

Last updated: April 2023

Data privacy statement - CoSpaces website

Any collection, processing and use (hereinafter "use") of data is solely for the purpose of providing our services. Our services have been designed to use as little personal information as possible. For that matter, "personal data" is understood as all individual details about a person or factual circumstances of an identifiable natural person (so-called "affected person"). The following statements on data protection describe what types of data are collected when accessing our website, what happens with these data and how you may object to data usage.

1 General information on data processing

1.1 Person Responsible (Controller)

Responsible within the meaning of the EU General Data Protection Regulation (GDPR) and the new Federal Data Protection Act (BDSG) is:

Delightex GmbH

Address: Christoph-Rappardini-Bogen 25, 80369 Munich, Germany

Email: info@cospaces.io

Homepage: cospaces.io

1.2 Name and address of the Data Security Officer

The data protection officer is:

Kemal Webersohn of WS Datenschutz GmbH

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WS Datenschutz GmbH
Dircksenstraße 51
D-10178 Berlin

webersohnundscholtz.de

1.3 Protection of your data

We have taken technical and organizational measures to ensure that the requirements of the EU General Data Protection Regulation (GDPR) are met by us, as well as, by external service providers working for us.

If we work with other companies to provide our services, such as email and server providers, this will only be done after an extensive selection process. In this selection process, each individual service provider is carefully selected for its suitability in terms of technical and organizational data protection skills. This selection procedure will be documented in writing and an agreement on the order processing of data (data processing agreement) will only be concluded if the third party complies with the requirements of Art. 28 GDPR.

Your information will be stored on specially protected servers. Access to it is only possible for a few specially authorized persons. Our App is SSL/TLS encrypted, as can be seen by the <https://> at the start of our URL.

1.4 Erasure of personal data

We process personal data only if necessary. As soon as the purpose of the data processing is fulfilled, erasure of the data is carried out according to the standards of the erasure concept, unless legal or contractual regulations oppose this.

2 Use of data on this website and in log files

2.1 Scope of processing personal data

When visiting our website, AWS web servers temporarily store every access in a log file. The following data may be collected and stored by AWS until automated erasure:

Date and time of access

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Message if the retrieval was successful

Detection data of the browser and operating system used

We do not access or analyze this data, which is stored on AWS servers.

We use the services of AWS for hosting purposes. The data processing is carried out by: Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, Luxembourg 1855, Luxembourg (a subsidiary of Amazon.com Inc., 410 Terry Avenue North, Seattle WA 98109, USA).

AWS hosting services are used to provide the following services: Infrastructure and platform services, computing capacity, storage space and database services, e-mail dispatch, security services and technical maintenance services, which we use for the purpose of operating this online offer.

You can find more information on the data protection of the service provider here:

<https://aws.amazon.com/de/privacy/>

2.2 Legal basis for processing personal data

The legal basis for the temporary storage of the data and log files is Art. 6 para. 1 s. 1 lit. f) GDPR. Our legitimate interest is to make our App accessible for you.

2.3 Purpose of data processing

The processing of this data serves: the purpose of enabling the use of the website (connection establishment), system security, the technical administration of the network infrastructure, as well as to optimize the website. The IP address is evaluated only in case of attacks on our network infrastructure or the network infrastructure of our internet provider.

2.4 Duration of storage

As soon as the purpose of the data processing is fulfilled, erasure of the data is carried out. This happens as soon as you close our website. Our hosting service, Amazon Web Services (AWS) might use data for statistical purposes. Any personal data will be anonymized for this. Our hosting service will delete this data after a period of 6 months.

2.5 Right of objection and erasure

3 Use of cookies

3.1 Description and scope of data processing

Our website uses cookies. This means that when using the website, cookies are stored on your computer. Cookies are small text files which are assigned to the browser you are using and which are stored on your hard drive. Through this information flows to us or the party who set the cookie. Cookies cannot run programs on or transmit viruses to your computer. They are used to analyze the use of our website in anonymized or pseudonymized form and to enable a personalized user experience on this website. The following data may be transmitted:

- Your last session ID (encrypted)
- Your IP address (anonymized)
- Your cookie settings
- Timestamp of your accepted or declined consent

Upon entering our website, a cookie banner informs you about the use of cookies on this website and asks for your consent to the use of cookies. Also, you are pointed to the data privacy statement of this website.

3.2 Legal basis for data processing

The legal basis for the processing of data by cookies, which do not only serve the functionality of our website, is Art. 6 para. 1 s. 1 lit. a) GDPR.

The legal basis for the processing of data for cookies, which serve only the functionality of this website, is Art. 6 para. 1 s. 1 lit. f) GDPR.

