

# Personal data and deletion mechanisms

Inxmail Commerce

Mail Relay

Inxmail Professional

Inxmail New Xperience

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## OVERVIEW

This document describes the storage of personal data in Inxmail Commerce, Inxmail Professional and Inxmail New Xperience. The corresponding deletion mechanisms are also described. Our software is constantly being further developed and functions for automated data deletion are taken into account.

This document does not contain descriptions of individual interfaces between

- Inxmail Commerce
- Inxmail Professional
- Inxmail New Xperience

and third-party systems.

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# **1 Inxmail Commerce**

# 1.1 Personal data

This section distinguishes between personal data of recipients and personal data of users. Personal data of recipients refers to all information of recipients stored or processed in Inxmail Commerce (these may receive emails sent by Inxmail Commerce) that relates to identifiable natural persons. Personal data of users refers to all information stored in Inxmail Commerce about users (who carry out email marketing activities with Inxmail Commerce) that relates to identifiable natural persons.

## 1.1.1 Personal data of recipients

Depending on the configuration, Inxmail Commerce stores the following personal data for each recipient, for example:

- Data on opening and click behaviour in the recipient's emails
- Event data, for details see section 1.1.1.1
- Delivery information on emails sent to the recipient, for details see section 1.1.1.2
- Bounce messages

### 1.1.1.1 Event data

Recipient-related event data is deleted by default two years after the workflow has been successfully completed (i.e. the workflow has been run completely to the end). A period of between one day and two years can be configured, and the event data will only be deleted after the configured period.

If event data is to be deleted immediately after the workflow has run through, this can be configured per event. Existing event records will also be deleted.

The links to the web view within the sent mailings no longer work without event data.

### 1.1.1.2 Mailing delivery information

Delivery information, i.e. whether an email was sent and delivered or bounced, is deleted according to the defined deletion period.

Detailed information, i.e. the delivery information of the receiving mail server, is always deleted after 30 days due to the large amount of data.

### 1.1.1.3 Report retention period

Reports only work for the time period in which reaction data is available. Example: If two years is configured as the deletion period for reaction data, reports for two years can be viewed retroactively.

## 1.1.2 Personal data of users

Inxmail Commerce stores the following personal data for each user:

- Email
- Language
- Assigned roles
- Assigned spaces
- User Log
  - If tracking settings are changed or the time period for automated deletion of a certain data type is changed, the user's email address is stored.

## 1.2 Automated data deletion

The following data is automatically deleted according to the current configuration:

Category	Implementation
Event data	› For each category and each individual data type within a category, the user can define a time period when the corresponding data will be deleted.
Error log data	
Delivery informationen	› By default, the data is deleted after two years.
Openings and clicks	› The data retention period can be configured between one day and two years for each category or data type.
Bounces and returns with the following data types:	
› Hard bounces	
› Soft bounces	
› Spam complaint	
› Autoresponder	
› Blocked	
› Uncategorised	

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## 1.3 Deactivation and deletion of spaces

The following process is carried out when one (or more) spaces are cancelled:

- › Inxmail deactivates a space at the end of the contract term.
- › Inxmail deletes a space after deactivation within 30 days.
- › Backups are created daily and a backup is automatically deleted after 30 days. After deactivation of a space, no more backups are created. After 30 days, the last available backup is deleted.
- › When a space is deleted, all data is deleted. The associated sender domains are deleted when they are no longer used in any other space.

## 1.4 Deletion of accounts

An account can contain one or more spaces.

When an account is cancelled, all the spaces assigned to it are deactivated at the end of the contract and finally deleted (for a description of the process, see the previous section).

As soon as the last space in an account has been deleted, the associated account is also deleted. The users of the account are then deleted if they are no longer used in any other account.

## 1.5 Mail Relay

As a standalone product based on Inxmail Commerce, Mail Relay enables secure email delivery from third-party systems. To do this, Mail Relay accesses the dispatch infrastructure, bounce management, response data (openings, clicks) and reports from Inxmail Commerce.

The following previous sections apply to Mail Relay:

- 1.1 Personal data except for 1.1.1.1 Event data
- 1.2 Automated data deletion
- 1.3 Deactivation and deletion of spaces
- 1.4 Deletion of accounts



# **2 Inxmail Professional**

## 2.1 Personal data

This section distinguishes between personal data of recipients and personal data of users. Personal data of recipients refers to all information of recipients stored or processed in Inxmail Professional (these may receive emails and newsletter campaigns sent by Inxmail Professional) that relates to identifiable natural persons. Personal data of users refers to all information of users stored in Inxmail Professional (they implement email marketing activities with Inxmail Professional) that relates to identifiable natural persons.

### 2.1.1 Personal data of recipients

Depending on the configuration, Inxmail Professional stores the following personal data for each recipient, for example:

- Recipient record: email address and other enriched information with personal data through customer-responsible processes
- Information on consent or revocation of tracking permission
- Entries in tracking permission logs
- Subscription and unsubscription information for standard lists
- IP address

- Open and click information triggered by the recipient in the emails
- Delivery information on emails sent to the recipient: which emails the recipient received and when.
- Creation of presentation tests
- Entry in mailing dispatch error protocols
- Emails in the inbox when the recipient has replied to an email
- Bounce messages
- Entry in import protocols of the manual recipient import
- Entry in import protocols of automated recipient import
- Entry in the black list
- Entries in the black list protocol

#### 2.1.1.1 When and which mailings did a recipient receive?

Inxmail Professional keeps a so-called dispatch history, in which the start and end time of the dispatch is saved for each dispatch (there can be several for the same mailing, especially in the case of trigger mailings); in addition, the fact that the recipient was contacted and whether the email was delivered is saved for each recipient.

This log is kept for two years by default. If the mailing is deleted beforehand, the log is also deleted 30 days after deletion.

The mailing log can be retrieved via Inxmail Professional REST API and RPC API (for Java, .NET, PHP).

### **2.1.1.2 When did the recipient click which link in which mailing?**

This information is stored on a personal basis, i.e. it can be traced back to a specific recipient, provided that the recipient had consented to person-based tracking at the time of opening or Inxmail Professional is configured in such a way that person-based tracking is always carried out.

