



## **Information on data processing in accordance with the EU General Data Protection Regulation (GDPR)**

Last updated 17 July 2024

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### **I. General information**

#### **1. Controller, contact details**

The controller for the processing of personal data by Sharing the Presence GmbH (STP) is

Sharing the presence GmbH  
represented by the Managing Director Thomas Hübl  
Wardenburger Str. 24  
26203 Wardenburg  
Phone: +49 (0) 4407 - 71 60 94  
e-mail: [info@thomashuebl.com](mailto:info@thomashuebl.com)



## 2. Data Protection Officer, contact details

ViCoTec IT-Sicherheit & Datenschutz GmbH & Co. KG  
Thorsten Brendel  
August-Wilhelm-Kühnholz-Str. 5  
26135 Oldenburg  
e-mail: datenschutz@vicotec.de  
0441 20 57 22 20

## II. Information about data processed by Sharing the presence GmbH

### 3. Purpose of data processing; legal bases

#### 3.1. STP processes personal data

- to ensure and promote their company purpose, namely and in particular the organization, management, communication and marketing of teaching, learning and workshop formats, concepts and strategies; rights (e.g. intellectual property rights, such as copyrights, and industrial property rights such as trademark rights, personality rights and other rights) and other activities or associated work results of Thomas Hübl as a modern, mystical, spiritual teacher, author and systematic thinker.
- to establish, implement or terminate contractual relationships for the above-mentioned purpose (including future ones), including employment contracts;
- to take into account the health suitability of participants in the courses and workshops offered in order to minimize any health risks for them;
- to fulfil obligations under statutory provisions in connection with the above-mentioned purposes, including fiscal, social security, regulatory or supervisory obligations;

#### 3.2. Data are processed

- based on consent of the data subject (cf. Art. 6 (1) (a) GDPR),
- on the basis of the consent of the data subjects for the processing of special categories of personal data, in particular health data, in accordance with Art. 9 para. 2 lit. a GDPR,
- because this is necessary to execute a contract concluded with the data subject or to carry out pre-contractual measures on request of the data subject (cf. Art. 6 (1) (b) GDPR)
- because this is necessary to protect the legitimate interests of STP, its affiliates or any other third party, unless the interests or fundamental rights or freedoms of the data subjects, which would require the protection of personal data, prevail (cf. Article 6 (1) (f) GDPR); or
- because this is permitted by other legislation.



In particular, STP has a legitimate interest in promoting its company purpose and in cooperating with its affiliated companies for this purpose.

Health data is processed in order to take into account the health suitability of participants and to minimize any health risks for them.

Legitimate interests of third parties are, primarily:

- the interests of participants to ensure that their health suitability to participate in the courses and workshops is considered in order to minimize health risks;
- the interests of STP's affiliated companies in cooperating with STP to promote the company purpose;
- the interests of those who wish to learn more about, study, practice, teach, disseminate or communicate the teachings of Thomas Hübl;
- the interests of STP's commercial, distribution, business and other contractual partners and of the public to initiate and/or enter into contractual relations with STP as part of or in connection with the company purpose and/or to be informed about and to communicate the company purpose or the nature of cooperation subject to contractual and legal restrictions.

#### 4. Categories of data being processed

**4.1.** In particular: names, company names or other designations of natural and legal persons, their contact details (such as addresses, telephone and fax numbers and e-mail addresses, etc.), where applicable health data (such as general health and medication) and the data required for processing payments (such as bank and account details, etc.) and for financial and payroll accounting (such as dates of birth, tax or social security numbers) as well as other personal data required for the purpose set out in section 3.

**4.2.** When using (electronic/digital) services and means to establish direct and indirect contact, communication and organization with and without audio and video function (telephone and video conferences, video calls, webinars, web conferences, newsletters, network services, business and event organization services, cloud services and mobile apps, etc.), also the following:

- personal data provided by the participants themselves, such as information about their own person and circumstances, the device and software they use to access these services and means, such as the IP address of their end device, operating system version, device ID, browser type, and information about their location and duration of use;
- personal data exchanged during communications, to the extent that these data are obvious from the chat history and if the chat history is recorded;
- biometric data (in particular voices and faces or other physiognomic features).



## 5. Categories of recipients; processors

**5.1.** The third parties listed in section 3 with whom STP cooperates, communicates or is contractually or effectively affiliated in order to achieve the processing purposes.

**5.2.** STP cooperates with processors, in particular to handle its electronic communications and when utilising the telemedia services referred to in section 4.2. These processors are primarily providers of database and communication software as well as providers of the cloud services on which this software is hosted. For that purpose, personal data will be transferred to the processors, where appropriate. The processors are bound by the instructions of STP with regard to the way in which these data are processed and are obliged to STP to delete these data again after the communication purpose has been achieved or when instructed to delete the data, unless regulated otherwise by contractual agreements with the service providers or statutory regulations or if ordered otherwise by the authorities based on such regulations. In addition, there may be differences for processors not domiciled in EU Member States. More details are provided in section III.

