

Privacy Policy Moojo

1. General

This privacy policy informs you about the nature, scope and purpose of the processing of your personal data by the data controller in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR).

The definitions of the GDPR, in particular according to Art. 4, are used as a basis.

1.1. Controller

The controller according to data protection law is:

Moojo GmbH („Moojo“, „we“)
Straße der Pariser Kommune 12-16
10243 Berlin
E-Mail: hello@moojo.io

1.2. Data Protection Officer

You can reach the appointed data protection officer as follows:

Intelliant GmbH
Immanuelkirchstr. 3/4
10405 Berlin
E-Mail: privacy@getmoojo.com

2. Details of data processing

2.1. Website operation and website functions

When you visit our website, we process personal data as follows.

We use third party services for this purpose. These services also include the use of cookies (Essential, Preferences, Statistics, Marketing, not classified). You can find specific information on the individual cookies and individual setting options under „Details“ in our consent management.

In consent management, you can consent to processing and object to processing based on legitimate interest. You can also adjust your preferences at a later date or revoke your consent with effect for the future. These adjustments are possible at any time via the “ Manage Cookies “ button in your browser window. Please note that without your consent, individual functions of the website may only function to a limited extent.

2.1.1. Provision of the website content

Processing	Provision website content
Purpose	<ul style="list-style-type: none">▪ Establishment of the technical connection between the visitor’s terminal device and our website (execution of the session).▪ Maintaining and improving the functionality of the website▪ Maintaining and improving the information security or data security (confidentiality, availability and integrity) of the website (data storage in log files)

Categories of processed data	<ul style="list-style-type: none"> ▪ IP address of the accessing system ▪ browser type of the end device used and version ▪ Internet service provider of the accessing system ▪ Date, time and success of the access ▪ Third-party websites from which the user's system accesses our website ▪ Third-party websites that are accessed by the user's system via our website
Categories of recipients	<ul style="list-style-type: none"> ▪ Webhosting – IONOS SE ▪ Diverse Cookie providers (see consent management) ▪ Google Tag Manager – Google Inc. (no personal data)
Third-country transfer	<ul style="list-style-type: none"> ▪ US, depending on your cookie consent
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Session: data deletion at the end of the respective session ▪ Log files: data deletion after 7 days or anonymization ▪ Cookies: see consent management
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 b) GDPR (contract performance) ▪ Art. 6 para. 1 f) GDPR (legitimate interests)

2.1.2. Newsletter / waitlist subscription via the website

Via our website you can subscribe to a newsletter with regular updates at any time. This subscription is based on your consent and can be revoked at any time.

Processing	Newsletter subscription (website)
Purpose	<ul style="list-style-type: none"> ▪ Legally compliant provision/distribution of marketing e-mails ▪ Provide information on news and services from Moojo
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ E-mail address ▪ IP address ▪ Logfiles and tracking
Categories of recipients	<ul style="list-style-type: none"> ▪ Sendgrid – Twilio Inc.
Third-country transfer	<ul style="list-style-type: none"> ▪ US in accordance with appropriate safeguards pursuant to Art. 46 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Until withdrawal of consent
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 a) GDPR (consent)

By subscribing to our marketing e-mails you consent to receiving regular e-mail updates from Moojo. You can withdraw your consent anytime by unsubscribing via the provided link in every e-mail, as well as by sending an e-mail to Moojo.

Further, at times we offer the opportunity to subscribe to our waitlist in order to get informed for the launch of new features or products.

Processing	Waitlist subscription
Purpose	<ul style="list-style-type: none"> ▪ Provision of waitlist subscription funnel ▪ Management of waitlist ▪ Information on feature updates for waitlist subscribers
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ E-mail address ▪ IP address

	<ul style="list-style-type: none"> Logfiles and tracking
Categories of recipients	<ul style="list-style-type: none"> Waitlist ranking/referral - Viral Loops Technologies Inc. Waitlist form – Fluent Forms (WPManageNinja LLC)
Third-country transfer	<ul style="list-style-type: none"> US in accordance with appropriate safeguards pursuant to Art. 46 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> Until withdrawal of consent
Legal basis	<ul style="list-style-type: none"> Art. 6 para. 1 a) GDPR (consent)

2.1.3. Website optimization, reach analysis and social media integration

We process personal data of website visitors for the purposes of website optimization and reach analysis, as well as for the integration of social media functionalities. You can find detailed information on this data processing in the consent management under „Details“. The legal basis for processing for these purposes is Art. 6 para. 1 a) GDPR (consent).

2.2. Moojo app und Moojo services

The services offered by Moojo can be used in the Moojo app. For this purpose, a sign-up or a user account is necessary. In addition, data is processed, among other things, in the context of the operation of the app, as well as for the provision of the functions, the security and the improvement of the features offered. The individual processing is explained below.

