

Joint transparency text for customers, suppliers, interested parties

You are viewing the joint transparency text for the processing operation(s). The processing operations for the company 'ZONTAL GmbH' are displayed. This document was created on December 8, 2025.

The following transparency texts fulfill all disclosure and information requirements.

ZONTAL GmbH

This joint transparency text summarizes all information required by the "information" obligations of [Article 13](#) GDPR, [Article 14](#) GDPR, [Article 15](#) GDPR, [Article 26](#) GDPR, and [Article 30](#) GDPR.

Name and address of the responsible body

ZONTAL GmbH

Address: Eisenbahnweg 9-11, 52068 Aachen

Phone: 0049 241 94314550

Internet: www.zontal.io

Email: privacy@zontal.io

Legal contact: Wolfgang Colsman

Data protection officer: Nicholas Vollmer (SecureDataService)

Data status: November 25, 2025 (the last change was made on this date).

IT administration (including data carrier and file destruction)

1. **What is the purpose of this processing?**
Administration of the company's IT systems (directory service, user administration, support, backup, maintenance, access control regulations, etc.). Destruction of data carriers and paper files.
2. **Who is responsible for this processing?**
ZONTAL GmbH
Address: Eisenbahnweg 9-11, 52068 Aachen
Phone: 0049 241 94314550
Website: www.zontal.io
Email: privacy@zontal.io
3. **Who is designated as the company data protection officer?**
Nicholas Vollmer (SecureDataService)
4. **What is the legal basis? Why is this processing permissible?**
Safeguarding the legitimate interests of the controller in accordance with Article 6 (1f) GDPR
5. **Specifically, what "legitimate interests" does the controller pursue?**
Ensuring data protection and (information) security;
Generally necessary measures for operational organization
6. **Who are the authorized recipients (both internal and external)?**
 - IT department
 - Infrastructure service providers
 - Document destruction service provider*
7. **When will the data be deleted?**
 - Depending on the situation with regard to IT administration data
 - Collection containers for files and data carriers (collected regularly or as needed)
 - 14 days for video surveillance
 - 1-4 months for alarm system log files (depending on the number of events)
8. **What categories of data are processed?**
All IT-related data (names, IP addresses, access authorizations, telephone data, log data, usage data, video data if applicable). Also paper files in the context of document destruction.
9. **Which persons are affected?**
 - Employees
 - Job applicants
 - Business partners
 - Customers
 - Suppliers

10. The right to "information"

You have the right to information about the data concerning you. This document is intended to guarantee this right as far as possible. If you have any further questions, please do not hesitate to contact us.

11. The right to "rectification" of inaccurate data

You have the right to have inaccurate data corrected. Please contact us for this purpose.

12. The right to "erase your data"

You have the right to have your data deleted if (a) the data is no longer necessary, (b) you have revoked your consent or there is no other legal basis (anymore), (c) you have objected to the processing on legitimate grounds, (d) the data has been processed unlawfully, (e) erasure is required by law, (f) the data originates from children and is to be erased. Please note that, in accordance with Article 17 (2) GDPR, it may not be possible or permissible to erase the data.

13. The right to "restriction of processing"

You have the right to have your data "blocked" if (a) you dispute the accuracy of the data, (b) the processing is unlawful and you refuse to have the data erased, (c) we no longer need the data, (d) but you still need the data for legal claims.

14. The right to "object to processing"

You have the right to object to processing if there are reasons for this arising from your PARTICULAR SITUATION. We will consider whether we have compelling legitimate grounds for processing.

15. The right to "withdraw consent"

You have the right to withdraw consent (if this is relevant to the processing described here). The withdrawal only applies to the future.

16. The right to "data portability"

You have the right to receive your data, provided that (a) the legal basis is based on consent or a contract, (b) you have provided this data yourself, (c) the data is processed automatically. If these conditions are met, you can also request that we transfer the data to a recipient of your choice.

