

— PRIVACY · DATA PROTECTION

# Privacy *policy.*

How we process your personal data. Clear and GDPR-compliant, as it should be.

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## 00 Introduction

This Privacy Policy (hereinafter, the “Policy”) describes how Promega Service GmbH (hereinafter, “Promega” or the “Controller”) processes the personal data collected in connection with the provision of the Workont service (hereinafter, the “Service”), accessible through the website [www.workont.com](http://www.workont.com) and the related mobile application.

The Service is offered exclusively to business customers — Unternehmer within the meaning of § 14 BGB — such as start-ups, small and medium-sized enterprises, professionals, self-employed persons and freelancers, who act in the exercise of their professional, business, commercial or craft activity, with their registered office or place of business in a Member State of the European Union. The Service is not offered to consumers within the meaning of § 13 BGB.

This Policy is drawn up in accordance with Regulation (EU) 2016/679 (“GDPR”), the Bundesdatenschutzgesetz (“BDSG”), as well as the further applicable provisions on the protection of personal data, anti-money laundering and payment services, in particular:

- Regulation (EU) 2016/679 of 27 April 2016 (GDPR);
- Bundesdatenschutzgesetz (BDSG) and the related German provisions implementing the GDPR;
- Directive (EU) 2015/2366 (PSD2) and Delegated Regulation (EU) 2018/389 on Strong Customer Authentication;
- Geldwäschegesetz (GwG), Directive (EU) 2015/849 and Regulation (EU) 2024/1624 (AMLR) on anti-money laundering;
- Zahlungsdienststeuergesetz (ZAG) and the applicable provisions on payment services.

The general conditions of the Service are governed by the “Terms and Conditions of the Workont Service” (hereinafter, “T&C”), published on the website [www.workont.com](http://www.workont.com) in the footer section “Important legal pages”, under “Terms and Conditions of the Service”.

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## 01 Role and capacity of the parties

### 1.1 Independent controller

Promega Service GmbH is the independent controller (Verantwortlicher within the meaning of Art. 4(7) GDPR) of the personal data processed in connection with the provision of the Service, in relation to the activities within its own competence — such as, by way of example, the management of the Platform, customer support, the KYC/KYB checks within its competence, fraud prevention, compliance with anti-money-laundering obligations as an obliged entity (Verpflichteter) within the meaning of § 2 GwG, accounting and tax obligations and the commercial management of the relationship.

Identification details of the Controller:

- Name: Promega Service GmbH;
- Registered office: Karlstraße 16, 40210 Düsseldorf, Germany;
- Registration: Amtsgericht Düsseldorf, HRB 108351;
- VAT no.: DE453738678;
- Regulatory capacity: agent of a payment service provider within the meaning of § 1 Abs. 9 ZAG, entered in the ZAG-Instituts-Register kept by BaFin ([www.bafin.de](http://www.bafin.de)) and subject to BaFin's conduct supervision pursuant to § 60 ZAG;
- Privacy contact: [privacy@workont.com](mailto:privacy@workont.com);
- Website: [www.workont.com](http://www.workont.com).

## 1.2 Treezor SAS as controller for the payment services

The Service is made possible by the collaboration between Promega and Treezor SAS, an electronic money institution (EMI) authorised and supervised by the Autorité de Contrôle Prudentiel et de Résolution (ACPR), 4 place de Budapest, CS 92459, 75436 Paris (CIB 16798, [www.regafi.fr](http://www.regafi.fr)), also operating in Germany through its branch Treezor SAS Zweigniederlassung Deutschland, Walter-Kolb-Straße 9-11, 60594 Frankfurt am Main (hereinafter, "Treezor" or the "Issuer"), which provides on an exclusive basis the payment and electronic-money services accessible to the Customer through the Platform.

