

Privacy Policy - Batalyse GmbH

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At Batalyse, we value your privacy. This Privacy Policy explains how we handle your personal data when you use our website and software products.

This Privacy Policy should be read in conjunction with our [End User License Agreement \(EULA\)](#) and our [Terms and Conditions](#), which provide additional details on data handling for Software users.

This Privacy Policy forms part of the Agreement between you and Batalyse GmbH, as defined in the End User License Agreement (EULA). In case of conflicts regarding data processing and personal data handling, this Privacy Policy prevails to the extent permitted by applicable law.

All references to "EULA Section X" refer to the [EULA v2025-10-09](#).

1. What Data We Collect

We may collect the following types of data:

1.1 Personal Data

Information that identifies you, such as your name, address, email, and phone number. We collect this when you provide it directly (e.g., contacting us, subscribing to our newsletter, or requesting a trial license).

1.2 General Data

Technical information about your browser, operating system, IP address (anonymized), Origin serial number, MAC address, server fingerprint, and website usage.

1.3 Usage Data

For the Data Analysis module, we collect details on how often you use our software for license management and software improvement purposes.

1.4 Test/Analysis/Raw/Result Data (User Content)

Only if you actively mail or upload this data either directly to us or to a Collect or Mind demo server not installed at your site. Batalyse otherwise has no access to this information.

For complete details on User Content handling, see [EULA Section 5.1](#).

1.5 Bug Reports and Log Files

Data Analysis Module:

- Automated bug reporting is enabled by default (opt-out available)

- When an error occurs, the software automatically sends error details, software version, timestamp, filename (not contents), and your contact information
- You can disable this feature at any time through software settings
- No test data, analysis results, or file contents are transmitted
- See [EULA Section 5.2.3](#) for complete details

Collect and Mind Modules:

- Optional telemetry (opt-in required)
- You must explicitly enable log file transmission through software settings
- When enabled, system log files and technical diagnostics are sent
- No user content or test data is transmitted
- See [EULA Section 5.2.2](#) for complete details

Manual Provision:

- You may manually provide log files or diagnostic information when requesting technical support
- See [EULA Section 5.2.4](#) for details

2. How We Collect Data

We collect data:

- When you visit our website
- When you subscribe to our newsletter
- When you contact us via email, phone, or contact forms
- When you actively mail, send, or upload test/analysis/raw/result data or bug reports
- Through Google Analytics for website usage analysis, if you accept cookies (see Section 10.1)
- Through HubSpot for newsletter management and tracking (see Section 10.2)
- When you use our software products as described below

2.1 Software Data Collection

Batalyse offers both online and offline licensing options. Data collection varies by module and license type:

On-Premise Operation:

- The Software operates on your own infrastructure
- Batalyse does not have access to your analysis, test, or result data
- Your scientific work and User Content remain on your own systems
- See [EULA Section 5.1](#) for complete on-premise data handling details

License Validation:

- For online licenses, connection to our license server transmits only information necessary for validating and managing the license (hardware fingerprints, license status, usage counts)

- License server communication never includes the content of your analysis or test data
- See [EULA Section 3](#) for license activation details

Optional Data Transmission:

- Batalyse only accesses your data if you choose to manually send or upload analysis/test data or log files for technical support, troubleshooting, or optional demo purposes
- Automated bug reporting and telemetry are opt-in (Collect/Mind) or opt-out (Data Analysis) as described in Section 1.5 and [EULA Section 5.2](#)
- In specific cases, Batalyse can offer non-anonymized usage counts or similar identifying data exchange as part of the licensing process, but this will only be enabled if explicitly authorized by you with your written consent

Offline Licenses:

- Operate without any data transfer to or from Batalyse servers unless you proactively initiate such contact
- See [EULA Section 3.2](#) for offline license details

For comprehensive information on data access, telemetry features, and user control mechanisms, please refer to [EULA Section 5.2](#).