## 6. Storage duration

STP only stores personal data as long as permitted by the data subjects or as long as necessary and permissible for achieving the purpose of processing as outlined in section 3. If these conditions are no longer met, STP will delete the personal data.

The storage duration and deletion of the data is subject to the proviso that statutory provisions do not permit or provide otherwise with regard to their storage or deletion.

## 7. Rights of data subjects

The data subjects can demand from STP access to their personal data and can demand STP to rectify, erase or restrict processing of such data, and data subjects are entitled to data portability.

## 8. Right to withdraw consent; right to object

Insofar as the data subjects have agreed to the processing of their personal data by STP, they have the right to withdraw their consent at any time.

If processing is in the overriding interest of STP or third parties (cf. Art. 6 (1) (f) GDPR), data subjects also have the right to object to this processing for reasons arising in connection with their particular situation.

Any withdrawal of consent or an objection should be made in writing or in text form and be addressed to the address set out in section I.

## 9. Right to lodge complaint with supervisory authority

Data subjects have the right to lodge a complaint with a data protection supervisory authority in their Member State, at their place of residence, at their place of work or at the place of the alleged infringement if they believe that the processing of their personal data violates the GDPR. They also



have the right to legal remedies if they believe that their rights under the GDPR were violated by their personal data being processed in a manner not compliant with the GDPR.

## 10. Sources

STP processes personal data mainly because these have been communicated to STP by the data subjects or the recipients listed in section 5 above, in particular in connection with business and corporate communication, if such is not expressly or recognizably for purely private purposes, as well as from publicly accessible sources where these data are made public either voluntarily or on the basis of legal requirements, such as legal information on websites, in social networks or public directories / registers.

### III. Information on the personal data processed by STP, third parties and processors when using the functions of STP websites as well as communication and telemedia services; warnings in case data are transferred to third countries

## 11. STP websites

STP websites are all websites operated by STP, irrespective of their (sub-) domains, in particular:

<https://thomashuebl.com>  
<https://registration.thomashuebl.com>  
<https://summerintensive.thomashuebl.com>  
<https://store.thomashuebl.com>  
<https://tw.t.thomashuebl.com>  
<https://sharingthepresence.com>

## 12. Data entered into forms

Data entered into fields and forms by visitors of STP websites (for example for subscribing to our newsletter, in our contact form, for booking sessions or ordering services, courses or products), which are used to process the associated request, will only be processed by us under the conditions set out in the preceding sections 1 - 10 if the person(s) entering the data has given their prior consent to processing by clicking the boxes provided.

## 13. Communication services

For the purpose of communication according to sections 5.2 and 12, we use the services of the processors or companies listed in section 16. Personal data as listed in sections 5 and 13 are also processed, including by those same processors or companies. This includes, in particular, the data generated by the participant(s) or the person(s) entering the information when using these services.

## 14. Cookies and plug-ins

The programs that form the STP websites and that are stored on our web server use so-called cookies and plug-ins. These are files or functions which can place and exchange information between the STP websites or our web server and the visitor's web browser or they are program elements of the operators of other websites embedded in the STP websites (e.g. "Social Media"), which provide a



connection to the servers of the operators of these other websites, thus also effecting an exchange of information that is collected when visiting the STP websites (e.g. IP addresses). These are the cookies and plug-ins of the processors or companies listed in section 17. Their use also leads to the aforementioned data processing by these same processors or companies.

You have the possibility to prevent the installation of cookies by selecting the corresponding settings in your Internet browser. To do so, select “do not accept cookies” in the browser settings. If your browser does not accept cookies, the functionality of the website may be reduced.

### **15. Transmission to third countries; risk notice**

The data processing outlined in sections 12 - 14 also results in data being transferred to processors and companies not domiciled in EU Member States (third countries).

We point out that this may result in personal data, in particular those mentioned in section 4.2, being processed outside of our control (e.g. profiling). Such processing operations are subject to the legal regulations applicable in the respective third country. An adequacy decision of the EU Commission and adequate guarantees according to the GDPR are not available. In principle, this entails legal and actual risks for the data subjects, in particular in connection with asserting and enforcing claims and rights, especially with regard to their personal data.

### **16. Specific processors and companies**

**16.1** STP transfers personal data on a case-by-case basis, always only for the stated purposes and under the conditions of a binding data processing contract, to the following affiliated company domiciled outside the EU (third country):

**Inner Science LLC (InnerScience)**  
Managing Director: Thomas Hübl  
2 Ranch Drive  
Novato, CA 94945, USA  
Phone: 415 785 3064  
e-mail: support@thomashueblonline.com

as well as to the domestic association

#### **Pocket Project e.V.**

Executive Board: Thomas Hübl and Ute Kostanjevec  
Wardenburger Str. 24  
26203 Wardenburg  
e-mail: info@pocketproject.org  
Phone: +49 (0) 4407 - 71 609-4  
Fax: + 49 (0) 4407 - 71 609-5

**16.2** STP cooperates with the following companies to process data entered into forms as set out in section 13:

Sharing the Presence GmbH  
Wardenburger Str.24  
26203 Wardenburg  
Phone: +49 4407 716094  
info@thomashuebl.com

