Version: GER 12.0 November 2026

PRIVACY POLICY

We, BRYTER GmbH (hereinafter "**we**" or "**BRYTER**") are pleased about your interest in our company.

We take the protection of your personal data and their confidential treatment very seriously. The processing of your personal data takes place within the framework of the legal provisions of the data protection law of the European Union, in particular the General Data Protection Regulation (hereinafter "**GDPR**") and further applicable regulations.

With this privacy policy, we inform you about our approach to privacy by explaining why and how we process your personal data and explaining your rights. This privacy policy applies to all situations in which BRYTER processes your personal data. This implies visiting the BRYTER websites (bryter.com and beamon.bryter.com), using all BRYTER products such as the BRYTER Platform, BRYTER Assist, and BRYTER Extract, and other situations mentioned in this privacy policy.

If you are in a contractual relationship with BRYTER and a Data Processing Addendum ("**DPA**") has been concluded between you and BRYTER, the DPA applies in addition to this privacy policy. The BRYTER DPA can be found here.

1. General information

1.1 Controller and contact details

This data privacy policy shall apply to data processing activities by the following controller:

BRYTER GmbH
Biebergasse 2
60313 Frankfurt am Main
E-Mail: **privacy@bryter.io**

Legal representatives: Michael Grupp, Dr. Micha-Manuel Bues, Michael Hübl, to be reached under the above contact details.

1.2 Data protection officer

The operational data protection officer can be reached as follows:

HeyData GmbH
Schützenstr. 5
10117 Berlin
E-Mail: **info@heydata.eu**

1.3 Affiliates of the controller

BRYTER US Inc.
33 Irving Place
Suite 5007
New York, NY 10003,USA

BRYTER Services UK Limited
21-33 Great Eastern St.
London EC2A 3EH, UK

2. Subject matter of data protection

The subject matter of data protection is personal data. This means any information relating to an identified or identifiable natural person ('data subject'). These include e.g. information such as name, postal address, e-mail address or telephone number.

Specific information on the personal data processed by us can be found below in detail in the data processing operations listed.

3. Collection and storage of personal data as well as the nature and purpose of their processing

3.1 When visiting the website

When visiting and using our website, the browser used on your end device will automatically send information to the server of our website. This information is temporarily stored in a so-called log file.

Categories of personal data processed:

- internet protocol address of the requesting computer
- date and time of the access
- website that is viewed
- browser used

Purposes of processing:

- ensuring smooth establishment of the website's connection
- ensuring comfortable use of our website
- evaluation of system safety and stability, as well as
- other administrative purposes

Legal basis:

- Art. 6(1)(f) GDPR (legitimate interest in operating and securing the website)

Further information on cookies and similar technologies can be found in Sections 6 and 7 of this privacy policy.

3.2 **Customer Relationship Management**

We offer you the option to contact us via email to purchase access to the BRYTER platform. If you will enter or have entered a customer relationship with BRYTER, we process personal data to manage and maintain our business relationship.

Categories of personal data processed:

- Identification and contact data (e.g. name, email address)
- Contractual and communication data (e.g. emails, service requests, invoices)
- Customer account and usage-related information:

Purposes of processing:

- Customer acquisition and relationship management
- Contract initiation, performance and administration
- Customer support and service fulfillment

Legal basis:

- Art. 6(1)(f) GDPR (legitimate interest in managing customer relationships)
- Art. 6(1)(b) GDPR, where processing is necessary for the performance or initiation of a contract

3.3 **Meeting Documentation and Transcription**

In the context of sales, customer success, onboarding or similar customer interactions, we may use external meeting documentation tools (e.g. AI-based meeting assistants) to create transcripts, summaries and notes of meetings.

Categories of personal data processed:

- Audio recordings and transcripts of meetings

- Meeting metadata (e.g. participants' names, email addresses, meeting ID, date and time)

- Meeting chat content, where applicable

- If recording is enabled: video and screen-sharing content as part of the meeting recording

Purpose of processing:

- Documentation of meetings (transcripts, summaries, action items)

- Internal quality assurance and follow-up of customer interactions

Important clarification on AI usage:

- Personal data processed in this context is not used to train or improve general AI or machine-learning models.