3.3 Purpose of data processing

Our legitimate interests are to provide you with a working website connection and to ensure a comfortable use of this website. Also, we need to process your personal data to solve occurring safety and security issues, as well as to ensure system stability.

The data processing takes place to make a statistical evaluation of our website possible.

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explained below:

Transient cookies (see a)

Persistent cookies (see b)

a) **Transient cookies** are automatically deleted when you close the browser. This is especially true for session cookies which store your session ID, with which various requests from your browser can be assigned to your session. This will allow your computer to be recognized when you return to our website. Session cookies are deleted when you log out or close the browser.

b) **Persistent cookies** are automatically deleted after a specified period, which may differ depending on the cookie.

3.5 Right to objection and erasure

You have the possibility to revoke your consent to the data processing by means of cookies, which do not only serve the functionality of the website. In addition, we do not set cookies until you have agreed to set cookies when you visit the site. In this way, you can prevent data processing via cookies on our website. You can also delete the cookies in your browser's security settings at any time. Please note that you may not be able to use all the features of this website. The setting of cookies can also be prevented at any time by appropriate settings in your internet browser.

4 Contact

4.1 Description and scope of data processing

Via our website it is possible to contact us via contact form. This will require different data to answer the request, which will be automatically saved for processing. The following data is required to process your request:

E-mail address

First name

Last name

Country

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Information about the license plan in use

Information about your user role as a student or teacher

Personal message

Uploaded files

Your data will not be passed on to third parties, unless you have given your consent.

4.2 Legal basis for data processing

The legal basis depends on Art. 6 para. 1 s. 1 lit. b) GDPR.

4.3 Purpose of data processing

The processing of personal data from the input form is used solely handling the contact request.

4.4 Duration of storage

The data will be deleted as soon as we answer your request. There might occur rare cases when legal or contractual retention periods interfere with the erasure of your personal data. In this case your data will be deleted after these periods.

4.5 Right to objection and erasure

The user has the right to withdraw their consent to the processing of personal data at any time. If the user contacts us, they can object to storage of their personal data at any time. In such cases, the conversation cannot be continued. All personal data that has been stored in the course of the contact will be deleted.

4.6 HelpScout

4.6.1 Description and scope of data processing

Our system emails are being sent by "HelpScout", an email service provider. The personal data is being processed by: Help Scout PBC, 1000 City hall Plaza, Boston, MA 02108, USA.

Help Scout processes our and your email address, name, age, sex, gender, family status, address, education level, IP-address, location, customer satisfaction, profession, employment status, usage data and image recordings.

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data of our users, to process this data according to its regulations and to not share with unauthorized third parties. You can view the privacy policy of Help Scout here:

<https://www.helpscout.com/company/legal/privacy/>

4.6.2 Legal basis for data processing

This data processing is legally based on Art. 6 para. 1 s. 1 lit. b) GDPR. We send these emails to confirm your registration and to facilitate the verification of your registration within the same media and in a timely manner.

4.6.3 Purpose of data processing

We use Help Scout as a processor to ensure an efficient management of our system emails.

4.6.4 Duration of storage

Help Scout only stores the data for as long as it is necessary for the processing purpose. After that, the data will only be processed anonymously.

4.6.5 Right to object and erasure

The data processing is necessary in order to maintain full functionality of registering on our website. Therefore, objecting is not possible.

5 Blog

5.1 Medium

Our blog is hosted by the online publishing platform Medium. The Platform is operated by A Medium Corporation located at 799 Market St FL 5 San Francisco, CA 94103 United States.

Users can leave comments on the blog. These posts can also be commented on by third-party users. If, at the time of visiting our blog, the user is logged in on Medium, Medium will process, in addition to the comment content itself, the following account data:

Your name, display name, username

Your photos and avatar image

Your activity Information

Your device and Usage Information

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that the storage of this data is based on the legal basis of Art. 6 para. 1 s. 1 lit. a) GDPR.

5.1.2 Purpose of data processing

We use the Medium to promote our blog and our company. We also want to give you the opportunity to interact with other Medium users.

5.1.3 Duration of storage

Medium stores your data only for as long as necessary to carry out the purposes for which they originally collected it and for legitimate business purposes, including to meet their legal, regulatory, or other compliance obligations.

5.1.4 Right to objection and erasure

You have the right at any time to revoke your consent to the publication of a comment and to object to the processing of your personal data by medium. To do so, please contact Medium at privacy@medium.com

6 Social media links

We have integrated social media platforms into our services, which may result in the social media provider receiving data from you. If you click on the social media link, the website of the respective social media provider is loaded. By loading the website of the respective social media provider via our services, the respective reference data is transmitted to the respective social media provider. The social media provider thereby receives the information that you have visited us.

