

PRIVACY POLICY

for Pakera (Website and SaaS Platform)

Effective as of August 2026

1. Controller

The controller within the meaning of the General Data Protection Regulation (GDPR) is:

Pakera AI Packaging Optimization GmbH Brunnenweg 35, 83666 Waakirchen, Germany Managing Directors: Thomas Goldhofer, Ali Yelsali Email for data protection matters: privacy@pakera.com.

2. General information on data processing

We process personal data only insofar as this is necessary to provide a functional website and our Pakera SaaS platform as well as our content and services, or where another legal basis exists. Pakera is intended exclusively for companies (B2B).

The legal bases for processing include in particular:

- **Art. 6 para. 1 lit. b GDPR** – performance of a contract and pre-contractual measures (e.g. registration, provision of the services, billing);
- **Art. 6 para. 1 lit. c GDPR** – compliance with legal obligations (e.g. retention under commercial and tax law);
- **Art. 6 para. 1 lit. f GDPR** – legitimate interests (e.g. security, operation, reach measurement, direct marketing in the B2B sector);
- **Art. 6 para. 1 lit. a GDPR** – consent (e.g. non-essential cookies, certain analytics/marketing tools, newsletters).

Where we use non-essential cookies or comparable technologies, this is done on the basis of your consent pursuant to § 25 para. 1 TDDDG in conjunction with Art. 6 para. 1 lit. a GDPR.

3. Provision of the website and server log files

Each time our website is accessed, our system automatically collects data and information from the accessing device, in particular the IP address, date and time of access, page/file accessed, volume of data transferred, referrer URL, browser type and version, and operating system.

These data are stored in log files to ensure delivery of the website, the stability and security of the system, and error analysis. The legal basis is Art. 6 para. 1 lit. f GDPR. The log files are deleted after 30 days unless they are required for security purposes for a longer period.

The core functions of the platform are hosted in Germany. A data processing agreement is in place with the hosting provider.

4. Login, registration, customer account and use of the platform

Registration is required to use Pakera (beyond the limited use without registration). In this context and during use, we process in particular name, business email address, password (encrypted), telephone number, address, job title, company name, industry, company size, company website, sales channel of the initial contact (e.g. LinkedIn, YouTube), and, for paid subscriptions, additionally the VAT ID no., as well as usage, log and device/browser data. During registration, authentication data (e.g. email, login information, security features) are processed.

Purposes: Provision and administration of the account, authentication, provision of the contractual services, user and rights management, security, and billing.

Legal bases: Art. 6 para. 1 lit. b and lit. f GDPR. Where processing takes place in a third country, it is safeguarded by appropriate measures such as EU Standard Contractual Clauses and/or, where applicable, the EU-US Data Privacy Framework.

Content in the platform (data processing on behalf of a controller): We process uploaded content, including CAD data, documents, entries, comments and approval data, on behalf of the respective customer on the basis of the DPA. The respective customer is the controller for this. Customer content is not used to train AI models. During the approval process, you can send an access-protected link (with OTP) to internal and/or external persons. In doing so, we process the data required for delivery (e.g. email address) as well as submitted comments.

Login & security: Hanko (Hanko GmbH) is used to ensure the necessary security during login.

Legal basis: Art. 6(1)(b) and (c) of the GDPR. [Hanko's privacy policy](#) applies in addition.

5. Payment processing

Payments are processed via Stripe (Stripe Payments Europe, Ltd.). For paid bookings, the data required for payment (e.g. name, billing data, VAT ID no., payment method information) are processed. Payment method data are processed directly by Stripe; we do not store complete payment data.

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Stripe Privacy Policy](#) also applies.

Interface with DATEV: Fizard (Fizard GmbH) is used for the automated processing of payments and bookings. For paid bookings, the data required for payment (e.g. name, billing data, VAT ID no., payment method information) are processed. Payment method data are processed directly by Fizard; we do not store complete payment data.

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Fizard Privacy Policy](#) also applies.

Accounting: We use DATEV eG (Germany) for invoice and accounting processing.

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [DATEV Privacy Policy](#) also applies.

6. Support

For support requests via our internal ticket system, by email or telephone, we process the data you provide (e.g. name, contact details, content of the request and, where applicable, screenshots as attachments) to handle your request.

Legal basis: Art. 6 para. 1 lit. b and lit. f GDPR.

7. Cookies and similar technologies

We use cookies and similar technologies. Technically necessary cookies are required for the operation of the website/platform (legal basis: § 25 para. 2 TDDDG, Art. 6 para. 1 lit. f GDPR). We use non-essential cookies and analytics and marketing technologies only with your consent via our consent management system (§ 25 para. 1 TDDDG, Art. 6 para. 1 lit. a GDPR). You may withdraw your consent at any time with effect for the future via the consent management system. Further information can be found in the consent management system.

Cookies: To obtain, manage and document your consents to the use of non-essential cookies and comparable technologies, and to control your cookie settings, we use the consent management system “Cookiebot by Usercentrics”.

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Cookiebot Privacy Policy](#) also applies.

8. Web analytics, tracking and marketing

Where the following services process personal data and are not strictly technically necessary, we use them only on the basis of your consent (Art. 6 para. 1 lit. a GDPR, § 25 para. 1 TDDDG). In the case of services from US providers, data may be transferred to the USA, safeguarded by EU Standard Contractual Clauses and/or the EU-US Data Privacy Framework.

- **Google Analytics 4 (GA4) (Google, LLC)** – reach/usage analysis;
Google Tag Manager – tag management (does not itself process any personal content, but loads tags);
- **Google Search Console** – analysis of visibility in Google Search;
- **Google Ads** – conversion tracking and advertising;
- **Microsoft Clarity** – reach/usage analysis;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Google Privacy Policy](#) also applies.