- AI-based processing is limited to the generation of meeting transcripts, summaries and related documentation for our internal purposes.

Legal basis:

- Art. 6(1)(f) GDPR (legitimate interest in efficient documentation and quality assurance of customer communication)

- Art. 6(1)(b) GDPR, where meetings are necessary for the performance or initiation of a contract

- Art. 6(1)(a) GDPR (consent), where required by applicable law, in particular for audio, video or screen recordings

Recipients and roles:

- External providers of meeting documentation services (e.g. Glyphic) act as processors on our behalf in this context.

- These services are not part of the provision of the BRYTER Software as a Service to customers and are used exclusively within BRYTER's own responsibility (e.g. sales and customer success).

Data retention:

- Meeting recordings and transcripts are retained only as long as necessary for the above purposes and can be deleted or restricted at any time; recordings are deleted in accordance with our internal retention policies.

Screen sharing:

- Screen-sharing content is only captured if meeting recording is enabled. Without active recording, screen-sharing content is not persistently stored.

3.4 **Payments and Billing (Self-Service Credit Card Payments)**

If you purchase our services via self-service (e.g. by credit card), we process personal data for the purpose of payment processing and billing.

Categories of personal data processed:

- Identification and contact data (e.g. name, email address, billing address)
- Payment and transaction data (e.g. transaction ID, payment status, amount, currency; credit card data is processed in tokenized form)
- Device and usage data for fraud prevention and security purposes

Purposes of processing:

- Processing payments and billing
- Fraud prevention and ensuring payment security
- Compliance with legal accounting and retention obligations

Legal basis:

- Art. 6(1)(b) GDPR (performance of a contract)
- Art. 6(1)(f) GDPR (legitimate interest in secure and efficient payment processing and fraud prevention)
- Art. 6(1)(c) GDPR (compliance with legal obligations)

Recipients:

- Stripe and affiliated companies, acting as independent controllers for payment processing and fraud prevention. Further information can be found in Stripe's privacy policy.

Data retention:

- Payment-related data is retained in accordance with statutory retention obligations; otherwise, data is deleted once it is no longer required for the above purposes.

International data transfers:

- Where data is transferred to third countries, this is done under appropriate safeguards as described in Section 5 of this privacy policy (e.g. EU-US Data Privacy Framework, Standard Contractual Clauses).

3.5 **Subscribing to our Newsletter**

If you have consented pursuant to Art. 6(1)(a) GDPR, we process your personal data to send our newsletter.

Categories of personal data processed:

- Email address
- Name, surname and company affiliation

Purpose of processing:

- Sending newsletters and product-related information

Legal basis:

- Art. 6 (1) (a) GDPR (consent)

You may revoke your consent at any time for the future.

3.6 **When using our contact form, email contact or downloading content**

You may contact us via contact forms or email and download content such as guides or reports.

Categories of personal data processed:

- Identification and contact data (e.g. name, email address)
- Company affiliation and job title
- Communication content

Purposes of processing:

- Responding to inquiries
- Providing requested content
- Occasional informational updates on our products and services

Legal basis:

- Art. 6(1)(f) GDPR (legitimate interest in responding to inquiries)
- Art. 6(1)(a) GDPR (consent), where required

3.7 **Recruitment and Onboarding**

We collect application relevant documentation provided by the candidate. In general, it includes name, surname, e-mail address, address, phone number, a cover letter and the CV and a link to the applicant's LinkedIn profile or website. Moreover, certain information can be provided for self-identification under local US law (gender, race or ethnicity, veteran status, disability). Do disregard this section unless it is required by local law.

Depending on whether your application is successful, we need further information to enter into an agreement/employment relationship with you. This may be: date of birth, bank account details, insurance number, work permits, disabilities if legally required under local law etc. We will also conduct automated checks against applicable sanctions-party lists.