17. The right to "complain"

You have the right to lodge a complaint with a data protection supervisory authority. The contact details are: LDI NRW, Kavalleriestr. 2-4, 40213 Düsseldorf GERMANY, Tel. 0049-211-38424-0, www.ldi.nrw.de.

You are welcome to contact us first before reporting to the supervisory authority; our highly competent company data protection officer(s) will deal with your concern much more quickly and just as thoroughly. If we are unable to help you, you can still contact the supervisory authority.

18. Data collection by third parties

No, no data is collected by third parties. This means that all data is requested/collected by us.

19. Is profiling carried out? Are personal aspects analyzed or predicted? Are automated individual decisions made?

No, this does not take place.

20. Is data transferred to recipients in third countries (i.e., outside the EU)?

No, this does not take place.

21. Are there several controllers in the sense of "joint responsibility"?

No, there is only ONE controller as mentioned above.

Customer service (in the broader sense)

1. **What is the purpose of this processing?**
AWS Cloud (uploading files); DocuSign (signing contracts); customer support portal; product planning and optimization
2. **Who is responsible for this processing?**
ZONTAL GmbH
Address: Eisenbahnweg 9-11, 52068 Aachen
Phone: 0049 241 94314550
Website: www.zontal.io
Email: privacy@zontal.io
3. **Who is designated as the company data protection officer?**
Nicholas Vollmer (SecureDataService)
4. **What is the legal basis? Why is this processing permissible?**
Safeguarding the legitimate interests of the controller in accordance with Article 6 (1f) GDPR
5. **Specifically, what "legitimate interests" does the controller pursue?**
The software packages are important aspects of customer service.
6. **Who are the authorized recipients (both internal and external)?**
Group-wide infrastructure through US parent company
7. **When will the data be deleted?**
 - Immediately after the end of the contract (regarding access data)
 - AWS files)
 - 10 years after the end of the contract (regarding DocuSign)
 - customer support portal)
8. **What categories of data are processed?**
 - Access data (name, email, permissions)
 - Files (uploaded to AWS)
 - digitally signed via DocuSign)
 - Customer support (questions about ZONTAL products)
9. **Which individuals are affected?**
 - Employees
 - Customers
10. **The right to "information"**
You have the right to information about the data concerning you. This is largely guaranteed by this document. If you have any further questions or concerns, please do not hesitate to contact us.
11. **The right to "rectification" of inaccurate data**
You generally have the right to have inaccurate data corrected. Please contact us for this purpose.

12. The right to "erasure of your data"

You have the right to have your data deleted if (a) the data is no longer necessary, (b) you have revoked your consent or there is no other legal basis (anymore), (c) you have objected to the processing on legitimate grounds, (d) the data has been processed unlawfully, (e) erasure is required by law, (f) the data originates from children and should be erased. Please note that, in accordance with Article 17 (3) GDPR, it may not be possible or permissible to erase the data.

13. The right to "restriction of processing"

You have the right to have your data "blocked" if (a) you dispute the accuracy of the data, (b) the processing is unlawful and you refuse to have the data erased, (c) we no longer need the data, but you still need it for your own legal claims, (d) you have objected to the processing and it is not yet clear whether the legitimate interests of the controller outweigh your interests.

14. The right to "object to processing"

You have the right to object to processing if there are reasons for this arising from your PARTICULAR SITUATION. We will consider whether we have compelling legitimate grounds for processing.

15. The right to "withdraw consent"

You have the right to withdraw consent (if this is relevant to the processing described here). The withdrawal only applies to the future.

16. The right to "data portability"

You have the right to receive your data ("data portability") provided that (a) the legal basis is based on consent or a contract, and (b) you have provided this data yourself, and (c) the data is processed automatically. If these conditions are met, you can also request that we transfer the data to a recipient of your choice.