In principle, Inxmail Professional stores every click on a tracked link as well as every call of a tracked image (opening pixel). In particular, the following is recorded:

- › the time of the call
- › the so-called user agent string of the browser/mail client from which the call was made
- › which link from which mailing and which dispatch was called up

If tracking permission is granted at the time of the call, this data is stored with the ID of the recipient data record and can therefore be evaluated on a personal basis.

If the tracking permission is NOT present at the time of the call and the observance of the tracking permission is activated, this

data is stored anonymously but distinguishable. It is then not possible to draw conclusions about the recipient's data record.

If a recipient is deleted from the system, it is no longer possible to infer the recipient record and thus the click information of the recipient.

Inxmail Professional RPC API: The basic click information can be retrieved via the dispatch log. The clicks with all meta information can be retrieved via a separate endpoint.

Inxmail Professional REST API: The click information can be retrieved via a separate endpoint.

### **2.1.1.3 When did the recipient open which mailing?**

From a technical point of view, an opening can be recognised when a tracked URL (link or image) from this mailing is called up. Because the time of each of these calls is also recorded (see above), Inxmail Professional records the time of each opening. Please refer to 2.1.1.2 When did the recipient click which link in which mailing?

If the tracking permission is NOT present at the time of the call and the observance of the tracking permission is activated, this data is stored anonymously but distinguishable. It is then not possible to draw conclusions about the recipient's data record.

If a recipient is deleted from the system, it is no longer possible to infer the recipient's data record and thus the recipient's opened information.

Inxmail Professional RPC API: Opened information can be retrieved via the dispatch log.

Inxmail Professional REST API: The opened information can be retrieved via a separate endpoint.

#### **2.1.1.4 When is the IP address of a recipient stored?**

Registration for the newsletter is usually done via the double opt-in procedure (DOI).

Confirmation of the DOI ensures that no one can register with someone else's email address and documents consent (e.g. with or without consent to tracking).

As a rule, the time of registration and confirmation as well as the IP address are logged. The IP address in particular is a personal data. The processing of the IP address within the framework of the DOI process is permissible. The data subjects should nevertheless be expressly informed of this (via the data protection statement) and be made aware of the risks and protective measures.

#### **2.1.1.5 When is the IP address of a recipient stored?**

If a recipient registers for a list using the double opt-in registration process, the recipient must confirm their registration once again using the registration link before they are added to the list as a recipient.

As long as the recipient has not confirmed his double opt-in registration, his recipient data will not be cached in a way that is visible to the Inxmail Professional user.

If the configured period for the double opt-in confirmation of a recipient has expired without the recipient having confirmed their registration via the registration link, all recipient data for this recipient will be automatically deleted from this list after a further 30 days.

## **2.1.2 Personal data of users**

Inxmail Professional stores the following personal data for each user:

- User name
- Full name
- Email address
- Language (stored in the Inxmail Professional client)
- User protocol
- IP address
- Entries in the approval protocol with email address of the user

## 2.2 Automated data deletion

Category	Implementation
Bounces messages	<p><b>The following data will be deleted:</b></p> <p>Data of the category 'Bounces' in the agent 'Inbox &amp; Bounces' with the data types 'Hard bounce', 'Soft bounce', 'Unknown bounce', 'Autoresponder bounce' and 'Spam (bounce)' are automatically deleted by default after two years if they are received in a "bounce mailbox". Specifically, the bounce messages are deleted here and not the recipients whose email address caused a bounce.</p> <p>In consultation with a customer, Inxmail can configure an individual deletion period for the data types mentioned.</p> <p><b>The following data will not be deleted:</b></p> <p>Data of the category 'Inbox' in the agent 'Inbox &amp; Bounces' with the data types 'Reply', 'Complaint', 'Autoresponder' and 'Spam' received in a "non-bounce mailbox".</p>
Dispatch history	<p>By default, entries in the dispatch history are automatically deleted after two years. Inxmail can configure an individual deletion period for the dispatch history entries in consultation with a customer.</p> <p><b>Note:</b></p> <p>In the dispatch history, information is stored about which recipient received which emails and when.</p>

Category	Implementation
Coupon code plug-in	<p>With the optionally bookable Coupon code plug-in, coupon campaigns can be created, activated, deactivated and deleted.</p> <p>In the Coupon code plug-in, the following data is automatically deleted after two years:</p> <ul style="list-style-type: none"><li>› Archived (expired) campaigns are completely deleted.</li><li>› If the last voucher sent in an active campaign was more than two years ago, the campaign will be deleted completely.</li><li>› The deletion of a campaign includes sent vouchers, unused vouchers, expiry date, voucher/barcode selection and barcode type.</li><li>› The campaign contains a link from the respective recipient to the voucher code. If the campaign is deleted, the links are also deleted.</li></ul>
Email display test	<p>The generated preview images of the email display test are deleted after six months.</p>
Subscriptions and unsubscriptions of recipients	<p>In the double opt-in subscribe procedure, if a recipient does not confirm subscription to a standard list within the confirmation period, all of their cached recipient data is deleted after an additional 30 days.</p>
Import protocol   manual recipient import	<p>In case of a manual recipient import via the 'Recipients' agent, the following data is automatically deleted after 30 days:</p> <ul style="list-style-type: none"><li>• Metadata (e.g. date of recipient import, total number of imported rows in the import file).</li><li>• Email addresses that are stored in the import protocol due to defined error cases during recipient import (e.g. email address is on the black list).</li></ul>

