law. In such cases, appropriate safeguards are implemented, for example through contractual agreements. Data is only transferred to recipients that ensure an adequate level of data protection in accordance with Art. 44 to 49 GDPR.

1. Data Processing in the Context of Order Fulfilment

1.1. Order Registration and Processing

For processing your order or inquiry, we collect personal data of contact persons (name, address, email address, telephone number, mobile number, order content). During support activities (remote or on-site), access to personal data stored in your ERP or CRM systems may also occur.

Processing is based on contract performance or pre-contractual measures pursuant to Art. 6 (1) lit. b GDPR.

Data may be shared internally with relevant departments and externally with partners or subcontractors where necessary. Data is processed in Microsoft 365. Provider: Microsoft Corporation, USA. A data processing agreement has been concluded. Further information on Microsoft's data protection practices can be found at: <https://privacy.microsoft.com/de-de/privacystatement>

The company is certified under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the United States intended to ensure compliance with European data protection standards for data processing in the United States. Any company certified under the DPF commits to complying with these data protection standards. Further information can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000KzNaAAK&status=Active>

The data is stored in accordance with statutory retention obligations. If no contractual relationship is established, the data will be deleted after one year without any active contact.

1.2. Telephone Service

To ensure that your calls can also be answered outside office hours, we use a telephone service provider: kommpet GmbH, Dammer Weg 37, 63773 Goldbach, Germany. If you call outside office hours, your call will be automatically forwarded to the call center. The call center records your name, telephone number, and the reason for your inquiry. Your request is then forwarded to us.

The processing of your data is based on the performance of a contract pursuant to Art. 6 (1) lit. b GDPR, which permits the processing of data for the fulfillment of a contract or pre-contractual measures.

Your data is stored both by the call center and by the controller. We have concluded a data processing agreement with the call center.

The data is deleted once the purpose has been fulfilled.

1.3. Ticket System

To ensure IT support, as well as the prioritization and documentation of requests, we use the ticketing tool Jira by Atlassian Pty Ltd, Level 6, 341 George Street, Sydney NSW 2000, Australia.

When you submit a ticket, we collect the following data:

- From the processor: first name, last name
- From the requester: company, first name, last name, department, address code, customer number

Depending on the nature of the issue, personal data may also be included in the description of the error.

The processing of the data is based on a legitimate interest pursuant to Art. 6 (1) lit. f GDPR. The controller has a legitimate interest in optimizing IT processes.

The data is processed within the IT department and, if necessary, passed on to an external support service provider for handling the case. We have concluded a data processing agreement with Atlassian. Further information on Atlassian's data protection can be found at: [Privacy Policy | Atlassian](#)

The data transfer to Australia is based on the EU Standard Contractual Clauses. Details can be found here: [Datenschutzrichtlinie | Atlassian](#)

The company is certified under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the United States intended to ensure compliance with European data protection standards for data processing in the United States. Any company certified under the DPF commits to complying with these data protection standards. Further information can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000KzNaAAK&status=Active>

Your personal data will be stored in accordance with statutory retention periods.

1.4. Communication

To get in touch with you, we may send you emails containing further information in order to process your inquiry, your order, or within the scope of our general business relationship. For this purpose, your email address, the content of the email, and the communication history are processed. The emails are hosted by an external service provider. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. A data processing agreement has been concluded with the provider.

We may also contact you by phone using the telephone or mobile number stored in our systems.

The processing of your data is based on the performance of a contract pursuant to Art. 6 (1) lit. b GDPR, which permits the processing of data for the fulfillment of a contract or pre-contractual measures (customer relationships, contracts with business partners).

Data will only be shared if this has been agreed with you or is necessary for the specific business case. The processing and transfer of data by Microsoft is based on the Standard Contractual Clauses. Further information on Microsoft's privacy practices can be found at: <https://privacy.microsoft.com/de-de/privacystatement>.

The company is certified under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the United States intended to ensure compliance with European data protection standards for data processing in the United States. Any company certified under the DPF commits to complying with these data protection standards. Further information can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000KzNaAAK&status=Active>

Your data is stored on our systems in accordance with statutory retention obligations.

1.5. Digital Signing of Documents

For the digital signing of documents, such as contracts, a digital signature service is used. The provider is DocuSign Germany GmbH, Mies-van-der-Rohe-Straße 6, 80807 Munich, Germany.

During the signing process, your name, your email address, and your digital signature are processed.

The processing of data is based on a legitimate interest pursuant to Art. 6 (1) lit. f GDPR. The controller has a legitimate interest in signing and managing documents digitally and without paper. The processing is also based on the performance of a contract or pre-contractual measures pursuant to Art. 6 (1) lit. b GDPR. Furthermore, the use of digital signatures ensures compliance with legal obligations pursuant to Art. 6 (1) lit. c GDPR.

