



Whitepaper

Privacy in ginlo @work



Contents

- About this document.....3
- Team data.....3
 - Team account registration.....3
 - Billing4
 - Team account termination4
- User data.....5
 - User account registration5
 - Optional user account data6
 - Participation in a team.....6
 - Visibility within a team6
 - Conversations.....6
 - Archiving users7
- Device data7
- Connection data7
- Application data8
 - ginlo @work app.....8
 - ginlo Team Manager.....9
- Visitor traffic data9
- Contact.....10
- References10

About this document

This Whitepaper describes which data and metadata Brabblers AG (as the operator of ginlo @work) collects and stores about the customers and individual users of the ginlo @work solution, and why this information is needed. For more information about how Brabblers AG uses encryption and other protective measures to keep user data secure, please refer to the *ginlo @work Security Whitepaper*.

Team data

Team account registration

To register a team, the following data is required:

Data	Usage
Administrator's first and last name	<ul style="list-style-type: none"> ▪ Inviter name mentioned in the users' invitation e-mails ▪ Displayed in the ginlo address books of other users in the team ▪ Displayed in ginlo conversations next to messages sent by the administrator ▪ Used in communication from Brabblers AG to the administrator
Administrator's e-mail address	<ul style="list-style-type: none"> ▪ Login name in ginlo Team Manager and in the ginlo @work app ▪ Inviter and support e-mail address specified in the users' invitation e-mails. ▪ Displayed in the ginlo address books of other users in the team ▪ Means of contact for communication from Brabblers AG
Team name	<ul style="list-style-type: none"> ▪ Team name of administrator's choice, displayed in users' invitation e-mails, typically the company name

If the administrator fails to complete the team registration (i.e. does not confirm their e-mail address) within 7 days, all collected data will be permanently deleted.

For the e-mail communication towards administrators (e.g. to provide information about the trial phase or new releases), Brabblers AG uses the third-party software Newsletter2Go [1]. To do so, Brabblers AG transmits the administrator's salutation, first name, last name, and e-mail address as well as the subscription start date and type (trial, active, or terminated). A link to opt-out from receiving this communication is included in every e-mail. Upon opt-out, the respective data remains stored. This is necessary to ensure the opt-out is still effective even if the respective administrator terminates their account and re-registers at a later time. Administrators who prefer their data to be deleted can send a request to the ginlo Customer Care; then, they will have to opt out again in case they terminate and re-register their account.

Billing

By the end of the 30-day free trial period, organizations will need to have purchased a paid subscription to keep using ginlo @work. For payment processing, the following billing data must be provided by the organization:

Data retained for 10 years	Description
Master data	<ul style="list-style-type: none"> ▪ Organization name ▪ Billing address ▪ VAT number (optional) ▪ Purchaser's salutation ▪ Purchaser's first and last name ▪ Purchaser's e-mail address
Contract details	<ul style="list-style-type: none"> ▪ Number of seats ▪ Payment period (monthly or yearly) ▪ Credit card type and expiry date ▪ Credit card number (is only stored by the payment service provider BS PAYONE [2]).

Team account termination

Upon account termination (i.e. at the end of the 30-day free trial or when a paid subscription is terminated), the following happens:

- During a 7-day grace period, all ginlo @work functionality is still available.
- After that, a 60-day recovery period starts: In this period, all user accounts and user management features in the admin account are disabled. However, all data is retained, which allows the organization to re-activate the account without data loss or export all content in cleartext for future access outside ginlo @work.
- At the end of the recovery period, all data is deleted (except data subject to retention as stated in the table below). Organizations who do not wish to make use of the recovery period can send a request to the ginlo Customer Care to have their data deleted immediately upon account termination. Please note that in either case, it may take up to 30 days to delete the data from all server backups.

For paid accounts, Brabblers AG must retain the following billing data for 10 years due to applicable law:

Data retained for 10 years	Description
Master data	<ul style="list-style-type: none"> ▪ Organization name (or purchaser's first and last name for sole proprietors) ▪ Billing address ▪ VAT number ▪ Customer number
Contract details	<ul style="list-style-type: none"> ▪ Contract duration ▪ Number of seats ▪ Net amount payable monthly or annually ▪ Reference to current tax rate ▪ Payment method ▪ Payment target
Invoices	<ul style="list-style-type: none"> ▪ All invoices issued to the organization

User data

User account registration

The administrator creates the accounts for the users they want to invite to their team. Every invited user receives an e-mail via which they can accept the invitation and complete the registration.