Category	Implementation
Import protocol   automatic recipient import	<p>In case of a automatic recipient import via the 'Import Automation' agent, the following data is automatically deleted after 7 days:</p> <ul style="list-style-type: none"><li>• Metadata (e.g. date of recipient import, total number of imported rows in the import file).</li><li>• Email addresses that are stored in the import protocol due to defined error cases during recipient import (e.g. email address is on the black list).</li></ul>
Export Automation	<p>With the optionally bookable Export Automation, certain data in the Inxmail Professional client can be exported automatically at a defined retrieval interval.</p> <p>Depending on which package has been booked for the export automation, the data export can contain personal data (e.g. export of recipient data, subscriptions and unsubscriptions, etc.) or no personal data (e.g. mailings, links, etc.).</p> <p>The temporarily stored aggregated data of an export automation is deleted 20 days after the export process.</p> <p><b>Note:</b></p> <p>The CSV data generated by the Export Automation process, which is stored on the SFTP server, remains and is not deleted.</p>
Mailing dispatch error protocol	<p>When a mailing is sent, the following error protocol data is automatically deleted after 30 days:</p> <ul style="list-style-type: none"><li>• List and mailing metadata</li></ul>

Category	Implementation
	<ul style="list-style-type: none"><li data-bbox="869 300 1973 336">• Recipient ID, email address and as well as date and reason for the entry</li></ul>



## 2.3 Manual data deletion

Event/Action	Implementation
Unsubscribing a recipient from a standard list	<p>Unsubscribing a recipient from a list does not delete any data for that recipient.</p> <p>Unsubscribing a recipient from a list will exclude that recipient from all future mailings from that list.</p>
Deleting a recipient from a standard list	<p><b>The following data will be deleted:</b></p> <ul style="list-style-type: none"><li>› The information that the recipient is assigned to this list is deleted.</li><li>› The tracking permission of the recipient for this list is deleted by default. The user can define per list that the tracking permission of a recipient is not deleted if the recipient itself is deleted.</li></ul> <p><b>The following data will not be deleted:</b></p> <ul style="list-style-type: none"><li>› All other recipient data is retained, including the dispatch history and opening and click data. These data are not deleted due to the obligation to provide proof or the availability of the reports.</li></ul> <p><b>Note:</b></p> <ul style="list-style-type: none"><li>› When deleting a recipient from a standard list, make sure that the recipient is also deleted from import files and import lists of third party systems so that this recipient cannot be imported into this standard list again.</li></ul>
Delete a recipient from the system	<p><b>The following data will be deleted:</b></p>

**Event/Action****Implementation**

- › The email address, all recipient data and attributes (e.g. subscription date, last change, bounce status) of the recipient are deleted from all lists and the system.
- › All unsubscriptions to lists of the recipient are deleted.
- › All current tracking permissions of the recipient are deleted, but not the tracking permission log.

After a recipient has been deleted from the system, the email address and possibly the IP address are still included for reasons of traceability and allow conclusions to be drawn about the recipient. When a client is deleted, the email address and the IP address of the already deleted recipient are also deleted.

**The following data will not be deleted due to the obligation to provide evidence or the availability of the reports:**

- › Email address (in the subscription log)
- › IP address (in the subscription and tracking permission log)
- › Bounce messages
- › Subscription log entries
- › Tracking permission log entries
- › Opening and click data
- › Dispatch history log entries

After deleting a recipient from the system, the email address and possibly the IP address are still included in the subscription and tracking permission log for reasons of

**Event/Action****Implementation**

verification. When a client is deleted, the email address and the IP address of the already deleted recipient are also deleted. After the deletion of the recipient, all other listed data are available in an unpersonalised form and no longer allow any conclusions to be drawn about the recipient.

**Note:**

- › When deleting a recipient from the system, make sure that this recipient is also deleted from import files and import lists of third-party systems, so that this recipient cannot be imported again.

Add a recipient to the black list

Recipients who are on the black list do not receive any emails and cannot subscribe to any mailing list. In order to be able to carry out the technical procedure of excluding these recipients from receiving mailings and subscribing to a mailing list, the email address must be stored. For each entry on the black list, the email address or entire address ranges (e.g. \*@example.com) and a description are stored.

The deletion concept for the event "Add a recipient to the black list" is the same as for the event "Delete a recipient from the system". Only the email address is saved in the black list.

**The following data will be deleted:**

- › All recipient data and attributes (e.g. subscription date, last change, bounce status) of the recipient are deleted from all lists and the system.
- › All unsubscriptions of the recipient are deleted.

Event/Action	Implementation
	<ul style="list-style-type: none"> <li>› All current tracking permissions of the recipient are deleted, but not the tracking permission log.</li> </ul> <p>After a recipient has been deleted from the system, the email address and possibly the IP address are still included for reasons of traceability and allow conclusions to be drawn about the recipient. When a client is deleted, the email address and the IP address of the already deleted recipient are also deleted.</p> <p><b>Note:</b></p> <p>By being blacklisted, this recipient can no longer be entered as a recipient in a list (manual entry, import, API, registration form) and is excluded from all future mailings of the corresponding client.</p>
Delete a black list entry	<p><b>The following data will be deleted:</b></p> <p>The email address or address range (e.g. *@example.com) and the description will be deleted.</p>
Delete an entry in the black list protocol	<p>In the black list protocol, all attempts are logged when recipients try to subscribe to standard lists that are already entered in the black list. Every attempt to subscribe is prevented by Inxmail Professional and an entry is made in the black list protocol with the date of the subscription attempt and the email address.</p> <p><b>The following data will be deleted:</b></p> <p>The email address or address range (e.g. *@example.com) and date of the blocked subscription attempt are deleted.</p>

**Event/Action****Implementation**

Delete a standard list

All mailings (text/HTML/multipart/template) of all mailing types (standard, trigger, actions, email sequence, split test and subscribe/unsubscribe), modules (text/HTML/multipart), import protocols and list properties of the list are deleted.

**When a mailing is deleted from the list, the following additional data is deleted:**

- › Entries in the link table  
The link table contains the following data: Link URL, link type, link alias, name in the report, mailing ID and sending ID
- › All openings and clicks of all relevant mailings
- › Inbox and bounce entries of all relevant mailings
- › The mailing content (completely unpersonalised content) of all relevant mailings stored in the dispatch table
- › The log of ongoing dispatches of all relevant mailings

Delete a mailing

Delete a mailing refers to mailings (text/HTML/multipart/template) of the mailing types standard, trigger, actions, email sequence and split test.

