

Knowhand review pack

For IT, data protection and the works council

Knowhand is a help board for colleagues helping colleagues in companies with 20 to 500 employees. This document summarises what IT, data protection officers and the works council check before introducing it. Everything comes from the documents published on knowhand.com and describes the application as of the date below. Legal texts are provided in German.

Last updated 25 September 2026

Who reads what

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1 Knowhand at a glance

IT

Data protection

Works council

Anyone who needs help posts a request with a deadline, visible to everyone on the board. Anyone who can help offers to; the two of them sort out the question directly, the request is marked as solved and stays findable in the archive. Knowhand is not a chat, not a wiki and not a ticket system.

- ✓ Knowhand runs in the browser, on computers and phones. There is nothing to install and no client to roll out.
- ✓ Knowhand needs no access to mailboxes, calendars, files or your directory.
- ✓ One board per company with the roles admin and member. Admins manage members, categories, templates and the brand; they can remove requests in case of misuse, but cannot mark requests as solved.
- ✓ Knowhand shows no values per person, not even to admins. Admins can export the board's data (data portability); the export shows who posted which request or offered help, with the time (chapters 4 and 8).
- ✓ Provider: Paul Krügel (sole proprietorship), Stephensonsgasse 2 / 19, 1210 Vienna, Austria. Your company is the controller for employee data on the board; Knowhand processes it as a processor under the data processing agreement (chapter 9).

2 What Knowhand stores and what it does not

Data protection

Works council

Knowhand stores what employees enter themselves, plus what is technically necessary:

Data	Required	Visible to
Name, email address	yes	all members of the board
Photo, team, role, summary	no	all members
Categories, tags, booking link, contact preference	no	all members
Capacity, away until date	no	all members
Requests, attachments, help offers, archive	when used	all members
Questions, referrals	when used	only the creator and those involved
Thanks counter, number of solved requests	automatic	only the person
Board metrics (chapter 8)	automatic	admin, totals only, from ten members on
Technical email delivery logs	automatic	not visible on the board

Knowhand does not process special categories of personal data under Art. 9 GDPR unless you enter them yourselves.

What Knowhand does not do

- ✗ No leaderboard, no points, no ranking, no per-person evaluation.
- ✗ No last-online indicator, no per-person response times, no usage logs beyond what is technically necessary.
- ✗ No calendar, mail or directory permissions at sign-in.
- ✗ No analysis of emails, chats or documents; expertise only appears in the voluntarily maintained profile.
- ✗ No analytics or advertising cookies, no cookie banner.

Technically necessary are: the sign-in session (cookie), email delivery logs with recipient, email type and content (90 days) and short-lived access logs of the hosting and database providers (IP address, time, requested address). Knowhand creates no per-person evaluations from them.

3 Hosting and sub-processors

IT

Data protection

Hosting, database and files are in Frankfurt (EU). Emails go through a sending service in the EU, payments through Stripe (EU). By creating a board you approve the following sub-processors:

Provider	Purpose	Location and basis
Vercel Inc.	Hosting and delivery of the application	EU (Frankfurt region), headquartered in the USA, EU Standard Contractual Clauses
Supabase Inc.	Database, authentication, file storage	EU (Frankfurt), headquartered in the USA, EU Standard Contractual Clauses
Resend (Plus Five Five, Inc.)	Sending sign-in and notification emails	EU (Ireland), headquartered in the USA, EU Standard Contractual Clauses
Cloudflare, Inc. (Turnstile)	Protecting the sign-in form against automated requests; processes technical browser characteristics and the IP address for bot detection when the form loads (sign-in page, invitation page)	Headquartered in the USA, EU Standard Contractual Clauses
Google Cloud EMEA Ltd. (Vertex AI)	AI assistant, only when the assistant is switched on without your own key; processes the entered request text and the names of the board categories	EU (Frankfurt)
Stripe Payments Europe Ltd.	Payment processing and invoices	EU (Ireland)

- ✓ Vercel, Supabase, Resend and Cloudflare are headquartered in the USA. Hosting, database, files and email sending are in the EU; any transfer is covered by EU Standard Contractual Clauses.

