

## **EH Health and Wellness LLP**

Palmgrove Road 20

560047 Bangalore, Indien

Email: [connect@emotionalerhunger.de](mailto:connect@emotionalerhunger.de)



# **Privacy Policy**

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## **1. Responsible Entity**

The responsible entity within the meaning of data protection laws is:

EH Health and Wellness LLP

Palmgrove Road 20

560047 Bangalore

India

Email: [connect@emotionalerhunger.de](mailto:connect@emotionalerhunger.de)

Website: [www.emotionalerhunger.de](http://www.emotionalerhunger.de)

### **1.1 Applicable Data Protection Law**

The processing of personal data is carried out in accordance with: the General Data Protection Regulation (GDPR) of the European Union, insofar as personal data of data subjects residing in the European Union are processed, as well as, additionally, the applicable national data protection laws of the provider's country of establishment (India), in particular the Digital Personal Data Protection Act (DPDP Act), where applicable.

For data subjects residing outside the European Union, the applicable national data protection regulations shall additionally apply.

## **2. General Information on Data Processing**

The protection of personal data is of high importance to us. We process personal data exclusively in accordance with the

applicable data protection regulations and in compliance with the principles of lawfulness, purpose limitation, data minimization, transparency, and data security.

Personal data is processed only to the extent necessary for:

- the operation of the website,
- the provision of our services and digital content,
- the processing of bookings, orders, and payments,
- the implementation of programs, coachings, workshops, retreats, and events,
- communication with users and customers,
- contract performance and administration,
- the technical security and stability of the platform,
- compliance with legal obligations.

Processing is carried out in particular on the following legal bases:

- Art. 6(1)(b) GDPR (performance of a contract and pre-contractual measures),
- Art. 6(1)(c) GDPR (legal obligation),
- Art. 6(1)(f) GDPR (legitimate interest),
- Art. 6(1)(a) GDPR (consent), where such consent has been expressly given.

For data subjects outside the European Union, processing is carried out on the basis of the applicable national data protection regulations as well as internationally recognized data protection principles.

### **No Automated Decision-Making**

There is no automated decision-making within the meaning of Art. 22 GDPR, including profiling.

### **3. Definitions**

For the purposes of this Privacy Policy, the following terms shall have the meanings set out below:

#### **Personal Data**

Any information relating to an identified or identifiable natural person (e.g. name, email address, IP address, location data, payment data, user behavior).

#### **Data Subject**

Any natural person whose personal data is processed.

#### **Processing**

Any operation or set of operations performed on personal data, in particular the collection, recording, storage, modification, transmission, linking, retrieval, consultation, use, deletion, or destruction.

#### **Responsible Entity**

The legal entity that alone or jointly with others determines the purposes and means of the

processing of personal data. For the purposes of this Privacy Policy, this is: EH Health and Wellness LLP.

#### **Processor**

Natural or legal persons who process personal data on behalf of the responsible entity (e.g. hosting providers, payment service providers, platform providers, IT service providers).

#### **Recipient**

Natural or legal persons, authorities, institutions, or other bodies to whom personal data is disclosed.

#### **Website / Platform**

The website operated at [www.emotionalerhunger.de](http://www.emotionalerhunger.de), including all subpages, member areas, login areas, restricted user areas, platform functions, booking systems, and integrated technical services.

#### **User**

Any person who visits or uses the website or platform.

#### **Customer / Client**

Any natural or legal person who books, purchases, or makes use of the provider's services or products.

#### **Digital Content**

All digitally provided content such as e-books, workbooks, videos, audios, online courses, webinars, programs, streaming content, downloads, platform content, and comparable digital formats.

#### **Consent**

Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they signify agreement to the processing of their personal data.

#### **Third Parties**

External service providers, platforms, or

systems used in the course of service provision (e.g. hosting providers, payment service providers, video platforms, analytics tools, newsletter systems).