- › When a user deletes a mailing, the corresponding record in the database receives a 'deletion mark'.
- › After 30 days, mailings with a 'deletion mark' are deleted by default.
- › If required, the user can instruct Inxmail to restore the deleted mailing within these 30 days.

Event/Action	Implementation
	<p><b>When a mailing is deleted from the list, the following additional data is deleted:</b></p> <ul style="list-style-type: none"> <li>› Entries in the link table           <p>The link table contains the following data: Link URL, link type, link alias, name in the report, mailing ID and sending ID</p> </li> <li>› All openings and clicks of the corresponding mailing</li> <li>› Inbox and bounce entries of the corresponding mailing</li> <li>› The mailing content (completely unpersonalised content) of the corresponding mailing stored in the dispatch table</li> <li>› The log of ongoing dispatches of the corresponding mailing</li> </ul>
<p>A recipient's tracking permission is withdrawn for a standard list</p>	<ul style="list-style-type: none"> <li>› New personal data (openings and clicks) of this recipient are stored anonymously after the tracking permission has been withdrawn.</li> <li>› Previously stored personal data of the recipient will not be subsequently anonymised or deleted.</li> <li>› The effect of the withdrawing only applies to the respective standard list. The tracking permission setting in other standard lists of the recipient are completely independent of the withdrawing of the tracking permission in a specific standard list.</li> </ul>
<p>Delete a module (text/HTML/multipart)</p>	<ul style="list-style-type: none"> <li>› When a user deletes a module, the corresponding data record in the database receives a 'deletion mark'.</li> <li>› After 30 days, modules with a 'deletion mark' are deleted by default.</li> </ul>

Event/Action	Implementation
	<ul style="list-style-type: none"><li>› If required, the user can instruct Inxmail to restore the deleted module within these 30 days.</li></ul>
Delete an import automation	<ul style="list-style-type: none"><li>› When a user deletes an import automation, the corresponding record in the database is marked with a 'deletion flag'.</li><li>› After 30 days, import automations with a 'deletion flag' are deleted by default.</li><li>› If necessary, the user can request Inxmail to restore the deleted import automation within these 30 days.</li></ul>
Delete an email in the inbox	<p><b>The following data will be deleted:</b></p> <p>The email will be deleted along with all the information it contains.</p> <p><b>Notice:</b></p> <p>When deleting a recipient, related emails remain in the inbox.</p>
Delete a bounce message	<p><b>The following data will be deleted:</b></p> <p>The undeliverable message, email address and date of the bounce message will be deleted.</p> <p><b>Note:</b></p> <p>When a recipient is deleted, associated bounce messages are retained.</p>
Delete a sender domain	<p><b>The following data will be deleted:</b></p>

Event/Action	Implementation
Delete a user	<p>The domain and the email address for forwarding responses will be deleted, as well as any other optional data.</p> <p>Only certain Inxmail employees can delete users upon request.</p> <p>A deleted user is no longer displayed in the overview table of all users in the 'Users' agent.</p> <p><b>The following data is not deleted for auditing purposes:</b></p> <ul style="list-style-type: none"> <li>› User name, full name, description, email address, and assigned roles and rights remain saved. This means that user operations (user protocol) and approvals of mailings (approval protocol) of this user can still be tracked.</li> <li>› All captured and saved operations that a user has triggered will remain in the user protocol indefinitely for auditing purposes even when the user is deleted.</li> <li>› In approval protocols (for approval of mailings) entries of this user are not deleted.</li> </ul>
Delete a client, on termination of the contractual relationship	<ul style="list-style-type: none"> <li>› Inxmail deletes the client(s) within 30 days.</li> <li>› Backups are created daily and a backup is automatically deleted after 30 days. After a client has been deleted, daily backups are no longer created.</li> <li>› If an Inxmail Webspaces / Inxmail Secure Webspaces has also been booked, this will generally be deleted within 35 days of the end of the contract.</li> </ul> <p><b>When deleting a client, all contained data is deleted except for the following data:</b></p>



Event/Action	Implementation
	<ul style="list-style-type: none"><li data-bbox="817 304 2128 485">› If the Client Manager was also used: On the day the contract ends, the client is set to inactive in the Client Manager. All data stored in the Client Manager remain stored for an unlimited period of time, in particular aggregated data on the dispatch volume and number of recipients of a client, Client Manager users, user groups and domains.</li><li data-bbox="817 517 1456 552">› Deletion of middleware and plug-in data</li><li data-bbox="817 584 1406 619">› Deletion of coupon code plug-in data</li><li data-bbox="817 651 2123 734">› With Export Automation, the exported CSV data is not deleted from the SFTP server if the customer's own SFTP server is used.</li></ul>

## 2.4 No data deletion

**Important note:** The following table shows in which cases no data deletion is possible during the contract period. Only when the client is terminated and deleted, all listed data of the following table will be deleted as well.

Category	Implementation
User protocol	<p>All recorded and saved processes that a user has triggered are retained for auditing purposes for an unlimited period of time during the term of the contract, even if the user is deleted.</p> <p><b>The following operations are recorded and stored:</b></p> <ul style="list-style-type: none"> <li>› Logging started</li> <li>› Logging stopped</li> <li>› User created</li> <li>› User deleted</li> <li>› User activated</li> <li>› User deactivated</li> <li>› Right added</li> <li>› Right removed</li> <li>› Role added</li> <li>› Role removed</li> <li>› Mailing activated</li> <li>› Mailing deactivated</li> <li>› Dispatch stopped</li> <li>› Dispatch postponed</li> <li>› Administrative property changed</li> <li>› Approval requested</li> <li>› Approval granted</li> <li>› Approval request revoked</li> <li>› Approval rejected</li> <li>› Approval process activated</li> </ul>