3. How We Use Your Data

We use your data to:

- Provide, expand, and improve our website and software
- Send newsletters with informational updates
- Respond to your service and feature requests
- Ensure security and prevent fraud
- Analyze how our website and software are used
- Optimize our marketing strategies
- Communicate and collaborate using Microsoft Teams and Microsoft Office software, which may involve processing your contact information and communication content
- Run, host, and manage our software infrastructure
- Manage and validate software licenses for our Data Analysis module, which involves storing an Origin Serial Number, anonymized IP address, license start and end date, and license name on our license server hosted by Ionos ([Ionos Privacy Policy](#))
- Count your and your team's number of test data evaluations for the Data Analysis module
- Create and manage licenses for our Collect and Mind software modules through Keygen ([Keygen Privacy Policy](#))
- Provide demo environments for our Mind and Collect software products, hosted by Contabo ([Contabo Privacy Policy](#))

For detailed information on how we use data provided for technical support and software improvement, see [EULA Section 5.3](#).

4. Data Sharing and International Transfers

4.1 Data Sharing

We do not share your personal data with third parties except when:

- Required by law
- Necessary to provide our services
- Using third-party processors under GDPR-compliant agreements

4.2 Third-Party Processors

We use the following third-party processors:

- **Ionos:** Data Analysis license server hosting (EU-based) - [Ionos Privacy Policy](#)
- **Keygen:** Managing Collect and Mind software licenses (US-based with safeguards) - [Keygen Privacy Policy](#)
- **Contabo:** Demo environment hosting for Collect and Mind (EU-based) - [Contabo Privacy Policy](#)
- **Microsoft:** Communication and collaboration (Office 365, Teams, Azure), with data primarily stored within the EU/EEA - [Microsoft Privacy Statement](#)
- **Google Analytics:** Website usage analysis (see Section 10.1)
- **HubSpot:** Newsletter management and email tracking (see Section 10.2)

4.3 International Data Transfers

Where personal data is transferred outside the EU/EEA (for example to service providers such as HubSpot, Microsoft, or Google), such transfers are made under:

- EU–U.S. Data Privacy Framework
- Standard Contractual Clauses (SCCs)
- Other appropriate safeguards ensuring an adequate level of protection in compliance with Article 46 GDPR

For complete details on international data transfers, including all third-party service providers and legal safeguards, see [EULA Section 5.5.3](#).

5. Data Storage and Retention

We retain your data only as long as necessary to fulfill the purposes outlined in this policy or as required by law:

- **Newsletter subscription data:** Kept until you unsubscribe
- **Demo server data:** Purged regularly after testing purposes are completed. Users **must** maintain their own backups of any data uploaded to demo servers.
- **Support and diagnostic data:** May be retained indefinitely for software testing, quality assurance, and compatibility validation purposes as detailed in [EULA Section 5.3.3](#). You may request deletion at any time by contacting support@batalyse.com. Deleted data will be removed within 30 days.
- **License and account data:** Retained for the duration of your license plus any legally required retention period for accounting and tax purposes
- **Contact and communication data:** Retained for as long as necessary to respond to your inquiries and maintain our business relationship

For detailed retention policies, anonymization procedures, and deletion rights, see [EULA Section 5.3](#).

6. Your Rights Under GDPR

Under the General Data Protection Regulation (GDPR), you have the following rights:

- **Access (Art. 15 GDPR):** Request a copy of the personal data we hold about you
- **Correction (Art. 16 GDPR):** Request the correction of inaccurate or incomplete personal data
- **Deletion (Art. 17 GDPR – Right to be Forgotten):** Request the deletion of your data under certain conditions
- **Restriction of Processing (Art. 18 GDPR):** Limit how we process your data
- **Data Portability (Art. 20 GDPR):** Receive your personal data in a structured, commonly used, and machine-readable format
- **Objection (Art. 21 GDPR):** Object to data processing for direct marketing or on grounds related to your situation
- **Automated Decision-Making (Art. 22 GDPR):** Not to be subject to decisions based solely on automated processing

To exercise these rights, please contact us at support@batalyse.com (see Section 12).

