# Privacy Policy

Datenschutzerklärung of Visontio FlexCo

Version 2025-11-25 · effective 2025-11-25

This Privacy Policy explains how Visontio FlexCo (“Visontio”, “we”, “us”, “our”) processes personal data when you visit our websites, use our software-as-a-service platform or otherwise interact with us.

We process personal data in accordance with the EU General Data Protection Regulation (“GDPR”) and the Austrian Data Protection Act (“DSG”).

## 1. Controller and contact details

The controller responsible for data processing described in this Privacy Policy is:

**Visontio FlexCo**
Erdbergstraße 91
1030 Vienna
Austria

Email: info@visontio.com
Website: https://www.visontio.com
Product: https://app.visontio.com

If you have any questions regarding this Privacy Policy or the processing of your personal data, you can contact us at any time using the contact details above.

## 2. Data Protection Officer

We are currently not legally required to appoint a Data Protection Officer.
For all data protection matters, please contact us using the contact details in Section 1.

## 3. Scope of this Privacy Policy

This Privacy Policy applies to:

- our public websites (e.g. https://www.visontio.com, https://app.visontio.com, https://visontio.ai),
- our software-as-a-service platform (“Visontio Investor OS”),
- our communication with business contacts, prospective customers, partners, suppliers and job applicants.

Our services are aimed exclusively at business customers (B2B). However, the GDPR applies to all personal data of identifiable individuals (e.g. employees of our customers), regardless of whether they act privately or in a professional context.

## 4. Categories of data, purposes and legal bases

We only process personal data to the extent necessary and in accordance with the legal bases provided by Art. 6 GDPR.

### 4.1 Website access and server log files

When you visit our websites, our servers automatically process the following data:

- IP address
- date and time of access
- browser type and version
- operating system
- referrer URL (previously visited page)
- accessed pages and files
- amount of data transferred
- HTTP status code

**Purpose:** Ensuring the technical provision of the website, system security and stability, error analysis, prevention of misuse.

**Legal basis:** Art. 6(1)(f) GDPR (legitimate interests – operation, security and optimization of our website).

Log files are stored for a limited period and deleted or anonymized afterwards, unless longer storage is necessary in individual cases (e.g. to clarify security incidents).

### 4.2 Cookies and similar technologies

We use cookies and similar technologies (e.g. local storage, session storage) on our websites.

**Technically necessary cookies:**
Required for the basic functioning of the site (e.g. login sessions, security, consent management).
Legal basis: Art. 6(1)(f) GDPR (legitimate interests) or, where necessary, Art. 6(1)(b) GDPR (contract performance).

**Optional / analytical / marketing cookies (if used):**
Used to analyze website usage, improve our services and measure marketing effectiveness (e.g. web analytics, A/B testing). These are only set with your prior consent via our cookie banner.
Legal basis: Art. 6(1)(a) GDPR (consent).

You can manage and withdraw your consent at any time via the cookie settings in your browser and, where provided, via our on-site cookie preferences tool. If you do not accept cookies, certain functions of the website may be restricted.

### 4.3 Contacting us (email, forms, phone, LinkedIn, etc.)

When you contact us, for example via email, contact form, phone or social networks, we process:

- name
- contact details (e.g. email, phone)
- company, role and other business details (if provided)
- content of your message and any follow-up communication

**Purpose:** Handling your inquiry, communication with you, initiating and maintaining business relationships.

**Legal bases:**

- Art. 6(1)(b) GDPR (pre-contractual steps or contract performance), where the communication relates to an existing or prospective contract.
- Art. 6(1)(f) GDPR (legitimate interests – efficient handling of inquiries and business communication) in other cases.

We may store correspondence as proof of communication or for legal retention periods.

### 4.4 Account registration and login for the Visontio platform

To use our SaaS platform, users must create an account or receive an invitation from their organization. We process in particular:

- first and last name
- business email address
- password (stored only in hashed form) or single sign-on token
- organization / company, department and role
- account settings and preferences
- access logs (e.g. login times, last activity, security events)

**Purpose:** Provision and administration of user accounts, authentication and authorization, securing access to the platform, preventing unauthorized access, license and access management.

**Legal basis:** Art. 6(1)(b) GDPR (contract performance) in relation to the underlying SaaS agreement with the customer or user, and Art. 6(1)(f) GDPR (legitimate interests – secure operation of our platform and prevention of misuse).

We only collect and store personal data that is necessary for user identification, security and contractual use of the platform.

