LEGAL

Privacy Notice

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The English version prevails.

Privacy Notice

Version v2026-12-01 · Effective 1 December 2026

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1. About this Privacy Notice

1.1 Scope

This Privacy Notice explains how PUSH - CONSULTING LLC processes personal data as a controller when you:

- visit our website growmino.de (including the blog);
- contact us, request a demo or book an appointment;
- register for and use an account in Growmino One (CRM at crm.growmino.de, Booking at booking.growmino.de, HR at hr.growmino.de and further modules);
- conclude or perform a contract with us for software or agency services ("Growmino" professional services);
- receive emails from us or connect a Google or Microsoft account in the CRM.

1.2 Data processed on behalf of our customers

Our customers use Growmino One to manage their own data, for example leads, contacts, call recordings, bookings, contracts, invoices, employee time records or member data ("Customer Data"). For Customer Data, **the respective customer is the controller** and PUSH - CONSULTING LLC acts only as its **processor** under the Data Processing Addendum (DPA) at growmino.de/legal/dpa. If you are a lead, contact, end customer, employee or member of one

of our customers and wish to exercise your rights regarding that data, please contact that customer directly. If you contact us, we will forward your request to the customer without undue delay.

1.3 Business offering

Our services are offered exclusively to businesses. Consumers may not use them. This Privacy Notice nevertheless protects every individual whose data we process, in particular the employees and representatives of our customers and prospects.

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2. Controller, EU representative, contact

2.1 Controller

PUSH - CONSULTING LLC
Limited Liability Company organised under the laws of the State of Wyoming, USA
30 N Gould St Ste N, Sheridan, WY 82801, USA
Represented by David Wolff (Sole Member and Manager)
Wyoming Secretary of State, Filing ID 2026-002106936
Email: office@growmino.de · Phone: +49 176 31685433

2.2 Representative in the EU (Art. 27 GDPR)

We have no establishment in the European Union. We have appointed as our representative in the Union:
David Wolff, sole proprietorship, Grüne Gärtel 7, 76316 Malsch, Germany, office@growmino.de.
Supervisory authorities and data subjects may contact our representative, in addition to or instead of us, on all issues related to the processing of personal data.

2.3 Data protection officer

We have not designated a data protection officer, because the legal requirements for a mandatory designation are not met. For all data protection questions, please contact office@growmino.de (subject "Privacy").

3. Website visits and server logs

3.1 Data

When you access growmino.de, your browser automatically transmits: IP address, date and time of the request, requested URL, referrer URL, HTTP status code, amount of data transferred, browser type and version, operating system.

3.2 Purpose and legal basis

Delivery of the website, stability, IT security and defence against attacks. Legal basis: Art. 6(1)(f) GDPR; our legitimate interest is the secure and reliable operation of the website. Storing and reading information on your device that is strictly necessary for providing the website is permitted under Section 25(2) no. 2 TDDDG (German Telecommunications Digital Services Data Protection Act).

3.3 Hosting

The website is hosted on a virtual server of Hostinger International Ltd., Cyprus, with server location in Lithuania (EU). Hostinger acts as our processor. Customer Data from the Growmino One apps is not stored on this server.

3.4 Retention

Server log files are deleted after 14 days at the latest, unless a specific security incident requires longer retention as evidence; in that case only the affected entries are kept until the incident has been resolved.

3.5 Fonts and images

Fonts and images are hosted on our own server. No connection to Google Fonts or external image CDNs is established when you load a page.

4. Contact requests and demo requests

4.1 Data

If you contact us by email, phone, through a form on our website or via a messenger, we process the data you provide, typically name, company, position, email address, phone number, the content of your request and the time of contact.

4.2 Purpose and legal basis

Handling your request and, if requested, preparing an offer. Legal basis: Art. 6(1)(b) GDPR, where your request concerns the conclusion of a contract; otherwise Art. 6(1)(f) GDPR (legitimate interest in answering business enquiries). We record requests in our own instance of Growmino One CRM.

4.3 Retention

If no contract is concluded, we delete your data 24 months after our last contact, unless you have asked us to delete it earlier or statutory retention obligations apply (for example to business letters). If a contract is concluded, Section 6 applies.

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5. Appointment booking

5.1 Booking via Google Calendar

Buttons on our website such as "Book a free consultation" or "Request a demo" open an external appointment booking page provided by Google (Google Calendar appointment schedules). No data is transmitted to Google before you click the link.

5.2 Data

When you book, Google collects on our behalf: name, email address, chosen time slot, and the optional information you enter (for example phone number, company, topic). Google sends us and you a calendar invitation.