#### **4. Collection and Processing of Personal Data**

The protection of personal data is of high importance to EH Health and Wellness LLP. Personal data is processed only insofar as this is necessary and a legal basis exists for such processing.

Processing is carried out in particular:

- for the provision of the website and platform functions,
- for contract performance and service provision,
- for communication with users and customers,
- for the processing of bookings and payments,
- for the fulfillment of legal obligations,
- to ensure technical security and stability,
- for the further development of the services and the platform.

##### **4.1 Types of Data Processed**

Depending on the use of the website and the services, the following personal data may in particular be processed:

###### **Master Data**

- Name
- Address
- Country of residence

- Language settings

###### **Contact Data**

- Email address
- Telephone number

###### **Contract and Booking Data**

- Booked services and products
- Membership status
- Contract terms
- Payment status
- Invoice data
- Booking history

###### **Payment Data**

- Payment method
- Payment status
- Transaction information  
*(The actual payment processing is carried out via external payment service providers; payment data is not fully stored on our own systems.)*

###### **Usage and Access Data**

- IP address
- Date and time of access
- Visited pages
- Browser used
- Operating system
- Referrer URL
- Device information

### **Communication Data**

- Content of emails
- Contact form inquiries
- Support requests
- Booking-related communication
- Program documents and organizational communication

### **Platform and Usage Data**

- Login data
- User account information
- Platform activities
- Course progress
- Membership usage
- Access logs

### **4.2 Data Minimization and Purpose Limitation**

Only personal data is processed that:

- is necessary for the respective purpose,
- is proportionate to the purpose,
- is lawfully collected,
- is processed for specific, defined purposes.

Processing for other purposes takes place only if:

- a legal basis exists, or
- the data subject has given explicit consent.

### **4.3 Disclosure of Data**

Personal data is disclosed only if:

- it is necessary for the performance of a contract,
- a legal obligation exists,
- consent has been given, or
- external service providers are involved within the scope of commissioned processing.

Recipients may include in particular:

- hosting providers,
- payment service providers,
- platform providers,
- IT service providers,
- accounting and billing service providers,
- communication services,
- analytics and security systems.

### **5. Purposes of Processing**

The processing of personal data by EH Health and Wellness LLP is carried out exclusively for clearly defined, legitimate, and lawful purposes.

Data processing serves in particular the following purposes:

#### **5.1 Contractual Purposes**

- Initiation, conclusion, and performance of contracts
- Processing of bookings and orders
- Management of memberships and user accounts
- Provision of booked services and content

- Implementation of coachings, programs, workshops, retreats, and events
- Contract administration and documentation

## **5.2 Communication**

- Contact and correspondence with users and customers
- Responding to inquiries
- Support and customer service
- Organizational communication
- Sending information in connection with services, bookings, and contracts

## **5.3 Payment Processing and Accounting**

- Execution of payment processes
- Processing of transactions
- Invoicing
- Accounting
- Tax documentation obligations
- Payment monitoring and receivables management

## **5.4 Technical Operation and Security**

- Operation, maintenance, and administration of the website and platform
- Ensuring the functionality of technical systems
- IT security
- Protection against misuse, fraud, and unauthorized access
- Error analysis and system optimization

- Ensuring platform stability

## **5.5 Organization and Administration**

- Internal administrative processes
- Organizational procedures
- Documentation
- Quality management
- Further development of services and platform functions

## **5.6 Legal Obligations**

- Fulfillment of statutory retention obligations
- Fulfillment of tax obligations
- Fulfillment of commercial law obligations
- Fulfillment of regulatory requirements
- Enforcement of legal claims
- Defense against legal claims

## **5.7 Legitimate Interests**

- Economic operation of the company
- Ensuring business activities
- Protection of company interests
- Protection of platform infrastructure
- Protection of users
- Prevention of misuse and unlawful use

## **5.8 Consent-Based Purposes**

Where explicit consent has been given, personal data is additionally processed for:

- marketing purposes,

- information mailings,
- newsletter distribution,
- personalized content,
- analysis and evaluation purposes.
- tax obligations,
- commercial law obligations,
- accounting obligations,
- statutory retention obligations,
- regulatory requirements.

