

Privacy Policy

This privacy policy applies to the use of the websites alltulu.com and tulu.tech, as well as to the use of the Tulu software service ("Tulu Software"). The websites and Tulu Software are provided by Tulu GmbH ("we," "us").

Tulu Software is a software service for visualizing marketing and sales data as a SaaS solution. The customer connects their data sources, media data, website data, and CRM data to a Tulu Software account. The data is stored in a Google Firebase account belonging to Tulu and then visualized using the front end of the Tulu Software. To this end, the customer is granted access to our servers or to the servers for which we are responsible.

Data subjects ("you," "your") in the context of this privacy policy may be customers who use Tulu Software as subscribers, their employees or contractors as authorized users, but also website visitors who wish to find out about our product as users.

The responsible body for data processing when visiting our website and using the Tulu software is

Tulu GmbH, Stollbergstraße 22, 80539 Munich, Germany
Managing Director: Adrian Knoll, email address: adrian@tulu.tech

The responsible body is the natural or legal person who, alone or jointly with others, decides on the purposes and means of processing personal data (e.g., names, email addresses, etc.).

I. **Visiting the websites**

The following data protection provisions apply to visitors to our websites.

1. **Processing of your data**

1. We collect and process technical usage data from you that your Internet browser automatically transmits to us. This includes, in particular

1. IP address
2. Device and browser type
3. Operating system
4. Time and duration of use

and other technical metadata. Processing is carried out on the basis of Art. 6 (1) lit. f) GDPR, as we have a legitimate interest in the secure and trouble-free operation of the website.

2. This data is used exclusively to ensure the functionality of the website, to troubleshoot errors, to improve the user experience, and to protect against unauthorized access. Processing is carried out in accordance with Art. 6 (1) lit. f) GDPR on the basis of our legitimate interest in the secure and trouble-free operation of the website.

2. **Transfer to third parties**

1. We use external service providers to process your data, who are bound by our instructions as processors in accordance with Art. 4 No. 8 GDPR. These processors have been carefully selected and commissioned by us. The commissions are based on data processing agreements in accordance with Art. 28 GDPR. The processors do not carry out independent processing for their own purposes. Information about the processors used can be found in the following paragraphs.
2. Framer B.V.
We use the services of Framer B.V. to create and revise our website and for the contact form. If you contact us via this contact form, Framer processes your personal data on our behalf and therefore acts as a processor. To contact us via this form, we only need your email address, your first and last name, and, if applicable, your company name. Any further information is voluntary. The legal basis for this processing is Art. 6 (1) (a) GDPR, as you must consent to data processing when contacting us via the contact form. These services are provided by Framer B.V., Rozengracht 207B, Netherlands. Further information on Framer B.V.'s data protection policy can be found at [HERE](#) . The regulations on order processing in accordance with Art. 28 GDPR can be found [HERE](#).
3. Hubspot Ireland Ltd. Hubspot, Inc.
We use the services of Hubspot Ireland Ltd. (Ground Floor, Two Dockland Central, Guild Street, Dublin 1, Ireland) for the collection, management, and qualification of prospects and leads within the Hubspot platform. Hubspot Ireland Ltd. is a subsidiary of Hubspot, Inc. (Headquarters USA: 2 Canal Park, Cambridge, MA 02141, United States of America). Hubspot uses various data for lead management, in particular from contact forms, responses to our marketing emails, and newsletter subscriptions. The transfer of personal data to the USA is based on the adequacy decision of the European Commission and the certification of Hubspot, Inc. under the EU-U.S. Data Privacy Framework. Further information on data protection at Hubspot, Inc. can be found at [HERE](#). The regulations on order processing in accordance with Art. 28 GDPR can be

found at [HERE](#).

4. Netcup GmbH

We use the services of netcup GmbH to operate our website and to provide our server infrastructure on which our Tulu software is operated. In doing so, personal data is also processed on the servers of netcup GmbH's data centers.

These services are provided by netcup GmbH, Emmy-Noether-Straße 10, 76131 Karlsruhe, as our processor.

Further information on data protection can be found at [HERE](#).