Please do not include in your CV and cover letter information about political opinions, religious beliefs, and similar sensitive data. They are not required for your application.

The legal basis for data processing activities during the recruitment process is the respective national employment law or Art. 6 (1)(b) GDPR (i.e., the processing is necessary for entering into or the performance of a contract with you).

If you provide any information in relation to e.g. referees, you are responsible for obtaining their consent and ensuring that they are aware that their details can be forwarded.

Where we obtain publicly available information about you from business- and employment-oriented social networks or websites, the legal basis is Art. 6(1)(f) GDPR. Our legitimate interests follow from the fact that we wish to conduct a proper assessment of an applicant.

When we do a video interview with you it might happen that we ask for a recording. We will always ask for your consent whether to record or not, pursuant to Art. 6(1)(a) GDPR. Please note – whether you consent is totally up to you. You have the right to revoke your consent at any time without reasons with effect for the future.

BRYTER uses the applicant tracking system & recruiting software Teamtailor for its hiring process. It is used to coordinate the application process, to monitor the status of

applications and to communicate with candidates and within the team. Only BRYTER employees who are involved in the application process for the respective position have access to the candidate's data. We have a specific Cookie policy for Teamtailor which can be found **here**.

The applicant data will be deleted by us six months after the end of the respective application procedure. This is necessary for the burden of proof in the event of a legal claim based on the German General Equal Treatment Act (AGG).

3.8 **BRYTER Academy & BRYTER Open**

BRYTER's learning platform for students - BRYTER Academy - enables us to provide online courses and learning material to interested participants. Personal data collected during the onboarding process and course participation is: name, email address, courses, interaction time, login times, progress.

The legal basis for the processing of participants' data is Art. 6(1)(b) GDPR.

BRYTER Open gives non-profits, NGOs and academic institutions the power of our platform for free. If you are using these services, our Customer relationship management section applies to the data collected as well as further privacy information provided on the signed-up service.

3.9 **In-app behavior analytics**

Categories of personal data processed:

- In-app usage and behavioral data within our platform (e.g., click paths, page and feature usage, session metadata, timestamps)
- Technical identifiers and device information (e.g., browser/device type, operating system, pseudonymous user IDs)
- No customer-generated content, prompts, documents, or attachments from our AI products are transmitted to Userpilot, Inc.

Purposes of processing:

- Product analysis and improvement, UX optimization, feature adoption analysis, and supporting user-centric development of the platform

Legal basis:

- Art. 6(1)(f) GDPR (our legitimate interest in improving and ensuring the stability of our services)

- Where technologies are used that require consent under applicable ePrivacy/telecom rules (e.g., accessing or storing information on end-user devices), we obtain such consent via our consent mechanism

Recipients:

- Userpilot, Inc. acts as our processor. The processing does not occur on behalf of customers and is not part of the provision of the BRYTER SaaS services.

Data retention:

- Personal data is stored only as long as necessary for the purposes described; aggregated or anonymized insights may be retained for longer.

3.10 **Additional Purposes for Processing**

The data mentioned above are also processed for the additional purposes.

Purposes of processing:

- To enable you to take part in events or complete surveys
- To provide, maintain, improve, and enhance our services
- To understand and analyze how you use our services and develop new products, services, features, and functionalities and deliver relevant website content or measure the effectiveness of our advertising activities
- To find and prevent fraud, and respond to trust and safety issues that may arise; and
- For compliance purposes, including enforcing our legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency
- Procurement of goods and services

Legal basis:

- Art. 6 (1)(f) GDPR (legitimate interest)

4. Categories of recipients

Your personal data will be disclosed to the following parties:

4.1 **Internal recipients**

We may share your personal data with our affiliates, when supporting us in the processing activity. The legal basis for such transfer is BRYTER's legitimate interest as we provide services with cross-country teams, to guarantee smooth operations. When personal data is leaving the European Union, necessary contractual safeguards have been put in place.

4.2 **External recipients**

We may engage third parties. These may be:

- companies and individuals (e.g. freelancer, consultants) who assist us in providing our services (e.g. payment, credit control, sanctions checks, marketing services, ICT services).