2.2.1. App operation and app features

For the provision of the Moojo app and for the operation of the app, personal data are processed. The processing defined in this section refers to the complete operation and forms the operating basis for all processing subordinate here from section 2.2.2.

Processing	Provision and operation of the app
Purpose	<ul style="list-style-type: none"> Hosting of the Moojo services Technical operation of the Moojo app Provision of the app and its functions Maintaining and improving information security and data security respectively
Categories of processed data	<ul style="list-style-type: none"> IP address of the mobile device Internet service provider of the mobile device Date, time of app use
Categories of recipients	<ul style="list-style-type: none"> App hosting – Heroku.com
Third-country transfer	<ul style="list-style-type: none"> US on the basis of binding corporate rules in accordance with Art. 47 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> -
Legal basis	<ul style="list-style-type: none"> Art. 6 para. 1 b) GDPR (contract performance) Art. 6 para. 1 f) GDPR (legitimate interests)

In addition, Moojo uses various technologies to track app usage for marketing purposes, to improve existing functionality, and for troubleshooting

Processing	App-Tracking and -Monitoring
Purpose	<ul style="list-style-type: none"> ▪ Bug/error monitoring and troubleshooting in the app. ▪ Maintaining and improving app functionality ▪ Evaluation of app usage for marketing purposes (anonymized)
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ E-mail address ▪ App usage data ▪ Error data
Categories of recipients	<ul style="list-style-type: none"> ▪ Product analytics – Mixpanel, Inc. ▪ Error tracking – Sentry, Inc. ▪ Marketing Analytics - AppsFlyer Ltd. (anonymized)
Third-country transfer	<ul style="list-style-type: none"> ▪ US in accordance with appropriate safeguards pursuant to Art. 46 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> ▪ 90 days ▪ Log files: data deletion after 30 days
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 a) GDPR (consent) managed through the mobile OS

You can object to app tracking at any time in the central privacy settings of your mobile device. The initial consent is requested when you start the app for the first time. In general, Moojo continuously works on minimizing the need for the processing of personal data and maximizing anonymization.

2.2.2. Moojo services

The following describes the processing of personal data during registration in the Moojo app and when using the services offered. For this purpose, the process is divided into several processing activities or phases.

Processing	Sign-Up
Purpose	<ul style="list-style-type: none"> ▪ Registration in the app ▪ Account creation at Moojo ▪ Conclusion of contract ▪ E-mail authentication
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ E-mail address ▪ If applicable, Google / Apple user account
Categories of recipients	<ul style="list-style-type: none"> ▪ E-mail authentication – auth0 (Okta, Inc.)
Third-country transfer	<ul style="list-style-type: none"> ▪ US in accordance with appropriate safeguards pursuant to Art. 46 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Processing within the scope of and until the end of contract fulfillment. ▪ For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 b) GDPR (contract performance)

Processing	Business details
Purpose	<ul style="list-style-type: none"> Creation of company master data in the app, in particular for correct attachment of the template for outgoing invoices (mandatory information according to the German Commercial Code)
Categories of processed data	<ul style="list-style-type: none"> Legal form (UG/Freelancer) Date of birth Name Address Tax number Sales tax identification number E-mail address Telephone number IBAN
Categories of recipients	<ul style="list-style-type: none"> -
Third-country transfer	<ul style="list-style-type: none"> -
Storage period or its criteria	<ul style="list-style-type: none"> Processing within the scope of and until the end of contract fulfillment. For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none"> Art. 6 para. 1 b) GDPR (contract performance)

Processing	Add client
Purpose	<ul style="list-style-type: none"> Creation of invoice recipients in the app
Categories of processed data	<ul style="list-style-type: none"> Company name and legal form Address Contact person E-mail address
Categories of recipients	<ul style="list-style-type: none"> -
Third-country transfer	<ul style="list-style-type: none"> -
Storage period or its criteria	<ul style="list-style-type: none"> Processing within the scope of and until the end of contract fulfillment. For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none"> Art. 6 para. 1 b) GDPR (contract performance)

2.2.2.1. Moojo services - Invoicing

Processing	Invoicing
Purpose	<ul style="list-style-type: none"> Creation of the invoice document

	<ul style="list-style-type: none"> ▪ Addition of various information (including itemization, message)
Categories of processed data	<ul style="list-style-type: none"> ▪ Individual message (free text) ▪ Name of the project (project, package, etc.) ▪ Description of the project (free text) ▪ PDF draft of the invoice
Categories of recipients	<ul style="list-style-type: none"> ▪ -
Third-country transfer	<ul style="list-style-type: none"> ▪ -
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Processing within the scope of and until the end of contract fulfillment. ▪ For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 b) GDPR (contract performance)