A data processing agreement has been concluded with the provider DocuSign. Further information about the provider can be found at: <https://www.docusign.com/de-de/datenschutzerklaerung/datenschutz>

Your data is stored on our systems in accordance with statutory retention obligations.

2. Data Processing in IT Systems

2.1. Contact and Address Management

To manage all contact information of business partners and customers, we store contacts in SevDesk, where the following data is recorded: name, contact person (if applicable), address, telephone number, mobile number, and email address.

The collection of this data is based on a legitimate interest pursuant to Art. 6 (1) lit. f GDPR, in order to manage contact information of employees and business partners in an organized manner.

Only our employees have access to this system. For the technical support of SevDesk, we have engaged 7-it Informations-Management & Services eG, Zweigstraße 10, 80336 Munich, Germany. We have concluded a data processing agreement with this service provider. Further information on 7-it's data protection practices can be found at: <https://www.7-it.de/datenschutz.html>

Your contact data will be stored in our system for the duration of the business relationship and for one year thereafter.

2.2. Audio and Video Conferencing

2.2.1 Data Processing

For communication with our customers, we use, among other things, online conferencing tools. The specific tools we use are listed below. If you communicate with us via video or audio conference over the internet, your personal data will be collected and processed by us as well as by the provider of the respective conferencing tool.

The conferencing tools collect all data that you provide or use to access the tools (such as your email address and/or telephone number). In addition, the conferencing tools process the duration of the conference, the start and end (time) of your participation, the number of participants, and other "contextual information" related to the communication process (metadata).

Furthermore, the provider of the tool processes all technical data required to facilitate online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or speaker, and the type of connection.

If content is exchanged, uploaded, or otherwise made available within the tool, this content is also stored on the servers of the tool providers. Such content includes, in particular, cloud recordings, chat or instant messages, voicemails, uploaded photos and videos, files, whiteboards, and other information shared during the use of the service.

Please note that we do not have full control over the data processing operations of the tools used. Our ability to influence these processes is largely determined by the policies of the respective providers. For further information on data processing by the conferencing tools, please refer to the privacy policies of the respective tools listed below this text.

2.2.2 Purpose and Legal Basis

The conferencing tools are used to communicate with prospective or existing contractual partners or to provide certain services to our customers (Art. 6 (1) lit. b GDPR). Furthermore, the use of these tools serves to simplify and accelerate communication with us or our company (legitimate interest within the meaning of Art. 6 (1) lit. f GDPR). Where consent has been obtained, the use of the respective tools is based on this consent; such consent may be withdrawn at any time with effect for the future.

2.2.3 Storage Duration

Data collected directly by us via video and conferencing tools will be deleted from our systems as soon as you request its deletion, withdraw your consent to storage, or the purpose for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory statutory retention periods remain unaffected.

We have no influence over the storage duration of your data that is stored by the operators of the conferencing tools for their own purposes. For further details, please contact the operators of the respective conferencing tools directly.

2.3. Conferencing Tools Used

We use the following conferencing tools:

2.3.1 Microsoft Teams

We use Microsoft Teams. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For details on data processing, please refer to the Microsoft Teams privacy policy: <https://privacy.microsoft.com/de-de/privacystatement>.

The company is certified under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the United States intended to ensure compliance with European data protection standards for data processing in the United States. Any company certified under the DPF commits to complying with these data protection standards. Further information can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000KzNaAAK&status=Active>

2.3.2 Data Processing Agreement

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract required under data protection law that ensures the provider processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

2.4. Transcription / Recording of Video Conferences

There is an option to record the online meeting and to transcribe it using Copilot. The provider of Copilot is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For details on data processing, please refer to the Microsoft Teams privacy policy: <https://www.microsoft.com/de-de/privacy/privacystatement>.

This is done for the purpose of making the online meeting available to you afterwards and enabling you to review its contents. Your consent is required for the recording. At the beginning of the meeting, you can decide whether the recording may take place. Your consent will be stored in video form. The recording will process and store your name, the content of the conversation, and any shared screen content.

The processing of the data is based on your voluntary consent pursuant to Art. 6 (1) lit. a GDPR. The data subject may withdraw their consent at any time by informal notification. Processing carried out prior to the withdrawal remains unaffected.

The video content is stored internally.

The company is certified under the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the United States intended to ensure compliance with European data protection standards for data processing in the United States. Any company certified under the DPF commits to complying with these data protection standards. Further information can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000KzNaAAK&status=Active>

The recordings are stored until you withdraw your consent.

2.5. File Exchange and Storage via SharePoint and OneDrive

We use SharePoint and OneDrive for file exchange. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA (hereinafter referred to as “SharePoint” or “OneDrive”).

SharePoint and OneDrive allow us to integrate a folder structure into our system where you can upload content. When you upload content, it is stored on Microsoft's servers. In addition, a connection to SharePoint is established so that SharePoint can recognize that you have visited our system.