VAT ID no. DE264648252  
Tax no. 06 421 12720  
Local Court of Oldenburg  
HRB203213

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GLS Gemeinschaftsbank Bochum  
IBAN DE83 430609672019685600  
BIC GENODEM1GLS





**Rocketgenius, Inc.**, 1620 Centerville Turnpike, Suite 102, Virginia Beach VA 23464-6500, USA  
(<https://www.gravityforms.com/privacy/>)  
**Elegant Themes, Inc.**, 1233 Howard Street, Apartment 3A, San Francisco, CA 94103, USA  
(<https://www.elegantthemes.com>)  
**Rock Lobster, LLC** (<https://contactform7.com>)  
**WP Ninjas, LLC** (<https://ninjaforms.com>)  
**FameThemes, Inc.** (<https://www.famethemes.com>)

**16.3** Our web server **WP Engine**, Iringate House, 22-30 Duke's Place, London, EC3A 7LP, United Kingdom, uses cookies to generate so-called server log files, i.e. files containing information that is exchanged during the communication between the visitor's web browser and our web server when visiting our website, including IP addresses. This makes it, in general, possible to identify an individual. However, this data is not collected on our behalf and we have no influence on such data collection.

**16.4** Our website uses plug-ins of the social networks **Facebook** and **Instagram**. The providers are **Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland**, and **Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA**, and **1601 S. California Ave, Palo Alto, California 94304, USA**. If you visit our website or click the Facebook "Like" button or the Instagram "Follow Us" button, these plug-ins can establish a direct connection between your browser and the Facebook servers. Facebook receives certain information as a result. Please note that we are not made aware of the data transmitted to and used by Facebook.

**16.5** Our website uses **Google Analytics**, a service of **Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043 USA**. Google Analytics is an Internet analytics service that collects information which is generated when you visit websites. This information is **transmitted** to Google LLC. Please note that we are not made aware of the data transmitted to and used by Google.

**16.6** Our website uses **YouTube** plug-ins to integrate and display video content. The provider of the video portal is **YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA**. When you visit a page with a built-in YouTube plug-in, a connection to the YouTube servers can be established. YouTube receives certain information as a result. Please note that we are not made aware of the data transmitted to and used by YouTube.

**16.7** Our website uses the service **Twitter**, offered by **Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA**. By using Twitter and the "retweet" function, the websites you visit are linked to your Twitter account and made known to other users. Data are also transmitted to Twitter. Please note that we are not made aware of the data transmitted to and used by Twitter.

**16.8** Our website uses plug-ins of the **LinkedIn** service. The provider is **LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA** or the **LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland**. When you visit one of our websites with an integrated LinkedIn plug-in or when you click the "recommend" button, a connection to the servers of LinkedIn's is established and certain information is sent to LinkedIn. Please note that we are not made aware of the data transmitted to and used by LinkedIn.

**16.9.** Our website uses plug-ins of the service **Pinterest**. The providers are **Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland** and **Pinterest Inc., 651 Brannan Street, San Francisco, CA 94103**. If you visit our website or click the "Pinterest Share Button", these



plug-ins can establish a direct connection between your browser and the Pinterest servers. Pinterest receives certain information as a result. Please note that we are not made aware of the data transmitted to and used by Pinterest.

**16.10** For digital, internet-based communication, in particular for virtual meetings with video and voice recording, we use the services of **Zoom Video Communications, Inc., 55 Almaden Blvd, Suite 600, San Jose, CA 95113, USA**. The computers and programs which are used to process the personal data created through using these services are located at unspecified locations, including outside the EU, and the data entered by users may be passed on to undisclosed third parties and processed for undisclosed purposes. More information: <https://explore.zoom.us/de/privacy/>

**16.11** We use the cloud and database services of the company **airtable, 799 Market Street 8th Floor, San Francisco, California, 94103, USA**, to manage data in connection with enrolment in courses, meetings and events. The computers and programs which are used to process the personal data created through using these services are located at unspecified locations, including outside the EU, and the data entered by users may be passed on to undisclosed third parties and processed for undisclosed purposes. More information under: <https://www.airtable.com/privacy>

**16.12** To manage customer data and to send our newsletter and circulars, we use the cloud and customer data management services of **HubSpot Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, USA**. The computers and programs which are used to process the personal data created through using these services are located at unspecified locations, including outside the EU, and the data entered by users may be passed on to undisclosed third parties and processed for undisclosed purposes. More information under: [https://legal.hubspot.com/de/privacy-policy?hubs\\_content=www.hubspot.de/company/contact&hubs\\_content-cta=Privacy Policy](https://legal.hubspot.com/de/privacy-policy?hubs_content=www.hubspot.de/company/contact&hubs_content-cta=Privacy Policy)

## 17. Hyperlinks

Our website contains digital links (hyperlinks) to the digital information and communication services of third parties (services). By “clicking” on these hyperlinks, visitors to our website are referred to these services. It is likely that any use of these services initiated in this way will result in the service providers or other third parties collecting personal data, such as IP addresses. STP is not responsible for the content of these services, nor for the collection of personal data by the providers of the services or other third parties that may be effected by clicking on the hyperlinks.