17. The right to "complain"

You have the right to lodge a complaint with any data protection supervisory authority. The contact details of the data protection supervisory authority responsible for us are: LDI NRW, Kavalleriestr. 2-4, 40213 Düsseldorf GERMANY, Tel. 0049-211-38424-0, www.ldi.nrw.de.

You are welcome to contact us first before reporting to the supervisory authority; our highly competent company data protection officer(s) will deal with your concern much more quickly and just as thoroughly. If we are unable to help you, you can still contact the supervisory authority.

18. Data collection by third parties

No, no data is collected by third parties. This means that all data is requested/collected by us.

19. Is profiling carried out? Are personal aspects analyzed or predicted? Are automated individual decisions made?

No, this does not take place.

20. Is data transferred to recipients in third countries (i.e., outside the EU)?

USA (Natural persons (employees and freelancers, etc.) give their explicit consent in accordance with Article 49 (1a). Legal entities sign contractual provisions regarding

contract fulfillment in accordance with Article 49 (1c).)

21. Are there several controllers in the sense of "joint responsibility"?

Yes, there are OTHER joint controllers:

- ZONTAL Inc. (with these essential agreements: As a provider of highly specialized software, ZONTAL is represented worldwide. In this respect, ZONTAL is just as internationally positioned as almost all of its customers. Cross-border software products are used to support prospects and customers. In this respect, there is "joint responsibility" in accordance with Article 26 GDPR, in which ZONTAL Inc. (USA) and ZONTAL GmbH (Germany) are involved. In a special agreement on joint responsibility, the following, among other things, was stipulated in favor of the data subjects: (a) Both companies undertake to comply with the principles of data protection, (b) they will support each other in processing requests from data subjects, (c) they will inform each other in the event of problems relating to data protection issues. Specifically, this applies (in November 2025) in particular to the software products "Microsoft 365," "Jira and Confluence," AWS Cloud, DocuSign, and other small specialist applications.

Personal Information Management (PIM) incl. email server

1. **What is the purpose of this processing?**
Use of email client, calendar, tasks, notes, and contacts
Who is responsible for this processing?
2. **Who is responsible for this processing?**
ZONTAL GmbH
Address: Eisenbahnweg 9-11, 52068 Aachen
Phone: 0049 241 94314550
Website: www.zontal.io
Email: privacy@zontal.io
3. **Who is designated as the company data protection officer?**
Nicholas Vollmer (SecureDataService)
4. **What is the legal basis? Why is this processing permissible?**
Safeguarding the legitimate interests of the controller in accordance with Article 6 (1f) GDPR
5. **Specifically, what "legitimate interests" does the controller pursue?**
Right to make a profit, work and cost efficiency; generally necessary measures for operational organization; safeguarding ancillary contractual obligations
6. **Who are the recipients with access rights (both internal and external)?**
 - Employees
 - IT department
 - Group-wide infrastructure provided by US parent company
7. **When will the data be deleted?**
 - Immediately, when emails etc. are no longer relevant
 - 10 years (from the end of the calendar year)
8. **What categories of data are processed?**
 - Note data
 - Task data
 - Email (date, recipient, text, attachments)
 - Calendar data
 - Contact data (name, telephone number, email, address, etc.)
9. **Which individuals are affected?**
 - Employees
 - Prospective customers
 - Customers
 - Suppliers
10. **The right to "information"**
You have the right to information about the data concerning you. This document is intended to guarantee this right as far as possible. If you have any further questions, please do not hesitate to contact us.

11. The right to "rectification" of inaccurate data

You have the right to have inaccurate data corrected. Please contact us for this purpose.

12. The right to "erasure of your data"

You have the right to have your data deleted if (a) the data is no longer necessary, (b) you have revoked your consent or there is no other legal basis (anymore), (c) you have objected to the processing on legitimate grounds, (d) the data has been processed unlawfully, (e) erasure is required by law, (f) the data originates from children and should be erased. Please note that, in accordance with Article 17 (2) GDPR, it may not be possible or permissible to erase the data.

