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Germany

Privacy Policy

As of: 26.05.2026

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> **Neawolf Media Group is a German company. Only the German text is legally binding.**
>
> Jurisdiction: Germany (Aachen).

PRIVACY AT A GLANCE

Data minimization: Only operationally necessary data (Art. 5 GDPR); for contact requests: name, email, message for processing; IP pseudonymized (SHA-256).

AI Isolation: Personal data is not used for Naciro training.

US Transfer: Protected by EU-US Data Privacy Framework (Art. 45 GDPR).

Zero Tracking: No data transfer to third parties before your consent.

FOUNDATIONS & LEGAL FRAMEWORK

Data Protection

The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially.

Responsible Body

Neawolf Media Group, Owner Sven Schmidt, is responsible for data processing on this platform.

Legal Basis

Processing according to Art. 6 Para. 1 lit. a (consent), lit. b (contract), and lit. f (legitimate interest).

Data Minimization

In accordance with Art. 5 Para. 1 lit. c GDPR, we only collect data that is strictly necessary for operation.

Balancing Test

Processing under Art. 6 Para. 1 lit. f is based on a positive balancing test to maintain platform integrity.

Storage Limitation

Data is deleted as soon as the purpose no longer exists or legal deadlines require it. Contact requests are deleted after the matter is resolved.

Storage Periods & Deletion Concept

Contact requests: until the matter is resolved; server logs: 30 days (IP anonymized). Aggregated source data and wanted-person data are obtained read-only from public sources and processed in compliance with source licenses and operational retention periods.

Integrity

Technical and organizational measures (TOM) protect against unauthorized access.

Supervisory Authority

Competent: State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia (LDI NRW).

Right to Change

We adapt this statement in the event of technical further development or legal changes.

Protection of Minors

Use of the platform is only permitted for persons under 16 years of age with parental consent.

DATA PROCESSING BY DIVISION & PLATFORM

Shop / Commerce (neawolf-shop.com)

Order, payment, shipping, and invoice data; withdrawal and customer-service communication; retention per commercial and tax law (10 years under German § 147 AO). Shop platform: Shopify Inc. (data processor under Art. 28 GDPR, headquarters: Canada/USA, EU-US Data Privacy Framework certified). Payment providers: PayPal (Europe) S.à r.l. et Cie, S.C.A. (Luxembourg) and Stripe Payments Europe Ltd. (Ireland) as data processors for credit card payments (Visa, Mastercard, American Express). Data transmission to payment service providers is encrypted via PCI-DSS compliant interfaces.

Login, Registrierung & Kundenkonten

Account data (email, password hash, profile details where provided), session and authentication data, consent and device identification network-wide across affiliated domains.

NationFiles Intelligence

Usage and log data, pseudonymized IP, optional user submissions; no Naciro Engine training on personal profile data.

Publishing, Records, Broadcast

Newsletter, contact, and media inquiries; streaming/download metadata where technically required; no disclosure to third parties without legal basis.

Opoleo & Obravis (Software)

Software usage data, error logs, license and account data as required for operation; processing via Neawolf infrastructure in the EU.

Data Protection Impact Assessment (DPIA) under GDPR Art. 35

For the highly automated processing of personal data in the NationFiles Intelligence division (predictive analytics, algorithmic forecasting, aggregation of large datasets from public sources), we have conducted a Data Protection Impact Assessment (DPIA) pursuant to Art. 35 GDPR. The assessment includes the evaluation of risks to the rights and freedoms of data subjects, particularly in profiling based on publicly available data (media, weather data, economic indicators). Our DPIA concluded that the processing represents an acceptable risk through technical and organizational measures (pseudonymization, encryption, access restrictions, regular audits). Data subjects have the right to access information about their processed data (Art. 15 GDPR). The DPIA is reviewed regularly and updated when there are significant changes to processing activities.

