DNACoachAssist – Privacy Policy

I. Responsibility for data processing

For the data processing that takes place in connection with DNACoachAssist, we, the

DNAnalytics UG (limited liability)
represented by the managing director Joachim Döninghaus
Schenefelder Landstraße 12a
22587 Hamburg
Germany

are responsible under data protection law.

If you have any questions about data protection, please contact our data protection officer:

Paul Matthews
Dormienstraße 3a
Hamburg 22587
pm@dna-network.de

II. Overview of data processing

Data that we process automatically:

You can visit the DNACoachAssist website without disclosing much personal data. However, every time you or another user accesses the website, we process personal data (e.g. IP address) and other technical information (e.g. operating system, device type, language and region). We need your IP address, for example, to technically enable the operation of the software (Art. 6 para. 1 b) GDPR).

However, we cannot identify you directly with this data.

Data that you transmit to us voluntarily:

Beyond this, you do not have to provide any personal data when you access DNACoachAssist via the web address. Only if you wish to use further functions of the software or contact us voluntarily do we need further personal data from you. As soon as you enter personal data within the software (e.g. name, address, e-mail address), this is done on a voluntary basis. If you use the functions of the software (in particular for transcribing and analyzing coaching sessions), we process information about the sessions (name of your clients, time and content of the session).

Personal data is processed when you perform the following actions:

- Registration for DNACoachAssist; Conclusion of a subscription; Login
- Use of the software functions, in particular upload, transcription and analysis of recorded coaching sessions
- Contacting customer service or support
- Subscribe and unsubscribe to the newsletter

If you provide us with personal data for the above-mentioned reasons, we will use it to process the user contract between you and us (Art. 6 para. 1 b) GDPR). We will send you a newsletter on the basis of your consent (Art. 6 para. 1 a) GDPR) and use your contact data for this purpose.

We also process data about your usage behavior in order to continuously improve DNACoachAssist if you consent to this processing (Art. 6 para. 1 a) GDPR). For this purpose, we analyze the usage

behavior of all users. With such usage data, we can determine, for example, how many users access our software at the same time, which functions they use and which areas and functions of our app are particularly popular. These usage profiles are pseudonymized. Under normal circumstances, we are therefore unable to draw any conclusions about you and your use of DNACoachAssist.

We sometimes work with partners who process data on our behalf. Unless otherwise stated in this data protection notice, these partners generally process the data within the European Union.

Your rights:

We will be happy to inform you free of charge about the personal data we have stored about you and delete or correct it if you wish. You can generally object to data processing by us (always for the purpose of direct advertising, for example) and you can of course withdraw your consent at any time. Simply contact us with your request and please inform yourself in detail about your rights below.

We will of course ensure that you can make effective use of all your rights.

If you believe that your data has been processed unlawfully, you can lodge a complaint with the competent supervisory authority.

III. Further information on data processing

To ensure that you always have full control over your data and the data of your customers and know exactly how and for what purpose your data is processed and by whom, we will provide you with more detailed information on the individual topics below. Please therefore also read the following information carefully:

1. General information on data processing

1.1. **Important terms.** "Personal data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. a cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Processing" means any operation or set of operations which is performed on personal data, whether or not by automated means. This term covers practically most cases in which data is used in some way.

"Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

1.2. **Legal basis.** In accordance with Art. 13 GDPR, you should be informed of the legal basis of our data processing. Unless the legal basis is stated separately in this Privacy Policy, the following applies:

The legal basis for data processing based on consent is Art. 6 para. 1 a) and Art. 7 GDPR; the legal basis for processing for the performance of our services and implementation of contractual measures as well as responding to inquiries is Art. 6 para. 1 b) GDPR; the legal basis for processing to fulfil our legal obligations is Art. 6 para. 1 c) GDPR; and the legal basis for processing based on our legitimate interests is Art. 6 para. 1 f) GDPR. Should vital interests of a data subject or another natural person make it necessary to process personal data, we base this data processing on Art. 6 para. 1 d) GDPR.

1.3. **Cooperation with processors and third parties.** If we disclose data to other persons and companies as part of our data processing, transfer it to them or grant them access in any other

way, this is only done on the basis of legal permission. If we transfer your data to a payment service provider, for example, this serves to process the contractual relationship and is covered by Art. 6 para. 1 b) GDPR. Data may also be transferred if you have consented to this (Art. 6 para. 1 a) GDPR), if a legal obligation provides for a transfer (Art. 6 para. 1 c) GDPR) or if we can rely on our legitimate interests (Art. 6 para. 1 f) GDPR).

In some cases, we use other companies as processors. For this purpose, we conclude data processing agreements on the basis of Art. 28 GDPR.