- **Framer (Framer B.V.)** – Website Hosting - reach/usage analysis;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Framer Privacy Policy](#) also applies.

- **LinkedIn (LinkedIn, Inc.) (Insight Tag / Conversion Tracking)** – reach and conversion measurement;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [LinkedIn Privacy Policy](#) also applies.

- **YouTube (Insight Tag / Conversion Tracking)** – reach and conversion measurement;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Google Privacy Policy](#) also applies.

- **Facebook (Meta Platforms, Inc.) (Insight Tag / Conversion Tracking)** – reach and conversion measurement;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Facebook Privacy Policy](#) also applies.

- **X (X Corp.) (Insight Tag / Conversion Tracking)** – reach and conversion measurement;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [X Privacy Policy](#) also applies.

- **PostHog (PostHog, Inc.)** – usage analysis;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [PostHog Privacy Policy](#) also applies.

- **Tella (Tella HQ, Inc.)** – management of video content – reach/usage analysis;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Tella Privacy Policy](#) also applies.

- **HubSpot (HubSpot Germany GmbH)** – CRM - reach/usage analysis, newsletter;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [HubSpot Privacy Policy](#) also applies.

9. Appointment booking and webinars

- **HubSpot (HubSpot Germany GmbH)**: Online appointment booking; the data provided for arranging the appointment are processed.

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [HubSpot Privacy Policy](#) also applies.

- **Livestorm SAS:** Conducting webinars/online appointments; participation and contact data are processed.

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Livestorm Privacy Policy](#) also applies.

For services provided by US providers, data may be transferred to the USA, safeguarded by EU Standard Contractual Clauses and/or the EU-US Data Privacy Framework.

10. Direct marketing, newsletters and sales outreach (B2B)

In the B2B context, we contact potential business customers for advertising purposes and may send newsletters. Depending on the circumstances, the legal basis is your consent (Art. 6 para. 1 lit. a GDPR, for email advertising § 7 UWG) or our legitimate interest in direct marketing (Art. 6 para. 1 lit. f GDPR), subject to the statutory limits. To organise sales and campaigns, we use, among others:

- **FooMonk LLC (Instantly)** – sales outreach (email) and newsletter distribution;

Legal basis: Art. 6(1)(b) and (c) of the GDPR. [Instantly's privacy policy](#) applies in addition.

- **HubSpot (HubSpot Germany GmbH)** – CRM, customer and prospect management;

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [HubSpot Privacy Policy](#) also applies.

- social networks (e.g. LinkedIn, YouTube, Facebook, Reddit, Quora) for marketing purposes (see Section 8 for links).

- **Brevo GmbH** – Transactional emails

Legal basis: Art. 6 para. 1 lit. b and lit. c GDPR. The [Brevo Privacy Policy](#) also applies.

Right to object: You may object at any time to the processing of your data for direct marketing purposes (Art. 21 para. 2 GDPR); thereafter, your data will no longer be processed for these purposes. You may withdraw any consent given at any time with effect for the future.

11. Security (Captcha, DDoS protection)

To protect against misuse and attacks, we use security measures, where applicable including a Captcha service, e.g. hCaptcha/Cloudflare Turnstile, and DDoS protection via OVHCloud and/or Cloudflare.

Legal basis: Art. 6 para. 1 lit. f GDPR (security and operation). When providers outside the EU are used, the transfer is made on the basis of appropriate safeguards, secured by EU Standard Contractual Clauses and/or the EU-US Data Privacy Framework.

[Cloudflare's Privacy Policy](#).

12. Recipients and processors

We disclose personal data only insofar as this is permitted (e.g. for performance of a contract, due to legal obligations, with consent or on the basis of legitimate interests). Service providers used to process data on our behalf are bound by data processing agreements (Art. 28 GDPR).

13. Third-country transfers

Pakera is operated in Germany. Some of the additional services and service providers mentioned above may transfer data to third countries (in particular the USA). In these cases, we ensure an adequate level of data protection, in particular through an adequacy decision of the European Commission (e.g. the EU-US Data Privacy Framework, where certified) and/or through EU Standard Contractual Clauses together with supplementary safeguards (Art. 44 et seq. GDPR).

14. Retention period

We store personal data only for as long as necessary for the respective purposes or for as long as statutory retention obligations exist. In particular:

- Project history of unregistered users: No storage
- Project history of users registered for free: 30 days, followed by automatic deletion
- Project history for the Pro plan: 180 days, followed by automatic deletion
- Project history for the Business and Enterprise plans: Permanent storage or until the end of the subscription;
- Customer data after the end of the contract: Immediate, irreversible deletion, except for support tickets and data subject to statutory retention;
- Accounting/invoice data: in accordance with retention periods under commercial and tax law (usually 6 or 10 years).

15. Your rights as a data subject

You have the right of access (Art. 15), rectification (Art. 16), erasure (Art. 17), restriction of processing (Art. 18), data portability (Art. 20) and the right to object to processing (Art. 21 GDPR). You may withdraw any consent given at any time with effect for the future (Art. 7 para. 3 GDPR).

To exercise your rights, please contact: privacy@pakera.com

Where we process data on behalf of a customer (content in the platform), please address your request to the respective customer as controller.

Right to lodge a complaint: You have the right to lodge a complaint with a data protection supervisory authority. The competent authority is, inter alia, the Bavarian State Office for Data Protection Supervision (BayLDA), Promenade 18, 91522 Ansbach.

16. No automated decision-making

No decision-making based solely on automated processing with legal effect within the meaning of Art. 22 GDPR takes place.

17. Changes to this Privacy Policy

We amend this Privacy Policy when required due to changes in the legal situation, technical developments or changes in processing. The current version published on our website applies.