- ✓ Cloudflare Turnstile protects the sign-in form against automated requests. When the form loads (sign-in page, invitation page), Cloudflare processes technical browser characteristics and the IP address for bot detection. Cloudflare receives no board content.
- ✓ Google Vertex AI only receives data if an admin switches the AI assistant on and does not enter their own endpoint (chapter 6).
- ✓ Stripe processes payment data as an independent controller; Knowhand never receives full card details.
- ✓ Knowhand announces changes to the sub-processors at least 30 days in advance by email to the admins. You can object for good cause and terminate the contract.
- ✓ knowhand.com sets no analytics or advertising cookies. It only sets the sign-in session cookies, the language choice (kh_locale) and, after opening a referral link, kh_ref.

4 Technical and organisational measures

IT

Data protection

Works council

In the data processing agreement (section 6) Knowhand commits to these measures:

- ✓ Hosting and data storage exclusively in the EU (Frankfurt), encrypted transport (TLS), encrypted storage at the database provider.
- ✓ Server-side access control per board (Row Level Security), roles admin and member, no access across boards.
- ✓ Attachments and images only through short-lived signed links; customer keys for the AI assistant encrypted (AES-256-GCM).
- ✓ Data minimisation: no usage logs per person beyond what is technically necessary (chapter 2), no response times per person, metrics only aggregated.
- ✓ Daily backups kept for 7 days; retention periods as in the terms; logs without request content.
- ✓ Operator access to production systems only with multi-factor authentication.

How the application implements this

- ✓ Tenant isolation in the database: Row Level Security is active on every table. Reads only happen within your own board, including images and attachments.
- ✓ Column-level write permissions: through the database interface, members and admins can only change the fields the application intends. Plan, status, counters, email address and board membership are changed by the server only. Protected database functions check sign-in, membership and role.
- ✓ Server-side checks: every action checks membership and role on the server. The database service key is never used in the browser.
- ✓ Files: uploads only through the server, with checks for file type, size and storage quota, plus fixed limits per storage area (attachments at most 4 MB, images at most 2 MB per file).
- ✓ Security headers on every page: HSTS, a Content Security Policy as an allow list (connections, images and frames only to Knowhand, the database in Frankfurt and the sign-in bot protection at Cloudflare), protection against embedding in other sites, nosniff, Referrer-Policy and Permissions-Policy (camera, microphone and location off).

- ✓ Sign-in without passwords (chapter 5). Joining and creating a board only with a confirmed email address; private email domains cannot create a board.
- ✓ Abuse limits: invitations per board and day are limited. When the AI assistant runs on Knowhand's key, a daily limit per person and board applies.
- ✓ Payment and email callbacks (Stripe, Resend) are only processed with a valid signature, scheduled jobs only with a secret key.
- ✓ Emails without open or click tracking. Links in notifications change nothing on their own: solving, extending, closing and unsubscribing need a confirmation on the page.
- ✓ Exports for spreadsheet programs are protected against injected formulas.
- ✓ A daily job deletes email delivery logs (queue and callbacks from the sending service) after 90 days.
- ✓ All operator accounts for hosting, database, code, payment and email sending are protected with two-factor sign-in.

Retention periods

- ✓ Board in trial: 30 days, then frozen (readable), deleted after another 60 days.
- ✓ Board after cancellation: readable for 60 days, then deleted.
- ✓ Deletion by the admin: after confirmation by email a 14-day period, then final, including all attachments.
- ✓ Deleting an account as a member: immediately; the profile is pseudonymised ("Former member"), requests stay in the board archive.
- ✓ Leaving the company: the admin removes the person (chapter 5); the profile is pseudonymised, requests stay in the archive as "Former member".
- ✓ Requests during the contract: they stay on the board and in the archive until an admin deletes them or the board is deleted. The person who asked can close a request but not delete it.
- ✓ Email delivery logs: 90 days. Backups: daily, 7 days.

Export

- ✓ Every member exports their data in the profile as JSON (account, profile, own requests, help offers, questions and referrals).
- ✓ The admin exports the whole board as JSON and the requests as CSV (data portability). The export contains the members with email address, role, join date and profile, and who posted which request, offered help, asked questions or gave pointers, each with the time.
- ✓ Attachments appear in the export with file name, type and size; the files themselves are not included.

