# **Privacy Policy**

# **Privacy Policy Introduction and Overview**

We have written this privacy policy (version 04.09.2023-122320933) in order to explain to you, in accordance with the provisions of the <u>General Data Protection Regulation (EU)</u> 2016/679 and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered genderneutral.

**In short:** We provide you with comprehensive information about any of your personal data we process.

Privacy policies usually sound very technical and use legal terminology. However, this privacy policy is intended to describe the most important things to you as simply and transparently as possible. So long as it aids transparency, technical **terms are explained in a reader-friendly manner, links** to further information are provided and **graphics** are used. We are thus informing in clear and simple language that we only process personal data in the context of our business activities if there is a legal basis for it. This is certainly not possible with brief, unclear and legal-technical statements, as is often standard on the internet when it comes to data protection. I hope you find the following explanations interesting and informative. Maybe you will also find some information that you have not been familiar with. If you still have questions, we kindly ask you to contact the responsible body named below or in the imprint, follow the existing links and look at further information on third-party sites. You can of course also find our contact details in the imprint.

# Scope

This privacy policy applies to all personal data processed by our company and to all personal data processed by companies commissioned by us (processors). With the term personal data, we refer to information within the meaning of Article 4 No. 1 GDPR, such as the name, email address and postal address of a person. The processing of personal data ensures that we can offer and invoice our services and products, be it online or offline. The scope of this privacy policy includes:

- all online presences (websites, online shops) that we operate
- Social media presences and email communication
- mobile apps for smartphones and other devices

**In short:** This privacy policy applies to all areas in which personal data is processed in a structured manner by the company via the channels mentioned. Should we enter into legal relations with you outside of these channels, we will inform you separately if necessary.

# Legal bases

In the following privacy policy, we provide you with transparent information on the legal principles and regulations, i.e. the legal bases of the General Data Protection Regulation, which enable us to process personal data.

Whenever EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE

EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016. You can of course access the General Data Protection Regulation of the EU online at EUR-Lex, the gateway to EU law, at <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679</a>.

We only process your data if at least one of the following conditions applies:

- 1. **Consent** (Article 6 Paragraph 1 lit. a GDPR): You have given us your consent to process data for a specific purpose. An example would be the storage of data you entered into a contact form.
- 2. **Contract** (Article 6 Paragraph 1 lit. b GDPR): We process your data in order to fulfill a contract or pre-contractual obligations with you. For example, if we conclude a sales contract with you, we need personal information in advance.
- 3. **Legal obligation** (Article 6 Paragraph 1 lit. c GDPR): If we are subject to a legal obligation, we will process your data. For example, we are legally required to keep invoices for our bookkeeping. These usually contain personal data.
- 4. **Legitimate interests** (Article 6 Paragraph 1 lit. f GDPR): In the case of legitimate interests that do not restrict your basic rights, we reserve the right to process personal data. For example, we have to process certain data in order to be able to operate our website securely and economically. Therefore, the processing is a legitimate interest.

Other conditions such as making recordings in the interest of the public, the exercise of official authority as well as the protection of vital interests do not usually occur with us. Should such a legal basis be relevant, it will be disclosed in the appropriate place.

In addition to the EU regulation, national laws also apply:

• In **Austria** this is the Austrian Data Protection Act (**Datenschutzgesetz**), in short **DSG**.

Should other regional or national laws apply, we will inform you about them in the following sections.

# Contact details of the data protection controller

If you have any questions about data protection, you will find the contact details of the responsible person or controller below:

Michael Ostermann,

KLG Knödelhütte Parz. 127, 1140 Wien, Österreich

E-Mail: privacy@michael-ostermann.com

Phone: 0676/5412343

Company details: https://www.michael-ostermann.com/impressum/

# **Storage Period**

It is a general criterion for us to store personal data only for as long as is absolutely necessary for the provision of our services and products. This means that we delete personal data as soon as any reason for the data processing no longer exists. In some cases, we are legally obliged to keep certain data stored even after the original purpose no longer exists, such as for accounting purposes.

If you want your data to be deleted or if you want to revoke your consent to data processing, the data will be deleted as soon as possible, provided there is no obligation to continue its storage.

We will inform you below about the specific duration of the respective data processing, provided we have further information.

# **Rights in accordance with the General Data Protection Regulation**

In accordance with Articles 13, 14 of the GDPR, we inform you about the following rights you have to ensure fair and transparent processing of data:

- According to Article 15 DSGVO, you have the right to information about whether we are processing data about you. If this is the case, you have the right to receive a copy of the data and to know the following information:
  - o for what purpose we are processing;
  - o the categories, i.e. the types of data that are processed;
  - who receives this data and if the data is transferred to third countries, how security can be guaranteed;
  - o how long the data will be stored;
  - the existence of the right to rectification, erasure or restriction of processing and the right to object to processing;
  - o that you can lodge a complaint with a supervisory authority (links to these authorities can be found below);
  - o the origin of the data if we have not collected it from you;
  - Whether profiling is carried out, i.e. whether data is automatically evaluated to arrive at a personal profile of you.
- You have a right to rectification of data according to Article 16 GDPR, which means that we must correct data if you find errors.
- You have the right to erasure ("right to be forgotten") according to Article 17 GDPR, which specifically means that you may request the deletion of your data.
- According to Article 18 of the GDPR, you have the right to restriction of processing, which means that we may only store the data but not use it further.
- According to Article 20 of the GDPR, you have the right to data portability, which
  means that we will provide you with your data in a standard format upon request.
- According to Article 21 DSGVO, you have the right to object, which entails a change in processing after enforcement.
  - o If the processing of your data is based on Article 6(1)(e) (public interest, exercise of official authority) or Article 6(1)(f) (legitimate interest), you may object to the processing. We will then check as soon as possible whether we can legally comply with this objection.
  - If data is used to conduct direct advertising, you may object to this type of data processing at any time. We may then no longer use your data for direct marketing.