Consent may be withdrawn at any time with effect for the future.

## 6. Legal Bases for Processing (GDPR)

Insofar as personal data of data subjects residing in the European Union is processed, such processing is carried out on the basis of the General Data Protection Regulation (GDPR).

The processing of personal data is carried out on the following legal bases pursuant to Art. 6 GDPR:

### 6.1 Performance of a Contract and Pre-Contractual Measures

Art. 6(1)(b) GDPR

Processing is necessary for the performance of a contract or for the implementation of pre-contractual measures, in particular:

- for bookings,
- for orders,
- for the conclusion of contracts,
- for the use of memberships,
- for the provision of digital content,
- for the implementation of coachings, programs, workshops, retreats, and events.

### 6.2 Legal Obligations

Art. 6(1)(c) GDPR

Processing is carried out to fulfill legal obligations, in particular:

### 6.3 Legitimate Interests

Art. 6(1)(f) GDPR

Processing is carried out to safeguard the legitimate interests of the provider, in particular:

- economic operation of the company,
- IT security,
- operation of the platform,
- prevention of misuse,
- fraud prevention,
- protection of systems,
- protection of users,
- enforcement of legal claims,
- defense against legal claims.

In all cases, a balancing of interests is carried out between the legitimate interests of the provider and the interests of the data subjects that merit protection.

### 6.4 Consent

Art. 6(1)(a) GDPR

Where the data subject has given explicit consent, personal data is processed on the basis of such consent, in particular for:

- newsletter distribution,
- marketing communication,
- analytics and tracking measures,

- personalized content,
- information mailings.

Consent may be withdrawn at any time with effect for the future.

This provision expressly applies only to data subjects residing in the EU. For all other persons, the applicable national data protection laws and the contractual data protection provisions of this Privacy Policy shall apply.

## 7. Hosting & Servers

This website, as well as the associated platforms, user areas, membership areas, and digital systems, are operated via external hosting service providers (ALL-INKL.COM).

The processing of personal data takes place on servers of hosting providers who act either as processors within the meaning of data processing agreements or as independent controllers in accordance with the applicable data protection laws.

Data may be processed in:

- the European Union,
- third countries outside the European Union (in particular India and other countries), depending on the technical service providers and systems used.

Where personal data is processed in third countries outside the European Union, this is carried out exclusively in compliance with the data protection requirements of the GDPR, in particular on the basis of:

- Art. 44 et seq. GDPR (data transfers to third countries),

- appropriate safeguards (e.g. EU Commission Standard Contractual Clauses), where required,
- contractual data protection agreements,
- technical and organizational protection measures.

The provider ensures that appropriate security measures are taken to protect personal data against:

- loss,
- misuse,
- unauthorized access,
- unauthorized disclosure,
- alteration,
- destruction.

The hosting and infrastructure service providers used process personal data exclusively in accordance with the instructions of the provider or on the basis of their own data protection responsibility and in compliance with the applicable data protection laws.

## 8. Access Data & Log Files

When accessing this website as well as the associated platforms and systems, information is automatically collected by the hosting provider and the technical systems used and stored in so-called server log files.

This data includes in particular:

- IP address of the requesting device,
- date and time of access,
- accessed page or file,

- amount of data transferred,
- website from which access is made (referrer URL),
- browser type and browser version used,
- operating system used,
- device type used,
- name of the access provider.

The collection of this data is carried out for technical and security-related reasons, in particular to:

- ensure a smooth connection setup of the website,
- ensure convenient use of the website,
- system security and stability,
- error analysis,
- prevention of misuse and fraud,
- defense against attacks (e.g. DDoS, hacking attempts).