Category	Implementation
	<ul style="list-style-type: none"> <li>› Password changed</li> <li>› Login changed</li> <li>› User logged in</li> <li>› User logged off</li> <li>› API user logged in</li> <li>› Login failed</li> <li>› API user logged off</li> <li>› API login failed</li> <li>› Role created</li> <li>› Role deleted</li> <li>› Right added</li> <li>› Right removed</li> <li>› Role renamed</li> <li>› List created</li> <li>› List deleted</li> <li>› List renamed</li> <li>› Mailing created</li> </ul>
	<ul style="list-style-type: none"> <li>› Approval process deactivated</li> <li>› Approval invalidated</li> <li>› Recipient deleted</li> <li>› Advanced property changed</li> <li>› Editorial property changed</li> <li>› Split test created</li> <li>› Split test deleted</li> <li>› Split test scheduled</li> <li>› Split test activated</li> <li>› Split test deactivated</li> <li>› Automated import created</li> <li>› Automated import edited</li> <li>› Automated import deleted</li> <li>› Automated import activated</li> <li>› Automated import deactivated</li> <li>› Automated import postponed</li> <li>› Action without running tracking permission was deactivated</li> </ul>

Category	Implementation
	<ul style="list-style-type: none"> <li data-bbox="831 304 1106 336">› Mailing deleted</li> <li data-bbox="831 371 1061 403">› Mailing sent</li> <li data-bbox="831 438 1144 470">› Mailing scheduled</li> <li data-bbox="831 505 1115 537">› Mailing stopped</li> </ul> <ul style="list-style-type: none"> <li data-bbox="1487 304 2074 384">› Action without running tracking permission was activated</li> </ul>
Openings and clicks	<p data-bbox="819 587 2119 815">All recorded and saved openings and clicks that a recipient has triggered in sent emails remain saved for an unlimited period of time during the contract term, even if the recipient is deleted from a list or from the system and if a recipient unsubscribes from a list. Reports on openings and clicks in mailings can therefore be retrieved indefinitely during the contract period.</p> <p data-bbox="819 842 2085 927">When deleting a list, associated openings and clicks are deleted. When a mailing is (finally) deleted, openings and clicks are also deleted (see section 2.3 "Delete a mailing").</p> <p data-bbox="819 954 904 986"><b>Note:</b></p> <p data-bbox="819 1018 2078 1150">If a recipient is deleted from the system or placed on the blacklist, the openings and clicks made by this recipient are only available in anonymized form, as the associated email address has already been deleted.</p>
Subscriptions protocol	<p data-bbox="819 1197 2123 1329">All recorded subscription protocol entries of a list (all subscription and unsubscription events and error cases with email address and IP address of the recipient) are stored indefinitely during the contract period.</p> <p data-bbox="819 1356 904 1388"><b>Note:</b></p>

Category	Implementation
	If a recipient is deleted from the system or placed on the blacklist, the data of this recipient can still be analyzed in the subscriptions protocol, as the associated email address is also saved in the protocol.
Approval protocol	The protocol of mailing approvals (Who approves a mailing and when?) is stored indefinitely during the contract period.
Tracking permission	Tracking permissions are stored indefinitely during the contract period. <b>Exception:</b> If a recipient is deleted from the system or placed on the blacklist, all tracking permissions for this recipient are deleted.
Tracking permission protocol	The tracking permission protocol contains the following data: Recipient ID, list ID, tracking permission status (tracking permission yes/no), origin of the change (e.g. subscription JSP), determined IP address, specified IP address of the originating system, message from the originating system and timestamp. This data is stored indefinitely during the contract period. <b>Note:</b> If a recipient is deleted from the system or placed on the blacklist, the data of this recipient is only available in the tracking permission protocol in anonymized form, as the associated email address has already been deleted.
Sending protocol	Sending protocol data (sending ID, mailing ID, mailing type, sending status, start and end date of a sending) are stored indefinitely.

**Category****Implementation****Note:**

If a recipient is deleted from the system or placed on the blacklist, the data of this recipient is only available in the sending protocol in anonymized form, as the associated email address has already been deleted.

## 2.5 Cancellation of a client

When a client is cancelled, the following process is followed:

- › Inxmail deactivates the client at the end of the contract term.
- › After a retention period of 30 days, Inxmail permanently deletes the client.
- › Backups are created daily and a backup is automatically deleted after 30 days. After deletion of a space, backups are no longer created. The recovery of an account or space on the basis of a backup is possible within the retention period upon request. After 30 days, the last available backup is deleted.

When a client is deleted, all data described in section 2.3 under *Delete a client* is deleted.

# **3 Inxmail New Xperience**



## 3.1 Basic structure

Inxmail New Xperience provides central, independent functions that, in combination with other Inxmail Professional functions, create a complete email marketing solution.

Mailings are basically created and tested in Inxmail New Xperience. The dispatch of the mailing is triggered in Inxmail New Xperience, the corresponding mailing is synchronized with Inxmail Professional, linked to a group of recipients and sent. All dispatch information and thus recipient-related data is stored exclusively in Inxmail Professional, for details see section 2.1. Message data on the mailings sent as well as on bounces and returns (e.g. replies) are stored and displayed in Inxmail Professional. In Inxmail New Xperience, some selected report data on the mailings sent can be viewed.

### 3.1.1 Structure of Inxmail New Xperience

Inxmail New Xperience provides the following functions:

- Mailing editor for creating and testing (display test, spam test) mailings.
- Integrated image editing
- Inxmail webspace for image and document management

- External content: import of external content from third-party systems into a mailing at the time of editing.
- Mailing synchronization: mailings are synchronized for dispatch to Inxmail Professional.
- Triggering of mailing dispatch: the mailings are then synchronized to Inxmail Professional and sent via this application.
- Reporting: selected report data on the sent mailings can be called up. The database for reporting is stored in Inxmail Professional.
- Style set editor
- Container editor
- User administration
- Role and rights concept for users
- Structured administration of all objects and data via accounts and spaces

### 3.1.2 Interaction with Inxmail Professional

Inxmail Professional provides the following functions:

- Management of recipient data
- Provision of modules and target groups

- Test dispatch and dispatch of mailings
- Storage of bounces and returns (e.g. replies) of sent mailings
- Storage of report data of sent mailings
- Structured management of all objects and data via clients and lists

In the interaction between Inxmail New Xperience and Inxmail Professional, the information on data storage and deletion mechanisms in section 2 applies to the listed functions.