Data Processing Agreements (DPA) under GDPR Art. 28

We engage external service providers as data processors that process personal data on our behalf. Data Processing Agreements (DPA) have been concluded with all data processors in accordance with Art. 28 GDPR, ensuring compliance with the General Data Protection Regulation. Data processors: (1) Contabo GmbH (Germany, ISO 27001) – hosting, servers, databases; (2) Shopify Inc. (Canada/USA, EU-US Data Privacy Framework) – e-commerce platform for neawolf-shop.com; (3) PayPal (Europe) S.à r.l. et Cie, S.C.A. (Luxembourg) – payment processing; (4) Stripe Payments Europe Ltd. (Ireland) – credit card payments (PCI-DSS compliant); (5) Cloudflare Inc. (USA, EU-US Data Privacy Framework) – CDN, DDoS protection, DNS. All data processors are contractually obliged to process personal data exclusively according to our instructions and to implement appropriate technical and organizational measures (TOM) to protect the data. Transfer to subcontractors only occurs with our prior written consent. Data subjects may at any time request information about the data processors we use (privacy@neawolf.com).

DIVISIONS, PLATFORMS & UNIFIED LEGAL DOCUMENTS

Unified legal documents (company-wide)

The company maintains one unified legal notice, privacy policy, and terms of service for all divisions and platforms. Linked at /company/legal-notice/, /company/privacy/, and /company/terms/ on all brand hosts. These legal documents apply uniformly to all websites, platforms, and services operated by Neawolf Media Group—including neawolf.com (corporate brand), nationfiles.com (intelligence), neawolf-publishing.com (publishing), neawolf-records.com (records), neawolf-broadcast.com (broadcast), neawolf-shop.com (commerce/shop), opoleo.com and obravis.com (software), affiliated alias domains, registration/login, digital products, and physical shipping.

Neawolf Media Group

Domains: neawolf.com (canonical), neawolf.de, neawolf.blog, neawolf.cloud (mirror); neawolf.group (development/staging only). Corporate hub of Neawolf Media Group, brand overview, central legal documents, and company information.

NationFiles Intelligence

Domains: nationfiles.com. AI-driven intelligence data, indices, and analyses (Naciro Engine). Not investment advice.

Neawolf Publishing

Domains: neawolf-publishing.com, neawolf-verlag.com (+ .de aliases). Book publishing, catalog, author and publisher content (print & digital).

Neawolf Records

Domains: neawolf-records.com (+ .de alias). Music label, releases, artist and label content (ISRC DE-1VC, GVL label code).

Neawolf Broadcast

Domains: neawolf-broadcast.com, neawolf-video.com (+ .de aliases). Video, show, and broadcast content across the media group.

Neawolf Shop / Commerce

Domains: neawolf-shop.com, neawolf.shop, label.productions, label.lc (+ .de aliases). E-commerce: physical shipping worldwide where offered; EU withdrawal rights for distance sales; payment and shipping data per the privacy policy.

Opoleo (Software)

Domains: opoleo.com (+ .de alias). Software venture of Neawolf Media Group; use subject to the same terms and privacy policy.

Obravis (Software)

Domains: obravis.com (+ .de alias). Software venture of Neawolf Media Group; use subject to the same terms and privacy policy.

Login, Registration & Customer Accounts

Domains: network-wide across all division hosts. Unified account management (registration/ login) for digital services worldwide; unified account management and consent per the privacy policy; no phone support.

DATA COLLECTION & INFRASTRUCTURE

Server Log Files

Storage of IP, browser, and timestamp for 30 days for threat prevention (Art. 6 Para. 1 lit. f GDPR).

Encryption

End-to-end AES-256 SSL encryption for all data transfers (Grade A+).

Hosting (Contabo)

Data processing by Contabo GmbH on ISO 27001 certified servers in Germany.

Database Security

MariaDB instances with encryption of data at rest.

Backup Management

Encrypted off-site backups to ensure integrity according to Art. 32 GDPR.

Security Standard 2026

Notification of personal data breaches to the supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware (Art. 33(1) GDPR), where the breach is likely to pose a risk to data subjects.