This data is not used to draw conclusions about the identity of individual persons.

Processing is carried out on the basis of:

- Art. 6(1)(f) GDPR (legitimate interest),
- the provider's legitimate interest in the technical security, stability, and functionality of the website and systems.

The log file data is stored only for as long as necessary for the purposes stated and is then automatically deleted, unless statutory retention obligations prevent deletion.

No merging of this data with other personal data takes place.

## 9. Cookies & Tracking

### 9.1 Use of Cookies

This website uses cookies and similar technologies (e.g. local storage, session storage, pixels, tags) to ensure the functionality of the website, provide user-friendly content, and enable certain features.

For users in the EU, the setting and reading of cookies and similar technologies are additionally subject to the applicable regulations on the protection of privacy in electronic communications (e.g. the ePrivacy Directive and its national implementations).

Cookies are small text files that are stored on users' devices and contain information that can be retrieved when the website is visited again.

The following types of cookies are used:

#### a) Technically Necessary Cookies

These cookies are required for the operation of the website, platform, user accounts, and membership areas.

They serve in particular:

- the secure use of the website,
- authentication and login,
- storage of language settings,
- storage of login states,
- functioning of shopping carts and booking systems,
- use of restricted member areas,

- system security.

These cookies are necessary for the operation of the website. Users may block them via browser settings; however, this may result in certain website functions (in particular login, membership, and booking functions) not being available or only being usable to a limited extent.

**Legal basis:**

Art. 6(1)(f) GDPR (legitimate interest) and Art. 6(1)(b) GDPR (performance of a contract)

**b) Functional Cookies**

These cookies enable extended functions and personalization, e.g.:

- storage of individual settings,
- user preferences,
- comfort functions,
- personalization of content.

**Legal basis:**

Art. 6(1)(a) GDPR (consent)

**c) Analytics and Statistics Cookies**

These cookies are used to analyze the use of the website in order to improve content, structure, user guidance, and performance. They enable, for example:

- reach measurement,
- usage statistics,
- page views,
- interactions,
- time spent on pages,
- technical optimizations.

**Legal basis:**

Art. 6(1)(a) GDPR (consent)

**d) Marketing and Tracking Cookies**

These cookies serve marketing purposes, reach measurement, and possibly personalized advertising.

They may be used in particular for:

- conversion tracking,
- retargeting,
- marketing analysis,
- campaign measurement,
- cross-platform evaluation.

**Legal basis:**

Art. 6(1)(a) GDPR (consent)

**9.2 Consent Management (Cookie Consent)**

When visiting the website for the first time, users are informed about the use of cookies via a cookie consent banner.

Users have the option to:

- accept all cookies,
- allow only necessary cookies,
- select individual categories,
- refuse consent,
- withdraw or change consent at any time.

Consents are documented and can be changed at any time via the corresponding settings on the website.

**9.3 Withdrawal of Consent**

Consent given may be withdrawn at any time with effect for the future.

Withdrawal can take place via:

- the cookie settings on the website,
- the functions of the cookie consent tool,
- the settings in the respective browser.

#### 9.4 Deactivation of Cookies in the Browser

Users may deactivate, restrict, or delete cookies at any time via their browser settings.

This may, however, result in certain functions of the website, platform, or membership areas not being available or only usable to a limited extent.

#### 9.5 Third-Party Tracking Technologies

Where third-party tools are used (e.g. analytics, tracking, marketing, or social media tools), their use is carried out exclusively:

- on the basis of consent,
- within the framework of applicable data protection laws,
- in accordance with the respective privacy policies of the providers.

Detailed information on the tools and services used is provided separately in the respective subsections of this Privacy Policy.

### 10. User Accounts / Memberships

#### 10.1 Registration and User Accounts

For the use of certain services, memberships, restricted user areas, and platform functions, the creation of a personal user account is required.

