

# tts performance suite PRIVACY POLICY

July 21, 2025



## **Preface**

The protection of your personal data is an important concern for the company that uses tts performance suite (hereinafter referred to as "company" or "controller"). This privacy policy provides transparent information about which personal data is processed when using the tts performance suite software, for what purposes this is done, on what legal basis this is based, and what rights you have as a data subject.

The tts performance suite is a powerful platform for the digital support of learning, work, and change processes. Depending on the design and use, personal data of users (e.g., first and last name, email address, usage behavior) may be processed. This processing is carried out within the framework of a contract concluded between the company and tts. tts acts as a processor in accordance with Art. 28 GDPR and processes personal data exclusively on behalf of and in accordance with the instructions of the company.

This privacy policy is intended for all people who access the tts performance suite or use it during their professional activities. It contains, among other things, information on:

- the purpose and scope of data processing,
- the categories of data concerned,
- the hosting service providers used and technical measures,
- the recipients or categories of recipients of personal data,
- the applicable legal basis for data processing,
- the storage periods, and
- your rights as a data subject.

Please note that this privacy policy applies exclusively to the use of the tts performance suite. Separate privacy policies may apply to other applications or online offerings of the company.



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# 1 Name and address of the party responsible

The controller within the meaning of the General Data Protection Regulation (GDPR), other data protection laws applicable in the member states of the European Union, and other data protection regulations is the company that uses tts performance suite (hereinafter referred to as "company" or "controller").

The company decides on the purposes and means of processing personal data within the scope of the use of the software and is therefore responsible for compliance with data protection obligations.

# 2 Data processing by tts

The tts performance suite is provided by tts Knowledge Products GmbH, Schneidmühlstraße 19, 69115 Heidelberg,

Germany.

Personal data is processed by tts on behalf of the company that has concluded a corresponding contract with tts for the use of the tts performance suite. The legal basis and purposes of the processing are governed by this contract and the respective instructions of the company as the controller within the meaning of Art. 4 No. 7 GDPR.

tts acts as a processor in accordance with Art. 28 GDPR and processes personal data exclusively for the purpose of enabling and managing the use of the software and for the technical provision of the associated functions.

# 3 Name and address of the data protection officer

The data protection officer of the tts Group is:

Mr. Marius Merck tts GmbH Schneidmühlstraße 19 69115 Heidelberg, Germany

Email: dsb@tt-s.com



If you have any questions about data protection or wish to exercise your rights as a data subject in accordance with Art. 15 ff. GDPR, you can contact our data protection officer at any time in confidence.

# 4 All general information on data processing

## 4.1 Scope and purpose of personal data processing

In the context of providing and using our software, we process personal data of users—in particular, first and last names and email addresses (details in a separate section). Processing is carried out for the purpose of setting up, managing, and using software access and, if necessary, for communication in the context of use.

## 4.2 Legal basis for the processing of personal data

Processing is carried out based on Art. 6 para. 1 lit. b GDPR, insofar as it is necessary for the fulfillment of a contract or for the implementation of pre-contractual measures (e.g., provision of a user account or trial access).

Insofar as consent to processing is obtained (e.g., for additional functions, newsletters, or analysis purposes), processing is based on Art. 6 para. 1 lit. a GDPR. Consent may be revoked at any time with effect for the future. The revocation can be declared informally to the controller.

## 4.3 Data deletion and retention period

Personal data will be deleted or blocked as soon as the purpose for which it was collected no longer applies. Further storage may take place if this is provided for by the EU or national regulations to which the controller is subject. In these cases, the data will be deleted or blocked as soon as the statutory retention periods expire, unless the storage of the data is still necessary for the fulfillment of contractual obligations or for the implementation of pre-contractual measures within the meaning of Art. 6 para. 1 lit. b GDPR.

## 5 Rights of the user as the data subject

Data subjects have the following rights vis-à-vis the company as the controller within the meaning of the GDPR regarding their personal data:

- Right to information (Art. 15 GDPR),
- Right to rectification (Art. 16 GDPR),
- Right to erasure ("right to be forgotten," Art. 17 GDPR),
- Right to restriction of processing (Art. 18 GDPR),
- Right to object to processing (Art. 21 GDPR),



• Right to data portability (Art. 20 GDPR).

In addition, you have the right to lodge a complaint with a competent data protection supervisory authority if you believe that the processing of your personal data by the company violates data protection regulations (Art. 77 GDPR).

# 6 Data processing by hosting service providers

If the tts performance suite is provided in the cloud as part of a Software-as-a-Service (SaaS) offering, hosting is carried out on servers of external hosting service providers.

tts has concluded an agreement with the respective hosting service providers for order processing in accordance with Art. 28 GDPR that complies with data protection requirements.

The processing of personal data by the hosting service provider takes place exclusively in the territory of the Federal Republic of Germany, in a member state of the European Union or in another contracting state of the Agreement on the European Economic Area (EEA).

A transfer to a third country outside the EEA will only take place on documented instruction from the company with the meaning of Art. 28 (3) lit. a GDPR and exclusively in compliance with the requirements of Art. 44 to 49 GDPR (e.g., adequacy decision, standard contractual clauses, or appropriate safeguards).

# 7 Technical information on data protection

When using the tts performance suite, no personal data is stored by tts.

Insofar as third-party software products are used, tts is only responsible for those features that are essential for the operation of its own software. For further information, please refer to the product descriptions of the respective manufacturers.

