

ashoka ritual – Privacy Policy (English Translation)

Source: German version dated 13.02.2026 (unofficial translation for convenience).

Privacy Policy for the “ashoka ritual” platform

Version: 13 February 2026

This Privacy Policy informs you about the processing of personal data when using the “ashoka ritual” platform and its associated websites, apps and online services.

1. Controller

Controller: X-Working GmbH

Address: Hofrichterstrasse 32, 51067 Cologne, Germany

Email: mail@artist-ritual.com

2. Data protection contact / Data protection officer

You can contact us at any time using the contact details above for data protection inquiries. If a data protection officer is appointed, their contact details will be published separately on the platform.

3. Categories of personal data

Depending on usage, we process in particular the following categories of personal data:

- Master data (e.g., name/artist name, contact details, language, country/region if provided).
- Account and authentication data (e.g., username, password hash, login times, security features).
- Profile data and content (e.g., portfolio, works, texts, images, audio/video, comments, messages, metadata).
- Communication data (e.g., support requests, correspondence).
- Usage and log data (e.g., IP address, device/browser information, access times, error logs).
- Billing data (only for paid services; e.g., billing address, transaction information; payment data is generally processed by the payment service provider).

4. Purposes and legal bases of processing (Art. 6 GDPR)

We process personal data only insofar as necessary to provide the platform, ensure security and comply with legal obligations. Depending on the circumstances, processing is based in particular on:

- Art. 6(1)(b) GDPR (performance of contract): registration, account management, provision of community functions, publication/display of content according to your settings, communication within the platform.
- Art. 6(1)(f) GDPR (legitimate interests): IT security, prevention of abuse/fraud, error analysis, protection of the platform and community, enforcement of our GTC.

- Art. 6(1)(c) GDPR (legal obligation): compliance with mandatory commercial and tax retention obligations and, where applicable, evidentiary obligations.
- Art. 6(1)(a) GDPR (consent): optional features (e.g., newsletter, non-essential cookies/tracking, certain marketing or convenience features), if offered.

5. Registration and user account

When you register, we process the data you provide to set up and manage your account. Mandatory fields are marked as such; additional information is voluntary.

6. Content, profiles, visibility

Content and profile data are processed and displayed according to your privacy settings (e.g., public, registered users only, or selected contacts only). Please note: public content may also be perceived, shared or indexed outside our platform by third parties.

7. Direct messages and confidential communication

Direct messages and comparable non-public communication content are generally treated confidentially. We access content only insofar as exceptionally necessary for abuse/security prevention, handling support cases or enforcing the GTC and legally permissible.

8. Server log files and security

With each access to the platform, log data may be processed for technical reasons (e.g., IP address, timestamp, accessed pages, status codes). This processing is necessary to provide the platform, defend against attacks and ensure system security (Art. 6(1)(f) GDPR).

9. Cookies, local storage technologies, consent management

We may use cookies and similar technologies. We distinguish between:

- Necessary technologies: required for basic functions (e.g., login, session, security). Legal basis: Art. 6(1)(f) GDPR or Art. 6(1)(b) GDPR.
- Optional technologies (if used): e.g., reach measurement, convenience functions or analytics. We use these only with consent (Art. 6(1)(a) GDPR) and provide withdrawal/settings management.

Details on the specific cookies/tools used (name, provider, storage duration) are provided—if relevant—in the consent banner or in a cookie overview on the platform.

10. Recipients / categories of recipients

We disclose personal data only if necessary, legally permissible or initiated by you. Recipients may include in particular:

- Processors (Art. 28 GDPR), e.g., hosting/cloud providers, email/support providers, technical service providers.
- Payment service providers for paid services (as separate controllers or processors depending on the service).
- Legal and tax advisors (where required).
- Other users/public in accordance with your visibility and publication settings.

Data is not disclosed voluntarily to government institutions; see additionally the “Government-Requests Policy” and section 13 of this Privacy Policy.

11. Third-country transfers

If we use service providers outside the European Economic Area (EEA) or data is processed there, this takes place only in compliance with the requirements of Art. 44 et seq. GDPR (e.g., adequacy decision, standard contractual clauses, additional safeguards).

12. Storage duration and deletion

We store personal data only as long as necessary for the respective purposes or as long as statutory retention obligations exist. Indicative criteria:

- Account data: until account deletion/termination; thereafter deletion/anonymisation unless obligations prevent this.
- Content: until deleted by you or account deletion; technical residuals (backups) may persist for a limited time until overwritten.
- Server logs: generally short-term; longer storage only in case of security incidents/defence or for evidentiary purposes.
- Billing and accounting data: in accordance with commercial and tax retention obligations.

13. Handling of official requests (principle)

We pursue a government-independent orientation and do not voluntarily disclose data to authorities. We strictly review any information or surrender requests and fulfil them—where we are legally bound—only to the strictly necessary extent. Where legally permissible, we inform affected users. Details are governed by our separate “Government-Requests Policy”.

14. Your rights (data subject rights)

As a data subject, you have—subject to the legal requirements—the following rights:

- Access (Art. 15 GDPR).
- Rectification (Art. 16 GDPR).
- Erasure (Art. 17 GDPR).
- Restriction of processing (Art. 18 GDPR).
- Data portability (Art. 20 GDPR).
- Objection to processing based on Art. 6(1)(f) GDPR (Art. 21 GDPR).
- Withdrawal of consent at any time with effect for the future (Art. 7(3) GDPR).

To exercise your rights, a message to mail@artist-ritual.com is sufficient. For verification, we may request appropriate evidence to prevent unauthorised access to data.

15. Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR), in particular in the Member State of your residence, workplace or the place of the alleged infringement.

16. Obligation to provide data

Certain data is required for registration and operation of the platform. Without this data, use may not be possible or may be restricted.

17. Automated decisions / profiling

We do not make automated decisions within the meaning of Art. 22 GDPR that have legal effects on you or similarly significantly affect you. Security and abuse mechanisms (e.g., spam detection) may be automated without intending any legally significant effect.

18. Changes to this Privacy Policy

We may adapt this Privacy Policy if the platform, legal situation or processing operations change. The current version is published on the platform.