Note on data processing to the United States:

If you click on a social media link, data about you may be processed by the respective provider in the United States. According to the European Court of Justice, the data protection standard in the United States is not adequate and there is a risk that your data will be processed by the U.S. authorities for control and monitoring purposes, possibly also without any legal remedy. Provided that you do not click on the links of the social media providers, no data transfer takes place.

Further information on data processing by the social media providers can be found here:

Meta: <https://de-de.facebook.com/help/pages/insights> <https://de-de.facebook.com/about/privacy> https://de-de.facebook.com/full_data_use_policy

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7 Forum

7.1 Description and scope of data processing

We run a forum. Users can leave comments in the forum. These posts can also be commented on by third-party users. If the user publishes a comment in our Forum, we store and publish, in addition to the comment content itself, following data:

Time stamp of your log-in

Username

A transfer of the data to third parties does not take place, unless the affected person has given his/her consent.

7.2 Legal basis of data processing

This data processing is legally based on our legitimate interest (Art 6 para. 1 s.1 lit. f) GDPR) in enabling our users to participate in an active and fair community.

All data that you disclose in the context of the commenting function are given voluntarily, so that the storage of this data is based on the legal basis of Art. 6 para. 1 s. 1 lit. a) GDPR.

7.3 Purpose of data processing

The collection of data is intended to ensure the stability and usability of this website and the forum. Also, it is necessary to prevent misuse of the commenting function. In addition, comments enable our users to share their questions and experiences.

7.4 Duration of storage

We process personal data only as long as necessary. As soon as the purpose of the data processing is fulfilled, erasure of the data is carried out according to the standards of the erasure concept, unless legal or contractual regulations oppose this.

7.5 Right to objection and erasure

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disagreement, please provide us with the reasons why we should not process your personal data as we have done. We will then examine the situation and either discontinue or adjust the data processing or will tell you based on which reasons we have to continue this processing.

As far as the data processing is based on your consent, you can prevent it by not agreeing with them. You also have the option to withdraw your consent at any time (see Art. 7 GDPR and "Your rights"). A withdrawal only applies to any processing that takes place after it has been pronounced. This can be done by telephone, mail, email or any other means. In case we delete your account, the comment content will remain visible for all visitors, but your account information will be anonymized and is no longer retrievable. All other data will be deleted.

8 Tracking and analytics

For the continuous improvement of our website we use the following tracking and analytics tools. Below you can find information on which personal data is processed in each case and how you can reach the respective service providers:

8.1 Google Analytics

8.1.1 Description and scope of data processing

Our website uses Google Analytics. This is a service for analyzing access to websites of Google Inc. ("Google") and allows us to improve our website. Data processing for the European Economic Area and for Switzerland is carried out by: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Cookies enable us to analyze your use of our website. The information collected by a cookie are:

IP address

Access time

Access Duration

The information is transmitted to a Google server in the USA and stored there. The evaluation of your activities on our website is transmitted to us in the form of reports. Google may pass on the collected information to third parties, if required by law or if third parties process this data on behalf of Google. The Google tracking codes of our Internet offer use the function

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under <https://www.google.com/analytics/terms/de.html> you can find out more about the terms of use and privacy policy of Google Analytics.

8.1.2 Legal basis of data processing

The legal basis is your given consent, Art. 6 para 1 s. 1 lit. a) GDPR.

8.1.3 Purpose of data processing

By processing the data, we can analyze how our website is used, so we can improve it for our users.

8.1.4 Duration of storage

The data will be deleted 50 months after your last website visit.

8.1.5 Right to objection and erasure

You can prevent the installation of cookies by Google Analytics in your browser settings. In this case, however, it may happen that you cannot fully use all features of our website. Also, through browsers extensions e.g. <https://tools.google.com/dlpage/gaoptout?hl=de> Google Analytics can be disabled and controlled.

8.2 Google Tag Manager

8.2.1 Description and scope of data processing

Google Tag Manager is a solution that allows us to manage web site tags through one interface (including Google Analytics and other Google marketing services on our website). The tag manager itself (which implements the tags) does not process users' personal data. Regarding the processing of users' personal data, reference is made to the details of the Google services. Google Tag Manager usage policies can be viewed here:

<https://www.google.com/intl/de/tagmanager/use-policy.html>

9 Service providers from third countries

In order to be able to provide our services, we use the support of service providers from third party countries (non-EU countries). In order to ensure the protection of your personal data in this case, we conclude processing contracts with each - carefully selected - service provider. All of our processors provide sufficient guarantees to implement appropriate technical and organizational measures. Our third country data processors are either located in a country

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Adequate level of protection: The provider comes from a country whose level of data protection has been recognized by the EU Commission. For more information, see: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

EU standard contract clauses: Our provider has submitted to the EU standard contractual clauses to ensure secure data transfer. For more information, see: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en

Binding Corporate Rules: Article 47 of the GDPR provides the possibility of ensuring data protection when transferring data to a third country via Binding Corporate Rules. These are examined and approved by the data security authorities within the framework of the consistency mechanism pursuant to Art. 63 GDPR.