As part of the registration process, the following personal data is processed in particular:

- First and last name
- Email address

- Username
- Password (stored in encrypted form)
- if applicable, billing data
- if applicable, payment information (via payment service providers)
- if applicable, profile data
- if applicable, usage and access data

The data is processed exclusively for the creation, management, and use of the user account and for the performance of the contract.

#### 10.2 Purpose of Data Processing

Processing is carried out in particular for the following purposes:

- creation and management of user accounts,
- authentication and login,
- provision of restricted content,
- management of memberships,
- access control to content and platform areas,
- processing of bookings and payments,
- communication with users,
- management of subscriptions and terms,
- support and service services,
- security and misuse prevention.

#### 10.3 Legal Bases for Processing

The processing of personal data in the context of user accounts and memberships is carried out on the basis of:

- Art. 6(1)(b) GDPR (performance of a contract),
- Art. 6(1)(c) GDPR (legal obligation),
- Art. 6(1)(f) GDPR (legitimate interest in secure platform operation),
- where applicable, Art. 6(1)(a) GDPR (consent).

#### 10.4 Storage and Duration

Data is stored:

- for the duration of the existing user account,
- for the duration of active memberships and contracts,
- within the scope of statutory retention obligations,
- as long as legitimate interests exist.

After termination of the user account, personal data is deleted, unless statutory retention obligations prevent deletion.

#### 10.5 Access Restrictions and Security

Access to user accounts is password-protected. Passwords are stored in encrypted form.

Technical and organizational security measures are used to protect data against:

- unauthorized access,
- loss,
- manipulation,
- misuse,
- unauthorized disclosure.

#### 10.6 Third-Party Systems

External service providers and platforms may be used for the technical implementation of user

accounts and memberships (e.g. hosting providers, membership systems, payment services, platform software).

Processing is carried out exclusively within the framework of:

- contractual agreements,
- data protection requirements,
- applicable international data protection regulations.

#### 11. Newsletter / Email Systems

If users subscribe to the newsletter or register for email information, personal data is processed.

**Processed data:**

- First and last name
- Email address
- IP address
- Time of registration
- Confirmation data (double opt-in)
- Usage data in connection with the newsletter (e.g. opens, clicks – if tracking is enabled)
- Technical metadata

**Purposes of processing:**

- Distribution of newsletters
- Sending information about offers, programs, products, and services
- Customer communication
- Marketing and information purposes

- Contract initiation
- Customer retention
- Service information
- System documentation

### 11.1 Legal Bases for Processing

Processing is carried out on the basis of:

- Art. 6(1)(a) GDPR (consent),
- Art. 6(1)(b) GDPR (performance of a contract / pre-contractual measures),
- Art. 6(1)(f) GDPR (legitimate interest in information, communication, and customer retention).

### 11.2 Double Opt-in Procedure

Newsletter registration is carried out using the double opt-in procedure. After registration, users receive a confirmation email in which they must actively confirm receipt of the newsletter.

### 11.3 Withdrawal

Consent may be withdrawn at any time. Withdrawal is possible via the unsubscribe link in the newsletter or by email to [connect@emotionalerhungler.de](mailto:connect@emotionalerhungler.de).

### 11.4 Storage Period

The data is stored for as long as the newsletter subscription exists. After unsubscribing, the data is deleted unless statutory retention obligations apply.

## 12. Communication (Contact Forms, Email)

When contacting us via contact forms, email, platform functions, or other communication channels, personal data is processed.

### 12.1 Processed Data:

- First and last name

- Email address
- if applicable, telephone number
- content of the message
- IP address
- timestamp of the contact
- technical metadata
- usage data
- system data

### 12.2 Purposes of Processing:

- processing of inquiries
- communication
- support
- consultation
- contract initiation
- contract performance
- organization of services
- customer care
- documentation
- quality assurance
- system security

### 12.3 Legal Bases for Processing

Processing is carried out on the basis of:

- Art. 6(1)(b) GDPR (performance of a contract / pre-contractual measures),
- Art. 6(1)(f) GDPR (legitimate interest in communication, organization, security, and service quality),

- Art. 6(1)(a) GDPR (consent, where required).