2.2.2.2. Moojo services - Factoring

Processing	Factoring ("Instant Payment")
Purpose	<ul style="list-style-type: none"> ▪ Transfer of the receivable to a factor ▪ Status tracking and overview of the receivables ▪
Categories of processed data	<ul style="list-style-type: none"> ▪ See privacy policy Aifinyo AG
Categories of recipients	<ul style="list-style-type: none"> ▪ Aifinyo AG
Third-country transfer	<ul style="list-style-type: none"> ▪ -
Storage period or its criteria	<ul style="list-style-type: none"> ▪ See privacy policy Aifinyo AG
Legal basis	<ul style="list-style-type: none"> ▪ See privacy policy Aifinyo AG

The initial use of our factoring offer requires registration with our service provider Aifinyo AG. Aifinyo is separately responsible for handling the factoring process. Among other things, this requires the PSD2-compliant verification of your bank details via our partner FinTecSystems, as well as identification and digital signature of factoring agreement via IDnow. You will be informed about this process in detail in Aifinyo's privacy policy, which can be found [here](#).

2.2.2.3. Moojo services – Insuring

If users already registered for the invoicing or factoring service, available personal information will be used/pre-filled when signing up for insurance services with Moojo. We do not provide the offered insurances ourselves, but act as a broker for our partner Hiscox SA.

Processing	Insuring
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Purpose	<ul style="list-style-type: none"> ▪ Offering and brokering relevant and tailored insurance solution to customers within the app ▪ Choosing best fitting/suiting insurances according to individual need
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ Address ▪ E-mail address ▪ Telephone number ▪ IBAN ▪ Job title ▪ Start date as freelancer ▪ Average expected revenue (range) ▪ Individual cost depending on package/contract period/billing cycle ▪ Selected bundle (insurance components) ▪ Insurance conditions / insurance offer / consultation protocol PDFs
Categories of recipients	<ul style="list-style-type: none"> ▪ Hiscox SA (only in case of insurance contract formation)
Third-country transfer	<ul style="list-style-type: none"> ▪ -
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Processing within the scope of and until the end of contract fulfillment. ▪ For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 b) GDPR (contract performance)

2.3. Communication & Support

2.3.1. Customer Support

Processing	Customer Support & FAQ
Purpose	<ul style="list-style-type: none"> ▪ Contacting Moojo ▪ Processing (customer) inquiries and follow-up communication ▪ Communication of feedback, questions, answers, bugs ▪ Provision of information and FAQ
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ E-mail address ▪ Meta data of communication ▪ If applicable, content data of the respective message.
Categories of recipients	<ul style="list-style-type: none"> ▪ Intercom chat – Intercom, Inc.
Third-country transfer	<ul style="list-style-type: none"> ▪ US in accordance with appropriate safeguards pursuant to Art. 46 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Up to 6 months after receipt of the request.
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 f) GDPR (legitimate interests)

2.3.2. E-Mail Communication

Processing	Transactional / product-related e-mail communication
Purpose	<ul style="list-style-type: none">▪ Distribution/provision of transactional e-mails▪ Distribution/provision of product-related updates and e-mail notifications
Categories of processed data	<ul style="list-style-type: none">▪ Name▪ E-mail address▪ Content data (only transactional e-mails)
Categories of recipients	<ul style="list-style-type: none">▪ E-mail provider – SendGrid (Twilio, Inc.)
Third-country transfer	<ul style="list-style-type: none">▪ US on the basis of binding corporate rules in accordance with Art. 47 GDPR
Storage period or its criteria	<ul style="list-style-type: none">▪ Processing within the scope of and until the end of contract fulfillment.▪ For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none">▪ Art. 6 para. 1 b) GDPR (contract performance)

2.3.3. Community Management

We offer various communication channels for our users to communicate feedback or to clarify questions and potential bugs.

If you contact us via external platforms, like Facebook, Instagram, WhatsApp or TikTok, your request will also be processed by the respective platform provider. Since as a registered user there you have already concluded a user agreement with the platform, you have already been informed about the processing of personal data by the provider. We are not responsible for the processing of your data by e.g. Meta Platforms, Inc., WhatsApp LLC, or TikTok Pte. Ltd. – please see the corresponding privacy policies.

Processing	Community Management
Purpose	<ul style="list-style-type: none">▪ Contacting Moojo▪ Processing (customer) inquiries and follow-up communication▪ Communication of feedback, questions, answers, bugs
Categories of processed data	<p>Depending on the selected medium</p> <ul style="list-style-type: none">▪ If applicable, personal master data (name, e-mail address)▪ If applicable, telephone number▪ If applicable, content data of the respective message.
Categories of recipients	<ul style="list-style-type: none">▪ Gmail – Google Inc. (Mail)▪ External platforms or messengers – see above▪ WhatsApp Ireland Limited▪ Meta Platforms, Inc.▪ TikTok Pte. Ltd.