For the payment and electronic-money services, Treezor SAS acts as the sole controller (Data Controller) of the relevant personal data, including the data of the payment transactions, of the opening and management of the Account, of the issuance and management of the Cards and of the related anti-money-laundering and regulatory obligations of the Issuer. In relation to those services, Promega acts as an agent of a payment service provider (§ 1 Abs. 9 ZAG) and, with regard to the processing of personal data carried out on behalf of Treezor within that perimeter, as a processor (Auftragsverarbeiter, Art. 28 GDPR), in accordance with the data processing agreement (DPA) concluded between Promega and Treezor and with Article 24 of the T&C. There is no joint controllership within the meaning of Art. 26 GDPR.

Promega remains an independent controller solely for the processing falling within its own perimeter described in point 1.1 (management of the Platform, customer support, website and cookies, commercial management of the relationship and Promega's own statutory obligations as an obliged entity).

For the processing carried out by Treezor as an independent controller (in particular that relating to the opening and management of the Payment Account, the execution of payment transactions, the issuance and management of the Payment Cards, the Issuer's anti-money-laundering obligations, international restrictive measures, reports to the competent Authorities and any other financial matter), the Customer is invited to consult Treezor's Privacy Policy (Annex 2 to the DETCs), published at <https://www.trezor.com/de/datenschutzbestimmungen/> and referenced in the "Important legal pages" footer of the website [www.workont.com](http://www.workont.com), under "Privacy Policy Treezor".

**This Policy does not govern, supplement or modify in any way the processing carried out by Treezor SAS, for which only Treezor's Privacy Policy is authoritative.**

## 1.3 Contact channels and rights of the data subject

For any request relating to the protection of personal data and to the exercise of the rights provided for in Art. 15-22 GDPR, the data subject may contact the Controller through the following channels:

- Privacy email: [privacy@workont.com](mailto:privacy@workont.com) — primary channel for the exercise of GDPR rights, requests for information on the processing and reports on data protection matters;
- Support email: [support@workont.com](mailto:support@workont.com) — for requests for operational assistance relating to the use of the Platform and the Service;
- Complaints email: [complaints@workont.com](mailto:complaints@workont.com) — for the submission of formal complaints under the Workont Complaints Procedure, including complaints concerning the management of personal data by Promega;
- Postal address: Promega Service GmbH — For the attention of the Privacy Team — Karlstraße 16, 40210 Düsseldorf, Germany.

For the processing carried out by Treezor SAS as a separate independent controller, the exercise of GDPR rights takes place directly vis-à-vis the Issuer through the Datenschutzbeauftragter (DPO): email [dpo@treezor.com](mailto:dpo@treezor.com); postal address Datenschutzbeauftragter — Treezor SAS Zweigniederlassung Deutschland — Walter-Kolb-Straße 9-11, 60594 Frankfurt am Main, Germany.

### § Distinction between GDPR rights and contractual complaint

The exercise of the rights provided for in Art. 15-22 GDPR vis-à-vis Treezor SAS constitutes an autonomous right of the data subject, exercisable directly vis-à-vis the Issuer as an independent controller, without the need to go through Promega first.

It is understood that — for contractual complaints relating to the Service (other than the exercise of GDPR rights) — the Workont Complaints Procedure applies in full, under which the complaint is submitted primarily to Promega as the point of contact and, only subsidiarily, directly to Treezor in accordance with the means provided for in the DETCs (Klausel 12).

## 02 Categories of data subjects

Promega processes the personal data of the following categories of data subjects:

- the natural persons who are legal representatives of the Customer (Geschäftsführer / directors) and who operate on the Account;
- the beneficial owners (wirtschaftlich Berechtigte within the meaning of § 3 GwG) of the Customer;
- any other persons required to be identified for KYC/KYB purposes (proxies, shareholders, non-operating directors, politically exposed persons);
- the potential customers who register on the Platform or request information;
- the users who browse the website [www.workont.com](http://www.workont.com) (with reference to technical data and cookies);

- the natural persons who interact with Promega through the support, complaints or commercial contact channels.

