



PIMCORE PRIVACY STATEMENT (PPS)

Last Update: April 2025

This Privacy Policy applies to data processing by (1) Pimcore GmbH, Söllheimer Straße 16, AT-5020 Salzburg, Republic of Austria ("**Pimcore**") regarding any service and (2) Platform.sh SAS, 22 Rue de Palestro, F-75002 Paris, France ("**Platform.sh**") when using the "Platform as a Service" ("**PaaS**") service in the respective Pimcore PaaS Edition. Pimcore offers the use of its software ("**Software**") and, as PaaS, of its platform specified on the Software and operated by Platform.sh, which consists of software, configurations and tools for the development and hosting of websites ("**Platform**").

Pimcore and Platform.sh are each independently responsible for the personal data they process. However, Platform.sh also partially acts as a processor for Pimcore (for the distinction, see the explanations at <https://platform.sh/trust-center/privacy/gdpr/>). For the latter scenario, Pimcore and Platform.sh have concluded a so-called Data Processing Agreement ("**DPA**"). Pimcore also uses other data processors.

With the following Privacy Policies, we inform you about the type, scope and purpose of the collection, use and other processing of Personal Data when using the Software and/or the Platform.

I. PRIVACY POLICY OF PIMCORE

When you use the Software and/or the Platform, Pimcore ("**we**", "**us**") processes your Personal Data. "**Personal Data**" means any information relating to an identified or identifiable natural person. When Personal Data is processed, this means that we collect, store, transmit, delete or other-wise use this data.

When processing your Personal Data, we comply with the applicable data protection laws, in particular the General Data Protection Regulation ("**GDPR**") and the Austrian Data Protection Act ("**DSG**").

If the data processing carried out by us changes, we will adapt our Privacy Policy. We therefore ask you to inform yourself regularly about the content of our Privacy Policy. We will inform you if the change requires any action on your part, such as consent or other individual notification.

CONTROLLER FOR DATA PROCESSING

The controller responsible for processing your data is

Pimcore GmbH,
Söllheimer Straße 16,
AT-5020 Salzburg,
Republik Österreich
email: privacy@pimcore.com

DATA PROTECTION COORDINATOR

You can contact our data protection coordinator at any time with any questions on the subject of data protection or to exercise your rights in accordance with section 6 of this Privacy Policy in connection with the use of the Software and/or the Platform:

Name: Stefan Scherbichler, Data Protection Coordinator
E-Mail-Adresse: privacy@pimcore.com

COLLECTION AND STORAGE OF PERSONAL DATA; TYPE AND PURPOSE OF PROCESSING AND RELEVANT LEGAL BASIS

In the following, we will inform you which Personal Data we process when you use the Software and/or the Platform and/or utilise our services. We also explain the purpose for which we process your data and the legal basis on which we do so.

ACCESS/USE OF THE SOFTWARE AND/OR PLATFORM/CONCLUSION OF A PAAS USER AGREEMENT

Regardless of the edition in which you use the Software and/or the Platform, we collect the following Personal Data from you to set up access to and use of the Software and/or Platform:

- Your first name and surname
- Your email address.

If you have concluded a licence agreement with us as a paying customer on the basis of our PaaS GTC and our General Terms and Conditions (PTOS), we will also collect the following Personal Data from you:

- Invoice address.

We process the aforementioned Personal Data in order to fulfil the user agreement with you and/or with a paying customer. If you are not a paying customer yourself, you will only be granted access to and use of the Software and/or the Platform on the basis of an existing user-agreement with a paying customer. The legal basis for data processing is therefore Art. 6 para. 1 lit. b) GDPR.

In addition, we process your Personal Data for advertising purposes in order to send you personalised advertising, provided you have given your consent in accordance with Art. 6 para. 1 lit. a) GDPR.

WHEN DO WE DELETE YOUR PERSONAL DATA?

We delete your data when it is no longer required for the purposes for which it was originally collected.

Irrespective of this, we store your Personal Data processed when using the Software and/or the Platform or otherwise utilising our services until the expiry of the statutory or possible contractual warranty rights. After this period has expired, we will retain the information required under commercial and tax law relating to the contractual relationship for the periods specified by law. For this period, the Personal Data will only be processed again in the event of a review by the tax authorities.

PROCESSORS

Pimcore uses the following processors, each of whom has a Data Processing Agreement:

(a) Platform.sh:

Pimcore provides the PaaS service using the service provider Platform.sh. This service provider therefore only acts as a processor for data from customers who have booked the PaaS service.

(b) Stripe Payments Europe, Limited ("SPEL"),

1 Grand Canal Street Lower, Grand Canal Dock, Dublin D02 H210, Ireland:

Pimcore uses SPEL's payment services for billing customers.

