

Berlin, 15th October 2015

Ingenious Technologies on the decision by the European Court of Justice on the Safe Harbor Agreement

Recently, the European Court has declared the policy for exchanging data between the US and Europe (Safe Harbor) invalid. It remains to be seen, if and when a new privacy policy with the US will be agreed upon at a European level. That is why we have been focusing on a self-regulating and proactive approach right from the start – to protect our clients and their data.

Through data collected from our tracking technology, no single physical person can be detected, only anonymized information about the devices.

Two pillars of data protection at Ingenious Technologies:

1. Partner agreement with Microsoft

- Our infrastructure is located entirely within the European Union.
- We have contractually agreed that our partner Microsoft and its cloud services Microsoft Azure are bound to comply with the European data protection policy. Moreover, it was negotiated that no data will be sent outside the EU. Microsoft Azure is presently ISO 27018 (privacy cloud) certified.
- See also the current statement from our partner Microsoft:
<http://blogs.microsoft.com/on-the-issues/2015/10/06/a-message-to-our-customers-about-eu-us-safe-harbor/>

2. Compliant tracking technology

- By default, Ingenious Technologies collects no personal data and guarantees compliance with the German Data Protection Act (Bundesdatenschutzgesetz). The German Data Protection Act is the strictest regulation in the EU.
- Should a client require the collection of personal data for further technical functions, the client must encrypt the data before transmitting them to Ingenious Technologies.
- We provide our clients with the functionalities, with which every end user can use to turn off the tracking of their devices at any time and permanently through an opt-out procedure, should they wish to.
- All stored data are fragmented, will not be used individually and cannot be reassembled without the relevant knowledge of the underlying algorithm and applied logic.

That is how we assure our clients and their end users of the maximum possible protection of personal information – data protection according to the German Data Protection Act with conviction!

Yours sincerely,



Christian Kleinsorge
CEO Ingenious Technologies AG