3. Cookies

1. Cookies can originate from the controller (first-party cookies) or from third-party companies (third-party cookies). Third-party cookies enable the integration of certain services from third-party companies within websites. Our websites use third-party cookies. We do not use first-party cookies.
2. Cookies are small data packets that are stored on your device either temporarily for the duration of a session (session cookies) or permanently (permanent cookies). Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your device until you delete them yourself or your web browser automatically deletes them.
3. Cookies have various functions. Numerous cookies are technically necessary, as certain website functions would not work without them. Other cookies can be used to evaluate user behavior or for advertising purposes.
4. Cookies that are necessary for the electronic communication process, for the provision of certain functions requested by you, or for the optimization of the website (e.g., cookies for measuring the web audience) (necessary cookies) are stored on the basis of Art. 6 (1) lit. f) GDPR, unless another legal basis is specified. As the website operator, we have a legitimate interest in storing

necessary cookies for the technically error-free and optimized provision of our services. If consent to the storage of cookies and similar recognition technologies has been requested, processing is carried out exclusively on the basis of this consent (Art. 6 (1) (a) GDPR and § 25 (1) TTDSG); consent can be revoked at any time.

5. You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general, and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be restricted.
6. You can find out which cookies and services are used on this website in this privacy policy.

4. Consent with Usercentrics

1. We use the consent management service Usercentrics from Usercentrics GmbH, Sendlinger Straße 7, 80331 Munich, Germany. This enables us to obtain and manage the consent of website users for data processing. The processing is necessary to fulfill a legal obligation, pursuant to Art. 6 (1) (c) GDPR, Art. 7 (1) GDPR.
2. When you visit our website, the following personal data is transferred to Usercentrics:
 1. Your consent(s) or the revocation of your consent(s)
 2. Your IP address
 3. Information about your browser
 4. Information about your device
 5. Time of your visit to the website
 6. Geolocation

3. Furthermore, Usercentrics stores a cookie in your browser in order to be able to assign the consents you have given or their revocation. The data collected in this way is stored until you request us to delete it, delete the Usercentrics cookie yourself, or the purpose for data storage no longer applies. Mandatory legal retention obligations remain unaffected.
4. Processing takes place in the European Union. For more information on how to object to and remove Usercentrics, please visit:
<https://usercentrics.com/de/datenschutzerklaerung/>.

5. Requests via contact form, email, telephone, or fax

1. If you send us inquiries via the contact form, your details from the inquiry form, including the contact details you provided there, will be stored by us for the purpose of processing the inquiry and in case of follow-up questions. If you contact us via this contact form, Framer B.V. will process your personal data on our behalf and act as a processor. To contact us via this form, we need your email address, your name, and, if applicable, the company name; any further information is voluntary. The legal basis for this processing is Art. 6 (1) (a) GDPR, as you must consent to data processing when contacting us via the contact form. These services are provided by Framer B.V., Rozengracht 207B, Netherlands.
2. If you contact us by email, telephone, or fax, your request, including all resulting personal data (name, request), will be stored and processed by us for the purpose of processing your request.
3. This data is processed on the basis of Art. 6 (1) lit. b) GDPR, provided that your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, processing is based on our legitimate interest in the effective processing of inquiries addressed to us (Art. 6 (1) (f) GDPR) or on your consent (Art. 6 (1) (a) GDPR) if

this has been requested; consent can be revoked at any time.

4. The data you provide to us will remain with us until you request us to delete it, revoke your consent to its storage, or the purpose for data storage no longer applies (e.g., after your inquiry has been processed). Mandatory legal provisions—in particular retention periods—remain unaffected.

6. **Analysis tools and advertising**

1. **Meta Pixel (formerly Facebook Pixel)**

This website uses Meta Pixel to measure visitor interactions. This service is provided by Meta Platforms Ireland Limited ("Meta"), 4 Grand Canal Square, Dublin 2, Ireland. Meta is a subsidiary of Meta Platforms, Inc., 1601 Willow Rd Menlo Park, CA 94025). Meta is the controller (together with us) with regard to your data. However, the data collected may also be transferred by Meta to the USA and other third countries.

Meta pixels can be used to track the behavior of website visitors after they have been redirected to the provider's website by clicking on a Meta advertisement. This allows the effectiveness of Meta advertisements to be evaluated for statistical and market research purposes and future advertising measures to be optimized.

The data collected is anonymous to us as the operator of this website; we cannot draw any conclusions about the identity of the users. However, the data is stored and processed by Meta, so that a connection to the respective user profile is possible and Meta can use the data for its own advertising purposes in accordance with the Meta Data Use Policy (<https://de-de.facebook.com/about/privacy/>).

This enables Meta to place advertisements on its Facebook platform and outside of Facebook. As the website operator, we have no influence on this use of the data.

