

Wise Coders GmbH – GDPR Compliance Statement

Last updated: 2025

Wise Coders GmbH (“Wise Coders”, “we”, “us”) is a Germany-based software company developing and supporting **DbSchema**, a database design and management platform. We are committed to protecting the privacy and rights of individuals in accordance with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and the **UK Data Protection Act 2018**.

This GDPR Policy explains how Wise Coders processes personal data as a **data controller** when providing DbSchema, support services, licensing activities, and when interacting with customers, prospects, and partners.

1. Scope

This policy applies to the processing of personal data by Wise Coders in relation to:

- DbSchema Pro (commercial edition)
- DbSchema Community Edition (free edition)
- Licensing, renewals, invoicing, and customer account management
- Support tickets, bug reports, and technical assistance
- Website communication, downloads, evaluations, and interest inquiries
- The optional **AI Module** of DbSchema (see Section 7)

This policy does **not** apply to data processing performed independently by:

- PayPro Global (payment processor)
- Authorized resellers
- AI service providers processing user-generated content for AI responses

These entities act as **independent controllers** or **processors**, as applicable, under GDPR.

2. Personal Data We Collect

Wise Coders may collect and process the following categories of personal data:

2.1 Customer & Licensing Data

- Name
- Email address
- Company name (if applicable)

- License details and activation history
- Support history and submitted materials
- Financial records (held by PayPro Global or resellers; only references are stored by us)

2.2 Technical & Support-Related Data

- Information voluntarily submitted in bug reports or tickets
- Logs shared by the user for troubleshooting
- IP address for website analytics and fraud detection
- Browser and system information (website only)

2.3 Website Interaction & Cookies

- IP address
- Session metadata
- Analytics & usage statistics
- Cookie preferences
(See our **Site Privacy Policy** for full details.)

2.4 Job Applicants

- CV, contact information, and any personal data voluntarily submitted.

3. Purposes and Legal Bases for Processing

Processing is carried out pursuant to the following lawful bases:

Purpose	Legal Basis
Delivering DbSchema software, managing licenses, user accounts	Performance of a contract (Art. 6(1)(b))
Providing support, technical assistance, troubleshooting	Legitimate interest (Art. 6(1)(f))
Communicating product updates, security information, renewals	Legitimate interest (Art. 6(1)(f))
Processing payments (via PayPro Global/resellers)	Contract / Legal obligation
Security, fraud prevention, server logs	Legitimate interest
Bookkeeping, tax, and regulatory obligations	Legal obligation (Art. 6(1)(c))

Purpose	Legal Basis
Sharing data with resellers only when you submit a form granting permission	Consent (Art. 6(1)(a))
AI Module processing	Performance of a service + Legitimate interest (details below)

4. Data Retention

Wise Coders retains personal data only as long as necessary:

- **License data and financial records:** retained for as long as the customer retains a license (including perpetual licenses) plus statutory retention periods for accounting and taxation.
- **Support correspondence:** retained as needed for service quality, support history, and security.
- **Job applicant data:** deleted after recruitment processes unless consent for future roles is provided.
- **Opt-out requests:** kept only to prevent further communication.

Users may request deletion of their data at any time; however, doing so may affect our ability to provide licenses or perpetual-use rights.

5. Recipients and Transfers

We may share personal data with:

- PayPro Global (independent controller for purchases)
- Authorized resellers (when interacting by consent)
- IT service providers, hosting providers, or support tools (as **processors**)
- Legal authorities, when required by law
- Entities involved in mergers or acquisitions

Cross-Border Transfers

Where personal data is transferred outside the EU/EEA or UK, Wise Coders employs lawful mechanisms such as:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions

- Additional technical safeguards (e.g., encryption)
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6. Security

Wise Coders implements appropriate technical and organizational measures:

- Encrypted communication (TLS/HTTPS)
- Restricted access and role-based controls
- Secure development practices
- Monitoring and incident response measures
- Logging stored locally on user machines unless voluntarily submitted

Licensor maintains an information security management system aligned with **ISO/IEC 27001** and implements technical and organizational measures appropriate to the risks (access control, encryption in transit for online services, secure development, vulnerability management, incident response).

ISO/IEC 27001 Certification. Wise Coders maintains ISO/IEC 27001 certification covering the information security management system relevant to DbSchema development and supporting services. A certificate copy and scope statement can be provided under NDA.

7. AI Module (DbSchema AI)

DbSchema includes an optional **AI Module** that allows users to submit natural language prompts about database design and receive AI-generated suggestions.

7.1 Data Processed by the AI Module

Only **schema-level information** needed to fulfill the user prompt is transmitted, such as:

- Table names
- Column names and data types
- Relationships
- User-supplied prompts

No actual data records or database contents are transmitted unless voluntarily included by the user.

7.2 AI Service Providers

AI processing is performed by third-party AI providers acting as **processors**. Processing is limited to generating responses.

7.3 Responsibilities

- AI output may be inaccurate; the user must validate results.
 - The user must not submit personal data to the AI Module.
 - The feature is optional and can be disabled at any time.
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8. Your GDPR Rights

You have the right to:

- Access your personal data
- Rectify inaccurate data
- Erase data (“right to be forgotten”)
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time (where applicable)
- Lodge a complaint with a supervisory authority

Requests can be made via: **support@dbschema.com**

9. Changes to This Policy

We may update this GDPR Policy to reflect legal changes or operational adjustments. Updates will be posted on our website.

Contact

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