5 Sign-in and account management

IT

Works council

Knowhand has no passwords. People sign in in one of two ways:

Method	How it works	Properties
Link by email	Knowhand sends a sign-in link to the work email address. The same email contains a code that can be entered on the sign-in page instead. This works with any work address, including Microsoft 365 mailboxes.	valid for 60 minutes, works once, 8-digit code
Sign in with Google	With your company's Google account, for example from Google Workspace. The person signs in at Google, and multi-factor authentication and access rules of your account stay in effect.	openid, email, profile

- ✓ Sign-in with Microsoft is not available yet. For Microsoft 365, use the link by email.
- ✓ From Google, Knowhand receives the name, email address, the Google account ID and, if available, the address of the profile picture.
- ✓ A board is created with a work email address. Knowhand rejects personal email domains such as gmail.com, gmx.at or outlook.com at that step ("Please use a work address").
- ✓ People with the same company domain join the board automatically unless the admin turns this off. Everyone else joins with an invite link.
- ✓ SAML is not built in; on request we look into it, without a commitment. There is no SCIM. Today you sign in with a link to your work email or with the company Google account.
- ✓ Link scanners such as Microsoft Defender Safe Links do not use up the sign-in link: the person is only signed in after clicking "Sign in now" on knowhand.com.

Email

Sender address	board@knowhand.com
Sender name	"Knowhand" for sign-in links, "Board name via Knowhand" for notifications
Technical sender domain	send.knowhand.com (Return-Path)
Sending	Resend, from the EU (Ireland)
Signature	DKIM for knowhand.com, SPF via send.knowhand.com; both align with the sender domain, so the emails pass DMARC
Sign-in links and codes	Valid for 60 minutes, work once
Measurement	No open or click tracking

Sign-in links and notifications come from the same address. Allow it in your spam filter, ideally with a passed DKIM check for knowhand.com.

Addresses for firewalls and filters

Address	Used for
knowhand.com, www.knowhand.com	Website, app and sign-in links from emails
lbtyszczqsjdkzgiefy.supabase.co	Sign-in, data and files (Supabase, Frankfurt)
challenges.cloudflare.com	Bot protection of the sign-in form (Cloudflare Turnstile); without this address no sign-in link can be requested by email
accounts.google.com	Only for "Sign in with Google"
board@knowhand.com, send.knowhand.com	Sender and technical sender domain of emails
checkout.stripe.com, billing.stripe.com	Payment and customer portal, only for admins who manage the subscription

Who creates the board and how IT becomes admin.

- ✓ There is one board per company domain. Whoever signs in first with an address from your domain creates it and is admin.
- ✓ An admin appoints further admins under Admin › Members with "Make admin". That is also how IT becomes admin: the person who created the board appoints you.
- ✓ An admin turns off automatic joining via the company domain under Admin › Members. Then only people with an invite link get in.
- ✓ Admins manage members, categories, templates, brand, subscription and export. They can delete requests in case of misuse but cannot mark any as solved. Admins don't see values per person either.
- ✓ The last admin can't be removed or demoted.

Offboarding

Knowhand is not connected to your directory. If you block an account in Microsoft Entra ID or Google Workspace, the person stays a member in Knowhand. Remove them in the board as well. Go to Admin › Members and choose "Remove".

- ✓ The profile is pseudonymised, the person's requests stay as "Former member".
- ✓ Open offers to help and the person's invite links are withdrawn.
- ✓ The person can't come back on their own, neither through the company domain nor through an invite link.
- ✓ The last admin can't be removed. Appoint another one first.

6 AI assistant

Data protection

Works council

- ✓ Off by default. Only an admin can switch it on for the board.
- ✓ What it does: it turns free text into a suggestion for title, summary, category, tags and deadline. Nothing is applied without a click.

- ✓ What is sent: only when someone clicks "Draft with assistant", the entered text and the names of the board categories. Names, email addresses, profile data and other requests are not sent.
- ✓ Where to: Google Cloud (Vertex AI, Frankfurt region) or, if you enter your own key, your own endpoint. The provider is contractually barred from using the data for training.
- ✓ Limits: a daily limit applies on Knowhand's key. When the board is frozen, the assistant is blocked.
- ✓ The works council template keeps the assistant switched off until the works council has agreed to switching it on (§ 5).