#### 12.4 Storage Period

Communication data is stored for as long as necessary to process the request. Beyond this, data is stored only within the scope of statutory retention periods.

#### 12.5 Confidentiality

The transmitted content is treated confidentially. Disclosure to third parties does not take place unless a legal obligation exists or explicit consent has been given.

### 13. Video Conferencing (e.g. Zoom, comparable services)

For the provision of online coachings, consultations, online workshops, programs, group formats, meetings, and events, the provider uses video conferencing systems and digital communication platforms (e.g. Zoom or comparable providers). In this context, personal data is processed.

#### 13.1 Processed Data

Depending on the use and functionality of the respective service, the following data may in particular be processed:

- First and last name
- Email address
- if applicable, username
- profile picture
- IP address
- device information
- location data (technically required)
- audio, video, and image data

- chat content
- communication metadata
- connection data
- usage data
- technical log data
- system information

#### 13.2 Purposes of Processing

Processing is carried out in particular for the following purposes:

- conduct of online coachings and consultations
- conduct of online workshops, programs, and group formats
- communication with participants and customers
- organization, implementation, and follow-up of services
- customer care and service provision
- technical provision and security of communication

#### 13.3 Legal Bases for Processing

Processing is carried out on the basis of:

- Art. 6(1)(b) GDPR (performance of a contract / pre-contractual measures),
- Art. 6(1)(f) GDPR (legitimate interest in the secure and efficient provision of online services and communication),
- Art. 6(1)(a) GDPR (consent, where required, e.g. for recordings).

#### 13.4 Commissioned Processing

Where external video conferencing providers are used, processing is carried out within the

framework of data processing agreements pursuant to Art. 28 GDPR, where required.

### 13.5 Data Transfer to Third Countries

Depending on the provider, personal data may be transferred to third countries (e.g. outside the EU/EEA). This takes place only in compliance with the legal requirements of the GDPR, in particular through:

- adequacy decisions of the EU Commission,
- Standard Contractual Clauses (SCCs),
- appropriate safeguards pursuant to Art. 44 et seq. GDPR,
- additional technical and organizational protective measures.

### 13.6 Recordings

Video or audio recordings are carried out exclusively:

- after prior information of the participants, and
- only with the explicit consent of all affected persons.

Personal one-to-one coachings and consultations are generally not recorded unless expressly agreed otherwise.

### 13.7 Storage Period

Data is stored only for as long as necessary for the performance of the respective service or as long as statutory retention obligations apply.

## 14. Digital Content & Platform Access

### 14.1 Type of Digital Services

The provider offers digital content and services exclusively in electronic form, in particular:

- online courses
- programs
- membership content
- video and audio content
- e-books
- workbooks
- online workshops
- webinars
- recordings
- streaming content
- downloadable content
- restricted member areas
- digital learning platforms
- digital working materials

There is no entitlement to physical delivery.

### 14.2 Access to Platforms and Member Areas

Access to digital content is provided via:

- restricted user areas
- member areas
- login systems
- online platforms
- streaming platforms
- download areas

Access may require the creation of a user account.

Access credentials are:

- personal,

- confidential,
- non-transferable.

The disclosure of access credentials to third parties is prohibited.

### 14.3 Scope of Use

The digital content and platform access provided are intended exclusively for:

- private use,
- personal development,
- personal education,
- individual use within the scope of the booked service.

Use for business, commercial, or professional purposes is permitted only if expressly agreed.

### 14.4 Technical Requirements

The use of digital content requires:

- a functioning internet connection,
- suitable end devices,
- compatible software,
- up-to-date browser versions,
- if applicable, installed apps or programs.

The provider assumes no liability for usage restrictions resulting from technical requirements on the user's side.