5.3 Purpose, legal basis, recipient

Scheduling and conducting the appointment. Legal basis: Art. 6(1)(b) GDPR (pre-contractual steps at your request) and Art. 6(1)(f) GDPR (efficient organisation of appointments). The booking service is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, which processes booking data as our processor. Google LLC, USA, may be involved; transfers are based on the EU-U.S. Data Privacy Framework (DPF) and the Standard Contractual Clauses. If you are signed in to your own Google account, Google may additionally process data as an independent controller under its own privacy policy (policies.google.com/privacy).

5.4 Retention

Appointment data is deleted 24 months after the appointment if no contract is concluded; otherwise Section 6 applies.

6. Registration, account and contract

6.1 Data

When you register for Growmino One or conclude a contract for agency services, we process: first and last name, business email address, phone number (optional), company name, legal form, address, VAT identification number, role and authority to represent, password (stored only as a hash), two-factor authentication settings, chosen modules and plans, number of users, contract and usage data (for example login times, plan changes, telephony and SMS volumes for billing), and correspondence concerning the contract.

6.2 Purpose and legal basis

Conclusion and performance of the contract with the customer, provision of the account, user administration, billing of usage-based fees. Legal basis: Art. 6(1)(b) GDPR. Where you act as an employee or representative of a customer and are not yourself party to the contract, the legal basis is Art. 6(1)(f) GDPR; our legitimate interest is the performance of the contract with your organisation.

6.3 Verification

To ensure that we contract only with businesses, we may check the VAT identification number you provide against the EU VIES database. Legal basis: Art. 6(1)(c) GDPR where we are subject to a legal obligation under EU or Member State law, otherwise Art. 6(1)(f) GDPR (correct tax treatment, exclusion of consumers).

6.4 Retention

Account data is stored for the duration of the contract. After the contract or subscription ends, the customer may export its data for 90 days (Section 10.9 of the Terms). We then delete the account data within a further 30 days; backups are overwritten within 90 days. Data we must keep for proof or statutory reasons (Sections 7 and 8) is retained separately and with restricted access.

7. Contract acceptances and evidence

7.1 Data

When legal documents are accepted (for example the Terms of Service, the DPA or an Order Form), we record in an immutable protocol: user ID, organisation, name and email address of the accepting person, document key and version, a cryptographic hash of the accepted text,

the wording of the checkbox, timestamp, browser user agent and the IP address in shortened form (the last octet of IPv4 addresses or the last 80 bits of IPv6 addresses removed). The shortened IP address is additionally stored as a keyed hash (HMAC) so that it can be compared with evidence without storing the full address.

7.2 Purpose and legal basis

Proof of conclusion and content of the contract, defence against legal claims. Legal basis: Art. 6(1)(f) GDPR; our legitimate interest is being able to prove which version a customer accepted and when. Where consent records are concerned, Art. 6(1)(c) in conjunction with Art. 7(1) GDPR also applies.

7.3 Retention

Three years after the end of the contract, calculated from the end of the calendar year in which the contract ended. If a dispute is pending, until it is concluded.

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8. Invoicing and payment

8.1 Data

Invoice address, VAT identification number, invoice items, payment status, the last four digits and type of the payment card, payment history.

8.2 Stripe

Card payments are processed by Stripe Payments Europe, Ltd., 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland, together with Stripe, Inc., USA. Stripe processes the payment data as an **independent controller** and is subject to its own legal obligations (for example anti-money laundering, fraud prevention). We do not receive or store full card numbers. Stripe's privacy policy: stripe.com/privacy. Stripe transfers data to the USA on the basis of the DPF and the Standard Contractual Clauses.

8.3 Purpose and legal basis

Collection of fees, accounting and compliance with tax and commercial law. Legal basis: Art. 6(1)(b) GDPR (payment processing), Art. 6(1)(c) GDPR where we are subject to retention obligations under EU or Member State law, and otherwise Art. 6(1)(f) GDPR (orderly accounting, tax compliance in all relevant jurisdictions, proof towards tax authorities).

8.4 Retention

Invoices and accounting records are kept for 10 years, or longer where a statutory retention obligation requires this. Other payment data is deleted three years after the end of the contract.

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9. Security logs

9.1 Data

For the Growmino One apps we log security-relevant events: login attempts (successful and failed), password resets, changes to two-factor authentication, changes of roles and permissions, administrative actions, API key usage, IP address, user agent and timestamp.