### 4.5 Use of the Visontio Investor OS (B2B SaaS)

When you use our platform, we process:

- user account data (see 4.4)
- usage data (e.g. which features are used, time and frequency of access, navigation flows)
- content and metadata entered by users (e.g. comments, notes and documents that may contain personal data of contact persons)
- technical telemetry (e.g. error reports, performance metrics)

**Purpose:**

- Provision of the contracted SaaS functionalities
- Account- and role-based access control
- License management and billing (where applicable)
- Ensuring availability, performance and security of the platform
- Product analytics and improvement of functionalities (where possible with pseudonymization or aggregation)

**Legal bases:**

- Art. 6(1)(b) GDPR (contract performance – provision of the platform to our customers),
- Art. 6(1)(f) GDPR (legitimate interests – secure, efficient and user-friendly operation, product development).

Where possible, we use pseudonymized or aggregated data for product analytics.

The corporate data processed within the platform remain under the control of the respective customer organization. Visontio acts as a processor (Art. 28 GDPR) for such data and processes it only as instructed by the customer, based on a data processing agreement.

#### 4.6 Marketing, newsletters and product information

If you subscribe to our newsletter (e.g. “Visontio Pulse”) or explicitly request product information, we process:

- name
- business email address
- company and role (if provided)
- preferences (e.g. newsletter topics)
- interaction data with our emails (e.g. opens, clicks), if permitted

**Purpose:** Sending newsletters, event invitations, product updates and other information about our company and services.

**Legal basis:**

- Art. 6(1)(a) GDPR (consent), where you actively subscribe and confirm your email (double opt-in).
- In some B2B constellations, Art. 6(1)(f) GDPR (legitimate interests) in conjunction with § 107 TKG, where legally permitted (e.g. existing customer relationships).

You can unsubscribe from our email communications at any time via the unsubscribe link in the email or by contacting us.

#### 4.7 Contract management, billing and compliance

If you or your organization become our customer, partner or supplier, we process:

- contact details of relevant contact persons (name, position, business contact data)
- contract data (e.g. agreement, term, services)
- billing and payment data (e.g. invoices, transaction references)
- correspondence related to the contractual relationship

For online payments, we may use payment service providers (e.g. Stripe). In this case, the payment provider independently processes certain data under its own responsibility.

**Purpose:** Contract execution, billing, financial accounting, assertion and defense of legal claims, compliance with statutory obligations (e.g. tax, accounting, corporate, supervisory requirements).

**Legal bases:**

- Art. 6(1)(b) GDPR (contract performance)
- Art. 6(1)(c) GDPR (legal obligations, e.g. tax retention)
- Art. 6(1)(f) GDPR (legitimate interests – enforcement of rights, defense against claims, efficient contract handling).

#### 4.8 Job applicants

If you apply for a position at Visontio, we process:

- identification and contact data
- application documents (e.g. CV, cover letter, references, certificates)
- interview notes and correspondence
- where applicable, other information you provide voluntarily

**Purpose:** Selection and hiring of staff, administration of the application process, documentation of the selection decision.

**Legal bases:**

- Art. 6(1)(b) GDPR (pre-contractual measures for an employment contract)
- Art. 6(1)(f) GDPR (legitimate interests – documentation and defense of claims under employment law).

Application data will be deleted after completion of the application process within standard periods, unless you consent to longer storage or legal retention and documentation obligations apply.

## 5. Recipients and processors

We only share personal data with third parties where:

- this is necessary for the performance of a contract (Art. 6(1)(b) GDPR),
- we are legally obliged to do so (Art. 6(1)(c) GDPR),
- you have given your consent (Art. 6(1)(a) GDPR), or
- this is based on our legitimate interests (Art. 6(1)(f) GDPR) and not overridden by your interests or fundamental rights.

Typical recipients include:

- IT service providers (e.g. hosting, cloud infrastructure, backup, monitoring, security services)
- email and communication providers

- payment service providers (for subscription billing, where applicable)
- CRM, analytics and support tools
- tax advisors, auditors, lawyers
- public authorities and courts, where legally required.

These service providers act as processors under Art. 28 GDPR and are contractually bound to process personal data only in accordance with our instructions and to ensure appropriate security measures.