The Service is intended for legal persons and for natural persons who are Unternehmer (§ 14 BGB). The personal data processed therefore concern the natural persons connected to the business Customer, to the extent necessary for the provision of the Service and compliance with statutory obligations.

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## 03 Categories of personal data processed

Depending on the category of data subject and the stage of the relationship, Promega processes the following categories of personal data.

### 3.1 Data provided directly by the data subject

- Identification data: first name, surname, date and place of birth, nationality, address of residence, tax code or equivalent, country of tax residence;
- Contact data: email address, telephone number, delivery address for the Payment Cards;
- Details of the identity document (passport, identity card, residence permit), copy of the document; the images and short video sequences captured for liveness-verification purposes are processed exclusively by Treezor's certified providers within Treezor's controllership (see point 3.4) and are not processed independently by Promega;
- Data relating to the activity carried out and to the corporate structure of the Customer: company name, registered office, legal form, registration in the commercial register, articles of association, company extract, organisational chart, role of the data subject;
- Economic and financial data of the Customer necessary for customer due diligence: sector of activity, expected volumes of activity, source of funds, description of the activity;
- Data communicated in the course of the relationship: written communications (email, online form, support ticket, complaints), supplementary documentation requested in the context of the KYC/KYB updates.

### 3.2 Data collected automatically during use of the Service

- Access credentials and authentication factors (in encrypted form) managed in the context of SCA;
- Technical data relating to the device and the connection: IP address, device identifier, operating system, browser type and version, language, time zone, connection logs, application logs;
- Data on the use of the Platform: date and time of access, pages consulted, functions used, application errors, session duration;
- Cookies and similar technologies, as described in the Cookie Policy published at [www.workont.com](http://www.workont.com).

The data relating to the payment transactions (amount, currency, counterparty, IBAN, SCT/SCT Inst/SDD references, ATM withdrawals, Card transactions) are processed exclusively by Treezor SAS as an independent controller, as provided for in Treezor's Privacy Policy.

### 3.3 Data received from third parties

- Data from identification/KYC and document-verification providers tasked with carrying out the checks required by the anti-money-laundering rules (in particular Treezor and its specialised providers);
- Data from public databases and public registers (commercial register, Transparenzregister, international sanctions lists, PEP lists, open-source sources for reputation checks);
- Data from anti-fraud providers and from fraud-prevention databases;
- Data communicated by competent Authorities in the exercise of their functions.

### 3.4 Special categories of data and biometric data

Promega does not independently collect or process data belonging to the special categories referred to in Art. 9 GDPR (racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, data concerning health, data concerning sex life or sexual orientation). The data subject is invited not to transmit such categories of data in the course of communications with Promega.

The remote identification procedure required for KYC purposes entails the processing of biometric data (in particular the facial scan for liveness purposes and the comparison with the identity document), which constitute special categories of data within the meaning of Art. 9 GDPR. Promega does not independently collect, process, retain or analyse such biometric data. The biometric extraction and verification are carried out exclusively by Treezor's direct and certified providers, within and under the controllership of Treezor SAS as controller for the payment services; the relevant legal bases (in particular Art. 9(2) GDPR in conjunction with the anti-money-laundering obligations) and the retention periods are described in Treezor's Privacy Policy (<https://www.treezor.com/de/datenschutzbestimmungen/>). Should Promega process biometric data for its own purposes outside the perimeter of the payment services, such processing would be based exclusively on the explicit consent of the data subject pursuant to Art. 9(2)(a) GDPR.

## 04 Purposes and legal bases of the processing

The personal data are processed by Promega for the following purposes and on the basis of the following legal bases. Depending on the purpose, the legal bases are: the performance of the contract and of pre-contractual measures (Art. 6(1)(b)); compliance with legal obligations, in particular as regards anti-money laundering/KYC, tax and accounting (Art. 6(1)(c)); the pursuit of the legitimate interest, including IT security, fraud prevention and B2B direct marketing (Art. 6(1)(f)); and, where required, the consent of the data subject (Art. 6(1)(a)). The details are set out in the table below.

