

1. Data Controller

Valden Systems

Kellerskopfweg 15 65931 Frankfurt am Main, Germany

 ${\sf Email:} \textbf{support@valdensystems.com}$

Phone: +49 163 9517121

The controller responsible for the processing of personal data on this website and through associated services is Valden Systems is the above-named operator ("we", "us", "our").

2. Scope and Purpose of Data Processing

We collect and process personal data from visitors, users, and customers who:

- visit our website (valdensystems.com),
- contact us via forms, email, or phone,
- book or request consultation calls; or
- interact with our digital products, services, or official social-media pages.

Personal data is processed for the following purposes:

- to respond to inquiries and consultation requests, and customer support messages
- to manage client relationships and communication history, and onboarding processes
- to prepare and conduct sales or support calls or messages.
- to improve and optimize our services, offers, and website functionality,
- to fulfill contractual or pre-contractual obligations in accordance with Art. 6(1)(b) GDPR.

We do **not** sell, rent, or trade personal data with third parties for marketing or resale.

3. Categories of Data Processed

Depending on how you interact with us, we may process the following types of personal data:

- Identification data (name, email address, phone number)
- Contact and form data (messages, submitted details in forms)
- Consultation and qualification data and information voluntarily shared during consultations or communications, such as trading experience, goals, preferences,



attitude, seriousness, approximate budget range, trading or financial background, and notes taken during conversations or from publicly available community or social media interactions.

- Technical data (browser type, device identifiers, IP address, session data, cookies)
- Payment data (if applicable, processed by our payment providers)

All consultation and qualification data are used **internally** to personalize communication, evaluate client fit, and improve service quality.

4. Legal Basis for Processing

We process personal data primarily under **Article 6(1)(f) GDPR (legitimate interests)**, which allows processing necessary for our legitimate business purposes, including:

- evaluating potential clients and providing personalized consultations;
- maintaining business relationships and communication history; and
- improving our services, processes, and client experience.

In specific cases (e.g. newsletter sign-ups or explicit form consent), processing is also based on **Article 6(1)(a) GDPR (consent)**.

Our legitimate interest is maintaining an efficient lead and client-management process and offering relevant services.

Data is retained indefinitely for relationship management unless a deletion request is received under Article 17 GDPR (right to erasure)

You may withdraw consent or object to data processing based on legitimate interest at any time.

5. Data Retention

We retain personal information as long as necessary for the purposes described above. Consultation and CRM data are generally stored indefinitely for reference, unless you request deletion or restriction under Article 17 or 18 GDPR.

Technical and analytic data may be retained for shorter periods according to Wix and integrated analytics provider policies.

6. Data Storage and Access



All personal data is stored securely within the **Wix platform** and its integrated CRM environment.

Access to personal data is limited to:

- the business owner (Valden Systems), and
- authorized team members (e.g. sales or appointment staff).

No external processors or third-party storage services beyond Wix and its integrated infrastructure are used for customer data.

Data is protected by Wix's technical and organizational security measures (encryption, access control, server redundancy).

7. Data Sharing and Processors

We use the following service providers ("processors") to operate our website and handle customer interactions:

Processor	Purpose	Location	Privacy Info
Wix.com Ltd.	Website hosting, CRM, analytics, forms	Israel / EU / US	https://www.wix.com/about/privac y
PayPal (Europe) S.à r.l. & Cie, S.C.A.	Payment processing	Luxembourg	https://www.paypal.com/privacy
Wix Payments / Klarna	Payment processing	EU	https://www.klarna.com/privacy/
Usercentrics GmbH	Cookie consent management	Germany	https://usercentrics.com/privacy-policy/



Wix EmailEmail/newsletterIsrael / EUhttps://www.wix.com/about/privacMarketingcommunication $\underline{\vee}$

Each processor complies with GDPR and provides adequate safeguards for data transfers outside the EEA.

8. Cookies and Tracking

Our website uses cookies and similar technologies to improve functionality, analyze traffic, and personalize the user experience.

Cookie consent is managed through Usercentrics, which records and stores your consent status in compliance with Article 6(1)(a) GDPR.

You can review, adjust, or withdraw your cookie preferences at any time via the cookie banner or "Cookie Settings" link on our website.

Analytics and marketing data are collected via Wix Analytics and may include pseudonymous identifiers, device information, session duration, and usage metrics.

Such data are used exclusively for statistical and performance-analysis purposes and do not enable direct identification of individual users.

9. Newsletters and Marketing Communication

If you subscribe to our newsletter or opt in to receive marketing communications, your name and email address will be stored and processed within Wix Email Marketing for the purpose of sending relevant updates, product information, or promotional content.

Processing is based on your consent under Article 6(1)(a) GDPR.

You may withdraw your consent at any time by clicking the unsubscribe link included in each email or by contacting support@valdensystems.com.

After unsubscribing, your data will be removed from our active mailing list, though limited information may be retained to ensure compliance with your unsubscribe request.

10. Data Subject Rights

Under the **General Data Protection Regulation (GDPR)**, you have the following rights regarding your personal data:



- **Right of access** (Article 15 GDPR) to obtain confirmation as to whether data concerning you is being processed and to receive a copy of such data.
- **Right to rectification** (Article 16 GDPR) to have inaccurate or incomplete personal data corrected.
- **Right to erasure** ("right to be forgotten", Article 17 GDPR) to request deletion of your personal data where legally permissible.
- **Right to restriction of processing** (Article 18 GDPR) to request limited processing of your data in certain circumstances.
- **Right to data portability** (Article 20 GDPR) to receive your data in a structured, commonly used, and machine-readable format.
- **Right to object** (Article 21 GDPR) to object to processing based on legitimate interests or for direct marketing purposes.

To exercise any of these rights, please contact us at **support@valdensystems.com**. We will respond to your request **within the statutory period of one month** in accordance with Article 12(3) GDPR.

11. Data Security

We take appropriate **technical and organizational measures** to protect personal data against unauthorized access, loss, misuse, or alteration, in accordance with **Article 32 GDPR**.

All data transmitted between your browser and our website is protected by **SSL/TLS encryption**.

Stored data is secured through **Wix's enterprise-grade security infrastructure**, including network firewalls, encrypted storage, and continuous monitoring.

Access to personal information is **strictly limited** to authorized personnel who require it to perform their professional duties and are bound by confidentiality obligations.

12. International Data Transfers

Wix and other processors may transfer data outside the EU (e.g. to Israel or the US). All such transfers are based on adequacy decisions (Art. 45 GDPR) or standard contractual clauses (Art. 46 GDPR).

13. Supervisory Authority

You have the right to lodge a complaint with your local data protection authority. For Valden Systems (based in Frankfurt am Main), the competent authority is:

Valden Systems - Privacy Policy (Datenschutzerklärung)



Der Hessische Beauftragte für Datenschutz und Informationsfreiheit (HBDI)

Gustav-Stresemann-Ring 1, 65189 Wiesbaden, Germany https://datenschutz.hessen.de