

Imprint & Privacy Statement

Identity and contact details of the Controller:

LeReTo KG (hereinafter also referred to as "LeReTo" or "we" or "us")

Register No: FN 422744h, Commercial Court Vienna

Address: Zitterhofergasse 8/4, 1070 Vienna, Austria

VAT-ID No ATU69026813

Registered Seat: Vienna

Email: info@lereto.at

Website: <https://www.lereto.at>

Director: Dr Veronika Haberler, single signatory powers

Shareholders: Melicharek Rechtsanwalts GmbH (50%),

Dr Veronika Haberler (25%),

Mag Peter Melicharek (25%)

Member of the Chamber of Commerce Vienna

Chapter Membership Business Consultants and IT Entrepreneurs

The relevant trade regulation laws can be accessed at www.ris.bka.gv.at

The website "smartfiles.lereto.at", "smartfiles.net" including their subdomains (hereinafter the "Website") is a so-called big website in the sense of Section 25 para 2,3 and 4 of the Austrian Media Act, as users of the Smart-files Network can access court decisions and/or other documents generated by third parties and hosted by third party databases, in a structured way.

The purpose and aim of the Website is to inform users, especially legal professionals, about court decisions, national, international and supra-national laws, enactments and legal literature, about legal tech in general and about LeReTo's products and services in specific.

We take the protection of your data seriously! For LeReTo, data protection and confidentiality are very important. Hereby we inform you how we process your data provided, and we also inform you about your rights pursuant to the GDPR (General Data Protection Regulation), the DSGVO (Austrian Data Protection Act), the TKG (Austrian Act on Telecommunication) and other statutory laws that may be relevant.

Scope of Application, General Principles

This Privacy Policy applies to the processing of personal data when using the Website and our services. Personal data is any information relating to an identified or identifiable individual. We collect and process your (hereinafter also referred to as the "user" or "you") personal data only if it is necessary for the fulfilment of the contract that we have with you, or if we have your prior consent for the processing of the data. Where it should not be possible to obtain your consent for factual reasons, we will only process any personal data if such is permitted by a statutory provision.

For the beta testing phase and for open services that we may provide for free: When uploading any documents for analysis, (a) you warrant and represent that you are rightfully entitled to dispose of this document in its entirety as set forth below and will not violate any third party's rights in doing so, and (b) you understand, acknowledge and agree that we can store it, process it ourselves, be it using algorithms for semantic analysis, morphologic reduction and/or machine learning or by any other digital or manual way, **for the purpose of improving our recognition algorithms, to train our software, and/or for statistical purposes.** Explanation: We have no interest at all in those contents of your documents that are related to any persons (at least we think so), and we do not intend to use any personal-related data that may, or may not, be contained in your PDFs. We however cannot guarantee that for example a false positive hit would not return a name contained in your PDF as a result, which is why we need to have your consent as above.

For regular commercial accounts: All documents transmitted to our research and linking tool within the scope of our services are processed by the system solely for the purpose of linking and creating the visualization as well as the smart PDF for your session. Any personal data contained in these documents will only be temporarily processed in the system's memory during the analysis process and then deleted immediately. It is technically impossible for us to inspect/view any such personal data which it may possibly contain.

Data Processing when Accessing our Website

Each time you access our Website, the following data will be collected automatically: Information about the browser type and the version used, operating system, IP-address, date and time of access. These data are stored in the log files of our system. The data will not be stored together with your other personal data.

The legal justification for the temporary storage of the data and the log files is the protection of our legitimate interests (Art. 6 para. 1 lit f GDPR).

The temporary storage of the IP-address is necessary in order to enable the retrieved data to be delivered to your electronic device. For this purpose, your IP-address must remain stored for the duration of the session. Other data are stored in log files to ensure the functionality of the Website. In addition, the data serve to optimise the Website and help us to prevent malfunctions and abuse of our systems. These purposes also represent our legitimate interests in data processing pursuant to Art. 6 Para. 1 lit. f GDPR.

The data will be deleted as soon as it is no longer required for the purpose for which it was collected. In the case of the collection of data for the provision of the Website, this is the case when the respective session has ended. If the data are stored in log files, this is the case after a few days at the latest, unless a longer storage period is necessary in order to comply with contractual or legal obligations. In addition, storage is only possible for statistical purposes, or to optimise our Website and the content offered. In this case, your IP-addresses are deleted or alienated, so that an identification of the incoming client is no longer possible.