13. The right to "restriction of processing"

You have the right to have your data "blocked" if (a) you dispute the accuracy of the data, (b) the processing is unlawful and you refuse to have the data erased, (c) we no longer need the data, (d) but you still need the data for legal claims.

14. The right to "object to processing"

You have the right to object to processing if there are reasons for this arising from your PARTICULAR SITUATION. We will consider whether we have compelling legitimate grounds for processing.

15. The right to "withdraw consent"

You have the right to withdraw consent (if this is relevant to the processing described here). The withdrawal only applies to the future.

16. The right to "data portability"

You have the right to receive your data, provided that (a) the legal basis is based on consent or a contract, (b) you have provided this data yourself, (c) the data is processed automatically. If these conditions are met, you can also request that we transfer the data to a recipient of your choice.

17. The right to "complain"

You have the right to lodge a complaint with a data protection supervisory authority. The contact details are: LDI NRW, Kavalleriestr. 2-4, 40213 Düsseldorf GERMANY, Tel. 0049-211-38424-0, www.ldi.nrw.de. You are welcome to contact us first before reporting to the supervisory authority; our highly competent company data protection officer(s) will deal with your concern much more quickly and just as thoroughly. If we are unable to help you, you can still contact the supervisory authority.

18. Data collection by third parties

No, no data is collected by third parties. This means that all data is requested/collected by us.

19. Is profiling carried out? Are personal aspects analyzed or predicted? Is automated individual decision-making carried out?

No, this does not take place.

20. Is data transferred to recipients in third countries (i.e., outside the EU)?

USA (Natural persons (employees and freelancers, etc.) give their explicit consent in

accordance with Article 49 (1a). Legal entities sign contractual provisions regarding contract fulfillment in accordance with Article 49 (1c.)

21. Are there several controllers in the sense of "joint responsibility"?

Yes, there are OTHER joint controllers:

- ZONTAL Inc. (with these essential agreements: As a provider of highly specialized software, ZONTAL is represented worldwide. In this respect, ZONTAL is just as internationally positioned as almost all of its customers. Cross-border software products are used to support prospects and customers. In this respect, there is "joint responsibility" in accordance with Article 26 GDPR, in which ZONTAL Inc. (USA) and ZONTAL GmbH (Germany) are involved. In a special agreement on joint responsibility, the following, among other things, was stipulated in favor of the data subjects: (a) Both companies undertake to comply with the principles of data protection, (b) they will support each other in processing requests from data subjects, (c) they will inform each other in the event of problems relating to data protection issues. Specifically, this applies (in November 2025) in particular to the software products "Microsoft 365," "Jira and Confluence," AWS Cloud, DocuSign, and other small specialist applications.

Complying with tax legislation (including online banking)

1. **What is the purpose of this processing?**
Law-compliant handling of business letters and accounting documents. Preparation of accounting, financial statements, and tax returns. Transfers via online banking.
2. **Who is responsible for this processing?**
ZONTAL GmbH
Address: Eisenbahnweg 9-11, 52068 Aachen
Phone: 0049 241 94314550
Website: www.zontal.io
Email: privacy@zontal.io
3. **Who is designated as the company data protection officer?**
Nicholas Vollmer (SecureDataService)
4. **What is the legal basis? Why is this processing permissible?**
Safeguarding the legitimate interests of the controller in accordance with Article 6 (1f) GDPR
5. **Specifically, what "legitimate interests" does the controller pursue?**
Obligation to comply with legal requirements. Measures for operational organization. Safeguarding ancillary contractual obligations.
6. **Who are the recipients with access rights (both internal and external)?**
 - Owners of the company
 - Service providers, including for legal and financial services
 - Tax advisors
7. **When will the data be deleted?**
 - 3 years after the end of the calendar year (in accordance with Section 195 of the German Civil Code (BGB)) with regard to the statute of limitations for services and consents (or revocations)
 - 6 years after the end of the calendar year (in accordance with § 147 of the German Fiscal Code) for business letters, offers, and orders
 - 8 years after the end of the calendar year (in accordance with § 147 of the German Fiscal Code) for receipts
 - 10 years after the end of the calendar year (in accordance with § 147 of the German Fiscal Code) for annual financial statements, etc.
8. **What categories of data are processed?**
 - Offers
 - Orders
 - Performance data (claims or defense against performance claims)
 - Account statements
 - Receipts (invoices, credit notes, reminders, travel expenses, etc.)
 - Contract data
9. **Which persons are affected?**
 - Employees
 - Customers