Consent: In addition, a data transfer to a third country without an adequate level of protection will only take place if you have given us your consent in accordance with Art. 49 sec. 1 lit. a) GDPR for this purpose.

10 Your rights

You have the following rights with respect to the personal data concerning you:

10.1 Right to withdraw a given consent (Art. 7 GDPR)

If you have given your consent to the processing of your data, you can withdraw it at any time. This will affect the admissibility of processing your personal data by us for the time after you have withdrawn your consent. To withdraw your consent, contact us personally or in written form.

10.2 Right of access (Art. 15 GDPR)

You have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to your personal data and the following information:

- the purpose of processing;
- the categories of personal data concerned;

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organisations,

where possible, the envisaged period for which your personal data will be stored, or, if not possible, the criteria used to determine that period;

all available information on the source of your personal data;

the existence of automated decision-making, including profiling, referred to Art. 22 para. 1 and 4 GDPR and, in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

In the case of such a request, you must provide enough information about your identity to proof that the request concerns your own personal data.

10.3 Right to rectification and erasure (Art. 16, 17 GDPR)

You have the right to obtain from us without undue delay the rectification and completion of inaccurate personal data concerning yourself.

You may also request the erasure of your personal data if any of the following applies to you:

the personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed;

you withdraw consent on which the processing is based according to Art. 6 para. 1 s.1 lit. a) or Art. 9 para. 2 lit. a) GDPR, and where there is no other legal ground of processing;

you object to the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21 para. 2 GDPR;

the personal data have been unlawfully processed;

the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which we are subject;

the personal data have been collected in relation to the offer of information society services referred to in Art. 8 para. 1.

Where we made the personal data public and are obliged to erase the personal data pursuant to Art. 17 para. 1 GDPR, we, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

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for compliance with a legal obligation which requires processing by Union or Member State law to which we are subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;

for reasons of public interest in the area of public health in accordance of Art. 9 para. 2 lit. h) and i) as well as Art. 9 para. 3 GDPR;

for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89 para. 1 GDPR, in so far as the right referred to above is likely to render impossible or seriously impair the achievement of the objectives of that processing, or

for the establishment, exercise or defence of legal claims.

10.4 Right to restriction of processing (Art. 18 GDPR)

You shall have the right to obtain from us restriction of processing where one of the following applies:

the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;

the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;

we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;

you have objected to processing pursuant to Art. 21 para. 1 GDPR pending the verification whether our legitimate grounds override yours.

Where processing has been restricted under the aforementioned conditions, such personal data shall, except for storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If the limitation of the processing is restricted, you will be informed by us before the restriction is lifted.

10.5 Right to information (Art. 19 GDPR)

If you have asserted to us your right to rectification, erasure or restriction of data processing, we will inform all recipients of your personal data to correct, delete or restrict the processing of

10.6 Right to data portability (Art. 20 GDPR)

You have the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format. Also, you have the right to transmit those data to another controller, where

the processing is based on consent pursuant of Art. 6 para. 1 s.1 lit. a) GDPR or of Art. 9 para. 2 lit. a) GDPR or is based on a contract pursuant of Art. 6 para. 1 s. 1 lit. b) DS-GVO; and

the processing is carried out by automated means.

In exercising your right to data portability, you have the right to obtain that personal data transmitted directly from us to another controller, as far as technically feasible. The right to data portability does not apply to processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority that has been delegated to us.

10.7 Right to object (Art. 21 GDPR)

Where we based the processing of your personal data on a legitimate interest (Art. 6 para. 1 s. 1 lit. f) GDPR), you may object to the processing. The same applies if the data processing is based on Art. 6 para. 1 s. 1 lit. e).

In this case, we ask you to explain the reasons why we should not process your personal data. Based on this we will terminate or adapt the data processing or show you our legitimate reasons why we continue the data processing.

10.8 Right to lodge a complaint with supervisory authority (Art. 77 GDPR)

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the Member State of your residence, place of work or place of alleged infringement, if you believe that the processing of the personal data concerning you is against the infringes of the GDPR.

The supervisory authority to which the complaint has been submitted shall inform you of the status and results of the complaint, including the possibility of a judicial remedy according to Article 78 GDPR.

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Kemal Webersohn from Webersohn & Scholtz GmbH

delightex@ws-datenschutz.de

or by mail:

WS Datenschutz GmbH
Dircksenstraße 51
D-10178 Berlin

12 Subject to change

We reserve the right to change this privacy policy in compliance with legal requirements.

April 2023

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