7 Employees' rights

Data protection

Works council

- ✓ Voluntary use: profile, requests and help offers are voluntary. The works council template states that not using Knowhand leads to no disadvantages (§ 2).
- ✓ Access, rectification, erasure, restriction, data portability and objection under Art. 15 to 21 GDPR. Your company is the controller for board data; requests from data subjects that reach Knowhand directly are forwarded to you.
- ✓ Self-service: every member edits their profile, exports their data and deletes their account themselves. The profile is then pseudonymised ("Former member"), their requests stay in the archive.
- ✓ Non-essential emails can be unsubscribed via the link in every email and in the profile.
- ✓ Questions and referrals are only visible to the creator and those involved, the thanks counter only to the person.
- ✓ Supervisory authority named in Knowhand's privacy policy: Austrian Data Protection Authority (Datenschutzbehörde), Barichgasse 40-42, 1030 Vienna.

8 No monitoring of performance or behaviour

Works council

- ✗ No leaderboard, no points, no ranking, no per-person evaluation.
- ✗ No last-online indicator, no per-person response times, no per-person usage logs beyond what is technically necessary.
- ✗ No analysis of emails, chats or documents.
- ✗ No open or click tracking in emails.

What admins see

Metrics only exist as totals for the whole board and only from ten members on, never values per person:

- ✓ Members: number of members on the board
- ✓ Active in 30 days: number of members who posted a request, offered help or changed their profile in the last 30 days; sign-ins and page views do not count
- ✓ Requests in total and this month: number of requests on the board

- ✓ Solve rate: share of solved requests among all completed requests
- ✓ Median time to the first help offer: hours from the request to the first offer, as the median across all requests with an offer
- ✓ Offer within 48 hours: share of requests with an offer in the first 48 hours, with denominator
- ✓ Clicks on suggestions: share of the suggestions shown while writing a request (solved requests and people) that were clicked, with denominator; neither the suggested person nor who clicked is stored
- ✓ Nudges after 48 hours: number of requests for which a nudge was sent after 48 hours without a reply
- ✓ Pointers: number of "I know someone" pointers
- ✓ Questions: number of questions to people who asked

The metrics cannot be filtered by team, location or person.

Nudges and suggestions

- ✓ Emails about new requests and nudges only go to members whose self-maintained profile matches the request: same category or same tags.
- ✓ Nudge after 48 hours without a reply: to at most three matching people, and only to people who set "I have capacity right now" and are not away.
- ✓ Suggestions while writing a request: solved requests from the archive and up to three people with matching categories or tags, again only with capacity and not away.
- ✓ No history and no performance data: how often someone helped or reacted to a nudge plays no part.
- ✓ For nudges, only the email delivery is stored, and deleted after 90 days. For suggestions, Knowhand only counts how often they were shown and clicked; it stores neither which person was suggested nor who clicked.

Export

Knowhand shows no values per person, not even to admins. Admins can export the board's data (data portability); the export shows who posted which request or offered help, with the time (chapter 4). The works council template governs what the export may be used for: per-person evaluation is not allowed, including through export and later linking, and insights from Knowhand are not used for employment measures (§ 4).

9 Data processing agreement

Data protection

The data processing agreement under Art. 28 GDPR applies when a board is created and is published at knowhand.com/avv (in German), also as a PDF (knowhand.com/downloads/knowhand-auftragsverarbeitung.pdf). The key points:

- ✓ Parties: your company as controller, represented by the board admin, and Knowhand as processor.
- ✓ Instructions are given through the application's features or by email. Knowhand only accesses customer data to fix errors at your request or to prevent misuse, and logs such access.

- ✓ Everyone involved in processing is bound to confidentiality.
- ✓ Knowhand reports personal data breaches without undue delay, at the latest 48 hours after becoming aware, to the admins.
- ✓ Evidence is available on request. On-site audits are possible with four weeks' notice, at most once a year, if the evidence is not sufficient.
- ✓ After the contract ends Knowhand deletes all board data within the periods in chapter 4; before that you can export everything as JSON and CSV. Backups are overwritten after 7 days.
- ✓ In case of conflict the data processing agreement takes precedence over the terms. Austrian law applies.

Knowhand is a self-service product without a sales team. It deliberately does not offer contracts on your own paper, certifications or SCIM. SAML is not built in; on request we look into it, without a commitment. There is no SCIM. Today you sign in with a link to your work email or with the company Google account.

10 Works council template

Works council

Template for Austria (§ 96a ArbVG) and Germany (§ 87 (1) no. 6 BetrVG) for introducing Knowhand: fill in, adapt, sign together. Version of 25 September 2026. The full German text is in the appendix, at knowhand.com/betriebsvereinbarung and as an editable Word file at knowhand.com/en/pruefpaket.