Session Handling & Cookies

We use cookies and similar technologies (e.g. session IDs, local storage) for authentication, session management, and delivery of personalized content. Technically necessary cookies for

session, device identification, and consent have a validity of up to 365 days. They enable consistent use across affiliated Neawolf domains and store your consent preferences network-wide in encrypted server storage in the EU, without tracking-based redirects. An optional visitor hint is based on technical connection data (e.g. IP address, browser identifier) and is processed only in hashed form. Analytics and marketing cookies are only set after express consent (Art. 6 para. 1 lit. a GDPR). You can adjust your cookie settings at any time via the cookie banner or in the privacy settings.

Cookies, Consent & TTDSG (Sec. 25 TDDDG)

Before consent, we do not load analytics scripts (Matomo, Google Analytics 4). The banner offers “Accept all” and “Necessary only”. Necessary: session cookies, device identification, and consent status (cross-domain, up to 365 or 182 days respectively), and language/design preferences in local storage where used. After “Accept all”: Matomo (self-hosted) and GA4 (G-J0CW6ZQL6K). Legal bases: Art. 6(1)(a) GDPR (consent), (f) (operation/security), and Sec. 25 TDDDG. You may withdraw consent at any time via the cookie banner or privacy settings.

Design Preference

Storage of dark mode choice in LocalStorage (legitimate interest).

Language Auto-Detection

Local storage of language choice to provide country-specific data.

Anonymization

IP addresses are anonymized before any statistical evaluation.

Technical Safeguards

Use of TLS encryption (AES-256, Grade A+), access control, hashing (e.g. SHA-256 for IP pseudonymization), and log minimization. No transfer of raw data to third parties.

AI PROCESSING (NACIRO ENGINE)

AI Transparency

Compliance with the EU AI Act: Labeling of all AI-generated analysis content.

Training Exclusion

No use of your personal data for training machine learning models.

Human Oversight

Algorithmic results are regularly validated by experts (human-in-the-loop).

Profiling Prohibition

No automated creation of personality profiles (Art. 22 GDPR).

Data Streams

AI calculations are based on aggregated metadata, not on your identity.

Data Origin

Processing of public data (OSINT) with strict separation from user profiles.

Prediction Models

Predictive Layer analyzes geopolitical macro trends, not individual behavior.

Sentiment Analysis

Statistical evaluation of global intelligence briefing sentiment without personal reference.

Causality Logic

Automated determination of relationships on a purely mathematical basis.

Integrity Check

Permanent monitoring of the AI engine for bias and factual correctness.

THIRD-PARTY PROVIDERS & GLOBAL TRANSFER

Global Use & United States

Registration, login, and digital services may be used internationally. Transfers to the United States rely, where required, on the EU-US Data Privacy Framework, Standard Contractual Clauses (Art. 46 GDPR), and/or your consent. U.S. state privacy laws (CCPA/CPRA): see below.

Google Analytics 4

Web analytics with Google Analytics 4 (Google Ireland Limited / Google LLC) only after consent (Art. 6(1)(a) GDPR). Measurement ID: G-J0CW6ZQL6K; IP anonymization enabled. Data may be transferred to the United States (EU-US Data Privacy Framework / SCC). Details: Google privacy notices. You may withdraw consent at any time; objection under Art. 21 GDPR is possible.

Matomo (self-hosted)

After consent, we use Matomo (self-hosted; technical base on nationfiles.com). Tracker requests are first-party on each CMS host you visit (e.g. neawolf-publishing.com), while the Neawolf Shop and CDN contexts use neawolf.group/assets/nw-pulse.php—not the neawolf.cloud asset CDN (tracking hits are not cached). Measurement is split across Matomo websites: site ID 1 for

nationfiles.com (NationFiles Intelligence), site ID 2 for Neawolf CMS divisions (e.g. neawolf.group, Publishing, Records, Broadcast), and site ID 3 for the Neawolf Shop (neawolf-shop.com and related shop domains such as neawolf-shop.de, neawolf.shop, label.productions). Processed data includes page views, referrers, and technical device data; after consent, a pseudonymous device identifier (NW_DEVICE) may be sent as a user ID. No Matomo Cloud. Legal basis: Art. 6(1)(a) GDPR. Consent can be withdrawn in the cookie banner.