- those receiving personal data as required by law (for example if required by a court order). and under similar circumstances.

- companies' personal data is shared in connection with a merger, sale, or other asset transfer. Thereto we may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company, or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this privacy policy in effect at the time the applicable information was collected; and third parties to whom you have consented to the disclosure of personal data.

5. Transfers of personal data to third countries

Your personal data will be e. g. shared with third parties and partly their sub-processors based also outside of the European Economic Area.

Third parties will only use your personal data to the extent necessary to perform their functions and are contractually bound to adhere to an appropriate level of personal data protection.

Those to be mentioned are the following:

- We use the cloud software services of Amazon Web Services ("**AWS**") for the purpose of being able to offer our service – also BRYTER Academy and BRYTER Open. For more information, please see AWS' privacy policy (https://aws.amazon.com/privacy/?nc1=h_ls). We use AWS-servers that are based in the EU. AWS is based in the USA and legal basis for the transfer to AWS are the new EU Commission's Standard Contractual Clauses.

- Anthropic Ireland Limited

- Asana, Inc.;
- Datadog, Inc.;
- DocSend, Inc.;
- DocuSign, Inc.;
- Glyphic AI Limited;
- Google LLC; (Analytics & Ads, incl. Google Signals and Enhanced Conversions/Customer Match): Data may be transferred to the United States for the purpose of usage analytics, cross-device reporting, audience insights and advertising measurement. Transfers rely on the EU-U.S. Data Privacy Framework where applicable and, additionally, on the European Commission's Standard Contractual Clauses.
- Heap Inc.;
- Highspot, Inc.;
- Hubspot, Inc.;
- LearnWorlds Ltd.;
- LinkedIn Inc.;
- We use the cloud software services of Microsoft Azure ("**Azure**") for the purpose of being able to offer our service – also BRYTER Academy and BRYTER Open. For more information, please see Azure's privacy policy (https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA?lang=1). We use Azure-servers that are based in the EU. Azure is based in the USA and legal basis for the transfer to Azure are the new EU Commission's Standard Contractual Clauses.
- Mixpanel, Inc.;
- Notion Labs Inc.;
- Slack Technologies, Inc.;
- Stripe Technology Company Limited (STC);
- Twitter, Inc.;
- Userpilot, Inc.

- Zendesk, Inc.;
- ZenLeads, Inc.;
- Zoom Video Communications, Inc.

Additionally, when using BEAMON Assist, BEAMON Extract and the AI Connector, BRYTER engages sub-processors to process Personal Data provided by Customer or End Users in order to enable the AI Services.

For customers of BRYTER GmbH, the storage of Customer Data and the operation of the Software take place exclusively in data centers located within the European Union (Amazon Web Services, Frankfurt am Main; Microsoft Azure (Microsoft Ireland Operations Ltd), data center regions within the European Union). For AI-supported processing, the place of processing of the language model enabled in each case is additionally relevant:

- The default model is provided by Microsoft Azure (Microsoft Ireland Operations Ltd); processing takes place in data center regions within the European Union. In the delivery state, only this language model is enabled for each Tenant.
- The optionally available Claude models are provided by Anthropic Ireland Limited (registered in Ireland); processing takes place in the United States. These language models are used only after enablement by an administrator of the Customer; until then, no Customer Data is transferred to Anthropic Ireland Limited. Transfers to the United States are based exclusively on the Standard Contractual Clauses of the European Commission pursuant to Art. 46(2)(c) GDPR; no reliance is placed on an adequacy decision pursuant to Art. 45 GDPR.

For customers of BRYTER US, Inc. the sub-processing takes place in the European Union, the United Kingdom or the United States.

6. Cookies and Local Storage

6.1 Cookies

We use cookies to provide you with a pleasant and secure online experience on our website.