9.2 Purpose and legal basis

Detection and defence against unauthorised access and abuse, investigation of incidents, protection of the accounts and of Customer Data. Legal basis: Art. 6(1)(f) GDPR and our obligation under Art. 32 GDPR.

9.3 Retention

90 days. Entries relevant to a specific security incident are kept until it has been resolved.

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10. Support

10.1 Data

Name, contact details, organisation, content of your request, correspondence, and, if required for resolving the request and authorised by the customer, limited access to the affected account.

10.2 Purpose and legal basis

Handling support requests. Legal basis: Art. 6(1)(b) GDPR, for employees of customers Art. 6(1)(f) GDPR. Where support requires access to Customer Data, we act as processor under the DPA.

10.3 Retention

Three years after the request has been closed, calculated from the end of that calendar year (general limitation period for claims).

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11. Emails

11.1 Service emails

We send emails necessary for the account and the contract, for example registration confirmation, security notices, invoices, payment-failure notices, renewal reminders, notices of amendments to terms and of new sub-processors, and maintenance announcements. Legal basis: Art. 6(1)(b) GDPR; for users who are not themselves party to the contract, Art. 6(1)(f) GDPR (informing the users of our customers). Service emails cannot be unsubscribed from separately while the account exists. They are sent via the email infrastructure of our hosting provider Lovable (sender domain notify.growmino.de).

11.2 Marketing emails

We send newsletters and product news **only with your consent** (Art. 6(1)(a) GDPR). We use a double opt-in procedure and log the registration, the confirmation and their timestamps as evidence (Art. 6(1)(c) in conjunction with Art. 7(1) GDPR). You can **withdraw your consent at any time** with effect for the future, via the unsubscribe link in every email or by writing to office@growmino.de. Your email address is then deleted from the mailing list; the evidence of consent and withdrawal is kept for three years.

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12. Connected Google and Microsoft accounts (CRM)

12.1 Process

In the CRM, our customers and their users can connect a Google account (Gmail, Google Calendar, Google Workspace) or a Microsoft account (Microsoft 365, Outlook) in order to send emails from the CRM and to synchronise emails and calendar entries. Sign-in to Growmino One itself takes place with email address and password; we do not offer sign-in with Google. Google Ireland Limited or Google LLC and Microsoft Ireland Operations Limited or Microsoft Corporation act as independent controllers for their own accounts and for the authorisation process.

12.2 Permissions and data received

We request only the permissions required for the functions chosen by the customer (sending emails, reading the emails and calendar entries to be synchronised). Where a customer administrator configures central access for its domain (domain-wide delegation), this takes place on the basis of the customer's settings. We do not receive your Google or Microsoft password.

12.3 Roles, purpose, legal basis, retention

The emails, calendar entries and contacts synchronised into the CRM are Customer Data and are processed on behalf of the customer under the DPA (Section 1.2). We are controller only for the technical connection data required to operate and secure the connection (account ID, email address, permission status, timestamps). Legal basis: Art. 6(1)(b) GDPR; for users who are not themselves party to the contract, Art. 6(1)(f) GDPR. This connection data is deleted within 30 days after the connection is removed, at the latest with the account (Section 6.4).

12.4 Limited Use

Growmino One's use and transfer of information received from Google APIs will adhere to the Google API Services User Data Policy, including the Limited Use requirements.

We do not use information received from Google APIs for advertising, do not sell it and do not use it to train AI models. This also applies where a customer connects a Google mailbox or calendar in the CRM; such connections are processed on behalf of the customer under the DPA.

12.5 Removing the connection

You can remove the connection at any time in the CRM settings and in your Google account at myaccount.google.com/permissions or your Microsoft account at myaccount.microsoft.com.

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13. Google Analytics 4 (growmino.de only)

13.1 Only with consent

On the website growmino.de, and **only there**, we use Google Analytics 4 if, and only after, you have consented via our cookie banner. Without your consent, no analytics tag is loaded and no data is transmitted to Google ("Basic Consent Mode"). Legal basis for storing and reading information on your device: Section 25(1) TDDDG; for the subsequent processing: Art. 6(1)(a) GDPR.

13.2 Data

Pseudonymous identifiers stored in cookies, pages visited, time and duration of visit, referrer, approximate location (country/region, derived from the IP address, which Google Analytics 4 does not store for users in the EU), device type, browser, operating system, screen resolution, and interactions such as clicks on buttons.

13.3 Purpose

Statistical analysis of the use of our website to improve content and usability. We do not combine this data with account data from Growmino One.