The use of this service is based on your consent in accordance with Art. 6 (1)

(a) GDPR and § 25 (1) TTDSG, which is granted via the Usercentrics consent management service. Consent can be revoked at any time.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, are jointly responsible for this data processing (Art. 26 GDPR). Joint responsibility is limited exclusively to the collection of data and its transfer to Meta.

The processing by Meta after the transfer is not part of the joint responsibility.

The obligations incumbent upon us jointly have been set out in a joint processing agreement. The wording of the agreement can be found at:

https://www.facebook.com/legal/controller_addendum.

According to this agreement, we are responsible for providing data protection information when using the Meta tool and for implementing the tool on our website in a manner that complies with data protection laws. Meta is responsible for the data security of Meta products. You can assert your rights as a data subject (e.g., requests for information) regarding the data processed by Meta directly with Meta.

If you assert your rights as a data subject with us, we are obliged to forward them to Meta. You can find further information on the protection of your privacy in Meta's privacy policy: <https://de-de.facebook.com/about/privacy/>.

You can also disable the "Custom Audiences" remarketing feature in the ad settings section at: https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen. To do this, you must be logged in to Meta or Facebook.

If you do not have an account with Meta or Facebook, you can deactivate usage-based advertising from Meta on the website of the European Interactive Digital Advertising Alliance:

<http://www.youronlinechoices.com/de/praferenzmanagement/>.

The transfer of personal data to the USA is based on the adequacy decision of the European Commission and the certification of Meta Platforms Inc. under the EU-U.S. Data Privacy Framework. In addition, the corresponding EU standard contractual clauses have also been signed.

2. Google Ads

We use Google Ads, an advertising service provided by Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Ireland (parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA), and also conversion tracking as part of Google Ads. Conversion tracking allows us to track whether or not you have clicked on a particular ad on our website. This information is used to compile statistics for advertisers who use conversion tracking. These statistics show us the total number of users who clicked on the ad and visited a website with a conversion tracking tag. The processing of this personal data is based on your consent, which you can revoke at any time with future effect, Art. 6 (1) (a), Art. 7 GDPR. The transfer of personal data to the USA is based on the adequacy decision of the European Commission and the certification of Google LLC under the EU-U.S. Data Privacy Framework. In addition, the corresponding EU standard contractual clauses have also been signed.

3. LinkedIn Insight Tag

We use the LinkedIn Insight Tag from LinkedIn Ireland Unlimited Company (hereinafter "LinkedIn"), Wilton Place, Dublin 2, Ireland, on our website. LinkedIn is a subsidiary of LinkedIn Corporation, 1000 W Maude Avenue, Sunnyvale, California 94085, USA.

The Insight Tag will collect the following information about you and transmit it to LinkedIn:

1. URL,
2. IP address,
3. Device and browser data, and
4. a timestamp.

We are jointly responsible with LinkedIn for the collection and transfer of data to LinkedIn; however, any processing of data after the transfer is the sole responsibility of LinkedIn.

The Insight Tag collects and transfers data only after you have given your express consent in the cookie banner that is displayed when you access our website.

In exceptional cases, profile data may be processed together with the above categories of data. This is the case if you are a member of LinkedIn. In this context, we would like to draw your attention to the settings options within your LinkedIn profile.

LinkedIn will provide us with an analysis of the use of our website in aggregated form, enabling us to improve our website and content for our users. This data is also used for targeted advertising measures on the LinkedIn platform.

LinkedIn will encrypt your data, IP addresses will be truncated, and direct identifiers will be removed within seven days to make the data pseudonymous. The remaining pseudonymized data will then be deleted within 90 days.

The processing of this personal data is based on your consent, which you can revoke at any time with future effect, Art. 6 (1) (a), Art. 7 GDPR.

The transfer of personal data to the USA is based on the adequacy decision of the European Commission and the certification of LinkedIn Corporation under the EU-U.S. Data Privacy Framework. In addition, the corresponding EU standard contractual clauses have also been signed.

Further information can be found at: <https://www.linkedin.com/legal/privacy-policy>.

4. Matomo

We use the "cookie-free" version of Matomo from InnoCraft Limited on our website. InnoCraft Limited is based at 7 Waterloo Quay, 6140 Wellington, New Zealand. This means that user behavior on our website continues to be recorded and analyzed, but cannot be attributed to a specific user. In particular, no profile is created for a user that can be used to identify a returning website visitor via their IP address and other technical information. Since Matomo does not process any personal data in this cookie-free version, its use is not subject to the GDPR. If personal data is nevertheless processed,

we have a legitimate interest in using the tool, as Matomo improves the user experience on the website, in accordance with Art. 6 (1) (f) GDPR. The transfer of personal data to New Zealand is based on the adequacy decision of the European Commission pursuant to Art. 45 (1) GDPR. According to this, New Zealand has an adequate level of data protection.