Purpose	Legal basis (GDPR)	Legal references
Performance of the contract: management of the Platform, the Account and customer support, enabling access to the Payment Services provided by Treezor.	Art. 6(1)(b) — performance of the contract and pre-contractual measures.	Workont T&C; § 675c BGB.

Purpose	Legal basis (GDPR)	Legal references
Onboarding and customer due diligence (KYC/KYB), identification of legal representatives and beneficial owners, ongoing monitoring.	Art. 6(1)(c) — legal obligation.	§§ 10–13 GwG; Dir. (EU) 2015/849; Reg. (EU) 2024/1624 (AMLR).
Reporting of suspicious transactions to the FIU and cooperation with the competent Authorities.	Art. 6(1)(c) — legal obligation.	§ 43 GwG; § 47 GwG (tipping-off); § 48 GwG.
Checking of national and international sanctions lists and application of restrictive measures.	Art. 6(1)(c) — legal obligation.	AWG, AWV and relevant EU regulations.
Prevention and combating of fraud, management of operational and compliance risk, security of the Platform.	Art. 6(1)(f) — legitimate interest.	Recital 47 GDPR.
Accounting, tax and document-retention obligations.	Art. 6(1)(c) — legal obligation.	§ 257 HGB; § 147 AO; UStG; DPR 633/1972 and DPR 605/1973 (Italian customers).
Handling of complaints and litigation, protection of rights in and out of court.	Art. 6(1)(c) and (f).	§ 62 Abs. 3 ZAG; Complaints Procedure; §§ 195 ff. BGB.
Service communications relating to the relationship (changes to T&C, Policy, security).	Art. 6(1)(b) — performance of the contract.	§ 675g BGB; Art. 248 EGBGB.
Direct marketing by email on similar products, reserved for existing business customers (B2B).	Art. 6(1)(f) or, where not applicable, (a) — consent.	§ 7 Abs. 3 UWG (soft opt-in B2B).
Use of technical, analytics and profiling cookies on the website <a href="http://www.workont.com">www.workont.com</a> .	Technical: (f); others: (a) — consent.	§ 25 TDDDg; Dir. 2002/58/EC (e-Privacy).
Aggregate statistics, improvement of the Service, IT security and system testing.	Art. 6(1)(f) — legitimate interest.	Recital 49 GDPR.

Nature of the provision. The provision of the data necessary for the performance of the contract and compliance with the anti-money-laundering obligations is mandatory: any refusal to provide them makes it impossible to open the Payment Account, provide the Service or continue the relationship. The provision of data for marketing purposes is, by contrast, optional and does not condition the provision of the Service.

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## 05 Recipients of the data

The personal data may be communicated to the following categories of recipients, each within the limits and for the purposes of its own competence:

- Treezor SAS — authorised electronic money institution, as an independent controller, for the provision of the payment and electronic-money services, the opening and management of the Account, the issuance and management of the Cards, and the anti-money-laundering and regulatory obligations within its competence;
- identification/KYC and liveness providers engaged by Treezor, certified by the competent authorities;
- payment schemes (in particular Mastercard) and SEPA infrastructures, card processors and ATM network operators;
- IT and hosting providers acting on behalf of Promega as processors pursuant to Art. 28 GDPR (Auftragsverarbeitungsvertrag);
- providers of customer support, document management and email services;
- providers of anti-fraud, IT-security and operational-risk-prevention services;
- professional advisers (accountants, lawyers, auditors, tax advisers), bound by professional confidentiality obligations;
- credit institutions and other financial institutions in the context of checking counterparties and executing transactions;
- supervisory Authorities (BaFin, ACPR, Deutsche Bundesbank, Banca d'Italia where applicable), judicial Authorities, tax Authorities (Bundeszentralamt für Steuern and the Italian Agenzia delle Entrate for Italian customers), FIU, police forces;
- any assignees of the contract or of the receivable pursuant to Articles 25.3 and 6.5 of the T&C, to the extent necessary.