### 3.1.3 Basic note on data deletion

The following functions are available in both Inxmail New Xperience and Inxmail Professional, each in its own version:

- Mailing editor for creating and testing (display test, spam test) mailings
- Inxmail webspace for image and document management
- User administration
- Roles and rights concept

With these listed functions, which are available in both applications, the data deletion of the objects always takes place only in the application in which the deletion process was triggered. For example, if a user is deleted in Inxmail New Xperience, created users in Inxmail Professional remain unaffected.

### 3.1.4 Data deletion with hold time (Recycle bin function)

The deletion of accounts, spaces and users in Inxmail New Xperience follows a two-step procedure:

- In the first step, a user with the appropriate rights moves the object to be deleted to the recycle bin. The object is kept in the recycle bin for 30 days and can be restored or deleted by the user within this period.
- After 30 days in the recycle bin, objects are automatically deleted. Restoration from the recycle bin is then no longer possible.

## 3.2 Personal data

This section distinguishes between personal data of recipients and personal data of users. Personal data of recipients refers to all information of recipients stored or processed in Inxmail New Xperience (these may receive emails sent by Inxmail Professional) that relates to identifiable natural persons. Personal data of users refers to all information stored in Inxmail New Xperience about users (who carry out email marketing activities with Inxmail New Xperience) that relates to identifiable natural persons.

### 3.2.1 Personal data of recipients

In the interaction between Inxmail New Xperience and Inxmail Professional, almost all personal data of recipients is stored in Inxmail Professional, so the notes on data storage and deletion mechanisms in section 2 apply here.

In Inxmail New Xperience, the storage of personal recipient data only applies to the generation of display tests and spam tests: The generated preview images of the display test or the results of the spam test, which are stored for six months, may contain personal recipient data if real recipient data are used for test profiles.

Recipient management in Inxmail New Xperience allows users with the appropriate rights to view and edit recipients. All recipient data is always saved in Inxmail Professional. In Inxmail New Xperience, recipient data is only displayed when a user calls up the recipient overview or individual recipients or edits individual recipients, but is not saved in Inxmail New Xperience. Therefore, deletion mechanisms for recipient management in Inxmail New Xperience are not necessary and therefore do not exist.

In the case of optionally bookable Inxmail New Xperience add-ons, personal data may be processed and stored depending on the add-on; for detailed information, see section 3.3.

### 3.2.2 Personal data of users

Inxmail New Xperience stores the following personal data for each user:

- E-mail, title, language, first name and last name
- Optionally also profile picture, title/function, team, telephone number and personnel number/abbreviation
- Assigned roles
- Assigned spaces in the accounts
- Authentication and authorization data of the user
- Data about browser accesses (IP address) of the user
- Log files (stored for a maximum of one month)
- User ID, Space ID and IP address are stored for all login attempts
- For the evaluation of active users in the application a hash value of the session ID is stored

## 3.3 Inxmail New Xperience add-ons

The functionality of the Inxmail New Xperience can be extended via optionally bookable add-ons.

This section describes the basic structure, the stored data and the deletion mechanisms for each add-on.

### 3.3.1 Coupon add-on

With the optionally bookable Coupon add-on, coupon campaigns can be created, activated, deactivated and deleted.

A coupon campaign includes both the uploaded coupon codes and the email addresses of the recipients who have already received a coupon from the associated campaign in the past. Optionally, a campaign can contain individual e-mail addresses that receive automatic notifications after the campaign has been activated (e.g. when the number of available coupon contingents falls below a previously configured threshold). A coupon campaign can be assigned the status *activated* or *deactivated*.

A user with the role *Mailing Manager* or *Editor* or with the right *Use "Coupons" navigation item* may create, activate, deactivate and delete coupon campaigns as well as import, export, transfer and replace coupons for these campaigns.

#### Stored recipient data

The sending of a previously uploaded coupon code to a specific recipient email address is documented within the Coupon add-on or the Inxmail New Xperience infrastructure. The link consists of:

- Recipient email address
- Coupon code
- SendingID
- Time of sending

This link is used for the later traceability of the recipient-specific coupon dispatch.

#### Stored user data

The following data is stored for users who use the Coupon add-on in Inxmail New Xperience:

- Information about which campaign manager is assigned to the campaign
- Stored email addresses for notifications
- Upload history (which campaign manager has uploaded coupons)

#### Automated data deletion

If a coupon campaign has been in the *activated* status for two years and no coupon has been sent within this period, the status of the coupon campaign automatically changes to *deactivated*.

Deactivated campaigns are automatically deleted after a retention period of 30 days.

## Manual data deletion

If a user deletes a coupon campaign, this coupon campaign will be deleted immediately without a retention period.

If a user deactivates a coupon campaign, this coupon campaign is automatically deleted after a retention period of 30 days.

## Deleting a coupon campaign

When deleting a coupon campaign, the following data is deleted:

- Recipient email addresses
- Coupon codes
- SendingIDs
- Sending times

In addition, assignments to user data are deleted:

- Information about which campaign manager is assigned to the campaign
- Deposited email addresses for notifications

- Upload history (which campaign manager has uploaded coupons)

## 3.4 Automated data deletion

Category	Implementation
Accounts	<p>Accounts to be deleted that have been held in the recycle bin for 30 days will be permanently deleted after this period.</p> <p>At the time when an account is deactivated, all spaces are also deactivated and placed in the trash. With the deactivation of the spaces, all associated campaigns of the Coupon add-on are automatically deactivated and finally deleted after 30 days. This also applies if the Coupon add-on for the account is cancelled but the account remains.</p> <p><b>When an account is permanently deleted, the following data is deleted:</b></p> <ul style="list-style-type: none"><li>• All created users with all user-related data</li><li>• All created guest users</li><li>• All created individual roles</li><li>• All coupon campaigns</li><li>• All backups are deleted within 30 days</li></ul> <p><b>When finally deleting an account, the following data for each space included in the account can be deleted on request:</b></p> <ul style="list-style-type: none"><li>• All mailings</li></ul>

**Category****Implementation**

Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional.