7. Social media integration

1. Unless otherwise stated, we process your data on the basis of our legitimate interests pursuant to Art. 6 (1) lit. f) GDPR, in order to improve the content and user experience. The use of cookies when integrating social media content is based on your consent pursuant to Art. 6 (1) (a), Art. 7 GDPR.
2. We also link to our presence on various social networks on our website. The integration takes place via a linked graphic of the respective network. This prevents an automatic connection to the server of the respective network when our website is accessed; instead, the user is only redirected to the service of the respective social network when they click on the corresponding graphic.
3. After the redirection, information is collected by the respective network, whereby it cannot be ruled out that the data collected in this way may be processed in the USA.
4. The data collected initially includes your IP address, date, time, and page visited. However, if you are logged into your user account on the respective network, the network operator may be able to assign the information collected during your specific visit to your personal account. If you interact via a "share" button on the respective network, this information may be stored in your personal account and published if necessary. If you want to prevent the collected information from being directly assigned to your user account, you must log out before clicking on the graphic or the "share" button.

5. The following social networks are integrated into our site via links:

1. Instagram

Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, a subsidiary of Meta Platforms Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA.

Privacy policy: <https://privacycenter.instagram.com/policy>.

2. LinkedIn

LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085 USA.

Privacy policy: <https://www.linkedin.com/legal/privacy-policy>.

II. **Use of Tulu Software**

The following data protection provisions apply to the use of Tulu software.

1. **Processing of your data**

1. In order to provide our services, we collect basic information about you, including:

1. First and last names
2. Access data, in particular your email address
3. Company name
4. Address of the place of business

2. We collect and process this data on the basis of Art. 6 (1) (b) GDPR in order to fulfill our obligations under the SaaS agreement we conclude with you.

We also use your data for invoicing and to contact you. The legal basis for this is Art. 6 (1) (b) and (f) GDPR.

2. Technical usage data

1. We collect and process technical usage data from you that your internet browser automatically transmits to us. This includes, in particular

1. IP address
2. Device and browser type
3. Operating system
4. Time and duration of use

and other technical metadata. Processing is carried out on the basis of Art. 6 (1) lit. f) GDPR, as we have a legitimate interest in the secure and trouble-free operation of the website.

2. This data is used exclusively to ensure the functionality of the website, to troubleshoot errors, to improve the user experience, and to protect against unauthorized access. The data is processed on servers rented by us. Processing is carried out in accordance with Art. 6 (1) lit. f) GDPR on the basis of our legitimate interest in the secure and trouble-free operation of the website.

3. Transfer to third parties

1. We use external service providers to process your data, who are bound to our instructions as processors in accordance with Art. 4 No. 8 GDPR. These processors have been carefully selected and commissioned by us. The commissions are based on data processing agreements in accordance with Art. 28 GDPR. The processors do not carry out independent processing for their own purposes. Information about the processors used can be found in the following paragraphs.

2. Google Cloud Services, Google Workspace

We use the services of the Google Cloud Platform (including Big Query, Firebase, etc.) for communication, collaboration, and storage of the above-mentioned personal data. If our customers provide personal data of their own customers, this data is stored in Google Cloud.

These services are provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, as our processor. The parent company Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, may also have access to personal data in the context of order processing.

The transfer of personal data to the US is based on the adequacy decision of the European Commission and the certification of Google LLC under the EU-US Data Privacy Framework; alternatively, it is based on the corresponding EU standard contractual clauses.

Further information can be found at: <https://policies.google.com/privacy>.

3. Netcup GmbH

We use the services of netcup GmbH to provide our server infrastructure on which our software services are operated. This also involves the processing of personal data on the servers of netcup GmbH's data centers.

These services are provided by netcup GmbH, Emmy-Noether-Straße 10, 76131 Karlsruhe, as our processor.

Further information on data protection can be found at:
<https://www.netcup.com/de/kontakt/datenschutzerklaerung>.

4. **Inquiries via contact form, email, telephone, or fax**

1. If you send us inquiries via the contact form, your details from the inquiry form, including the contact details you provided there, will be stored by us for the purpose of processing the inquiry and in case of follow-up questions. If you contact us via this contact form, Framer B.V. will process your personal data on our behalf and act as a processor. To contact us via this form, we need your email address, your name, and, if applicable, the company name; any further information is voluntary. The legal basis for this processing is Art. 6 (1) (a) GDPR, as you must consent to data processing when contacting us via the contact form.

