CONSULTING · DOCUMENT

Privacy notice for clients and contact persons

Annex

01 PRIVACY NOTICE UNDER ARTICLES 13 AND 14 GDPR

English translation. The German version prevails.

Controller	Felix Reher, Am Pfeilshof 9A, 22393 Hamburg, Germany, mail@felixreher.de, telephone +49 40 64087520
Data protection officer	No data protection officer has been designated. Please contact me directly on all data protection matters.

02 PROCESSING

1. Data subjects and data

I process data of clients who are natural persons (freelancers and self-employed persons acting as entrepreneurs under section 14 BGB): salutation, title, first and last name, profession or occupation, business name, address, e-mail address, telephone number, tax number and VAT identification number, customer number, content of communications, contract, service, activity and billing data and payments received. Of contact persons and staff of my clients I process name, function, business contact details, content of communications and contract, service and billing data where they concern them. If I process data from a client's systems or documents on that client's behalf (Article 28 GDPR) or as a person acting under that client's authority (Article 29 GDPR), the client is the controller; the client's privacy notice applies to that processing.

2. Source

I receive the data from you personally (Article 13 GDPR) or from the business for which you work (Article 14 GDPR). In individual cases I also take business contact details and functions from publicly accessible sources such as your business's website, the commercial register or professional networks.

3. Purposes and legal bases

3.1 Preparing and performing the agreement: Article 6(1)(b) GDPR, to the extent you are yourself the contracting party; otherwise my legitimate interest in performing the agreement with your business (Article 6(1)(f) GDPR).

3.2 Invoicing and retention under tax and commercial law: Article 6(1)(c) GDPR in conjunction with section 147 AO, section 14b UStG and, where applicable, section 257 HGB.

3.3 Establishment, exercise and defence of legal claims: Article 6(1)(f) GDPR; my legitimate interest lies in enforcing and defending claims arising from the engagement.

3.4 Maintaining the business relationship after completion of an engagement using business contact details: Article 6(1)(f) GDPR; my legitimate interest lies in continuing the business relationship.

4. Recipients

Recipients are service providers for e-mail, data storage and bookkeeping, my tax advisers, banks for payment transactions, insurers in the event of a claim, and authorities and courts where there is a duty. Service providers used: phexnet UG (haftungsbeschränkt), Hamburg, as processor operating the web server, database, customer portal and e-mail dispatch, with Hetzner Online GmbH as sub-processor (data centre in Helsinki, Finland, EU); Apple Distribution International Limited, Ireland, as provider of my mailbox (iCloud Mail) and independent controller.

5. Third country

Transfer to a third country	takes place to the extent that e-mails are held in my mailbox.
Recipient, country and basis	Apple Inc., USA; according to Apple, such transfers are based on standard contractual clauses under Article 46(2)(c) GDPR. Server, database and customer portal are located in the EU; contract and invoice documents are stored there, not in the mailbox.

Where a transfer takes place, it is based on an adequacy decision under Article 45 GDPR or on standard contractual clauses under Article 46(2)(c) GDPR; the field above states which basis applies.

You can obtain a copy of the standard contractual clauses from me on request.

6. Storage period

I store the data for the duration of the cooperation and thereafter until the limitation period for possible claims has expired, as a rule three years from the end of the year in which the engagement ends (sections 195, 199 BGB). I keep invoices, cancellation invoices, reminders, payments received and signed contract documents uniformly for ten years from the end of the calendar year of their issue or completion (section 147 AO, section 14b UStG); documents you entrust to me in the engagement until the end of the tenth calendar year after the end of the engagement. I then delete the data after express confirmation, unless claims are pending.

7. Your rights

7.1 You have the right of access (Article 15 GDPR), rectification (Article 16 GDPR), erasure (Article 17 GDPR), restriction of processing (Article 18 GDPR) and data portability (Article 20 GDPR). The right to object is described separately at the end of this notice.

7.2 You may lodge a complaint with a data protection supervisory authority (Article 77 GDPR), in particular the authority of your place of residence or place of work or the authority competent for me, the Hamburg Commissioner for Data Protection and Freedom of Information (Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit), Ludwig-Erhard-Str. 22, 20459 Hamburg, mailbox@datenschutz.hamburg.de.

8. Necessity, automated decisions

8.1 The provision of the data is required neither by law nor by contract. If you are yourself the client, name, address and billing data are necessary for concluding and performing the agreement; without them I cannot accept the engagement. If you are a contact person or member of staff of a client, you have no duty towards me to provide data; without name and business contact details I cannot work with you on the engagement.

8.2 There is no automated decision-making, including profiling (Article 22 GDPR).

03 RIGHT TO OBJECT UNDER ARTICLE 21 GDPR

To the extent I process your data on the basis of Article 6(1)(f) GDPR, you may at any time object to the processing on grounds relating to your particular situation (Article 21(1) GDPR). I will then no longer process the data unless there are compelling legitimate grounds that override your interests or the processing serves the establishment, exercise or defence of legal claims.

You may object to processing for direct marketing purposes at any time without giving reasons (Article 21(2) GDPR).

The objection requires no particular form and may be sent to the address or e-mail address stated above.

As at 14 November 2026