- All mailing templates

Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional.

- All scheduled dispatches
- All style sets
- All workflows
- All test orders of the display tests and spam tests
- All own containers / all shared own containers
- All content containers / all shared content containers
- All content sources
- All mailing synchronizations
- All images and documents stored in the integrated web space
- CDN for media management

**Note:**

Category	Implementation
Spaces	<p>Log files are temporarily stored regardless of the deletion of an account and deleted within one month.</p> <p>Spaces to be deleted that have been held in the recycle bin for 30 days are permanently deleted after this period.</p> <p>If a space (independent of the account) is deactivated and thus placed in the recycle bin, all associated campaigns of the Coupon add-on will be deactivated and permanently deleted after 30 days. This also applies if the Coupon add-on for the space is cancelled but the space remains.</p> <p><b>When a space is finally deleted, the following data is deleted:</b></p> <ul style="list-style-type: none"><li>• All generated preview images of the display test are deleted after six months.</li><li>• All results of the spam tests are deleted after six months</li><li>• All coupon campaigns</li></ul> <p><b>When finally deleting a space, the following data can be deleted on request:</b></p> <ul style="list-style-type: none"><li>• All mailings</li></ul> <p>Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional.</p> <ul style="list-style-type: none"><li>• All mailing templates</li></ul>



Category	Implementation
	<p>Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional.</p> <ul style="list-style-type: none"><li>• All scheduled dispatches</li><li>• All style sets</li><li>• All workflows</li><li>• All test orders of the display tests and spam tests</li><li>• All own containers / all shared own containers</li><li>• All content containers / all shared content containers</li><li>• All content sources</li><li>• All mailing synchronizations</li><li>• All images and documents stored in the integrated web space</li></ul>
Users	<p>Users to be deleted that have been held in the recycle bin for 30 days are permanently deleted after this period.</p> <p><b>When a user is permanently deleted, the following data is deleted:</b></p> <ul style="list-style-type: none"><li>• Email, salutation, language, first name and surname</li><li>• Profile picture, title/position, team, telephone and personnel number/code</li><li>• Hash value of the password</li><li>• Assigned roles</li></ul>

Category	Implementation
	<ul style="list-style-type: none"> <li>• Assigned spaces in the accounts</li> <li>• Data on authentication and authorization of the user</li> <li>• Data about browser accesses (IP address) of the user</li> <li>• In connection with the optional Coupon add-on: If a user is removed from a space and this user is a campaign manager or a user is removed from the "campaign manager" role of the Coupon add-on, all assignments of the campaign manager to the campaigns managed by him/her are removed.</li> </ul> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• Log files are temporarily stored independently of the deletion of a user and deleted within one month.</li> <li>• Deleting a user also deletes all guest users based on it.</li> </ul>
Mailings	<p>Mailings to be deleted that have been held in the recycle bin for 30 days are permanently deleted after this period.</p> <p><b>Note:</b></p> <p>Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional. If necessary, synchronized mailings can be deleted manually in Inxmail Professional.</p>
Mailing templates	<p>Mailing templates to be deleted that have been held in the recycle bin for 30 days are permanently deleted after this period.</p>

Category	Implementation
	<p><b>Note:</b></p> <p>Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional. If necessary, synchronized mailings can be deleted manually in Inxmail Professional.</p>
Style sets	Style sets to be deleted that have been held in the recycle bin for 30 days are permanently deleted after this period.
Media (images and PDF files)	Media to be deleted (images and PDF files) that have been stored in the recycle bin for 30 days will be permanently deleted after this period.

## 3.5 Manual data deletion

Category	Implementation
Accounts	<p>A user with the role <i>Full access to account</i> can place accounts in the recycle bin as a preliminary step to the actual deletion process. An account is kept in the recycle bin for 30 days and can be restored by the role <i>Full access to account</i> within this period.</p> <p><b>Note:</b></p> <p>The right to place accounts in the recycle bin and subsequently delete them is reserved exclusively for certain Inxmail employees.</p>
Organizational units	<p>A user with the role <i>Full access to account</i> or <i>Rights manager</i> or with the right <i>Edit organizational chart</i> can delete an organizational unit.</p> <p><b>Exception:</b></p> <p>The top-level organizational unit cannot be deleted.</p>
Spaces	<p>A user with the role <i>Full access to account</i> can place spaces in the recycle bin as a preliminary step to the actual deletion process. A space is kept in the recycle bin for 30 days and can be restored by the role <i>Full access to account</i> within this period.</p> <p><b>Note:</b></p> <p>The right to place spaces in the recycle bin and subsequently delete them is reserved exclusively for certain Inxmail employees.</p>
User	<p>A user with the role <i>Full access to account</i> or <i>Rights manager</i> or with the right <i>Edit user</i> can place users in the recycle bin as a preliminary step to the actual deletion process. A</p>

Category	Implementation
	<p>user is kept in the recycle bin for 30 days and can be restored or permanently deleted within this period.</p> <p><b>Note:</b></p> <p>Deleting a user will also delete all guest users based on it.</p>
Guest user	<p>A user with the role <i>Full access to account</i> or <i>Rights manager</i> or with the right <i>Edit guest users</i> can delete a guest user.</p> <p><b>When a guest user is deleted, the following data is deleted:</b></p> <p>The guest user's assigned roles are deleted in the account from which the delete operation was initiated.</p> <p><b>Note:</b></p> <p>A guest user can be created in multiple accounts. When deleting a guest user, it will be deleted only in the account from which the deletion was triggered.</p>
OAuth clients	<p>A separate client ID with secret is created for each integration that is to work on behalf of an Inxmail New Xperience user. Authentication is performed using OAuth 2.0 (Open Authorization) with the stored authentication data client ID and secret.</p> <p>A user with the role <i>Full access to account</i> or with the right <i>Edit OAuth clients</i> can delete OAuth clients.</p>
SSO integrations	<p>A single sign-on integration must be created for integrations via which external users are to work in Inxmail New Xperience.</p>