Additionally, you have the right to lodge a complaint with a supervisory authority if your data protection rights have been violated.

7. US Residents - Additional Rights and Clarifications

7.1 GDPR-Level Rights for All Users

Batalyse provides all users—including US residents—the data rights described in Section 6 of this policy, including the rights of access, correction, deletion, restriction, objection, and data portability, as granted under the GDPR.

7.2 No Sale or Sharing of Personal Information

Batalyse does not sell personal information, nor do we share personal information for commercial purposes or cross-contextual behavioral advertising as defined under US state privacy laws (including California's CCPA/CPRA).

If these practices change, US customers will be notified in advance and provided with opt-out options.

7.3 Additional Rights Under US State Laws

Where US state privacy laws grant additional rights—such as the right to opt out of the sale or sharing of personal information, or enhanced rights regarding sensitive personal information—those rights will apply if and when Batalyse engages in such activities.

7.4 Data Deletion and Portability for US Residents

Upon request or account termination, US residents may request deletion of their personal data or a copy in a portable, commonly used format. Batalyse will comply within 90 days unless a longer or shorter period is required by applicable law.

7.5 How to Exercise US Privacy Rights

US users can exercise these rights in the same manner as described for GDPR rights by contacting support@batalyse.com (see Section 12). If you are a US resident and have any questions about your state-specific rights or wish to exercise them directly, please contact us and specify your state of residence.

7.6 Appeal Process

If you disagree with Batalyse's response to a data rights request, you may appeal the decision by emailing support@batalyse.com with the subject line "Privacy Appeal." Your appeal will be reviewed by a senior data protection officer, and a written response will be provided within 45 days as required by U.S. state law.

8. Legal Basis for Processing

We process your data based on:

- **Your consent (Art. 6(1)(a) GDPR)** - when you explicitly agree to data processing, such as enabling telemetry features
- **Contractual necessity (Art. 6(1)(b) GDPR)** - when processing is necessary to fulfill our contractual obligations to you
- **Legal obligations (Art. 6(1)(c) GDPR)** - when we must process data to comply with legal requirements
- **Legitimate business interests (Art. 6(1)(f) GDPR)** - when we have legitimate interests that do not override your rights, such as software improvement and security

9. Contacting Us

If you contact us (via email, Microsoft Teams, or website forms), we store your data to process and respond to your request. This data includes your name, contact information, and the content of your communication.

We retain this data for as long as necessary to respond to your inquiry and maintain our business relationship.

10. Third-Party Tools and Services

10.1 Google Analytics

If you accept cookies, our website uses Google Analytics with IP anonymization to analyze visitor behavior and improve our services.

Google Analytics may process data in the United States. Google participates in the EU-U.S. Data Privacy Framework and uses Standard Contractual Clauses (SCCs).

Users can opt out using the [Google Analytics Opt-Out Browser Add-on](#). More information is available in the [Google Privacy Policy](#).

10.2 HubSpot

We use HubSpot to send newsletters and track engagement (e.g., email opens and link clicks). HubSpot may collect IP addresses for statistical analysis. Batalyse itself does not store IP addresses related to newsletter tracking.

HubSpot may process data in the United States. HubSpot participates in the EU-U.S. Data Privacy Framework and uses Standard Contractual Clauses (SCCs).

You can opt out by unsubscribing from our newsletters at any time. More details are available in the [HubSpot Privacy Policy](#).

11. Technical and Organizational Security Measures

We implement security measures to protect your data, including:

11.1 Technical Safeguards

- Encryption in transit (TLS/SSL)
- Encryption at rest for sensitive data
- Secure servers and infrastructure
- Regular security assessments and updates

- Access logging and monitoring

11.2 Organizational Measures

- Access controls limiting data access to authorized personnel only
- Employee training on data protection and confidentiality
- Data processing agreements with all third-party processors
- Regular review and update of security practices

For information on security measures specific to the Software and user responsibilities for on-premise security, see [EULA Section 5.6](#).