Use of Cookies

Our Website uses cookies. Cookies are small text files that are stored by the Internet browser on your computer system. When our Website is accessed, a cookie can be stored in the cache of your internet browser, provided that you have not deactivated this function. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the Website is accessed again. We use cookies in order to adapt our Website to your preferences and to be able to recognise you when you re-visit our Website. Cookies are particularly necessary for functions that are only available after you have registered and logged in.

The following data are stored in the cookies (depending on the use of the Website): log-in information, data entered by you in an input field of the Website, characteristic character string, IP-address, date and time of access.

When accessing our Website, you will be informed about the use of cookies by means of a notification, and your consent to the processing of the personal data used in this combination is obtained. In this context, there is also a reference to this data protection declaration. The legal justification for the processing of personal data using cookies for analysis purposes is Art. 6 para. 1 lit a GDPR, if you have given your consent.

The purpose of using technically necessary cookies is to enable and simplify the use of Websites for you. Some functions of our Website cannot be offered without the use of cookies (e.g. recognition of the browser after a page change). The analysis cookies are used for the purpose of improving the quality of our Website and its content. The analysis cookies tell us how the Website is used and enable us to continually optimise our services.

Cookies are stored on your computer and transmitted to our Website. Therefore, you as the user also have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your internet browser. Cookies that have already been saved can be deleted at any time using the corresponding browser function. This can also be done automatically. If cookies are deactivated for our Website, however, it may no longer be possible to use all the functions of the Website to their full extent.

Disabling cookies in the browser

You can delete cookies that are already on your computer system at any time. Most modern internet browsers also offer the option of generally deactivating cookies. To do this, check the settings or the help menu in your browser. These links will also help you: [Firefox](#), [Chrome](#), [Edge](#), [Disable Tracking](#).

Google Analytics

On our Website - but not for the online tool itself (smartfiles.lereto.at/search) - we use the functions of the web analysis service Google Analytics for statistical analysis purposes. The provider of this service is Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google Analytics uses cookies for analysis purposes. For more information on how Google Analytics uses personal data, please see Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=en> and Google's privacy compliance page: https://privacy.google.com/businesses/compliance/?hl=en#?modal_active=none.

We use the function "IP anonymization" on our Website. This means that within member states of the European Union and member states of the European Economic Area, your IP-address is shortened by Google prior to further use in order to prevent identification. In exceptional cases, the full IP-address will be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this Website, Google will use this information to evaluate the use of the Website, to compile reports on Website activity and to provide other services relating to Website activity and internet usage to the Website operator. The IP-address transmitted by your browser as part of Google Analytics is not combined with other data from Google. When calling up our Website, you are informed by means of a notification about the use of cookies for analysis purposes and your consent to the processing of the personal data used in this combination is obtained. In this context, a reference is also made to this privacy statement.

The legal justification for the processing of personal data using cookies for analysis purposes and the transmission of anonymised data is Art. 6 para. 1 lit a GDPR if you have given its consent to the processing of the data. Google Analytics is used for the purpose of improving the quality of our Website and its content. By evaluating the anonymised data, we learn how the Website is used and can thus constantly optimise our offer. The cookies transmitted as part of Google Analytics are stored on your computer and transmitted to our Website by you. Therefore, you as a user have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for our Website, it is possible that all functions of the Website can no longer be used to their full extent. You can prevent Google from collecting the data generated by the cookie and related to your use of the Website and Google from processing this data by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

YouTube

On our Website - but not in the online tool itself - we have embedded YouTube videos for you to watch. These videos are stored on <http://www.youtube.com> and can be played directly from our Website. The operator of YouTube is YouTube LLC, 901 Cherry Ave, San Bruno, CA 94066, USA, which is a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

When you start playing an embedded video, it connects to YouTube's servers. This will tell the YouTube server which of our sites you are viewing the YouTube video from. If you are logged in to Google, your information will be directly associated with your account. If you do not want your profile to be associated with YouTube, you must log out of Google before starting the video. YouTube stores your data as usage profiles and uses them according to its own information for purposes of product development, improvement of YouTube services, advertising, market research and/or demand-oriented design of its Website (<https://policies.google.com/privacy?hl=de&gl=de#whycollect>). Such evaluation is carried out in particular (even for users who are not logged in) to provide demand-oriented advertising and to inform other users of the social networks of YouTube and affiliated companies about your activities. However, you have the right to object, and you must contact YouTube to exercise this right.