We distinguish between the following types of cookies:

- **Technically necessary cookies**: These are required for the basic functionality and security of our website. The legal basis for their use is Art. 6(1)(f) GDPR (legitimate interest).
- **Analytics cookies**: In addition to technically necessary cookies, we use analytics cookies provided by third parties such as Google Analytics to analyze user behavior and improve our website. These analytics cookies are only set with your explicit consent via

our cookie banner, in accordance with Art. 6(1)(a) GDPR (consent). You can withdraw or modify your consent at any time by accessing the cookie banner or adjusting your browser settings.

For more information about the specific cookies used, their purposes, retention periods, and how you can manage or delete them, please refer here.

In addition, you can delete individual cookies or the entire cookie stock via your browser settings. Information and instructions on how to delete these cookies or block their storage in advance can be found, depending on the provider of your browser, under the following links:

- **Mozilla Firefox**
- **Microsoft Edge**
- **Google Chrome**
- **Opera**
- **Safari**

Please note that if you do not allow technically required or certain functional cookies, some features of our website may not be available or may function only to a limited extent.

We also implement Google Consent Mode v2, which ensures that Google services receive information about your consent status. If you do not consent, Google only receives limited cookieless pings without setting or reading cookies; if you consent, full functionality is enabled. You can change your choice at any time via “Cookie Settings”.

6.2 Local Storage

To enable you to customize the usage of BRYTER’s website and software to your personal needs and usage, we also use local storage technology (also known as “local data” and “local storage”) in addition to cookies. This involves storing data locally in your browser's cache, which continues to exist and can be read even after closing the browser window or exiting the program - unless you delete the cache.

Local Storage enables your preferences when using the BRYTER website and/or BRYTER’s software to be stored on your computer and used by you. The following information is stored by BRYTER when using BRYTER’s software as local data:

- Configuration of data views including filters, columns visible and sorting.

Third parties cannot access the data stored in local storage. It will not be passed on to third parties and will not be used for advertising purposes.

Insofar as this storage or access is absolutely necessary for us to provide the service of our website expressly requested by our website visitors (e.g., to carry out a chatbot used by the website visitor or to ensure the IT security of our website) it is carried out on the basis of Section 25 para. 2 no. 2 of the German Telecommunications Telemedia Data Protection (Telekommunikation-Telemedien-Datenschutz-Gesetz, "**TTDSG**"). Otherwise, this storage or access takes place on the basis of the website visitor's consent (Section 25 para. 1 TTDSG).

The subsequent data processing is carried out in accordance with the following sections and on the basis of the provisions of the GDPR.

7. Integration of further services

Name of the service	Service provider	Description of the service	Legal basis	Link to the privacy policy of the provider
Vimeo	Vimeo, Inc, 555 West 18th Street New York, New York 10011, USA	Integration of video content on the website	Art. 6(1)(f) GDPR	https://vimeo.com/privacy
YouTube	Google Ireland Limited, Gordon House Barrow Street Dublin 4, D04E5W5, Irland	Integration of video content on the website	Art. 6(1)(f) GDPR	https://policies.google.com/privacy?hl=de
Google Analytics	Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	Web analytics for statistical evaluation and improvement of our website	Art. 6(1)(a) GDPR	https://policies.google.com/privacy

Google Signals (extension of Google Analytics)	Google Ireland Ltd. / Google LLC	Cross-device reporting and audience insights based on aggregated Google account information (e.g., location history, YouTube history)	Art. 6(1)(a) GDPR; Sec. 25(1) TTDSG (consent)	https://policies.google.com/privacy
Google Ads – Enhanced Conversions / Customer Match (User-provided Data)	Google Ireland Ltd. / Google LLC	Use of hashed customer data (e.g., email, phone) to improve conversion measurement and advertising audiences	Art. 6(1)(a) GDPR; Sec. 25(1) TTDSG (consent)	https://policies.google.com/privacy

Google Signals is only activated after you have given your consent in our cookie banner. You can withdraw consent at any time via “Cookie Settings” in the footer. Signed-in Google users can additionally manage ad personalisation in their own Google account at Google My Activity (https://myactivity.google.com/).