The use of SharePoint and OneDrive is based on Art. 6(1)(f) GDPR. The controller has a legitimate interest in a reliable and efficient data exchange system.

The company is certified under the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the United States intended to ensure compliance with European data protection standards for data processing in the U.S. Any company certified under the DPF commits to adhering to these data protection standards. Further information can be obtained from the provider at the following

link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000KzNaAAK&status=Active>

2.5.1 Data Processing Agreement

We have concluded a Data Processing Agreement (DPA) with the above-mentioned provider. This is a contract required under data protection law, which ensures that the provider processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

2.6. Guest WI-Fi

We offer our guests the option of internet access. For this purpose, you will receive access to our guest Wi-Fi. Access is provided upon request from the managing director or an authorized staff member.

Your name and log data are stored in our system.

The use of the Wi-Fi is based on your voluntary consent in accordance with Art. 6(1)(a) GDPR. You may withdraw your consent at any time without formalities. However, this will result in you no longer being able to use the internet access.

Data will only be shared if agreed with you or if necessary for the specific incident.

The log data is stored for three months and then deleted from the system.

3. Financial Accounting

3.1. Credit Checks

In the case of purchase on account or other payment methods where we provide advance performance, we may carry out a credit check (scoring). For this purpose, we transmit your entered data (e.g. name, address, age or bank details) to a credit agency. Based on this data, the probability of a payment default is assessed. If the risk of default is considered too high, we may refuse the respective payment method.

The credit check is carried out on the basis of contract performance (Art. 6(1)(b) GDPR) as well as to prevent payment defaults (legitimate interest pursuant to Art. 6(1)(f) GDPR). If consent has been obtained, the credit check is carried out on the basis of this consent (Art. 6(1)(a) GDPR); consent can be withdrawn at any time.

3.2. Financial Accounting

For the purpose of financial accounting, we have implemented a process within our IT systems. As part of this process, personal data of contact persons or data included in invoices may be processed (name, address, email address, telephone number, mobile number).

The processing is based on a legal obligation pursuant to Art. 6(1)(c) GDPR. The processing is necessary for compliance with a legal obligation to which the controller is subject (principles of proper accounting).

The data is shared with our responsible tax advisor.

The data is stored in accordance with statutory retention obligations.

3.3. Dunning Process

In the event of outstanding receivables, reminders are issued and, in case of non-payment, the claims may be transferred to service providers (e.g. lawyers or debt collection agencies). For this purpose, the following data is required: name, address, and the amount of the outstanding claims.

The processing is based on a contract or pre-contractual measures pursuant to Art. 6(1)(b) GDPR.

The data is shared with the respective service provider (e.g. lawyer, debt collection agency).

The data is stored in accordance with statutory retention obligations.

4. Miscellaneous

4.1. Paper File Disposal / Data Carrier Disposal

The destruction of paper documents and data carriers containing personal data that are no longer required is carried out. This ensures compliance with deletion deadlines following the applicable retention periods.

The documents and paper records may contain all data related to the customer relationship.

The processing of the data is based on a legal obligation pursuant to Art. 6(1)(c) GDPR. The processing is necessary to comply with a legal obligation to which the controller is subject.

The data is not stored.

4.2. Data Protection Management

You can contact the external Data Protection Officer at any time by email at xalution.dsb@datenbeschuetzerin.de or by phone at +49 9921 88 22 9000.

In this context, your name, the reason for your inquiry, the facts of the case, and, if applicable, data stored in the system relating to the data subject are collected and stored.

The processing of the data is based on contract performance pursuant to Art. 6(1)(b) GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures (service agreement, employment contract).

Information is only shared with your consent.

Your personal data will be stored for as long as necessary for the respective purpose. Statutory retention obligations remain unaffected.

4.3. Invitations to Events

Invitations to our own events are sent out on a regular basis. At these events, you will receive information about Microsoft products and our services. For event registration, the following data is processed: name, company, address, telephone number, and email address.

The processing of the data is based on contract performance pursuant to Art. 6(1)(b) GDPR, which permits the processing of data for the performance of a contract or pre-contractual measures.

The data remains internal and is not shared with third parties. We store your data as part of our ongoing collaboration.

4.4. Photography at Events

To capture the event, photos and videos are taken during the events. These images are recorded and used for marketing purposes, for example on our website or social media channels. In the case of individual recordings, the data subjects are asked for their consent.

Pursuant to Art. 6(1)(f) GDPR, the controller has a legitimate interest in documenting the event through photos and using them for marketing and sales purposes. Processing may also be based on voluntary consent in accordance with Art. 6(1)(a) GDPR. Consent can be withdrawn at any time by informal notification. Processing carried out prior to the withdrawal remains unaffected.

The data will be published for an indefinite period until consent is withdrawn or an objection is raised.