Further information on the purpose and scope of data collection and processing by YouTube can be found in YouTube's Privacy Policy. There you will also find further information on your rights and setting options to protect your privacy: <https://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA and has submitted to the EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

Publication of Search Results on Twitter and LinkedIn

On our website you have the possibility to publish the results of your research on Twitter and LinkedIn by clicking on the symbol of Twitter or LinkedIn, which is linked to the respective website. By activating the link, a connection to Twitter or LinkedIn will be established that transmits the IP-address of your device.

Apart from the IP-address, which is automatically transmitted to the respective social media service for the purpose of establishing the connection, you may decide for yourself which data you want to transmit and publish to the social media services. Before you use the link, no data will be transmitted by us to Twitter or LinkedIn.

If you live in the European Union or in the European Economic Association, the data controller for Twitter is Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland.

The data controller for LinkedIn is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland.

If you want to learn more how Twitter and LinkedIn process your data, or if you are looking for further contact information, please read the privacy policy of [Twitter](#) and [LinkedIn](#).

Newsletter Service

You may be able to subscribe to a free newsletter on our Website. In this case, we use the so-called Double-Opt-In procedure. This means that after registering for the newsletter on our Website, you receive an e-mail with a link to the e-mail address provided. Only if this link is called, the registration is confirmed and the e-mail address together with the given name is entered in the dispatch directory.

When registering for the newsletter, the following data from the input mask will be transmitted to us: First and last name, e-mail address. The consent of the person concerned is obtained during the registration process for the processing of the data. For the newsletter service we use a specialised software called Newsletter2Go. In order to use this software, your data will be transmitted to Newsletter2Go GmbH. Newsletter2Go it is forbidden to sell your data or to use it for other purposes than the dispatch of the newsletter. Newsletter2GO is a German, certified provider, which was selected according to the requirements of the GDPR. Further information can be found [here](#). In connection with the data processing for our newsletter service, no data will be passed on to third parties, except to our service provider Newsletter2Go. The data will be used exclusively for the dispatch of the newsletter. The legal justification for processing your data after your registration for the newsletter is your consent pursuant to Art 6 Abs 1 lit a GDPR. The collection of the e-mail address (and name) serves to deliver the newsletter (personalized).

The personal data you provided during registration will be stored as long as the newsletter subscription is active. After termination of the subscription, the personal data will be deleted immediately, unless a longer storage period is necessary to comply with legal obligations.

The subscription of the newsletter can be cancelled at any time. For this purpose, each newsletter contains a link with which you can unsubscribe from the dispatch list automatically. In this case, your personal data will be deleted automatically unless it is necessary to store the data in order to comply with legal obligations.

Registration and Conclusion of Contract

In order to use our services, you must first register on our Website or submit an offer to conclude a contract via our Website, providing personal data. The data are entered into an input mask and transmitted to us and stored. The data will not be passed on to third parties. The following personal data are collected as part of the registration process: Title, first and last name, e-mail address.

Legal justification for the processing of the data is your consent pursuant to Art 6 Abs 1 lit a GDPR, which you give us during the registration process. Since your registration serves to fulfil the contract or pre-contractual measures between you and LeReTo, the additional legal justification for the processing of the data is in any case the fulfilment of the contract pursuant to Art 6 para. 1 lit b GDPR.

The processing of your personal data is necessary for the conclusion and fulfilment of the contract or for the implementation of pre-contractual measures.

Your data will be deleted if the purpose of the processing is no longer given. This is the case when the data are no longer required for the execution of the contract. Even after conclusion of the contract it may be necessary to store personal data of the contractual partner in order to comply with contractual or legal obligations. For example, we are obliged to store data relating to invoices according to § 132 Abs 1 Austrian Federal Tax for a period of at least seven years.

Data Processing when Using the LeReTo Online-Viewer and the Word-Plugin

As a principle, we do neither view nor store the PDF files uploaded by you and/or the texts analysed by you using the LeReTo Word plugin (for an exception in connection with free use of The Smartfiles Network function, see above). As a consequence, we of course do not guarantee permanent storage of texts and PDFs, as they are stored on the server for a maximum of two hours and always encrypted to enable all functions and features. A logout or a new analysis (refresh) in the online viewer deletes the encrypted PDF file immediately, permanently and irretrievably from our servers.