User-provided data for Google Ads will only be used after your explicit consent under the “Marketing” category in our cookie banner. You can withdraw consent at any time via “Cookie Settings” in the footer.

8. Data retention

Your personal data will be retained as long as necessary to fulfil the legitimate purpose(s) for the processing and as long as required by law.

For Google Analytics (GA4), event-level data is retained for up to 14 months (default setting) unless you select a shorter period in the cookie banner. Aggregated analytics reports that do not allow direct identification may persist longer.

9. Rights of data subjects

You have the right:

- to demand information in accordance with Art. 15 GDPR regarding the processing of your personal data by us. In particular, you may request information on the purposes of the processing, the categories of personal data, the categories of recipients to whom your data have been or are disclosed, the envisaged storage period, the existence of the right to rectification, erasure, restriction of processing or objection, the right to lodge a complaint, the source of your data to the extent that these were not collected at our site, and the existence of automated decision-making, including profiling and any meaningful information on its details;

- in accordance with Art. 16 GDPR, obtain the rectification of any inaccurate personal data stored by us or completion of such data without undue delay;

- in accordance with Art. 17 GDPR, obtain the erasure of your personal data stored by us, to the extent that processing is not required for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;

- in accordance with Art. 18 GDPR, obtain the restriction of processing of your personal data, to the extent that the accuracy of the data is contested by you, processing is unlawful, but you oppose erasure and we no longer need the personal data, but you still require them for the establishment, exercise or defence of legal claims or you have objected to processing pursuant to Art. 21 GDPR;

- in accordance with Art. 20 GDPR, demand to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to demand transmission to another controller;

- in accordance with Art. 7(3) GDPR, to withdraw your consent once given to us towards us at any time. This has the consequence that we may no longer continue the data processing activities that were based on this consent in future and

- in accordance with Art. 77 GDPR, lodge a complaint with a supervisory authority. Usually, you may contact the supervisory authority at your habitual residence or place of work or our registered office for this.

10. Right to object

As far as your personal data are processed based on legitimate interests in accordance with Art. 6(1)(f) GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, to the extent that there are grounds relating to your particular situation or the objection is targeted against direct marketing. In the latter case, you have a general right to object that will be implemented by us without any indication of a particular situation.

If you want to exercise your withdrawal right or right to object, simply send us an email to privacy@bryter.io.

11. How to exercise your rights

You can also exercise the rights listed above at any time by contacting us at privacy@bryter.io.

12. Further information

In accordance with Art. 13(2)(e) GDPR we would like to inform you about the following:

The provision of personal data is neither a statutory nor contractual requirement, nor a requirement necessary to enter into a contract. You are not obliged to provide the personal data. There are no consequences resulting from failure to provide such data.

In accordance with Art. 13(2)(f) GDPR we would like to inform you about the following:

We do not process your personal data for the purpose of automated decision-making or to develop, improve, or train AI models or machine learning models.

13. Data security

Within the website visit, we use the common SSL procedure (Secure Socket Layer) in conjunction with the respective highest encryption level your browser supports. This usually is 256-bit encryption. If your browser does not support 256-bit encryption, we will use 128-bit v3 technology instead. Whether an individual website of our internet offer is transmitted encrypted or not is evident by the closed display of the key or lock symbol in the lower status bar of your browser.

Apart from this, we use appropriate technical and organisational security measures in order to protect your data from accidental or wilful manipulation, partial or complete loss, destruction or unauthorised access by third parties. Our security measures are continuously improved in response to technological developments and the ever-changing threat landscape.

14. Third Parties

Our website may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

15. Children's Privacy

We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our website is directed to children. If you learn that a child has

provided us with personal information in violation of this Privacy Policy, then you may alert us at privacy@bryter.io.

16. Topicality and changes of this data privacy statement

Further development of our website and offers through it or changed statutory or authority specifications may require changes to this privacy policy. You may call and print the respective current data privacy statement at any time on the website. If we materially change the ways in which we use or share personal data previously collected from you, we will notify you through the website, by email, or other means of communication.