13.4 Settings

Google Signals and the linking with Google Ads are deactivated; data sharing with Google for its own products is deactivated; no user ID is set. The retention period for event data in Google Analytics is set to **2 months**.

13.5 Recipient and transfer

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, acts as our processor. Data may be transferred to Google LLC, USA. Google LLC is certified under the EU-U.S. Data Privacy Framework; the transfer is therefore based on the adequacy decision of the European Commission of 10 July 2023 (Art. 45 GDPR), and additionally on Standard Contractual Clauses.

13.6 Withdrawal

You can **withdraw your consent at any time** with effect for the future via the link "Cookie settings" in the footer of the website. The lawfulness of processing carried out before withdrawal is not affected.

13.7 No tracking in the apps

In the Growmino One apps (CRM, Booking, HR and further modules) we use no analytics, advertising or tracking tools.

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14. Consent log

14.1 Data

When you make a choice in the cookie banner, we record: a randomly generated consent ID, the version of the banner, your selection per category, the timestamp and the user agent of

your browser. We do not store your IP address in the consent log.

14.2 Purpose, legal basis, retention

Proof that consent was validly obtained. Legal basis: Art. 6(1)(c) in conjunction with Art. 7(1) GDPR. Retention: three years from the date of the respective choice.

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15. YouTube video (click to play)

On our website we show an explanatory video hosted by YouTube. The video is integrated in privacy-enhanced mode (youtube-nocookie.com) and is loaded **only after you click on the preview image**. Before that, no connection to YouTube is established. After your click, YouTube (Google Ireland Limited; Google LLC, USA) receives your IP address, the URL of the page and technical browser information, and may store information on your device. Legal basis: your consent by clicking, Section 25(1) TDDDG and Art. 6(1)(a) GDPR. Transfers to the USA are based on the DPF. Google's privacy policy: policies.google.com/privacy.

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16. Cookies and similar technologies

Name	Provider	Where	Purpose	Category	Storage period
`growmino_consent` (cookie, also containing a random consent ID with no personal reference)	PUSH - CONSULTING LLC	growmino.de	Stores your choice in the cookie banner	Strictly necessary	12 months, then you are asked again
`sb-*-auth-token` (local storage) and session data	PUSH - CONSULTING LLC (via Supabase)	crm./booking./hr.growmino.de	Login session, authentication	Strictly necessary	Until logout or expiry of the session
Security cookies of our CDN (for example `__cf_bm`)	Cloudflare, Inc. (via our hosting)	Apps	Bot detection, protection against attacks	Strictly necessary	Up to 30 minutes
`_ga`	Google	growmino.de	Distinguishing visitors (pseudonymous)	Analytics, **only after consent**	2 years

Name	Provider	Where	Purpose	Category	Storage period
`_ga_*`	Google	growmino.de	Maintaining the session state	Analytics, **only after consent**	2 years

Strictly necessary technologies are used on the basis of Section 25(2) no. 2 TDDDG and Art. 6(1)(b) or (f) GDPR. All other technologies are used only with your consent.

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17. Recipients and sub-processors

17.1 Principle

We disclose personal data only where this is necessary for the purposes described above, where you have consented or where we are legally obliged to do so. We do not sell personal data.

17.2 Service providers

The current list of our sub-processors is published at growmino.de/legal/subprocessors. As of the effective date, the main service providers are:

Provider	Function	Location
Supabase Inc. (USA), on Amazon Web Services	Database, authentication, file storage of the apps	EU (Frankfurt, Ireland); support access from the USA possible
Lovable Labs Incorporated / Lovable (Sweden)	App hosting and build, service emails (notify.growmino.de), AI gateway	EU/USA/global edge
Cloudflare, Inc. (USA)	Content delivery, edge execution, security	Global
Google LLC / Google Ireland Limited	AI models (Gemini) via the Lovable AI gateway; appointment booking; Google Analytics (website, with consent only)	EU/USA
Google Ireland Limited / Google LLC (Google Workspace)	Our business email (office@growmino.de), calendar and file storage, including support and project communication	EU/USA
Twilio Inc. (USA)	Telephony and SMS in the CRM	USA

Provider	Function	Location
Hostinger International Ltd.	Hosting of the website growmino.de	Lithuania (EU)

17.3 Independent controllers

Stripe (payments, Section 8.2), Google and Microsoft for the accounts and authorisation processes described in Section 12 and Google for YouTube (Section 15), banks, tax advisors and auditors (professional secrecy), and public authorities where we are legally obliged.