## 7.1 Storage and processing of user data

## 7.1.1 Data processing for end users

Personal data (e.g., username, role) is only stored if the personalization function for end user accounts (WebAccess and QuickAccess) is activated. Personalization allows content to be tailored to specific roles/user groups within the company. If this function is deactivated, all users see the same content. Role filtering can then only be carried out manually.

When the personalization function is activated, the following data is transferred from end users to the tts performance suite or stored on the server:



#### Login data and authentication

In the standard configuration, a login name and password are required to access the end-user components of the tts performance suite (e.g., Web Publisher and QuickAccess). The username can be freely chosen and also pseudonymized.

Alternatively, login via single sign-on (SSO) can be set up. In this case, authentication is performed via directory services such as LDAP or via a SAML-based procedure. When integrating an Active Directory server, only a unique user ID is transferred and stored. In this case, passwords are not stored in the system but are checked directly against the directory service each time you log in.

Information	Mandatory
Login name and password (if maintained in the system; alternatively, can be checked against an external directory system)	✓
License assignment (assigns available licenses to individuals)	✓
Language (for system interface and display of content)	✓
First and last name	-
Process roles (e.g., "Purchaser"; primarily used for end users if personalization of the portal is desired)	-

Table 1 Overview of end user information processed by the system

#### One-time passwords (OTP)

Temporary one-time passwords (OTP) are used for certain access scenarios. In this context, technical user data (e.g., login, roles, license information) is stored for a short period of time and automatically deleted after expiration.

### 7.1.2 Data processing for authors:

To use the author function within the tts performance suite Workbench and the tts performance suite Client, user master records must be created and saved.

The following data is transferred by authors when using tts performance suite or stored on the server:

#### Login details and authentication

In the standard configuration, a login name and password are required to log in to the backend components (Web Workbench or Producer Client). The login name can be freely chosen and can also be pseudonymized.

Optionally, you can log in via single sign-on (SSO) (see 7.1.1).



Information	Mandatory
Login name and password	<b>√</b>
License assignment (assigns available licenses to individuals)	✓
Language (for system interface and display of content)	✓
First and last name	-
Email address (used for workflow notifications)	-
System roles (e.g., "e-learning author," "translator," "reviewer," etc.)	-
Display size of system dialog windows	-

Table 2 Overview of author information processed by the system

#### Login and logout times

The time of a person's last login and logout is stored.

#### Personal information

Personal data such as name or email address can be entered manually by users or administrators. The system does not check the accuracy of this information. The entry is voluntary, but may be required for certain functions (e.g., workflow notifications).

#### Object-related data storage and retention

When content (objects) is edited in the tts performance suite, all changes are logged together with the login name and stored on the server. This information can be viewed by other authorized authors via the system interface (GUI).

The stored data is retained for as long as the associated object exists in the system. When the object is deleted, all associated logged data is also automatically removed.

#### Change logs

Changes to content (e.g., documents) are stored together with the associated login name and can be viewed by authorized users.

#### Versioning

When versioning is enabled, changes to documents are saved. The log itself does not contain any personal data.

#### Search index (SolR)

A search index (SoIR) is used for the search function. This also stores document-related data. For the data fields "Owner" and "Responsible," IDs () are stored that cannot be assigned to any person without database access. A real name (first and last name) can be stored in the "Author" field if it is stored in the login profile. Otherwise, the login name is stored.

#### Log files

In the standard configuration, logins and logouts as well as object actions (e.g., check-in/check-out) are logged with login IDs. These logs can be customized by administrators. Additional access data is stored in the access log on the web server (e.g., Tomcat).



## 7.2 Communication between server and client

Communication between the client and server is unencrypted via HTTP. We therefore strongly recommend the use of HTTPS to ensure encrypted data transmission. Our SaaS offering can only be used via HTTPS using encrypted channels.

## 7.3 Storage of data in the tts performance suite client

The tts performance suite client stores personal settings such as view settings and changed program settings in the default configuration in the personal profile directory on the local drive of the respective authors. Passwords used are additionally encrypted and stored by default.

## 8 Activation of AI functions (optional)

When using tts performance suite, the company can activate certain AI functions on request. The specific functions that are activated are determined by the "Supplementary agreement to the retrieval order – Activation of AI function(s)" concluded between the company and tts.

To enable the desired AI functions, the company must provide tts with an API key from the respective AI service provider, which will be used to connect the tts performance suite via a programming interface (API – Application Programming Interface). The API is used for secure data exchange between the tts performance suite and the AI service. The API key provided acts as an access key that authorizes the connection to the selected service. tts stores the API key on the server side in the software configuration to enable the technical connection.

**Important**: No personal data is passed on to the integrated AI service. The AI services do not have access to personal data from the tts performance suite, nor is this data transmitted automatically or manually.

The company is obliged to independently review and comply with the data protection and terms of use of the respective AI provider with whom an API connection is established.

#### 9 Final

Protection of your personal data is a top priority for the company and tts. We process your data exclusively based on the applicable legal provisions and within the scope of clearly defined purposes. This privacy policy provides you with transparent information about the type, scope, and purposes of the processing of personal data in connection with the use of the tts performance suite.

Please note that legal requirements or technical developments may change. We therefore reserve the right to amend this privacy policy as necessary. The current version will be made available to you via application or by other appropriate means.



If you have any questions about data protection or exercising your rights under the GDPR, you can contact the company or the data protection officer at any time. The relevant contact details can be found in this statement.