For each user account, the administrator must provide the following data:

Data	Usage
User's e-mail address	<ul style="list-style-type: none"> ▪ Means of contact for system e-mails, e.g. team invitation or password reset instructions <u>Note:</u> Apart from such system e-mails, Brabblers AG will not contact the users in the team. The single point of contact for Brabblers AG is the team administrator. ▪ Login name for the ginlo @work app ▪ Displayed in the ginlo address books of all other users in the team
A first and last name	<ul style="list-style-type: none"> ▪ Used in system e-mails, e.g. team invitation or password reset instructions ▪ Displayed in the ginlo address books of all other users in the team ▪ Displayed in ginlo conversations next to messages sent by this user
Role	<ul style="list-style-type: none"> ▪ Used to define which other users are visible to and can be contacted by that user. Currently, the roles "member" and "guest" are available (see chapter "Visibility within a team", page 6)

If a user fails to activate their account within 7 days, the invitation expires. To allow for re-invitation, the user's registration data remains stored on the ginlo server until deleted by the administrator.

Optional user account data

As an option, users can add the following data to their account:

Data	Usage
Profile picture	<ul style="list-style-type: none"> ▪ Displayed in the ginlo address books of other users in the team ▪ Displayed in ginlo conversations next to messages sent by this user

Participation in a team

At this time, every ginlo @work user can only participate in 1 team. ginlo @work users of different teams can currently neither communicate with nor identify each other as ginlo @work users.

Visibility within a team

A user's role defines which other users in their team they can see and communicate with:

- **Member:** Members can see and communicate with all other users in their team.
- **Guest:** Guests can initially not see or communicate with any other users in their team. However, members in the team can find the guest in their contacts and can start one-to-one or group conversations with them. All participants in these conversations are then added to the guest's contacts, and the guest can then start new conversations with them.

Conversations

All message content including sent files is encrypted and can only be decrypted by the conversation participants or the team administrator. (For details about the ginlo @work encryption concept, please refer to the *ginlo @work Security Whitepaper*.)

The following conversation metadata is stored in unencrypted format:

Data	Usage
Sent date and time of messages	<ul style="list-style-type: none"> ▪ Required to retrieve the latest messages when syncing the client with the server
Conversation ID	<ul style="list-style-type: none"> ▪ Required to correctly allocate messages to the corresponding conversations
Participants' IDs (UUIDs)	<ul style="list-style-type: none"> ▪ Required to correctly allocate messages to the corresponding conversations
Message type (text message or attachment)	<ul style="list-style-type: none"> ▪ Can be derived from message structure

Archiving users

The administrator can archive an existing user, e.g. to free seats or if a user has left the organization. The affected user will be informed via e-mail and can no longer access the ginlo @work application. The user's messages can still be accessed by the respective conversation partners. Besides, the user's encrypted message archive remains stored on the ginlo server and can still be decrypted by the respective team administrator.

The user's account registration data (see chapter "User account registration", page 5) will remain stored on the ginlo server. The user's profile picture (see chapter "Optional user account data", page 6) will no longer be visible to neither the team administrator nor the other users in the team and will be permanently deleted from the ginlo server. Please note that it may take up to 30 days to delete the data from all server backups.

Device data

For the ginlo @work app, the following unencrypted per-device data is stored on the ginlo server to allow for future device management features (e.g. remote wipe):

- Device type (mobile or tablet)
- Device model (e.g. iPhone 7)
- Operating system (Android or iOS)
- Device ID
- Tokens for push notifications (GCM [3], APN [4])

For ginlo Team Manager, the operating system is communicated to the ginlo server when checking for updates. This takes place during every login. The corresponding logs on the ginlo server are deleted after 7 days.

Connection data

For both the ginlo @work app and ginlo Team Manager, encrypted public IP addresses are stored together with the access tokens used for authentication (see *ginlo @work Security Whitepaper*, chapter "Authentication"). This allows for the detection and prevention of misuse (e.g. concurrent connections to the same account from different continents), but cannot be used to identify a certain user.