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18. International data transfers

18.1 PUSH - CONSULTING LLC is a US company

Please note that we are a company organised under the laws of Wyoming, USA. When you provide personal data to us, it is processed by a company established in the USA. US authorities may, under US law, request access to data held by US companies. We apply the GDPR to all processing described here (Art. 3(2) GDPR).

18.2 Legal basis of the transfer

Where you provide your data directly to us (for example by registering or contacting us), the data is collected directly by us. Where personal data is transferred to us from the EEA, for example by your employer or another organisation, the transfer is based on Art. 49(1)(b) or (c) GDPR, insofar as it is necessary for the performance of a contract with you or in your interest; for ongoing transfers, on Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914), insofar as Chapter V GDPR applies. The app databases are hosted in the EU (Frankfurt and Ireland).

18.3 Transfers to service providers

Transfers to service providers in the USA are based on the EU-U.S. Data Privacy Framework (Art. 45 GDPR), where the recipient is certified, and otherwise on Standard Contractual Clauses (Art. 46(2)(c) GDPR), supplemented where necessary by additional safeguards. You can request a copy of the safeguards at office@growmino.de.

19. Your rights

19.1 Overview

Under the GDPR you have the right:

- of access to your personal data (Art. 15);
- to rectification of inaccurate data (Art. 16);
- to erasure (Art. 17);
- to restriction of processing (Art. 18);
- to data portability (Art. 20);
- to withdraw consent at any time with effect for the future (Art. 7(3)); the lawfulness of processing before withdrawal remains unaffected.

To exercise your rights, please contact office@growmino.de or our EU representative (Section 2.2). We may ask you to verify your identity.

19.2 Right to object (Art. 21 GDPR)

Where we process your data on the basis of Art. 6(1)(f) GDPR (legitimate interests), you have the right to object at any time, on grounds relating to your particular situation, to this processing. We will then no longer process the data unless we demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

Where we process your data for direct marketing purposes, you have the right to object at any time to such processing, without giving reasons. We will then no longer process the data for this purpose.

An objection can be sent informally to office@growmino.de.

19.3 Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place of the alleged infringement (Art. 77 GDPR). The authority competent at the seat of our EU representative is: Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Baden-Württemberg, Lautenschlagerstraße 20, 70173 Stuttgart, Germany, www.baden-wuerttemberg.datenschutz.de.

20. No automated decision-making

We do not use automated decision-making, including profiling, within the meaning of Art. 22 GDPR.

21. Obligation to provide data

Using our website does not require you to provide personal data, apart from the data automatically transmitted by your browser. For registration and the conclusion of a contract, the data marked as mandatory is required; without it we cannot conclude or perform the contract. Providing data for marketing purposes is voluntary.

22. Additional information for certain jurisdictions

22.1 United Kingdom

If you are in the United Kingdom, the UK GDPR and the Data Protection Act 2018 apply to our processing accordingly. References to the GDPR are read as references to the UK GDPR. Where Chapter V of the UK GDPR applies to transfers to us, they are based on the International Data Transfer Addendum to the Standard Contractual Clauses (we do not hold a Data Privacy Framework certification of our own); onward transfers to our service providers in the USA are based on the UK Extension to the EU-U.S. Data Privacy Framework, where the recipient is certified, or otherwise on that Addendum. You may lodge a complaint with the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, ico.org.uk.

22.2 Switzerland

If you are in Switzerland, the Swiss Federal Act on Data Protection (FADP) applies accordingly. Where transfers to us require safeguards, they are based on the Standard Contractual Clauses as adapted for Switzerland (we do not hold a Data Privacy Framework certification of our own); onward transfers to our service providers in the USA are based on the Swiss-U.S. Data Privacy Framework, where the recipient is certified, or otherwise on those adapted Standard Contractual Clauses. The competent supervisory authority is the Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Bern, www.edoeb.admin.ch.

22.3 United States (California)

To the extent the California Consumer Privacy Act, as amended by the California Privacy Rights Act (CCPA), applies to us: we collect the categories of personal information described in Sections 3 to 16 for the business purposes described there. We do **not sell** personal information and do **not share** it for cross-context behavioural advertising. We do not use sensitive personal information for purposes requiring a right to limit. California residents may request to know, delete and correct their personal information by writing to office@growmino.de; we will not discriminate against anyone for exercising these rights.

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23. Changes and archive

We update this Privacy Notice when our processing or the legal situation changes. The current version is available at growmino.de/legal/privacy. Previous versions are archived and available on request at office@growmino.de. Where changes require your consent, we will ask for it separately.