1.4. **Data transfer to third countries.** Unless otherwise stated in this data protection notice in individual cases, your data will not be transferred to third countries and will only be processed within the European Union.

1.5. **Storage period and deletion of data.** In accordance with Art. 17 and 18 GDPR, we erase personal data or restrict processing. Stored data is generally deleted when it is no longer needed for its intended purpose, unless deletion conflicts with statutory retention obligations. We restrict data processing if the data cannot be deleted because it is to be used for other, legally permissible purposes. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

In Germany, the retention period is 6 years in accordance with Section 257 (1) HGB (trading books, inventories, opening balance sheets, annual financial statements, commercial letters, accounting vouchers, etc.) and 10 years in accordance with Section 147 (1) AO (books, records, management reports, accounting vouchers, commercial and business letters, documents relevant for taxation, etc.).

Insofar as you are expressly informed in these data protection provisions when data will be deleted, this specific statement on the time of deletion naturally applies.

1.6. **Data security.** All data transfers between your end device and our servers or the servers of our service providers are encrypted. We use standard market encryption techniques to ensure that your data transfer is secure. We also follow the principle of data minimization and try to collect and store only as much of your personal data as is necessary for the provision of our services.

2. **Technically necessary data processing.** Technically necessary data processing occurs in the course of providing our services. This includes, for example, server logs, firewall logs, etc., e.g. at our hosting partner. Basic connection data is stored as part of these logs, such as

- Time of access
- IP address of the end device
- Requested resource

Insofar as this data processing is technically necessary, we process this data in order to fulfill our contractual obligations (Art. 6 para. 1 b) GDPR). Otherwise, this data processing is carried out on the basis of our legitimate interests in effective and efficient business operations and secure data processing (Art. 6 (1) f) GDPR).

3. **Registration and login.** If you wish to use DNACoachAssist to its full extent, in particular to analyze recorded coaching sessions, you must register. We process the registration data to initiate and fulfill the user contract (Art. 6 para. 1 b) GDPR).

We process the following personal data as part of the registration and login process:

- Required: e-mail address, password
- Optional: Name

Optionally, it is possible to access DNACoachAssist via so-called social logins, i.e. using existing user accounts from other providers (e.g. Google, Apple or Microsoft). In this case, your data stored with the respective provider that is required for login (e.g. e-mail address, user name) will be processed. The data protection provisions of the respective provider also apply.

4. Transcription and analysis of coaching sessions by us and with the help of processors

4.1. **General information.** DNACoachAssist is a program for transcribing and analyzing recorded coaching sessions using generative artificial intelligence. In addition to the data mentioned under points 2. and 3., all personal data that the user enters into the program in connection with the use of the functions of DNACoachAssist (e.g. names of your clients, date of recording of the session) will be processed. In addition, all personal data that may result from the content of the coaching session that is entered into the program is processed.

This data is processed for the purpose of fulfilling the contract, Art. 6 para. 1 b) GDPR. Insofar as personal data of your customers are concerned, the data processing is based on the customer's consent (Art. 6 para. 1 a) GDPR) or on our legitimate interest in processing the transmitted data of the coach in order to be able to offer our service (Art. 6 para. 1 f) GDPR).

Insofar as the processed data is sensitive information of the user's customers, the user himself ensures that he consents to the use and evaluation of this data within the framework of DNACoachAssist.

We realize the technical implementation of DNACoachAssist with the help of contract processors:

4.2. **AssemblyAI - Transcription of the coaching sessions.** The transcription of the uploaded audio file is done with the help of AssemblyAI (provided by AssemblyAI, Inc., 320 Judah St, San Francisco, California 94122, USA).

The audio file of the coaching session uploaded by the user is sent to AssemblyAI, where it is transcribed and temporarily stored in encrypted form before the transcription is sent back and stored in the DNACoachAssist database. AssemblyAI automatically deletes the audio file and the transcription from its systems no later than 24 hours after processing, under a retention period (time to live) that we have configured for our account. We have also opted out of AssemblyAI using our data to improve or train its models.

The estimated duration of data processing by AssemblyAI - from start to complete deletion - is no more than 24 hours.

The audio file is sent to AssemblyAI using an anonymous key. User data (e.g. names or e-mail addresses) are not shared with AssemblyAI. Personal data is therefore only processed to the extent that it is contained in the recorded coaching session.

We use the services of AssemblyAI to fulfill contractual performance obligations (transcription of coaching sessions using generative AI). The data processing is therefore carried out for the purpose of fulfilling the contract, Art. 6 para. 1 b) GDPR. Insofar as personal data of your customers are affected, the customer's consent forms the basis for processing (Art. 6 para. 1 a) GDPR) or - if no such consent exists - our legitimate interest in being able to transcribe the transmitted coaching sessions and offer our services (Art. 6 para. 1 f) GDPR).