These services are provided by Framer B.V., Rozengracht 207B, Netherlands.

2. If you contact us by email, telephone, or fax, your request, including all resulting personal data (name, request), will be stored and processed by us for the purpose of processing your request.
3. This data is processed on the basis of Art. 6 (1) lit. b) GDPR, provided that your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, processing is based on our legitimate interest in the effective processing of inquiries addressed to us (Art. 6 (1) (f) GDPR) or on your consent (Art. 6 (1) (a) GDPR) if this has been requested; consent can be revoked at any time.
4. The data you transmit to us will remain with us until you request us to delete it, revoke your consent to its storage, or the purpose for its storage no longer applies (e.g., after your inquiry has been processed). Mandatory legal provisions—in particular retention periods—remain unaffected.

III. Data security and storage period

Your personal data will always be treated confidentially and protected from unauthorized access by appropriate technical and organizational measures. Your data will remain with us until the purpose for data processing no longer applies. If you assert a legitimate request for deletion or revoke your consent to data processing, your data will be deleted unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, deletion will take place after these reasons no longer apply.

Otherwise, the data we process will be deleted or restricted in its processing in compliance with legal requirements, in particular Articles 17 and 18 of the GDPR.

Beyond the point at which the purpose ceases to apply, data will only be retained with your consent, or if it is necessary for other legally permissible purposes, or if the data must be retained further due to legal retention obligations. In these cases, processing will be restricted, i.e., the data will be blocked and not processed for other purposes.

IV. Legal basis for the processing of your data

If a specific legal basis for the processing of personal data is not mentioned in this privacy policy, the following applies to processing by Tulu:

1. Insofar as we obtain the consent of the data subject for the processing of personal data, Art. 6 (1) (a) GDPR serves as the legal basis.
2. When processing personal data that is necessary for the performance of a contract, whether paid or unpaid, Art. 6 (1) (b) GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.
3. Insofar as processing is necessary to fulfill a legal obligation to which our company is subject, Art. 6 (1) (c) GDPR serves as the legal basis.
4. In the event that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, Art. 6 (1) sentence 1 lit. e) GDPR serves as the legal basis.
5. If processing is necessary to safeguard our legitimate interests and the interests, fundamental rights, and freedoms of the data subject do not override the former interest, Art. 6 (1) (f) GDPR serves as the legal basis for processing.

V. Your rights

You can assert the following rights free of charge against any controller responsible for the processing of your personal data in accordance with Art. 4 No.

7 GDPR in accordance with the statutory provisions:

1. **Information** about the stored data (Article 15 GDPR); i.e., you may find out at any time what data we store about you.
2. **Rectification** of inaccurate or incomplete personal data stored by us (Art. 16 GDPR); i.e., if the data we have collected about you is incorrect or contains inaccuracies, you can request that we correct it.
3. **Deletion** of your data (Art. 17 GDPR); for this, there must be a reason for deletion in accordance with Art. 17 (1) GDPR, and there must be no exceptions in accordance with Art. 17 (3) GDPR.
4. **Restriction of processing** (Art. 18 GDPR); i.e., if the relevant conditions are met, you can request that your data may only be processed for very limited purposes.
5. **Transfer** of the personal data you have provided to us in a structured, commonly used, and machine-readable format, or transfer to another controller (Art. 20 GDPR).
6. **Objection** (Art. 21 GDPR); if the processing is based on Art. 6 (1) (e) or (f) GDPR, you may object to the processing.
7. **Withdrawal** of consent (Art. 7(3) GDPR); if the processing of your data is based on your express consent pursuant to Art. 6(1)(a) GDPR, this consent can be withdrawn at any time pursuant to Art. 7(3) GDPR.
8. **Complaint** pursuant to Art. 77 (1) GDPR; in the event of violations of the GDPR, data subjects have the right to lodge a complaint with a supervisory authority.

To assert your rights against Tulu, please contact the email address listed above. You also have the right to complain to a data protection supervisory authority about the processing of your personal data by the controller in accordance with Art. 77 et seq. GDPR. The supervisory authority responsible for us is the Bavarian State Office for Data Protection Supervision, P.O. Box 1349, 91504 Ansbach, poststelle@lda.bayern.de.

An overview of all supervisory authorities can be found at:

https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html.

We reserve the right to change this privacy policy. You can save or print the privacy policy at any time via your browser and access it as a PDF at any time.

As of: 28/04/2026