

Backwell Tech Corp. Europe GmbH - Privacy Policy

Last updated: 2. January 2026

1. Introduction

This Privacy Policy explains how Backwell Tech Corp. Europe GmbH ("Backwell Tech", "we", "us", "our") processes personal data in accordance with Regulation (EU) 2016/679 (the General Data Protection Regulation – GDPR) and applicable European data protection laws.

This Privacy Policy is provided for informational purposes and does not require consent. It applies to all processing activities carried out by Backwell Tech as an independent data controller and is made available at the point of data collection (e.g., forms, events, communications).

2. Data Controller

Backwell Tech acts as an independent data controller for the personal data it processes in connection with its business activities, including marketing, commercial outreach, and relationship management.

Contact details:

Backwell Tech Corp. Europe GmbH

Kemperplatz 1, 10785 Berlin

Email: hello@backwelltechcorp.com

Backwell Tech is not required to appoint a Data Protection Officer pursuant to Article 37 GDPR and applicable German data protection law.

3. Categories of Personal Data

We may process the following categories of personal data:

- Professional identification data (name, job title, company)
- Professional contact details (business email, phone number, business address)
- Communication and interaction data
- Publicly available professional information

We do not intentionally collect special categories of personal data.

4. Sources of Personal Data

Personal data may be collected:

- Directly from you (e.g., forms, events, communications)
- From public or professional sources (e.g., company websites, professional networks)
- From third-party business data providers that independently collect and provide professional contact information

Where personal data is obtained from third-party sources, Backwell Tech relies on providers that declare compliance with applicable data protection laws and the lawful collection of professional

contact data. Backwell Tech processes such data in accordance with GDPR requirements and informs data subjects of the source of their personal data at the first point of contact, as required by Article 14 GDPR.

5. Purposes and Legal Bases of Processing

We process personal data for the following purposes:

- Business development and professional outreach
- Relationship management
- Marketing communications (subject to applicable legal basis)
- Compliance with legal obligations
- Security and fraud prevention

Legal bases include:

- Legitimate Interests (Article 6(1)(f) GDPR):

We process personal data on the basis of our legitimate interests, which consist of maintaining professional relationships with relevant business contacts, conducting business development and outreach, and providing relevant information about our products and services. We ensure that these legitimate interests do not override the fundamental rights and freedoms of data subjects. In particular, data subjects have the right to object to processing for direct marketing purposes at any time, in accordance with Article 21 GDPR.

- Consent (Article 6(1)(a) GDPR):

where required by law, for example for certain marketing communications. Consent may be withdrawn at any time. To ensure that your consent to receive marketing communications is valid, informed, and verifiable, Backwell Tech uses a Double Opt-In (DOI) process. Following an initial opt-in, a confirmation email containing a unique link is sent to the data subject. Consent becomes effective only after the confirmation link is clicked. Until confirmation is completed, no marketing communications are sent. The DOI confirmation (including date, time, and source) is recorded and stored as proof of consent in accordance with Article 7 GDPR.

- Legal obligations (Article 6(1)(c) GDPR):

where required to comply with applicable laws or regulations.

Purpose of Processing	Legal Basis	GDPR Article	Notes
Business development and professional outreach	Legitimate interest	Art. 6(1)(f) GDPR	Balancing Backwell Tech's business interests with the rights and freedoms of data subjects
Professional relationship management	Legitimate interest	Art. 6(1)(f) GDPR	Includes communications, follow-ups, and ongoing professional interactions
B2B marketing - electronic communications (e.g. email newsletters, promotional emails)	Consent via Double Opt-In	Art. 6(1)(a) GDPR; Art. 7 GDPR	Consent required in accordance with EU ePrivacy rules and German Act Against Unfair Competition (UWG §7)
B2B marketing - non-electronic communications (e.g. events, physical mail, professional updates)	Legitimate interest	Art. 6(1)(f) GDPR	Limited to professional contacts; communications are proportionate and subject to the right to object at any time (Art. 21 GDPR)
Compliance with legal obligations	Legal obligation	Art. 6(1)(c) GDPR	e.g. tax, accounting, and regulatory requirements under German and EU law
Security and fraud prevention	Legitimate interest	Art. 6(1)(f) GDPR	Protection of company systems, resources, and personal data

Providing your personal data is voluntary. However, if you do not provide certain data, we may not be able to contact you or provide certain services.

6. Marketing Communications

Marketing communications are governed by a separate Marketing Communications Policy and are never a condition for accessing our services or participating in our activities.

7. Data Sharing

We do not sell personal data or share it with third parties for their own marketing purposes.

We may engage service providers (e.g., CRM systems, marketing automation platforms) that process data on our behalf under contractual confidentiality and data protection agreements (Art. 28 GDPR).

8. International Transfers

Where applicable, personal data transferred outside the EU/EEA is safeguarded through appropriate legal mechanisms, such as EU adequacy decisions or Standard Contractual Clauses (SCCs) in accordance with Articles 44-49 GDPR.

9. Data Retention

Personal data is retained only for as long as necessary for the purposes for which it was collected or as required by law.

Indicative retention periods:

- B2B contacts: up to 5 years from last commercial contact
- Tax or accounting data: up to 10 years (German law)
- Marketing communications: until consent withdrawal or objection

Retention periods are periodically reviewed to ensure compliance and data minimization.

10. Data Subject Rights

You have the following rights under GDPR:

- Access your data (Art. 15 GDPR)
- Rectify inaccurate data (Art. 16 GDPR)
- Delete your data (Art. 17 GDPR)
- Restrict processing (Art. 18 GDPR)
- Object to processing, including marketing (Art. 21 GDPR)
- Withdraw consent (Art. 7 GDPR)
- Lodge a complaint with a supervisory authority (Art. 77 GDPR)

Requests relating to Backwell Tech's processing will be handled directly by us. Requests concerning data held or processed by third-party providers may need to be addressed to those providers as independent controllers.

11. Automated Decision-Making

We do not make decisions based solely on automated processing, including profiling, that would have legal or similarly significant effects on you (Art. 22 GDPR).

12. Security Measures

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, or misuse, including:

- Access controls and authentication
- Encryption of sensitive information
- Role-based permissions and limited access
- Regular security monitoring and staff training

13. Updates

This Privacy Policy may be updated periodically. The latest version will always be available through our official channels.