When data is processed by AssemblyAI, data may be transferred to and stored in the USA or other third countries outside the EU that do not have a level of data protection equivalent to the GDPR. Therefore, we conclude so-called EU standard contractual clauses with AssemblyAI to ensure an adequate level of data protection and, if necessary, take further necessary measures to ensure an adequate level of data protection.

You can find more information on data processing by AssemblyAI at: https://www.assemblyai.com/legal/privacy-policy

4.3. **Anthropic / Claude - Analysis of the coaching sessions (US data residency).** The transcribed coaching session is analyzed using Claude (provided by Anthropic, PBC, 548 Market Street PMB 90375, San Francisco, CA 94104, USA).

Among other things, the transcription of the coaching session is sent to Claude (input) and then analyzed according to a specific analysis model using predefined parameters. The analysis results (output) are then sent back to DNACoachAssist and stored in our database.

Input and output are not retained by Anthropic for training purposes; the API default is that customer data is not used to train models, and zero-data-retention is available on request.

The transcription is sent to Claude anonymously and without disclosing user data (e.g. names or email addresses). Personal data is therefore only processed to the extent that it is contained in the recorded coaching session.

We use the services of Anthropic to fulfill contractual performance obligations (analysis of coaching sessions using generative AI). The data processing is therefore carried out for the purpose of fulfilling the contract, Art. 6 para. 1 b) GDPR. Insofar as personal data of your customers are concerned, the customer's consent forms the basis for processing (Art. 6 para. 1 a) GDPR) or - if no such consent exists - our legitimate interest in being able to transcribe the transmitted coaching sessions and offer our services (Art. 6 para. 1 f) GDPR).

When data is processed by Anthropic, data may be transferred to and stored in the USA or other third countries outside the EU that do not have a level of data protection equivalent to the GDPR. We therefore conclude so-called EU standard contractual clauses with Anthropic to ensure an adequate level of data protection and, if necessary, take further necessary measures to ensure an adequate level of data protection.

You can find more information on data processing by Anthropic at: https://www.anthropic.com/legal/privacy

4.4. **Mistral AI - Analysis of the coaching sessions (EU data residency).** The transcribed coaching session is analyzed using Mistral models (provided by Mistral AI SAS, 15 rue des Halles, 75001 Paris, France).

Among other things, the transcription of the coaching session is sent to Mistral (input) and then analyzed according to a specific analysis model using predefined parameters. The analysis results (output) are then sent back to DNACoachAssist and stored in our database.

Input and output are not retained by Mistral AI for training purposes; this is the API default for the services we use.

The transcription is sent to Mistral anonymously and without disclosing user data (e.g. names or email addresses). Personal data is therefore only processed to the extent that it is contained in the recorded coaching session.

We use the services of Mistral AI to fulfill contractual performance obligations (analysis of coaching sessions using generative AI). The data processing is therefore carried out for the purpose of fulfilling the contract, Art. 6 para. 1 b) GDPR. Insofar as personal data of your customers are concerned, the customer's consent forms the basis for processing (Art. 6 para. 1 a) GDPR) or - if no such consent exists - our legitimate interest in being able to transcribe the transmitted coaching sessions and offer our services (Art. 6 para. 1 f) GDPR).

Mistral AI processes data exclusively on servers within the European Union. No transfer of personal data to third countries takes place in connection with the analysis service.

You can find more information on data processing by Mistral AI at: https://mistral.ai/terms

5. Hosting

5.1. Hosting of DNACoachAssist - Heroku Webhosting & Database Storage. All DNACoachAssist data, including user data, hashed passwords, transcripts and analytics, is hosted at Heroku (provided by Salesforce, Inc., Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, California 94105, USA).

The data is processed by Heroku exclusively on servers within the EU.

The legal basis for this data processing is our legitimate interest in providing the functions of DNACoachAssist as reliably and securely as possible (Art. 6 para. 1 f) GDPR).

You can find more information on data processing by Heroku at https://www.salesforce.com/company/legal/privacy/ and at https://www.heroku.com/policy/security.

5.2. Storage of audio uploads - Amazon Web Services (AWS). The audio files of the recorded coaching sessions uploaded by the user are temporarily stored on the servers of AWS (provided by Amazon Web Services, Inc. Box 81226, Seattle, WA 8108-1226, USA).

The audio files are transmitted to AWS using an anonymous key. User data (e.g. names or e-mail addresses) are not shared. Personal data is therefore only processed by AWS to the extent that it is contained in the content of the audio files. The audio files are automatically deleted no later than one day after uploading.

The data is processed by AWS exclusively on servers within the EU.