The up-to-date list of Promega's main providers and processors is available on request by writing to [privacy@workont.com](mailto:privacy@workont.com). The personal data are not disseminated and are not transferred to third parties for autonomous marketing purposes.

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## 06 Transfers of data outside the EU/EEA

Promega processes personal data mainly within the European Union / European Economic Area. Some providers of Promega or of Treezor (in particular providers of IT, hosting, IT-security or anti-fraud services) may, however, carry out ancillary processing or support activities from third countries.

In such cases, Promega ensures that the transfer takes place in compliance with Art. 44 ff. GDPR and in particular:

- to countries that are the subject of an adequacy decision of the European Commission pursuant to Art. 45 GDPR (including the transfer to US recipients certified under the EU-U.S. Data Privacy Framework);
- or, in the absence of an adequacy decision, on the basis of the Standard Contractual Clauses (SCC) adopted by the Commission pursuant to Art. 46(2)(c) GDPR, supplemented where necessary by additional measures (encryption and pseudonymisation);
- or on the basis of other appropriate safeguards provided for in Art. 46-49 GDPR.

The data subject may request a copy of the safeguards adopted by writing to [privacy@workont.com](mailto:privacy@workont.com). The transfers carried out by Treezor as an independent controller are governed by Treezor's Privacy Policy.

## 07 Retention period

Promega retains the personal data for the time strictly necessary to pursue the purposes for which they were collected and, in any event, for the retention periods provided for by the applicable rules:

Purpose	Retention period
Data relating to the contractual relationship (Account management, communications, support)	For the entire duration of the relationship and until the limitation period expires (as a rule 3 years pursuant to § 195 BGB, subject to longer periods)
Anti-money-laundering documentation (KYC/KYB, identification, records of transactions and checks)	5 years from the termination of the relationship or from the transaction pursuant to § 8 GwG. For the perimeter of the payment services, falling within the controllership of Treezor SAS, the retention of the identification documents (KYC) takes place in accordance with Treezor's Privacy Policy, in compliance with the mandatory 5-year period provided for by the AML/CFT rules (in particular Art. L561-12 of the Code monétaire et financier for Treezor SAS and § 8 GwG for Promega).
Biometric data (facial scan / liveness)	Used exclusively for one-off authentication during onboarding and deleted immediately after completion of the verification. They are not retained by Promega and are in no case retained for 5 or 10 years. The processing takes place within Treezor's controllership, by its certified providers, in accordance with Treezor's Privacy Policy.
Accounting records and commercial documents	10 years from the end of the calendar year of their creation pursuant to § 257 HGB and § 147 AO
Documentation relating to complaints and litigation	10 years from the closure of the complaint / litigation

Purpose	Retention period
Technical and security logs	As a rule 12 months, subject to the needs of security investigations or requests of the Authorities
Cookies	In accordance with the specific time limits set out in the Cookie Policy
Marketing data	Until objection or withdrawal of consent, and in any event no later than 24 months from the last interaction
Prospect / applicant data	12 months from the last contact, unless otherwise requested

At the end of the periods indicated, the data are deleted or irreversibly anonymised, subject to further retention obligations provided for by law or to the need for defence in court.

## 08 Rights of the data subject

In accordance with Articles 15-22 and 77 GDPR, the data subject has the right to:

- obtain confirmation of the existence of processing and access their personal data (Art. 15);
- obtain the rectification of inaccurate data or the completion of incomplete data (Art. 16);
- obtain the erasure of data in the cases provided for by law (Art. 17), subject to the statutory retention obligations (anti-money laundering, accounting and tax);
- obtain the restriction of processing (Art. 18);
- receive the data provided in a structured, commonly used and machine-readable format, and transmit them to another controller (Art. 20);
- object to processing based on the legitimate interest (Art. 21), including direct marketing, at any time and without the need to state reasons;
- withdraw the consent given for specific processing, at any time (Art. 7(3));
- not be subject to decisions based solely on automated processing producing legal effects, subject to the cases of Art. 22;
- lodge a complaint with the competent supervisory authority.

