

Data Privacy Policy for the MitMut #Test01 Event

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Controller:

MitMut Studio eGmbH

Kolonnenstraße 8

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Email: contact@mitmutstudio.com

Data Privacy Officer: Adam Schiffer

DPO contact: info@mitmutstudio.com

Applicable Law and Supervisory Authority:

This processing is governed by the **EU General Data Protection Regulation (GDPR)** and the **Federal Data Protection Act (BDSG, Germany)**.

The competent supervisory authority is the

Berliner Beauftragte für Datenschutz und Informationsfreiheit

Alt-Moabit 59–61, 10555 Berlin, Germany

Email: mailbox@datenschutz-berlin.de

MitMut Studio eGmbH values your trust and takes the protection of your personal data very seriously. We handle all personal data in strict accordance with the **EU General Data Protection Regulation (GDPR)** and the **Federal Data Protection Act (BDSG)**. This Data Privacy Policy explains how we collect, use, and protect your information during participation in our gamified learning demo. It outlines what data are processed, for what purposes, which service providers are involved, and what rights you have. Our goal is full transparency and lawful, minimal, and secure data handling throughout this proof-of-concept event.

1. Purpose of Processing

Your personal data are used for:

- Evaluation and improvement of the MitMut Studio eGmbH's gamified learning environment;
- Educational and research documentation;
- **Public communication, investor presentations, and partnership outreach** to demonstrate the product concept and learning design;
- Communication with participants;
- Compliance with legal obligations.

2. Categories of Data Processed

- Audio, video, and screen recordings voluntarily provided by participants
- Audio and video communication data transmitted through Jitsi during the event
- In-game activity and avatar interactions within WorkAdventure
- Technical metadata (IP address, browser information, connection logs) automatically processed by service providers
- Embedded content interactions (YouTube, WordWall)
- Optional feedback form responses of participants
- Personal identification data of participants
- Contact data of participants
- Consent form responses of participants

3. Legal Basis

Processing of video and audio recordings and of feedback form responses is based on explicit consent under Art. 6(1)(a) GDPR.

Consent can be withdrawn anytime by contacting info@mitmutstudio.com.

Withdrawal does not affect lawfulness before withdrawal.

Personal identification data, contact data, consent form responses are processed in order to comply with applicable legal obligations under Article 6(1)(c) GDPR.

All other data necessary for the secure and efficient operation of this event are processed to pursue MitMut Studio eGmbH's legitimate interests under Article 6(1)(f) GDPR, namely maintaining system security, improving the service, and ensuring smooth event delivery.

4. Data Sources and Systems Involved

All data are collected directly from participants and processed only by the systems and authorized persons listed in point 5 of this policy.

5. Recipients and Access

Access to personal data is restricted to authorized members of MitMut Studio eGmbH for analysis and development. External processing is limited to the service providers listed above

System / Provider	Purpose	Location / Notes
WorkAdventure (The Coding Machine SAS)	Hosts the gamified map and player environment.	Servers located in the EU (France). Privacy Policy
Jitsi (8x8 Inc. / self-hosted instance)	In-game audio and video communication.	EU servers; peer-to-peer encrypted. Privacy Policy
YouTube (Google Ireland Ltd.)	Embedded videos shown via iframes.	EU–US Data Privacy Framework applies. Privacy Policy YouTube may collect view and engagement metrics for its own purposes (cookies, ad personalization). For our embedded educational videos, no automated decisions about participants occur.
Wordwall Ltd.	Hosts interactive language games embedded in the session.	UK-based (adequacy decision under GDPR). Privacy Policy Wordwall tracks activity for educators (e.g., quiz scores). These are not automated decisions with legal or significant effects under Art.22. of the GDPR
IONOS SE (Germany)	Hosts static assets, demo files, and web resources.	Data stored and processed in the EU (Germany) Privacy Policy
Tally BV (Belgium)	Collects consent and feedback forms.	EU-based; GDPR-compliant. Privacy Policy
Email (IONOS Mail)	Receives participant recordings and correspondence.	EU data centers. Privacy Policy

Access to raw recordings remains limited to authorized members of MitMut Studio eGmbH for analysis and development. Recordings or excerpts may be shown to external audiences (such as potential investors or collaborators) **only in anonymized or pseudonymized form**, ensuring that individual participants cannot be identified. No personal data are sold, transferred, or used for behavioral profiling.

6. Data Retention

Recording data (audio, video, and screen recordings) are stored securely until consent is withdrawn, after which they are deleted or irreversibly anonymized.

Administrative data (such as consent forms, correspondence, and documentation required for accountability under Art 5(2) GDPR) are retained for as long as required by law.

Data processed in order to pursue the legitimate interests of MitMut Studio eGmbH are retained as long as permitted by law.

7. Rights of Data Subjects

Under the European Union's General Data Protection Regulation you have the right to at any time:

- Request access to your personal data controlled by MitMut Studio eGmbH (Art. 15 GDPR)
- Request correction or deletion of your personal data. (Arts. 16–17) GDPR
- Restrict or object to processing of your personal data. (Arts. 18–21 GDPR)
- Withdraw consent anytime (Art. 7 GDPR)
- **You have the right to lodge a complaint pursuant to Article 77 GDPR if you believe that the processing of your personal data infringes data protection law. You may contact the Berliner Beauftragte für Datenschutz und Informationsfreiheit (Alt-Moabit 59–61, 10555 Berlin, mailbox@datenschutz-berlin.de) or any other competent supervisory authority in your EU or EEA Member State of residence or employment.**

8. International Transfers

- **YouTube:** transfers data to the United States of America under the EU–US Data Privacy Framework.
- **Wordwall:** Transfers data to the United Kingdom of Great Britain and Northern Ireland. The UK is covered by the EU's adequacy decision.
- All other processing occurs within the EU.

9. Technical and Organizational Measures (TOMs)

MitMut Studio eGmbH implements appropriate technical and organizational measures in accordance with Article 32 GDPR to ensure a level of security appropriate to the risk. These include:

- Encryption in transit and at rest (HTTPS for all platforms; encrypted storage on IONOS).
- Restricted internal access
- Regular encrypted backups on IONOS servers. (within the EU)
- Access control (password-protected systems, limited staff access).
- **GDPR-Conscious Data Handling** (MitMut Studio eGmbH processes all personal data in a manner consistent with the principles of the EU General Data Protection Regulation (GDPR))

- Firewall and malware protection on all devices handling data.
- Data minimization (collecting only necessary data and retaining them only for strictly defined data retention periods).
- Anonymization/pseudonymization before external display or sharing.

10. Consent and Ownership

By submitting your recording, you:

- Confirm you created the recording yourself;
- Grant MitMut Studio eGbR the right to use, reproduce, and edit the material for research, educational, and promotional purposes, including presentation to potential investors and collaborators;
- Understand that participation is voluntary and that you may withdraw consent at any time by emailing privacy@mitmutstudio.com, upon which your recording will be deleted and excluded from future use.

11. Final Provisions

This Data Privacy Policy is effective as of 02.11.2025. MitMut Studio eGbR may update it to reflect legal or procedural changes. If any material changes affect participants' rights or the scope of processing, all participants who have provided contact information will be notified directly (e.g., by email) before the updated policy takes effect.

For any questions or concerns regarding data protection, contact:
info@mitmutstudio.com

MitMut Studio eGbR
Berlin, Germany