The legal basis for this data processing is our legitimate interest in providing the functions of DNACoachAssist as reliably and securely as possible (Art. 6 para. 1 f) GDPR).

You can find more information on data processing by AWS at: https://aws.amazon.com/privacy/

6. Payment processing by us and with the help of processors

6.1. Stripe API. When you subscribe to DNACoachAssist, your payment details will be processed using Stripe (Stripe Payments Europe, Ltd., 1 Grand Canal Street Lower, Grand Canal Dock, Dublin D02 H210, Ireland) as our payment processor. Stripe processes all information from you that is required for a successful payment transaction, including your name, e-mail address, address and other billing and payment information. The data transfer takes place directly between your device and Stripe.

You can find more information on data processing by Stripe here: https://stripe.com/de/privacy

Our own systems do not receive, store or disclose credit card information or similar data. Please never send your credit card information directly to our team.

7. Making contact. If you contact us directly and you have questions or comments about DNACoachAssist or your user contract, the data processing takes place for the fulfillment or initiation of this contractual relationship (Art. 6 para. 1 b) GDPR). For other topics, the legal basis is our legitimate interest in being able to respond appropriately to general inquiries (Art. 6 para. 1 f) GDPR). Your data will be deleted as soon as the respective inquiry has been dealt with and there are no statutory retention obligations to the contrary.

8. **Email newsletter.** If you subscribe to our newsletter, we will process your e-mail address and your name in order to inform you about news and announcements relating to DNACoachAssist. This is done exclusively on the basis of your consent (Art. 6 para. 1 a) GDPR). This consent is voluntary and can be revoked at any time with effect for the future. You can unsubscribe from the newsletter, for example, by clicking on the link within the email or by setting your preferences for receiving emails in your user profile accordingly.

   We use the email service provider STRATO (STRATO GmbH, Otto-Ostrowski-Straße 7, 10249 Berlin, Germany) to send the emails, which processes your email address for the purpose of sending emails. The legal basis for this data processing is our legitimate interest in the efficient and secure delivery of the newsletter. You can find more information on data processing by STRATO at: https://www.strato.de/datenschutz/

9. **Analysis by us.** If you agree, we will also process data about your usage behavior of DNACoachAssist. With the help of such usage data, we can determine, for example, how many users access our software at the same time, which functions they use and which areas and functions are particularly popular. This data helps us to continuously improve DNACoachAssist.

   The legal basis for this data processing is your consent, Art. 6 para. 1 a) GDPR and - if no such consent exists - our legitimate interest (Art. 6 para. 1 f) GDPR) in the continuous improvement and further development of our products.

   The processing of such analysis data is pseudonymized and we therefore cannot draw any conclusions about you and your use of DNACoachAssist under normal circumstances. Data is not passed on to third parties as part of the analysis.

10. **Rights of data subjects.** You can assert your rights as a data subject of the processing of personal data against us at any time using the contact details provided at the beginning. As a data subject, you have the following rights:

    - **Right to information.** In accordance with Art. 15 GDPR, you have the right to request information about whether and how data concerning you is processed and you have the right to further information and copies of the data.
    - **Completion and rectification.** In accordance with Art. 16 GDPR, you have the right to request the completion of data concerning you or the rectification of inaccurate data concerning you.
    - **Right to object.** You can also object to the processing of your personal data at any time in accordance with the legal requirements. If we provide you with an opt-out option in these data protection provisions or in the software, you can simply exercise your right to object in this way.
    - **Revocation of consent.** You can withdraw your consent at any time with effect for the future. All you need to do is send us an informal email or use the opt-out option provided by us. The legality of the data processing carried out until the revocation remains unaffected by the revocation.
    - **Erasure and restriction.** In accordance with Art. 17 GDPR, you have the right to demand that data concerning you be deleted immediately or, alternatively, to demand that the processing of the data be restricted in accordance with Art. 18 GDPR.
    - **Data portability.** According to Art. 20 GDPR, you have the right to have data that we process automatically on the basis of your consent or in fulfillment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only be done insofar as it is technically feasible.

- **Right to lodge a complaint.** If you suspect unlawful data processing, you are free to lodge a complaint with the competent supervisory authority. The competent supervisory authority for data protection issues is the state data protection officer of the federal state in which our company is based (*Hamburg Commissioner for Data Protection and Freedom of Information, Ludwig-Erhard-Straße 22, 20459 Hamburg, Germany. mailbox@datenschutz.hamburg.de)*

11. **Adaptation of this privacy policy.** In the context of the further development of data protection law as well as technological and organizational changes, our data protection information is regularly reviewed for the need for adjustments or additions and updated if necessary. We therefore recommend that you read this data protection notice again from time to time.

(October 7, 2026)