US Data Transfer

Transfer to third countries only if adequacy decisions or SCCs are in place.

YouTube Plugins

Embedding in 'Enhanced Data Protection Mode' to prevent advance tracking.

Real-Time APIs

Financial data retrievals are anonymized without transferring end-user data.

Security Feeds

Display of INTERPOL, FBI Most Wanted, and OpenSanctions data occurs server-side without user tracking.

Legal Basis Wanted-Person Data

Processing of wanted-person data is read-only and based on Art. 6(1)(e) GDPR in conjunction with public interest in security. No data is transmitted to the sources.

Categories of Personal Data (Wanted Persons)

Wanted-person data may include name, photo, offense, nationality, date of birth, and other details provided by the source. See Source Registry (Legal → Sources) for details.

Social Links

Links to external platforms only transfer data to the provider upon clicking.

Affiliate Tracking

Use of partner links occurs without linking to your Neawolf account.

Abuse Prevention

Technical defense mechanisms against bot attacks (Art. 6 Para. 1 lit. f GDPR).

Standard Contractual Clauses

Securing international data flows through EU Standard Contractual Clauses.

Statistical Data Sources

NationFiles automatically ingests aggregated, non-personal data from public and licensed sources (e.g. World Bank, Open Data Commons). A full list of providers and licenses is available in the Source Registry (Legal → Sources).

DATA SUBJECT RIGHTS & REVOCATION

Right to Information

You have the right to confirmation and a copy of your stored data (Art. 15 GDPR).

Correction

Immediate correction of incorrect data according to Art. 16 GDPR.

Right to Deletion

Claim to data deletion (right to be forgotten) according to Art. 17 GDPR.

Restriction

Limitation of processing under the conditions of Art. 18 GDPR.

Portability

Provision of your data in a machine-readable format (Art. 20 GDPR).

Objection

Objection to data processing for special reasons (Art. 21 GDPR).

Revocation of Consent

Anytime revocation of consent with effect for the future.

Complaint Authority

Right to lodge a complaint with the competent supervisory authority (LDI NRW).

Provision Obligation

There is no contractual or legal obligation to provide data.

Data Contact

Central contact for data subject rights: privacy@neawolf.com.

REGIONAL STANDARDS & COMPLIANCE

CCPA / CPRA

Compliance with Californian privacy rights including 'Do Not Sell' policy.

LGPD Brazil

Compliance with the Lei Geral de Proteção de Dados for users in Brazil.

PIPL China

Protection measures according to the Personal Information Protection Law of the PR China.

COPPA USA

Strict protection of children's privacy according to US federal law.

Copyright / DMCA

Central process for takedown requests regarding AI content.

Trademark Law

Protection of the Neawolf® brand and associated user data stocks.

Anti-Fraud Policy

Data processing to identify misuse and manipulation.

Advertising Objection

Prohibition of the use of our contact details for marketing purposes.

Voting Integrity

Storage of user votings occurs exclusively in anonymized form.

Severability Clause

Validity of the statement remains even if individual clauses are partially ineffective.

https://neawolf-records.com/en/company/privacy/

As of: 26.05.2026

Only the German version is legally binding.

This page does not replace legal advice and does not constitute official warnings or recommendations. Forecasts and assessments are model-based.

Contact for legal inquiries: see imprint.

Abuse/DMCA: abuse@neawolf.com

Privacy: neawolf-records.com/en/company/privacy/

Legal notice: neawolf-records.com/en/company/legal-notice/

Infrastructure: Processing exclusively in Germany, TLS 1.3, VPC isolation.

Data protection: Processing of personal data in accordance with GDPR; no sharing or use for AI training.

Liability: No liability for external content or derived decisions. No investment advice within the meaning of the German Securities Trading Act (WpHG).

Place of jurisdiction: Aachen, Germany. German law applies to the exclusion of the UN Convention on Contracts for the International Sale of Goods (CISG).

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