## 6. International data transfers

We primarily store and process data within the European Union (EU) / European Economic Area (EEA). If we use service providers outside the EU/EEA (e.g. in the USA), we ensure an adequate level of data protection through:

- an adequacy decision by the European Commission, or
- the conclusion of Standard Contractual Clauses (SCCs) pursuant to Art. 46 GDPR, and, where required, additional technical and organizational measures.

You can request more information about international data transfers and copies of the relevant contractual safeguards via the contact details in Section 1, where legally permitted.

## 7. Storage periods

We store personal data only for as long as necessary for the purposes described in this Privacy Policy, or as required by statutory retention periods.

In particular:

- **log files:** typically a few weeks to months, unless required longer for security or evidence purposes
- **account data:** for the duration of the contractual relationship; afterwards for as long as legal retention or evidence requirements apply
- **contract and billing data:** usually 7 years under Austrian tax and commercial law
- **marketing data:** until withdrawal of consent or successful objection; certain metadata may be stored longer in anonymized or aggregated form
- **applicant data:** usually 6 months after completion of the application process, unless you consent to longer storage or legal disputes require longer retention.

Once the respective retention period has expired, the data will be deleted or anonymized, unless further processing is necessary to assert, exercise or defend legal claims.

## 8. Your rights as a data subject

Under the GDPR, you have the following rights regarding your personal data, subject to the conditions and limitations of applicable law:

- **Right of access (Art. 15 GDPR):** You can request information on whether we process your data and, if so, details about the processing.
- **Right to rectification (Art. 16 GDPR):** You can request the correction of inaccurate or incomplete data.
- **Right to erasure (Art. 17 GDPR):** You can request the deletion of your data, in particular if it is no longer necessary for the purposes for which it was collected or processed.
- **Right to restriction of processing (Art. 18 GDPR):** You can request that we restrict processing in certain cases.
- **Right to data portability (Art. 20 GDPR):** You can request to receive personal data you have provided to us in a structured, commonly used and machine-readable format, or to have it transmitted to another controller.
- **Right to object (Art. 21 GDPR):**
  You can object at any time, on grounds relating to your particular situation, to the processing of your personal data based on Art. 6(1)(f) GDPR (legitimate interests). We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or for the establishment, exercise or defense of legal claims.
  Where your data is processed for direct marketing purposes, you can object at any time. In this case, we will no longer use your data for such purposes.
- **Right to withdraw consent (Art. 7(3) GDPR):** If processing is based on your consent, you may withdraw this consent at any time with effect for the future. The lawfulness of processing before withdrawal remains unaffected.

To exercise your rights, contact us using the details in Section 1. We may need to verify your identity before processing your request.

You also have the right to lodge a complaint with a supervisory authority, in particular:

**Austrian Data Protection Authority (Österreichische Datenschutzbehörde)**
Barichgasse 40–42
1030 Vienna
Austria
Website: https://www.dsb.gv.at/

## 9. Obligation to provide data

In the context of our business relationship, you only need to provide the personal data that is required for the initiation, execution or termination of a contract or which we are legally obliged to collect.

If you do not provide such data, we may not be able to conclude or perform the contract or provide certain functionalities of our platform.
For purely informational use of our website, you are not obliged to provide personal data; however, the collection of certain technical data (see Section 4.1) is essential for the provision and security of the site.

## 10. Data security

We implement appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. These include, in particular:

- encryption of data in transit and at rest, where appropriate
- access control and role-based authorization
- secure development and deployment practices
- regular backups and monitoring
- confidentiality obligations for staff and processors.

However, no IT system can be completely secure. We continuously assess and improve our security measures in line with technological developments and risk assessments.

## 11. Automated decision-making and profiling

We do not use personal data for automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you within the meaning of Art. 22 GDPR.

Where our platform provides scoring, analytics or predictions regarding companies or deals, such outputs are decision-support tools for professional users and do not constitute automated decision-making about individuals under Art. 22 GDPR.

## 12. Third-party websites and services

Our websites and platform may contain links to third-party websites or integrate third-party services. These third parties are responsible for their own data processing. We have no influence on their privacy practices.

We recommend that you review the privacy notices of such third-party websites and services before providing personal data.

## 13. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our data processing, legal requirements or technological developments. The current version is always available on our website.

In the event of significant changes, we will inform you in an appropriate manner (e.g. via email or notice within our platform) where required by law.

## 14. How to contact us

For all questions, requests or concerns regarding this Privacy Policy or your personal data, contact:

**Visontio FlexCo**
Erdbergstraße 91
1030 Vienna
Austria

Email: info@visontio.com