Every deletion of files from our servers is irrevocable and without exception. No copies, not even partial ones, are retained or stored (all encrypted files are processed by us as “transient-use only” files in terms of Art 5 para 1 of the Directive 2001/29/EG).

For the beta testing phase and for open services that we may provide for free: When uploading any documents for analysis, (a) you warrant and represent that you are rightfully entitled to dispose of this document in its entirety as set forth below and will not violate any third party’s rights in doing so, and (b) you understand, acknowledge and agree that we can store it, process it ourselves, be it using algorithms for semantic analysis, morphologic reduction and/or machine learning or by any other digital or manual way, **for the purpose of improving our recognition algorithms, to train our software, and/or for statistical purposes**. Explanation: We have no interest at all in those contents of your documents that are related to any persons (at least we think so), and we do not intend to use any personal-related data that may, or may not, be contained in your PDFs. We however cannot guarantee that for example a false positive hit would not return a name contained in your PDF as a result, which is why we need to have your consent as above.

For regular commercial accounts: It is technically impossible for us to access, in any form, any personal data contained in your files. Only you have the cryptographic key for decryption. Consequently, we are also not able to provide any data protection information with regard to the content of your files.

The agreement between you and us expressly does not include the processing of personal data on behalf of a controller and **you are also free to anonymise your files before they are analysed**, with unrestricted functionality. If the documents to be analysed contain personal data from third parties, it is your responsibility to verify whether you are obliged to ensure before transmission that you have obtained the authorisation to transmit the data from the person(s) concerned. You are recommended to take precautions against unauthorised use of your account and in particular not to leave the access data with unauthorised persons. You are liable for your authorised employees.

Should you be a commercial account holder and should you wish a separate written contractual regulation and/or documentation with regard to data protection issues, please contact us at any time. We are proud to be compliant on the highest level and are willing to certify that.

Data Processing when Contacting Us

On our Website, you have the possibility to contact us by e-mail. If you contact us by e-mail, your e-mail address will be processed (stored) as long as we process your request and communicate with you. Further personal data will only be processed by us if you send them to us by contacting us. In this context, the data will not be passed on to third parties. The data will only be processed for the conversation. The legal justification for processing of the data is Art 6 para 1 lit a GDPR if you have given your consent, if the processing is necessary for the purposes of our legitimate interests, the legal justification is also Art 6 para 1 lit f GDPR. If the purpose of contacting us is to conclude a contract, the additional legal justification for the processing is Art 6 para 1 lit b GDPR. Your data transmitted to us will be deleted as soon as it will no longer be required for the purpose of its processing. This is the case when the conversation has ended. The conversation has ended when it can be inferred from the circumstances that the relevant facts have been conclusively clarified. Even after the end of the conversation, it

may be necessary to store personal data of the contractual partner in order to comply with contractual or legal obligations, and in such a case such data will also be stored for the duration required in each case.

Your Rights as a Data Subject under the General Data Protection Regulation

If your personal data is processed, you are a data subject and you have the following rights pursuant to the [GDPR](#):

Right to Access. You have the right to request a copy of the personal data we are processing about you, which we will provide to you in electronic form. We may require you to prove your identity before providing the requested information. If you require multiple copies, we may charge a reasonable administration fee.

Right to Rectification. You have the right to request that any incomplete or inaccurate personal data that we process about you will be corrected.

Right to Erasure. You have the right to obtain from us the erasure of your personal data concerning you, unless we are required to retain such data in order to comply with a legal obligation, to fulfil our contract with you, or to establish, exercise or defend legal claims.

Right to Restriction. You have the right to obtain from us the restriction of the processing of your personal data if you believe such data to be inaccurate, the processing to be unlawful, or if we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.

Right to Portability. You have the right to request that we transmit your personal data to another data controller under certain conditions pursuant to Article 20 para 1 GDPR.

Objection. If our legal justification for the processing of your personal data is in our legitimate interest, you may have the right to object to such processing on grounds relating to your particular situation. In this case, we will not process your personal data, unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

Withdrawing Consent. If you have given your consent to the processing of your personal data, you have the right to withdraw your consent at any time. You can simply contact us using the above stated contact information.

Lodge a Complaint. If you live in the European Union or in the European Economic Association, you also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. The competent authority for Austria is the [Austrian Data Protection Authority](#). If you are seeking another data protection authority, please access this [list of national data protection authorities](#) of the European Member States.

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