To exercise their rights, the data subject may write to [privacy@workont.com](mailto:privacy@workont.com) or by post to the Controller's address. The reply is provided without undue delay and in any event within one (1) month of receipt, extendable by a further two (2) months in cases of particular complexity. The exercise of the rights is generally free of charge; Promega reserves the right to apply a reasonable fee or to refuse the request in cases of manifestly unfounded or excessive requests pursuant to Art. 12(5) GDPR. For the processing carried out by Treezor SAS, the data subject turns to the DPO at the address [dpo@treezor.com](mailto:dpo@treezor.com).

Forwarding of requests falling within Treezor's controllership. Where a request to exercise rights (access, rectification, erasure, restriction, portability, objection) concerns the electronic-money and payment services falling within the controllership of Treezor SAS, Promega forwards the request to Treezor (dpo@treezor.com) within a maximum of 48 business hours of receipt. In that context, Promega does not process, reject or act on any request without the written and explicit instructions of Treezor, as controller.

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## 09 Competent supervisory authority

Promega Service GmbH is established in Düsseldorf (Nordrhein-Westfalen). The supervisory authority competent for the protection of personal data is therefore the Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI NRW):

- Address: Kavalleriestraße 2-4, 40213 Düsseldorf, Germany;
- Telephone: +49 (0)211/38424-0;
- Email: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de);
- Website: [www.ldi.nrw.de](http://www.ldi.nrw.de).

The data subject may nonetheless lodge a complaint with the supervisory authority of the Member State of their habitual residence, place of work or place of the alleged infringement, pursuant to Art. 77 GDPR. For Italian customers, the competent authority is the Garante per la protezione dei dati personali ([www.garanteprivacy.it](http://www.garanteprivacy.it)). Under the one-stop-shop mechanism (Art. 56 and 60 GDPR), the lead authority for Promega's processing is the LDI NRW. Before lodging a complaint, the data subject is invited to contact the Controller at the address [privacy@workont.com](mailto:privacy@workont.com).

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## 10 Security measures

Promega adopts appropriate technical and organisational measures, pursuant to Art. 32 GDPR, to ensure a level of security appropriate to the risk, taking into account the state of the art, the costs of implementation, the nature, scope, context and purposes of the processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.

Such measures include, by way of example: encryption of data in transit (TLS) and at rest where appropriate, access control based on the need-to-know principle, strong authentication of administrators and operators, segregation of environments, logging and monitoring of access, backup and disaster-recovery procedures, staff training, periodic risk assessments, processing agreements pursuant to Art. 28 GDPR with the processors. The technical infrastructure for the issuance and management of the Account and the Cards is operated by Treezor SAS, certified PCI DSS.

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## 11 Notification of breaches

In the event of a personal data breach of which Promega becomes aware and which concerns processing within its own competence as an independent controller, where the breach presents a risk to the rights and freedoms of natural persons, Promega notifies the breach to the LDI NRW without undue delay and, where possible, within 72 hours of becoming aware of it, pursuant to Art. 33 GDPR. Where the breach is likely to present a high risk, the communication is also forwarded to the data subjects pursuant to Art. 34 GDPR.

