

English version

Privacy policy for Ello

Status: 02/10/2025

This privacy policy contains information about the processing of your personal data within the AI-based chatbot called 'Ello'. The user's chat histories and interactions with 'Ello' may be stored in anonymised form and used to improve the service.

1. Contact details of controller

HelloBetter is a trademark of
GET.ON Institut für Online Gesundheitstrainings GmbH
Schrammsweg 11
20249 Hamburg
Tel.: +49 (0)40 / 532 528 67
Email: kontakt@hellobetter.de
which is responsible for the processing of your personal data.

2. Contact details of the data protection officer

Data protection officer of HelloBetter
GET.ON Institut für Online Gesundheitstrainings GmbH
Oranienburger Str. 86a
10178 Berlin
Email: privacy@hellobetter.de

3. Registration data and server logs

3.1 Scope and purpose of the processing of personal data

We only process personal data of our users to the extent necessary for the use of the app. To gain access to Ello, an individual user account is required. In addition, your age is required to ensure that all users are of legal age. Your intentions, motivation and gender are processed to offer you a more personalised product. When using the app, technical connection data is also processed, which is transmitted to us by your device. As part of this, we process registration and the following personal data:

Registration data

- user name
- e-mail address
- age

Optionally also

- gender
- user intention and motivation

Server logs

- IP address
- language setting
- time zone
- user ID

We respect your privacy and would like to point out that it is not necessary to provide personal data when registering - with the exception of age. When registering for our app, you have the option of entering your data anonymously using an alias as well as use an e-mail address that does not include personal identifiable data. This means that you can register with a user name that does not allow any direct personal reference. We require your age to ensure that you are of legal age.

3.2 Legal basis for data processing

The processing of server logs is carried out within the scope of our legitimate interest pursuant to Article 6(1)(f) GDPR to provide our app, to secure our systems and to ensure technical operability. The provision of the data is technically necessary so that the retrieved content can be delivered to you.

The processing of your personal data within the app is based on your consent in accordance with Article 6(1)(a) GDPR. If you do not give us your consent, it is not possible to use the app.

You can withdraw your consent to the processing of personal data at any time. To do so, please contact our data protection officer (see point 2). If you withdraw your consent, you will no longer be able to use the app. Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected.

3.3 Transfer of personal data and recipients

In principle, data is not passed on to other third parties. However, relevant data may be passed on to the law enforcement authorities in the event of an attack on our systems. No data is transferred to countries outside the European Economic Area.

To provide our service, we use the AWS european sovereign cloud, in which your data is stored. The operator is Amazon Web Services EMEA SARL (38 Avenue John F. Kennedy, L-1855 Luxembourg). The data is only processed in the AWS Paris region.

3.4 Storage period

Your registration data will be stored until the reception of your revocation. The server logs are stored for as long as it is technically necessary. If the server logs are no longer technically necessary, they are anonymised. In the event of criminal proceedings, the data will be deleted once the proceedings have been concluded.

4. AI-based chatbot

4.1 Scope and purpose of the processing of personal data

The respective chat histories are processed in order to make the use of the AI-based chatbot available and to anonymise the data. Personal data is processed as part of the use of Ello. The personal data that is processed is the data that you provide within the chatbot itself.

4.2 Legal basis for data processing

The processing of your personal data within the app is based on your consent in accordance with Article 6(1)(a) GDPR and for special categories of personal data (in particular health data) in accordance with Article 9(2)(a) GDPR. If you do not give us your consent, it will not be possible to use the app.

You can withdraw your consent to the processing of personal data at any time. To do so, please contact our data protection officer (see point 2). If you withdraw your consent, you will no longer be able to use the app. Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected.

4.3 Transfer of personal data and recipients

In principle, data is not passed on to other third parties. However, relevant data may be passed on to the law enforcement authorities in the event of an attack on our systems. In principle, no data is transferred to countries outside the European Economic Area. However, it cannot be ruled out that, in the event of misuse, Microsoft employees based outside the EU may gain access for verification purposes.

To provide our service, we use the AWS European sovereign cloud, in which your data is stored. The operator is Amazon Web Services EMEA SARL (38 Avenue John F. Kennedy, L-1855 Luxembourg). The data is only processed in the AWS Paris region.

In order to be able to offer the AI-based chatbot, HelloBetter uses the cross-regional version (Europe) of Azure OpenAI Endpoint (Microsoft Corporation, One Microsoft Way, Redmond, Washington, 98052-6399, USA). Microsoft stores your data only in the event that the abuse monitoring system detects something in the chat that is judged to be potential abuse. The data is then checked by a human. The verifiers are authorised Microsoft employees who access the data via selective queries using request IDs, Secure Access Workstations (SAWs) and Just-in-Time (JIT) request approvals by team leaders.

4.4 Storage period

Your data will be stored until the reception of your revocation. Microsoft stores your data for 30 days.

5. Data subject rights

You can assert the rights listed below against HelloBetter (see point 2).

5.1 Information according to Article 15 GDPR

You can request information about the personal data processed by HelloBetter, together with a copy of the data.

5.2 Right to rectification according to Article 16 GDPR

If your data is incorrect or incomplete, you have the right to request that your personal data be corrected or completed.

5.3 Deletion of your personal data pursuant to Article 17 GDPR

You can request the deletion of your personal data if one of the following reasons applies:

- The personal data are no longer necessary for the purpose for which they were collected or otherwise processed.
- You object to the processing in accordance with point 6 and there are no overriding legitimate grounds for the processing.
- The personal data have been processed unlawfully.
- The deletion of personal data is necessary to comply with a legal obligation under Union or German law.

This does not apply insofar as the processing is necessary:

- To comply with a legal obligation which requires processing in the relevant law.
- To assert, exercise or defend legal claims.

5.4 Restriction of processing according to Article 18 GDPR

You may request the restriction of the processing of your personal data if one of the following conditions applies:

- You dispute the accuracy of the personal data.
- The processing is unlawful and erasure of your personal data is refused by you.
- The data is no longer needed for the purposes of processing, but is required by you for the assertion, exercise or defence of legal claims.
- You have objected to the processing (see right of objection, point 6) and the weighing of interests in the context of the objection procedure has not yet been completed.
-

5.5 Data portability according to Article 20 GDPR

You have the right to receive your personal data in a structured, common and machine-readable format.

5.6 Right of complaint

You have the right to appeal to a competent data protection supervisory authority. The competent supervisory authority for HelloBetter is the

Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit

Thomas Fuchs

Ludwig-Erhard-Str 22, 7. OG

20459 Hamburg

Tel.: +49 (0)40 / 428 54 – 4040

Fax: +49 (0)40 / 428 54 – 4000

Email: mailbox@datenschutz.hamburg.de

6. Right of objection according to Article 21 GDPR

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(f) GDPR (data processing based on a balance of interests).

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the assertion, exercise or defence of legal claims.

7. Automated decision-making and profiling

HelloBetter does not engage in automated decision-making or profiling that has a legal effect on you.