- ✓ § 2: Use is voluntary; not using it leads to no disadvantages.
- ✓ § 4: no monitoring of performance or behaviour, only the listed metrics for the whole board from ten members on, no per-person evaluation. You decide who uses the export for what; insights from Knowhand are not used for employment measures.
- ✓ § 5: The AI assistant stays off until the works council agrees.
- ✓ § 6: The admins are named.
- ✓ § 7: You set the deadline for removing people who leave and how long archive content is kept.
- ✓ § 9: New evaluations and other feature changes that affect the agreement require an amendment. The provider's announcements of feature and sub-processor changes go to the works council.

For Switzerland there are separate usage rules at knowhand.com/nutzungsreglement-ch.

11 Contact and documents

IT

Data protection

Works council

Paul Krügel answers questions about your review by email at hallo@knowhand.com, within one working day. There is no phone hotline.

Document	Address
For IT admins	knowhand.com/en/it
Privacy on one page (German)	knowhand.com/datenschutz-onepager

Document	Address
Data processing agreement (German)	knowhand.com/avv
Data processing agreement as a PDF (German)	knowhand.com/downloads/knowhand-auftragsverarbeitung.pdf
Privacy policy (German)	knowhand.com/datenschutz
Works council template (German)	knowhand.com/betriebsvereinbarung
Usage rules Switzerland (German)	knowhand.com/nutzungsreglement-ch
Terms (German)	knowhand.com/agb
This review pack, current version	knowhand.com/en/pruefpaket
Report a security issue	hallo@knowhand.com (knowhand.com/.well-known/security.txt)

Appendix: works council template (German original)

Legal texts are provided in German. The template below is the text published at knowhand.com/betriebsvereinbarung.

Vorlage für Österreich (§ 96a ArbVG) und Deutschland (§ 87 Abs. 1 Nr. 6 BetrVG) zur Einführung von Knowhand. Ausfüllen, anpassen, gemeinsam unterschreiben. Fassung vom 25. September 2026.

Betriebsvereinbarung über die Einführung und Nutzung von Knowhand

zwischen der [Firma], vertreten durch [Geschäftsführung], und dem Betriebsrat der [Firma], vertreten durch [Vorsitz].

§ 1 Gegenstand

Knowhand ist ein internes Schwarzes Brett für Kollegenhilfe. Mitarbeitende veröffentlichen freiwillig Hilfsanfragen, bieten freiwillig Hilfe an und pflegen freiwillig ein Profil mit Expertise-Kategorien und Tags. Die Vereinbarung regelt die Einführung, die Datenverarbeitung und die Grenzen der Nutzung.

§ 2 Freiwilligkeit

Die Nutzung ist freiwillig. Mitarbeitende sind nicht verpflichtet, ein Profil auszufüllen, Anfragen zu stellen oder Hilfe anzubieten. Aus der Nichtnutzung entstehen keine Nachteile.

§ 3 Verarbeitete Daten

Name, dienstliche E-Mail-Adresse, optional Bild, Team, Rolle, Kurztext, Expertise-Kategorien, Tags, Booking-Link, Kontaktart, Kapazität, Abwesenheit; Inhalte von Anfragen und Anhängen, Hilfsangebote, Rückfragen, Hinweise, Danksagungen. Die vollständige Liste steht in „Datenschutz auf einer Seite“ des Anbieters (knowhand.com/datenschutz-onepager).

§ 4 Keine Leistungs- und Verhaltenskontrolle

Knowhand wird nicht zur Kontrolle von Leistung oder Verhalten eingesetzt. Es gibt keine Rangfolgen, Punkte, Reaktionszeiten je Person oder Anwesenheitsanzeigen. Der Danke-Zähler ist nur für die jeweilige Person sichtbar.

Der Arbeitgeber sieht ausschließlich diese Kennzahlen des gesamten Boards, erst ab zehn Mitgliedern und jeweils als Summe für das Board, ohne Werte je Person und ohne Filter nach Team, Standort oder Person: Mitglieder, Aktiv in 30 Tagen, Anfragen gesamt und im laufenden Monat, Lösungsquote, Median bis zum ersten Hilfsangebot, Angebot innerhalb von 48 Stunden, Klicks auf Vorschläge, Anstöße nach 48 Stunden, Hinweise, Rückfragen. „Aktiv in 30 Tagen“ zählt Mitglieder, die in den letzten 30 Tagen eine Anfrage gestellt, Hilfe angeboten oder ihr Profil geändert haben; Anmeldungen und Seitenaufrufe zählen nicht. Die Erklärung jeder Kennzahl steht in „Datenschutz auf einer Seite“ des Anbieters.