### 14.5 Availability

The provider endeavors to make digital content and platforms available with as little disruption as possible.

There is no entitlement to:

- permanent availability,

- uninterrupted use,
- continuous platform operation.

### 14.6 Blocking and Withdrawal of Access

The provider is entitled to block or withdraw access to digital content, platforms, member areas, user accounts, and digital services in whole or in part, temporarily or permanently, if there is a justified reason.

A justified reason exists in particular in cases of:

- violation of contractual provisions or terms of use,
- violation of this Privacy Policy or the Terms and Conditions,
- misuse of platform access or user accounts,
- unauthorized disclosure of access credentials,
- unauthorized disclosure, duplication, or distribution of content,
- circumvention of technical protection mechanisms,
- manipulation of systems or platforms,
- payment arrears or failed payments,
- suspicion of abusive use,
- violation of statutory provisions,
- security-related incidents,
- protection of other users,
- protection of the platform, systems, and content,
- protection of the integrity of the services.

Blocking or withdrawal may in particular include:

- deactivation of the user account,
- blocking of login access,
- withdrawal of membership access,
- withdrawal of platform rights,
- restriction of individual functions,
- complete exclusion from digital services.

There is no entitlement to restoration of access unless a statutory entitlement exists.

Any further statutory claims of the provider remain unaffected.

## 15. Analytics Tools

Google Analytics is used to analyze and optimize the website. Google Analytics is a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics uses cookies and similar technologies that enable an analysis of the use of the website. The information generated by these technologies about the use of this website (e.g. IP address, user behavior, device information, location data, technical information) is generally transmitted to Google servers and stored there. This may also involve transfers to third countries (e.g. the USA).

IP anonymization (IP masking) is used, meaning that IP addresses within the EU are shortened before transmission to servers outside the EU.

### Purposes of processing:

- analysis of user behavior
- optimization of the website
- reach measurement

- performance optimization
- technical improvement of the platform

### Legal basis:

Art. 6(1)(a) GDPR (consent)

The use of Google Analytics takes place exclusively after prior consent via the cookie consent tool.

Further information on data processing by Google:

<https://policies.google.com/privacy>

Opt-out:

<https://tools.google.com/dlpage/gaoptout>

## 16. Third-Party Providers

To provide the website, platform, digital services, and offerings, the provider uses selected technical service providers. These include in particular:

- **Hosting provider:** ALL-INKL.COM
- **Analytics service:** Google Analytics (Google Ireland Ltd.)
- **Newsletter and email system:** Mailchimp (The Rocket Science Group LLC)
- **Video conferencing systems:** e.g. Zoom or comparable providers
- **Technical platform and system providers** for the provision of the website, membership areas, and digital content

The integration of these third-party providers takes place exclusively insofar as this is:

- necessary for contract performance,
- required for the technical functionality of the platform,

- necessary for the provision of services,
- based on a legal basis, or
- based on the users' consent.

Where required, data processing agreements pursuant to Art. 28 GDPR are concluded with the respective service providers.

### **17. International Data Transfers**

Since the provider is based in India and international technical service providers are used, personal data may be transferred to third countries outside the European Union (EU) and the European Economic Area (EEA).

Such data transfers are carried out exclusively in compliance with data protection requirements, in particular the GDPR.

Transfers take place only if at least one of the following conditions is met:

- an adequacy decision of the EU Commission exists,
- appropriate safeguards pursuant to Art. 46 GDPR are in place,
- Standard Contractual Clauses (SCCs) have been concluded,
- binding corporate rules (BCRs) exist,
- the data subject has given explicit consent,
- the transfer is necessary for the performance of a contract,
- a legal obligation exists.

In addition, appropriate technical and organizational measures (TOMs) are implemented to ensure an adequate level of data protection, in particular:

- encryption,
- access restrictions,
- authentication systems,
- security protocols,
- data security concepts,
- access controls,
- logging,
- backup and recovery systems.