Application data

ginlo @work app

For the ginlo @work app, there are 2 types of log files that can be sent by the user to support troubleshooting:

Log type	Content	When and where is the log sent?
App log	<ul style="list-style-type: none"> ▪ App ID ▪ App name ▪ App version ▪ Vendor ID (device ID) ▪ Mono version ▪ OS version ▪ Device model ▪ Server request ID and end point for every failed call to the server ▪ IDs of incoming and sent messages ▪ Views the users navigates to ▪ Actions (taps) performed by the user 	At any time, the user can manually send this log to their team administrator, who can then forward it to Brabblers AG if required.
Crash log	<p>Exception (error, unexpected behavior). For details, see the following example:</p> <pre>Inconsistency detected. Invalid view holder adapter positionViewHolder{c9e5e20 position=28 id=636617355702660000, oldPos=25, pLpos:25 scrap [attachedScrap] tmpDetached no parent} android.support.v7.widget.Recycl erView{7a7d8c4 VFED..... .F....ID 0,240-1080,1610 #7f0b00d8 app:id/conversations_recyclervie w_messages}, adapter:md52295f0290af090920ccc6 538bb8a6cad.GinloChatAdapter@87e 0248, layout:android.support.v7.widget .LinearLayoutManager@cc77c5c, context:ag.brabblers.ginlo.work.G inloChatActivity@dd1830a</pre>	If the user opts in, this log is sent to Brabblers AG in the background whenever the app crashes.

ginlo Team Manager

For ginlo Team Manager, an error log is sent in the background by default. However, the administrator can opt out during registration or at any time later. Log files are deleted after 3 months at the latest. It may, however, take up to another 30 days to delete them from all server backups.

Content	When and where is the log sent?
<ul style="list-style-type: none"> ▪ Application ID ▪ Application version including build date and time ▪ Date and time of sending the log file ▪ OS version ▪ Device model ▪ User ID (hashed) ▪ Team ID ▪ Actions performed by the administrator ▪ Exception (error, unexpected behavior) ▪ Affected source code section 	<p>When an error (e.g. unexpected server response) occurs, this log is sent to Brabblers AG via the error tracking tool Sentry [5] hosted on the ginlo server.</p> <p>Note: The user ID in the log is hashed, so Sentry (or any other third party) cannot use it to identify a certain user.</p>

In one of the future versions, an audit trail will be introduced as well: All administrative activities (e.g. When and by whom is a message archive downloaded and decrypted?) will be written to an audit log that can be accessed for audit purposes by all administrators of an organization. In addition, Brabblers AG will be able to access this log for support purposes

Visitor traffic data

The ginlo.net website uses Piwik [6], an open source software for the statistical evaluation of visitor traffic. For purposes of promotion, ginlo.net also employs Google's analysis service "conversion tracking" [7] on the following pages:

- <https://www.ginlo.net/de/business/pricing/sales-contact/thanks>
- <https://www.ginlo.net/en/business/pricing/sales-contact/thanks>
- <https://www.ginlo.net/en/business/trial>
- <https://www.ginlo.net/en/business/trial>

Contact

With ginlo @work, we want to provide organizations with a solution that allows them to stay in full control of their data. Hence, we aimed at building the product in such a way that it creates as little data traces as possible while providing our customers with a good service. If you have ideas on how to optimize this balance, please share them with us. Please also let us know if you have any questions regarding privacy in ginlo @work, or if you would like to know which personally identifiable information Brabblers AG has stored:

Brabblers Secure Message and Data Exchange AG
– Privacy –
Ria-Burkei-Straße 26
D-81249 München
E-mail: privacy@ginlo.net

If you want to contact our Data Protection Officer personally, please send an e-mail to dpo@ginlo.net.

References

- [1] <https://www.newsletter2go.com>
- [2] <https://www.payone.de>
- [3] <https://developers.google.com/cloud-messaging>
- [4] <https://developer.apple.com/library/content/documentation/NetworkingInternet/Conceptual/RemoteNotificationsPG/APNSOverview.html>
- [5] <https://sentry.io/welcome/>
- [6] <https://piwik.org/>
- [7] <https://support.google.com/adwords/answer/1722022>