Third-country transfer	<ul style="list-style-type: none"> ▪ US in accordance with appropriate safeguards pursuant to Art. 46 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Up to 6 months after receipt of the request. ▪ For external platforms or messengers there is no separate storage by Moojo
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 f) GDPR (legitimate interests)

2.4. Business Intelligence

In order to improve the provided services and manage our customers data, we use business intelligence and data analytics.

Processing	Business intelligence and data management
Purpose	<ul style="list-style-type: none"> ▪ Systemic analysis of service features and service usage ▪ Management of customer data ▪ Data analytics
Categories of processed data	<ul style="list-style-type: none"> ▪ Name ▪ E-mail address ▪ Data regarding Moojo services (see 2.2.2) ▪ City ▪ Region ▪ Country ▪ Time zone ▪ Current URL Initial Referrer ▪ Device information (operating system, screen size, search engine, search keyword) ▪ Last Seen (the last time a property was set or updated).
Categories of recipients	<ul style="list-style-type: none"> ▪ Business intelligence – Metabase, Inc. ▪ Customer data management - Segment.io, Inc. (Twilio, Inc.)
Third-country transfer	<ul style="list-style-type: none"> ▪ US in accordance with appropriate safeguards pursuant to Art. 46 GDPR ▪ US on the basis of binding corporate rules in accordance with Art. 47 GDPR
Storage period or its criteria	<ul style="list-style-type: none"> ▪ Processing within the scope of and until the end of contract fulfillment. ▪ For the fulfillment of legal regulations on retention obligations, for evidence purposes or documentation obligations
Legal basis	<ul style="list-style-type: none"> ▪ Art. 6 para. 1 b) GDPR (contract performance) ▪ Art. 6 para. 1 f) GDPR (legitimate interests)

3. Rights of the data subjects

If your personal data is processed, you are a data subject within the meaning of the GDPR. You are therefore entitled to the following rights towards the controller:

3.1. Right of access

Pursuant to Art. 15 DSGVO, you have the right to request confirmation from us as to whether we are processing personal data relating to you. If this is the case, you can request the following information

from us: Processing purposes; Category of personal data being processed; Recipients or categories of recipients to whom your data have been or will be disclosed; Planned storage period or, if specific information on this is not possible, criteria for determining the storage period; Existence of a right to rectification, erasure, restriction of processing or objection; Existence of a right to lodge a complaint with a supervisory authority; Origin of your data, if it has not been collected by us; Existence of automated decision-making including „profiling“ and, if applicable, meaningful information on their details; transfer of personal data to a third country or to an international organization; appropriate guarantees pursuant to Art. 46 GDPR in connection with the transfer.

3.2. Right to rectification

In accordance with Art. 16 GDPR, you have the right to demand the correction or completion of your personal data stored by us without delay.

3.3. Right to restriction of processing

Pursuant to Art. 18 GDPR, you have the right to request the restriction of the processing of your personal data, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure and we no longer need the data, but you need it for the assertion, exercise or defense of legal claims or you have objected to the processing pursuant to Art. 21 GDPR.

3.4. Right to deletion

Pursuant to Art. 17 GDPR, you have the right to request the deletion of your personal data stored by us, unless the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims.

3.5. Right to notification

If you have asserted the right to rectification, erasure or restriction of processing against the controller, we are obligated pursuant to Art. 19 GDPR to notify all recipients to whom the personal data concerning you has been disclosed of this rectification or erasure of the data or restriction of processing, unless this proves impossible or involves a disproportionate effort. You have the right to be informed about these recipients.

3.6. Right to data portability

In accordance with Art. 20 GDPR, you have the right to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request that it be transferred to another controller.

3.7. Right to object

According to Art. 21 GDPR, you have the right to revoke your consent at any time. We will then no longer process the personal data relating to you unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

If the personal data concerning you is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to „profiling“ insofar as it is related to such direct marketing. If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.

3.8. Right to revoke the declaration of consent under data protection law

In accordance with Art. 7 (3) GDPR, you have the right to revoke your consent under data protection law at any time. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

3.9. Right to complain to a supervisory authority

Pursuant to Art. 77 DSGVO, you have the right to complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence, workplace or the place of the alleged infringement. For Moojo, the Berliner Beauftragte für Datenschutz und Informationsfreiheit is the responsible supervisory authority.

4. Actuality and changes to this privacy policy

This data protection declaration shall apply in its currently valid version. The current data protection declaration can be accessed and printed out at any time on the website at <https://getmoojo.com/privacy>.

Latest version: February 2022