Processing is always carried out in accordance with the principles of data minimization and purpose limitation.

### **18. Storage Period**

Personal data is stored only for as long as necessary for the respective purposes of processing or as long as statutory retention obligations exist.

The storage period is determined in particular by:

- the type of data processed,
- the purpose of processing,
- contractual obligations,
- statutory retention obligations,
- tax and commercial law requirements,
- legitimate interests of the provider,
- granted consents,
- statutory limitation periods.

Data is deleted or blocked as soon as:

- the purpose of processing no longer applies,
- a given consent has been withdrawn,
- no statutory retention obligations exist,
- no legitimate interests in storage remain,
- a request for deletion is asserted and no statutory reasons oppose it.

Where statutory retention obligations exist, data is stored for the duration of the respective statutory periods.

After expiry of the respective periods, the data is routinely deleted in accordance with legal requirements.

## **19. Rights of Data Subjects**

Data subjects have the following rights under the GDPR:

### **19.1 Right of Access**

Right to obtain information about the personal data processed in accordance with Art. 15 GDPR.

### **19.2 Right to Rectification**

Right to rectification of inaccurate or incomplete data in accordance with Art. 16 GDPR.

### **19.3 Right to Erasure**

Right to erasure of personal data (“right to be forgotten”) in accordance with Art. 17 GDPR, provided that no statutory retention obligations oppose this.

### **19.4 Right to Restriction of Processing**

Right to restriction of processing in accordance with Art. 18 GDPR.

### **19.5 Right to Data Portability**

Right to data portability in accordance with Art. 20 GDPR.

### **19.6 Right to Object**

Right to object to the processing of personal data in accordance with Art. 21 GDPR, in particular where processing is based on legitimate interests.

### **19.7 Right to Withdraw Consent**

Right to withdraw consent at any time with effect for the future, in accordance with Art. 7(3) GDPR.

These rights may be exercised at any time by sending an informal request to:

EH Health and Wellness LLP  
 Palmgrove Road 20  
 560047 Bangalore  
 India  
 Email: connect@emotionalerhunger.de

Requests will be handled within the legal framework of the GDPR.

## **20. Right to Lodge a Complaint with Supervisory Authorities**

Data subjects have the right to lodge a complaint with a competent data protection supervisory authority if they believe that the processing of their personal data violates applicable data protection regulations.

For data subjects residing in the European Union, this right exists in particular with the data protection supervisory authority of their respective country of residence.

For data subjects outside the European Union, the right to lodge a complaint is governed by the applicable national data protection laws.

Irrespective of this, data subjects may at any time contact the provider directly:

EH Health and Wellness LLP  
Palmgrove Road 20  
560047 Bangalore  
India  
Email: connect@emotionalerhunger.de

The provider endeavors to clarify data protection concerns transparently, cooperatively, and within the legal framework.

## 21. Data Security

The provider implements appropriate technical and organizational measures to protect personal data against:

- loss,
- destruction,
- manipulation,
- unauthorized access,
- unauthorized disclosure,
- misuse,
- unauthorized processing.

These security measures include in particular:

- access restrictions,
- authentication mechanisms,
- authorization concepts,
- technical protection mechanisms,
- secure server structures,
- encryption technologies (where technically implemented),
- organizational data protection measures.

The security measures are continuously adapted and improved in line with technological developments.

However, complete protection against all risks is not possible, as internet-based data transmissions may inherently involve security vulnerabilities.

## 22. Validity and Amendments to this Privacy Policy

This Privacy Policy is valid as of January 2026.

The provider reserves the right to amend this Privacy Policy at any time if this becomes necessary due to:

- legal changes,
- technical developments,
- organizational adjustments,
- expansion or modification of services,
- introduction of new systems, tools, or platforms,
- changes in data processing.

The current version is always available on the website.

Users will be informed in an appropriate manner of any material changes affecting the rights of data subjects.