12. Data Protection Officer

For privacy-related inquiries, to exercise your data rights, or to contact our Data Protection Officer, please contact:

Batalyse GmbH

Sattlerstr. 5
75045 Walzbachtal, Germany

Data Protection Officer: Eran Nave

Phone: +49 (176) 789 814 63

Email (Data Protection Officer): eran@batalyse.com

General Privacy Inquiries: support@batalyse.com

Website: www.batalyse.com

13. Definitions

For your convenience, here are simplified definitions of key terms:

- **Personal Data:** Information that identifies you
 - **Data Subject:** You, the individual whose personal data is processed
 - **Processing:** Any operation performed on your data (e.g., collection, storage, use, transmission, deletion)
 - **Processor:** Third parties that process data on our behalf (e.g., Ionos, Keygen, Microsoft)
 - **Controller:** Batalyse, responsible for determining how and why your data is processed
 - **Consent:** Your explicit permission for data processing
 - **User Content:** Your data, files, analysis results, and outputs created or processed using the Software (see [EULA Section 5.1](#))
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14. Collection of General Data and Information

We automatically collect general data when you visit our website, such as:

- Browser type and version
- Operating system
- IP address (anonymized)
- Referring website

- Date and time of access
- Pages visited

We use this data to:

- Deliver website content correctly
- Optimize website content and user experience
- Ensure IT system security and functionality
- Provide information for criminal prosecution in case of cyber-attacks
- Analyze website usage patterns (through Google Analytics if you accept cookies)

15. Changes to this Privacy Policy

We may update this policy to reflect changes in legal requirements or data processing practices.

Notification of Changes:

- Minor changes will be posted on our website
- Significant changes will be notified through our website and by email
- If changes materially affect your rights, Batalyse will notify you by email or on our website at least 14 days before the new version takes effect

Changes to data handling practices related to the Software are governed by [EULA Section 10](#).

16. Children's Privacy

Batalyse products and services are intended for professional and research use only and are not directed at children under 16 years of age.

We do not knowingly collect personal data from minors. If we become aware that personal data from a child under 16 has been provided to us, it will be deleted immediately.

If you believe we have inadvertently collected data from a minor, please contact us immediately at support@batalyse.com.

17. Data Breach Notification

In the unlikely event of a personal data breach that is likely to result in a risk to your rights and freedoms, Batalyse will:

- Notify affected users **within 72 hours of becoming aware of the breach** (where feasible), in compliance with GDPR Article 33
- Notify the competent supervisory authorities in accordance with GDPR Articles 33–34
- Comply with relevant U.S. state data breach notification laws where applicable

Notifications will include:

- The nature of the breach
- The categories and approximate number of data subjects affected
- The likely consequences of the breach

- The measures taken or proposed to address the breach
 - Contact information for further inquiries
-

18. Data Processing Agreement (DPA)

Institutional or enterprise customers who process personal data using our Software may request a Data Processing Agreement (DPA) under Article 28 GDPR.

The DPA ensures contractually regulated handling of personal data in accordance with EU and U.S. legal standards.

To request a DPA, please contact support@batalyse.com.

For information on when a DPA is required and the relationship between User data processing and Batalyse support services, see [EULA Section 5.5.2](#).

19. Contact Information

Batalyse GmbH

Sattlerstr. 5
75045 Walzbachtal, Germany

Support: support@batalyse.com

Data Protection Officer: eran@batalyse.com

Phone: +49 (176) 789 814 63

Website: www.batalyse.com

Related Documents

- **EULA (End User License Agreement):** www.batalyse.com/eula
 - **Terms and Conditions:** www.batalyse.com/terms
 - **Data Processing Agreement (DPA):** Available upon request at support@batalyse.com
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END OF PRIVACY POLICY