(c) Hubspot Germany GmbH ("Hubspot"),

Am Postbahnhof 17, 10243 Berlin, Germany:

Pimcore uses Hubspot's CRM system to manage customer and lead data; this data is used, among others, by the Pimcore sales team.

(d) Odoo S.A.,

Chaussée de Namur, 40, 1367 Grand-Rosière, Belgium:

Odoo S.A. provides and operates an ERP system. Pimcore uses it to manage Pimcore subscriptions, for invoicing, and to determine partner commissions.

YOUR RIGHTS

With regard to our processing of your Personal Data, you are entitled to the following rights free of charge:

1. Right to Information pursuant to Art. 15 GDPR

You have the right to obtain information from us as to whether and what Personal Data we process about you. This also includes information on how long and for what purpose we process the Personal Data, from which source it originates and to which recipients or categories of recipients we pass it on. We can also provide you with a copy of this Personal Data.

2. Right to rectification pursuant to Art. 16 GDPR

You have the right to demand that we correct any incorrect or no longer correct information about you without delay. You can also request that we complete your incomplete Personal Data. If this is required by law, we will also inform third parties of this correction if we have passed on your Personal Data to them.

3. Right to erase pursuant to Art. 17 GDPR

You have the right to request that we erase your Personal Data without undue delay if one of the following applies:

- Your Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed, or the purpose has been achieved;
- You withdraw your consent and there is no other legal basis for the processing;
- You object to the processing and there are no overriding legitimate grounds for the processing; in the case of the use of Personal Data for direct marketing purposes, a mere objection on your part to the processing is sufficient;

- Your Personal Data has been processed unlawfully;
- the deletion of your Personal Data is necessary to fulfil a legal obligation under EU law or the law of a member state to which we are subject.

Your right to erasure may be restricted on the basis of statutory provisions. This includes in particular the restrictions listed in Art. 17 GDPR.

4. Right to restriction of processing pursuant to Art. 18 GDPR

You have the right to obtain from us restriction of processing of your Personal Data if one of the following grounds applies:

- You contest the correctness of your Personal Data for a period of time that enables us to verify the correctness of the Personal Data;
- the processing is unlawful and you oppose the erasure of the Personal Data and re-quest the restriction of their use instead;
- We no longer need your Personal Data for the purposes of the processing, but you need it for the establishment, exercise or defence of legal claims, or
- You have objected to processing as long as it is not yet clear whether our legitimate grounds override yours.

If you have obtained a restriction of processing in accordance with the above list, we will inform you before the restriction is cancelled.

5. Right to data portability pursuant to Art. 20 GDPR

You have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those Personal Data to a third party. The exercise of this right does not affect your right to erasure.

6. Right to object pursuant to Art. 21 GDPR

Pursuant to Art. 21 GDPR, you have the right to object to the processing of your Personal Data at any time for reasons arising from your particular situation if we base this processing on legitimate interests pursuant to Art. 6 para. 1 lit. f) GDPR. If you file an objection, we will no longer process your Personal Data, except in two cases

- We can demonstrate compelling legitimate grounds for the processing which over-ride your interests, rights and freedoms, or
- The processing serves the assertion, exercise or defence of legal claims.

In particular, if we process your Personal Data for direct marketing purposes, you have the right to object at any time to the processing of your Personal Data for the purpose of such marketing. If you object to the processing of your Personal Data for direct marketing purposes, we will no longer use your Personal Data for this purpose.

7. Right to withdrawal of consent pursuant to Art. 7 GDPR

You can withdraw the consent you have given us at any time with effect for the future. This withdrawal can be made in the form of an informal notification to the above-mentioned contact addresses. If you withdraw your consent, this will not affect the legitimacy of the Personal Data processing carried out up to that point.

8. Right to file a complaint with the supervisory authority

If you believe that the processing of your Personal Data by us violates applicable data protection law, you have the right to file a complaint with the competent supervisory authority. The supervisory authority responsible for us is:

Austrian Data Protection Authority (DSB)
 Barichgasse 40-42, 1030 Vienna, Austria
 Tel.: +43 1 52 152-0, dsb@dsb.gv.at
 email: dsb@dsb.gv.at

In addition, you can file a complaint with the data protection supervisory authority responsible for you at your place of residence.

AUTOMATED INDIVIDUAL DECISION MAKING INCLUDING PROFILING PURSUANT TO ART. 22 GDPR

We do not process your Personal Data for automated decisions in individual cases, including profiling within the meaning of Art. 22 GDPR.

II. PRIVACY POLICY OF PLATFORM.SH

When you use the Platform, Platform.sh processes your Personal Data. For the type, scope and purposes of the collection, use and other processing of Personal Data, please refer to the current provisions of Platform.sh's "Privacy Policy". (<https://platform.sh/trust-center/privacy/privacy-policy/>).