Vorschläge von Personen beim Schreiben einer Anfrage und Anstöße nach 48 Stunden ohne Antwort beruhen nur auf den selbst gepflegten Profilingaben (Kategorien, Tags, Kapazität, Abwesenheit), nicht auf früherem Verhalten. Von Anstößen wird nur die Zustellung der Mail gespeichert, für 90 Tage; bei Vorschlägen wird nur gezählt, wie oft sie angezeigt und angeklickt wurden, ohne zu speichern, welche Person vorgeschlagen wurde oder wer geklickt hat.

Der Export des Boards (Datenportabilität) enthält, wer welche Anfrage gestellt, Hilfe angeboten, Rückfragen gestellt oder Hinweise gegeben hat, jeweils mit Zeitpunkt. Ihn nutzt nur [Funktion] zu [Zweck, zum Beispiel Datensicherung oder Wechsel des Anbieters]; der Betriebsrat wird vorher informiert. Auswertungen je Person, auch durch Export und nachträgliche Verknüpfung, sind unzulässig.

Erkenntnisse aus Knowhand werden nicht für arbeitsrechtliche Maßnahmen, Beurteilungen oder Entscheidungen über einzelne Beschäftigte verwendet (Verwertungsverbot).

§ 5 KI-Assistent

Der KI-Assistent bleibt ausgeschaltet, bis der Betriebsrat der Einschaltung zugestimmt hat. Er verarbeitet den freiwillig eingegebenen Anfragetext und die Namen der Board-Kategorien, keine Profildaten und keine anderen Anfragen. [Alternativ: Der Assistent wird eingeschaltet; Anbieter: Google Vertex AI, Frankfurt / eigener Endpunkt der Firma.]

§ 6 Zugriff und Rollen

Admins sind: [Namen, Funktion]. Admins verwalten Mitglieder, Kategorien, Vorlagen und die Marke; sie können Anfragen bei Missbrauch entfernen, aber keine Anfragen als gelöst markieren. Knowhand stellt Admins keine Auswertungen je Person bereit.

§ 7 Löschung

Mitarbeitende können ihr Konto jederzeit selbst löschen; das Profil wird pseudonymisiert, eigene Anfragen bleiben im Archiv. Beim Ausscheiden aus dem Unternehmen entfernt der Admin das Konto innerhalb von [Anzahl] Tagen nach dem letzten Arbeitstag.

Anfragen bleiben während der Laufzeit im Archiv, bis ein Admin sie löscht oder das Board gelöscht wird. [Regelung zur Aufbewahrung von Archivinhalten, zum Beispiel: Admins löschen gelöste Anfragen nach [Anzahl] Jahren.]

Der Anbieter löscht die Daten des Boards nach Vertragsende innerhalb der vereinbarten Fristen.

§ 8 Information und Schulung

Der Arbeitgeber informiert alle Mitarbeitenden vor der Einführung über Zweck, Daten und Freiwilligkeit und stellt „Datenschutz auf einer Seite“ des Anbieters (knowhand.com/datenschutz-onepager) bereit. Fragen beantwortet [Ansprechperson].

§ 9 Änderungen und Laufzeit

Funktionsänderungen mit Auswirkung auf diese Vereinbarung, insbesondere neue Auswertungen, bedürfen einer Ergänzung. Der Arbeitgeber leitet Ankündigungen des Anbieters zu Funktions- und Sub-Prozessor-Änderungen unverzüglich an den Betriebsrat weiter. Die Vereinbarung gilt unbefristet und kann mit einer Frist von drei Monaten zum Monatsende gekündigt werden; bis zu einer Neuregelung gilt sie fort. Für Österreich gilt § 96a ArbVG (Zustimmungspflicht bei Systemen zur Ermittlung von Personendaten, die über die Grundlagen hinausgehen); für Deutschland § 87 Abs. 1 Nr. 6 BetrVG.

Ort, Datum, Unterschriften Geschäftsführung und Betriebsrat.