

Privacy information — draft

For website visitors, prospective customers and customers. This draft is incomplete. Items marked in red remain unresolved; this is not a final, complete privacy notice.

1. Controller and contact

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Business registration has not yet been completed.

Representation rule: **TO BE FILLED**

Data protection officer, if appointed or required: **TO BE FILLED**

2. Enquiries and customer assignments

We process contact and company details, enquiries, service and contract information, and necessary billing details to handle your enquiry and any resulting assignment. Data generally comes from you or the company you represent.

Legal bases: Article 6(1)(b) GDPR for your own pre-contractual enquiries and contracts; Article 6(1)(f) GDPR for necessary communication with company contacts; Article 6(1)(c) GDPR for statutory obligations. The legitimate interest is business communication and contract administration.

3. Contact-form process

The form processes your name, company, email address, service area, any custom-request title and message. A copy is saved in the access-controlled Cloudflare library before the spam check. It can remain if you abandon the process or email delivery fails.

FormSubmit then receives the details and opens a spam check using Google reCAPTCHA. The enquiry is emailed to hello@kernl.network and forwarded through Cloudflare Email Routing to the Gmail inbox Mihailo Perovic uses for business enquiries. Please do not include passwords or confidential login details.

4. Recipients and provider details

Authorised people at kernl and the services used for the described process receive the data they need. Services used include Cloudflare (website delivery, Web Analytics, the internal library and Workers AI for the website chat), FormSubmit and Google services for reCAPTCHA and Gmail.

Full legal entities, addresses, roles and applicable account-contract arrangements: **TO BE FILLED**

Other recipients for specific assignments, payment processing or accounting, where used:

TO BE FILLED

We currently have no account-contract or data-processing agreement evidence available for review for FormSubmit, Cloudflare or Gmail. This notice does not confirm that such agreements are in place.

5. Website access, security and statistics

Cloudflare delivers the website. Access involves technical connection information such as IP address, time, requested URL, and browser and device information, insofar as needed for delivery and security. Cloudflare Web Analytics measures page views and loading times using a script from Cloudflare. According to Cloudflare, it sets no cookies, uses no local storage and does not track visitors across websites; we only see aggregated statistics.

Article 6(1)(f) GDPR may apply to operating a secure, functional website and understanding how it is used. Whether the statistics script requires consent under § 25 TDDDG: **TO BE FILLED**

Final assessment, logging scope and retention: **TO BE FILLED**

6. Fonts, preferences, chat and spam checks

The website code loads fonts from Google Fonts, creating connections to Google servers. Language and animation preferences may be stored locally in your browser. The internal library uses a protected session cookie lasting eight hours after sign-in.

The optional “Ask kernl.” chat sends your question and up to two of your earlier questions from the same conversation to our Cloudflare Worker. Answers come from reviewed website information or are generated by an AI language model on Cloudflare Workers AI. We do not store chat texts; to prevent misuse, a counter derived from a daily-changing hash of your IP address is kept briefly and deleted automatically after it expires. Please do not enter personal or confidential information. The chat cannot send enquiries or make bookings. Legal basis: Article 6(1)(f) GDPR, or Article 6(1)(b) GDPR for pre-contractual questions.

Digital business cards at [kernl.network/card/...](https://kernl.network/card/) offer a contact file (vCard) and an “Add to Google Wallet” link. Our Worker creates the Wallet card from our own public contact details and stores nothing about you; saving it to Google Wallet is handled by Google under its own terms.

reCAPTCHA is used during the subsequent FormSubmit step. Complete inventory of third-party services, cookies and storage access, their legal bases and any required consent: **TO BE FILLED**

No blanket claim is made that the website is free of tracking or third-party access.

7. International data transfers

Processing countries and possible transfers outside the European Economic Area still need to be established for the providers and accounts actually used.

Recipients and processing countries: **TO BE FILLED**

Applicable adequacy decision or appropriate safeguards, and how to obtain those safeguards:

TO BE FILLED

We do not claim exclusive EU processing or coverage by any particular transfer arrangement.

8. Retention

FormSubmit states that its submission archive retains entries for 30 days. This does not automatically apply to our internal library or email copies.

Retention period and deletion process for enquiries without a resulting contract in the library and email:

TO BE FILLED

Periods for technical logs, backups and deletion cycles: **TO BE FILLED**

Contract and billing records must be retained according to applicable statutory requirements or

necessary handling of legal claims. Specific data categories, periods and starting dates: **TO BE FILLED**

9. Your data protection rights

Subject to the statutory conditions, you have rights of access, rectification, erasure, restriction of processing and data portability. Where processing relies on legitimate interests, you may object on grounds relating to your particular situation. You may object to processing for direct marketing at any time.

You may withdraw consent at any time for the future, without affecting the lawfulness of earlier processing. Please contact hello@kernl.network with your request.

10. Right to complain

You may complain to a data protection supervisory authority, particularly where you live, work or believe an infringement occurred. The Bavarian State Office for Data Protection Supervision is responsible for non-public bodies in Bavaria.

Information and complaint route: <https://www.lda.bayern.de/de/beschwerde.html>

11. Required data and automated decisions

Necessary contact and assignment details enable us to handle your enquiry or assignment. Without them, we may be unable to do so. The contact form does not conclude contracts or take payments. No solely automated decision with legal or similarly significant effects was identified in the inspected enquiry process. Confirmation covering all business processes, including any profiling: **TO BE FILLED**

12. Further information and version

Updated 26 September 2026. This text describes known processes and marks missing information. It confirms neither completed provider agreements nor a complete privacy review.

FormSubmit: <https://formssubmit.co/documentation>

Form provider privacy notice: <https://formssubmit.co/privacy.pdf>

Google: <https://policies.google.com/privacy>

Legal reference: Regulation (EU) 2016/679 (GDPR), particularly Articles 6, 13–22, 44 onwards and 77.