For breaches concerning processing within the competence of Treezor SAS as an independent controller (in particular those relating to the Account, the IBAN, the Cards, the payment transactions and the Issuer's related regulatory and anti-money-laundering obligations), Treezor, as controller (Data Controller), is exclusively responsible for every decision and every obligation relating to notification to the supervisory authority pursuant to Art. 33 GDPR and communication to the data subjects pursuant to Art. 34 GDPR. In such cases, Promega does not directly notify the supervisory authorities or communicate to the data subjects, but transmits to Treezor, without undue delay, all the information necessary to enable the Issuer to assess the breach and comply with its obligations. To that end, Treezor is the mandatory recipient of any report relating to incidents affecting the Services: such reports are forwarded to Treezor's Datenschutzbeauftragter (DPO) at the address [dpo@treezor.com](mailto:dpo@treezor.com), as a mandatory external escalation channel.

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## 12 Automated decision-making

In the context of onboarding and the ongoing monitoring of the relationship, Promega and Treezor may carry out automated checks relating to identity verification, the checking of sanctions and PEP lists, anti-money-laundering risk scoring and the monitoring of anomalies. Such processes do not entail a decision based solely on automated processing producing significant legal effects on the data subject: every relevant final decision (opening, blocking or closure of the Account) is subject to human review and intervention, it being understood that, pursuant to Art. 22(2)(b) GDPR, any automated decisions attributable to anti-money-laundering obligations are authorised by the applicable rules. The data subject nonetheless has the right to request human intervention, to express their point of view and to contest the decision, by writing to [privacy@workont.com](mailto:privacy@workont.com).

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## 13 Cookies and similar technologies

The use of cookies and similar technologies on the website [www.workont.com](http://www.workont.com) is governed by the “Cookie Policy”, published in the “Important legal pages” footer section of the website, to which full reference is made for the description of the types of cookies used, the purposes, the retention periods and the means of giving and withdrawing consent. The preferences may be changed at any time through the panel accessible from the “Withdraw consent” link published in the footer of the website.

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## 14 Language and changes to the Policy

This Policy is drawn up in German, which constitutes the reference version and is authoritative in the event of an interpretative discrepancy. Translations into Italian and other languages are provided as a courtesy.

Promega reserves the right to amend this Policy at any time to adapt it to legal, regulatory, operational or technological changes. The changes take effect from the date of publication of the updated version on the website [www.workont.com](http://www.workont.com); material changes will be communicated to the data subject at least thirty (30) days in advance, by notification to the registered email address or through the Platform. The date of entry into force and the version number are indicated at the foot of the document.

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## 15 Related documents

This Policy must be read together with the following documents, all published in the “Important legal pages” footer section of the website [www.workont.com](http://www.workont.com):

- Terms and Conditions of the Workont Service — [workont.com/termini-e-condizioni-del-servizio/](http://workont.com/termini-e-condizioni-del-servizio/);
- Treezor Terms and Conditions (DETCs and Annexes 1-4) — [workont.com/termini-e-condizioni-trezor/](http://workont.com/termini-e-condizioni-trezor/);
- Treezor Privacy Policy (Annex 2 to the DETCs) — [workont.com/privacy-policy-trezor/](http://workont.com/privacy-policy-trezor/) and [trezor.com/de/datenschutzbestimmungen/](http://trezor.com/de/datenschutzbestimmungen/);
- Cookie Policy — [workont.com/cookie-policy/](http://workont.com/cookie-policy/);
- Legal Information — [workont.com/informazioni-legali/](http://workont.com/informazioni-legali/);
- General Conditions of Sale — [workont.com/condizioni-general-di-vendita/](http://workont.com/condizioni-general-di-vendita/);
- **Withdrawal and Refund Policy for the Services.**

In addition, the “Compliance & use” footer section publishes the Complaints Procedure ([workont.com/reclami/](http://workont.com/reclami/)), the Pricing ([workont.com/pricing/](http://workont.com/pricing/)), the AML & KYC Notice and the Security and Data Protection Notice, to which reference is made for the respective matters.



*Promega Service GmbH — Karlstraße 16, 40210 Düsseldorf — VAT DE453738678  
Workont Privacy Policy — Version 1.0 — Date of entry into force: 20 May 2026*