- Suppliers

10. The right to "information"

You can request information. This is largely guaranteed by this document. If you have any further questions or concerns, please do not hesitate to contact us.

11. The right to "rectification" of inaccurate data

You can request the correction of inaccurate data. Please contact us for this purpose.

12. The right to "erasure of your data"

You can request the deletion of your data. The prerequisite for this is that (a) the data is no longer necessary, or (b) you have revoked your consent or there is no other legal basis (anymore), or (c) you have objected with good reason, or (d) the data has been processed unlawfully, or (e) deletion is required by law, or (f) the data originates from children and is to be deleted.

Please note, however, that we may not be able/allowed to delete the data if processing is still necessary in accordance with Article 17 (3) GDPR (e.g., for tax documentation purposes).

13. The right to "restriction of processing"

You may request the "blocking" of your data. The prerequisite for this is that (a) you dispute the accuracy of the data, or (b) the processing is unlawful and you refuse to have it deleted, or (c) we no longer need the data, but you still need it for your own legal claims, or (d) you have objected to the processing and it is not yet clear whether the legitimate interests of the controller outweigh yours.

14. The right to "object to processing"

You may object to the processing if there are reasons for this arising from your PARTICULAR SITUATION. The prerequisite for this is that the legal basis for the processing lies in the "legitimate interest" within the meaning of Article 6 (1f) GDPR. We will then consider whether we have compelling legitimate grounds for processing.

15. The right to "withdraw consent"

You may withdraw your consent. The withdrawal only applies to the future. The prerequisite for this is that the legal basis for the processing is "consent" within the meaning of Article 6 (1a) or Article 9 (2a) GDPR.

16. The right to "data portability"

You may request the handover of your data ("data portability"). You may also request that we transfer the data to a recipient of your choice. The prerequisites for this are that (a) the legal basis is based on consent or a contract, and (b) you have provided this data yourself, and (c) the data is processed automatically.

17. The right to "complain"

You can lodge a complaint with a data protection supervisory authority. The contact details of the data protection supervisory authority responsible for us are: LDI NRW, Kavalleriestr. 2-4, 40213 Düsseldorf GERMANY, Tel. 0049-211-38424-0, www.ldi.nrw.de.

You are welcome to contact us first before reporting to the supervisory authority; we will deal with your concern much more quickly and just as thoroughly. If we are

unable to help you, you can still contact the supervisory authority.

18. Data collection by third parties

No, no data is collected by third parties. This means that all data is requested/collected by us.

19. Is profiling carried out? Are personal aspects analyzed or predicted? Are automated individual decisions made?

No, this does not take place.

20. Is data transferred to recipients in third countries (i.e., outside the EU)?

No, this does not take place.

21. Are there several controllers in the sense of "joint responsibility"?

No, there is only ONE controller as mentioned above.

Ticket system and intranet ("Freshservice," "Jira," and "Confluence," etc.)