Category	Implementation
	A user with the role <i>Full access to account</i> or with the right <i>Edit SSO integrations</i> can delete SSO integrations.
Individual roles	A user with the role <i>Full access to account</i> or <i>Rights manager</i> or with the right <i>Manage roles</i> can delete individual roles.
Mailings	<p>A user with the role <i>Full access to account</i>, <i>Mailing manager</i> or <i>Editor</i> or with the right <i>Delete mailings</i> can mark mailings so that these mailings are no longer displayed for users in the application. The mailings are kept in the database for 30 days and can be restored within this period. Afterwards, an automatic deletion takes place.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>• Synchronized mailings from Inxmail New Xperience to Inxmail Professional remain in Inxmail Professional. Reporting data on sent mailings can still be viewed in Inxmail Professional. If necessary, synchronized mailings can be deleted manually in Inxmail Professional.</li> <li>• When permanently deleting a space, mailings can be deleted in Inxmail New Xperience on request.</li> </ul>
Shared mailings	A user with the role <i>Full access to account</i> or <i>Mailing manager</i> or <i>Editor</i> or with the right <i>Delete mailings</i> cannot accept shared mailings. This means that the shared mailings are automatically deleted immediately and cannot be restored via the database. The original mailing remains unaffected.
Mailing templates	A user with the role <i>Full access to account</i> or <i>Mailing manager</i> or with the right <i>Delete mailing templates</i> can mark mailing templates so that these mailing templates are no longer

Category	Implementation
	<p>displayed for users in the application. The mailing templates are kept in the database for 30 days and can be restored within this period. Afterwards, an automatic deletion takes place.</p> <p><b>Note:</b></p> <p>When permanently deleting a space, mailing templates can be deleted in Inxmail New Xperience on request.</p>
Shared mailing templates	<p>A user with the role <i>Full access to account</i> or <i>Mailing manager</i> or <i>Editor</i> or with the right <i>Delete mailing templates</i> cannot accept shared mailing templates. This means that the shared mailing templates are automatically deleted immediately and cannot be restored via the database. The original mailing template remains unaffected.</p>
Mailing dispatch	<p>A user with the role <i>Full access to account</i> or with the right <i>Create Dispatch</i> can delete dispatches.</p>
Own container / shared own container	<p>A user with the role <i>Full access to account</i> or with the right <i>Manage and create own containers</i> can delete own containers and shared own containers.</p>
Content container / shared content container	<p>A user with the role <i>Full access to account</i> or with the right <i>Create content containers</i> can delete content containers and shared content containers.</p>
Style sets	<p>A user with the role <i>Full access to account</i> or <i>Mailing manager</i> or with the right <i>Use Style-sets</i> can mark style sets so that these style sets are no longer displayed for users in the application. The style sets are kept in the database for 30 days and can be restored within this period. Afterwards, an automatic deletion takes place.</p>

Category	Implementation
	<p><b>Note:</b></p> <p>When permanently deleting a space, style sets can be deleted on request.</p>
Shared style sets	<p>A user with the role <i>Full access to account</i> or <i>Mailing manager</i> or <i>Editor</i> or with the right <i>Use Stylesets</i> cannot accept shared style sets. This means that the shared style sets are automatically deleted immediately and cannot be restored via the database. The original style set remains unaffected.</p>
Workflows	<p>A user with the role <i>Full access to account</i> or with the right <i>Delete workflows</i> can delete workflows.</p>
Media (images and PDF files)	<p>A user with the role <i>Full access to account</i> or with the right <i>Manage media</i> can mark media (images and PDF files) in the integrated web space so that these media are no longer displayed for users in the application. The media are stored in the database for 30 days and can be restored within this period. The media are then automatically deleted.</p>
Content sources	<p>A user with the role <i>Full access to account</i> or with the right <i>Create external content data sources</i> can delete content sources.</p>



## 3.6 No data deletion

**Important note:** The following table shows in which cases no data deletion is possible during the contract period. Only upon final deletion of an account, the following data for each space contained in the account can be deleted upon request.

Category	Implementation
Mailing synchronizations	Mailing synchronizations cannot be deleted during the contract period. <b>Note:</b> When a space is permanently deleted, mailing synchronizations can be deleted upon request.

## 3.7 Cancellation of an account or space

An account can contain one or more spaces.

When an account or one (or more) spaces is cancelled, the following process is followed:

- › Inxmail deactivates the space(s) of the account at the end of the contract term.
- › After a retention period of 30 days, Inxmail permanently deletes the account or space(s).
- › Backups are created daily and a backup is automatically deleted after 30 days. After deletion of a space, backups are no longer created. The recovery of an account or space on the basis of a backup is possible within the retention period upon request. After 30 days, the last available backup is deleted.

When an account or space is deleted, all data described in section 3.4 is deleted.

# **4 Final remark**

## 4.1 Note on retention periods and data storage

If you have any fundamental questions about retention periods and data storage, we recommend that you consult the data protection officer responsible for your company as well as your legal counsel.

The assessment can be carried out, for example, by including the following aspects:

- Processing in the context of enquiries and contract processing is necessary for the fulfilment of the contract or to answer pre-contractual enquiries (Art. 6 para. 1 lit. b. DSGVO) - this also applies to the use of contact forms and enquiries.
- Processing due to legal obligations (Art. 6. para. 1 lit. c. DSGVO) - e.g. storage of invoices for 10 years in accordance with §147 of the German Tax Code.
- Processing on the basis of legitimate interests (Art. 6 para. 1 lit. f. DSGVO) - this also applies in particular to economic interests, which must always be weighed against the data protection interests of the affected persons. The protection interest of the affected persons can be reduced by the following measures: Technical-organisational protective measures such as anonymisation, information in a comprehensible data protection declaration and transparent declarations of consent. Affected persons must typically expect processing in individual cases.

# About Inxmail

As an email marketing specialist, we are known for powerful software solutions and excellent services from consulting to implementation. More than 2,000 customers worldwide use us to implement personalised newsletters, automated campaigns and transactional emails. They rely on reliably delivered emails and data security. Our software can be linked via interfaces with many specialised systems such as CRM, online shop and campaign management tools.