1. **What is the purpose of this processing?**
Joint coordination of work tasks and product errors in the form of a ticket system (for bugs, problems, tasks, etc.). Use of an intranet for internal organization.
2. **Who is responsible for this processing?**
ZONTAL GmbH
Address: Eisenbahnweg 9-11, 52068 Aachen
Phone: 0049 241 94314550
Website: www.zontal.io
Email: privacy@zontal.io
3. **Who is designated as the company data protection officer?**
Nicholas Vollmer (SecureDataService)
4. **What is the legal basis? Why is this processing permissible?**
Safeguarding the legitimate interests of the controller in accordance with Article 6 (1f) GDPR
5. **Specifically, what "legitimate interests" does the controller pursue?**
Right/obligation to perform controlling or quality management
Generally necessary measures for operational organization
6. **Who are the authorized recipients (both internal and external)?**
 - Customers
 - Project managers
 - Software developers
 - IT department
 - Ticket system service providers
 - Hosting service providers
7. **When will the data be deleted?**
 - Immediately after the end of employment in Confluence (by the departing employee themselves... see offboarding checklist)
 - 6 months after the end of the project (or product usage period), the instances are deactivated (unless a technical objection is lodged)
 - 30 years after the end of the project (or product usage period) in order to ward off claims for damages (in accordance with § 199 BGB)
8. **What categories of data are processed?**
 - User account (name, password, email, etc.)
 - Usage data (activities in Jira or Freshservice)
 - File attachments (screenshots, files)
9. **Which individuals are affected?**
Users of Freshservice, Jira, and Atlassian (employees, customers)
10. **The right to "information"**
You have the right to information about the data concerning you. This is precisely what aims to ensure as best as possible with this document. If you have any further

questions, please do not hesitate to contact us.

11. The right to "rectification" of inaccurate data

You have the right to have incorrect data corrected. Please contact us for this purpose.

12. The right to "erasure of your data"

You have the right to have your data deleted if (a) the data is no longer necessary, (b) you have revoked your consent or there is no other legal basis (anymore), (c) you have objected to the processing on legitimate grounds, (d) the data has been processed unlawfully, (e) erasure is required by law, (f) the data originates from children and should be erased. Please note that, in accordance with Article 17 (2) GDPR, it may not be possible or permissible to erase the data.

13. The right to "restriction of processing"

You have the right to have your data "blocked" if (a) you dispute the accuracy of the data, (b) the processing is unlawful and you refuse to have the data deleted, (c) we no longer need the data, (d) but you still need the data for legal claims.

14. The right to "object to processing"

You have the right to object to processing if there are reasons for this arising from your PARTICULAR SITUATION. We will consider whether we have compelling legitimate grounds for processing.

15. The right to "withdraw consent"

You have the right to withdraw consent (if this is relevant to the processing described here). The withdrawal only applies to the future.

16. The right to "data portability"

You have the right to receive your data provided that (a) the legal basis is based on consent or a contract, (b) you have provided this data yourself, (c) the data is processed automatically. If these conditions are met, you can also request that we transfer the data to a recipient of your choice.

17. The right to "complain"

You have the right to lodge a complaint with a data protection supervisory authority. The contact details are: LDI NRW, Kavalleriestr. 2-4, 40213 Düsseldorf GERMANY, Tel. 0049-211-38424-0, www.lds.nrw.de. You are welcome to contact us first before reporting to the supervisory authority; our highly competent company data protection officer will deal with your request much more quickly and just as thoroughly. If we are unable to help you, you can still contact the supervisory authority.

18. Data collection by third parties

No, no data is collected by third parties. This means that all data is requested/collected by us.

19. Is profiling carried out? Are personal aspects analyzed or predicted? Are automated individual decisions made?

No, this does not take place.

20. Is data transferred to recipients in third countries (i.e., outside the EU)?

USA (Natural persons (employees and freelancers, etc.) give their explicit consent in accordance with Article 49 (1a). Legal entities sign contractual provisions regarding contract fulfillment in accordance with Article 49 (1c).)

USA (The data importer is listed in the EU-US Data Privacy Framework (DPF); see Article 45 GDPR. In addition, the EU standard contractual clauses have been concluded.)

21. Are there several controllers in the sense of "joint responsibility"?

No, there is only ONE controller as mentioned above.