- If data is used to conduct profiling, you may object to this type of data processing at any time. We may no longer use your data for profiling thereafter.
- According to Article 22 of the GDPR, you may have the right not to be subject to a decision based solely on automated processing (for example, profiling).
- You have the right to lodge a complaint under Article 77 of the GDPR. This means that you can complain to the data protection authority at any time if you believe that the data processing of personal data violates the GDPR.

**In short:** you have rights – do not hesitate to contact the responsible party listed above with us!

If you believe that the processing of your data violates data protection law or your data protection rights have been violated in any other way, you can complain to the supervisory authority. For Austria, this is the data protection authority, whose website can be found at <a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>. The following local data protection authority is responsible for our company:

# **Austria Data protection authority**

**Manager:** Mag. Dr. Andrea Jelinek **Address:** Barichgasse 40-42, 1030 Wien

Phone number.: +43 1 52 152-0 E-mail address: <u>dsb@dsb.gv.at</u> Website: <u>https://www.dsb.gv.at/</u>

# Data transfer to third countries

We only transfer or process data to countries outside the EU (third countries) if you consent to this processing, if this is required by law or if it is contractually necessary. In any case, we generally only do so to the permitted extent. In most cases, your consent is the most important reason for data being processed in third countries. When personal data is being processed in third countries such as the USA, where many software manufacturers offer their services and have their servers located, your personal data may be processed and stored in unexpected ways.

We want to expressly point out, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing by US services (such as Google Analytics) may result in data processing and retention without the data having undergone anonymisation processes. Furthermore, US government authorities may be able to access individual data. The collected data may also get linked to data from other services of the same provider, should you have a user account with the respective provider. We try to use server locations within the EU, whenever this is offered and possible.

We will provide you with more details about data transfer to third countries in the appropriate sections of this privacy policy, whenever applicable.

# Security of data processing operations

In order to protect personal data, we have implemented both technical and organisational measures. We encrypt or pseudonymise personal data wherever this is possible. Thus, we make it as difficult as we can for third parties to extract personal information from our data.

Article 25 of the GDPR refers to "data protection by technical design and by data protection-friendly default" which means that both software (e.g. forms) and hardware (e.g. access to server rooms) appropriate safeguards and security measures shall always be placed. If applicable, we will outline the specific measures below.

# TLS encryption with https

The terms TLS, encryption and https sound very technical, which they are indeed. We use HTTPS (Hypertext Transfer Protocol Secure) to securely transfer data on the Internet. This means that the entire transmission of all data from your browser to our web server is secured – nobody can "listen in".

We have thus introduced an additional layer of security and meet privacy requirements through technology design <u>Article 25 Section 1 GDPR</u>). With the use of TLS (Transport Layer Security), which is an encryption protocol for safe data transfer on the internet, we can ensure the protection of confidential information.

You can recognise the use of this safeguarding tool by the little lock-symbol , which is situated in your browser's top left corner in the left of the internet address (e.g. examplepage.uk), as well as by the display of the letters https (instead of http) as a part of our web address.

If you want to know more about encryption, we recommend you to do a Google search for "Hypertext Transfer Protocol Secure wiki" to find good links to further information.

# **Communications**

# Communications Overview Affected parties: Anyone who communicates with us via phone, email or online form Processed data: e. g. telephone number, name, email address or data entered in forms. You can find more details on this under the respective form of contact Purpose: handling communication with customers, business partners, etc. Storage duration: for the duration of the business case and the legal requirements Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1) (f) GDPR (legitimate interests)

If you contact us and communicate with us via phone, email or online form, your personal data may be processed.

The data will be processed for handling and processing your request and for the related business transaction. The data is stored for this period of time or for as long as is legally required.

# **Affected persons**

The above-mentioned processes affect all those who seek contact with us via the communication channels we provide.

# **Telephone**

When you call us, the call data is stored in a pseudonymised form on the respective terminal device, as well as by the telecommunications provider that is being used. In addition, data such as your name and telephone number may be sent via email and stored for answering your inquiries. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

### **Email**

If you communicate with us via email, your data is stored on the respective terminal device (computer, laptop, smartphone, ...) as well as on the email server. The data will be deleted as soon as the business case has ended and the legal requirements allow for its erasure.

### **Online forms**

If you communicate with us using an online form, your data is stored on our web server and, if necessary, forwarded to our email address. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

# Legal bases

Data processing is based on the following legal bases:

- Art. 6 para. 1 lit. a GDPR (consent): You give us your consent to store your data and to continue to use it for the purposes of the business case;
- Art. 6 para. 1 lit. b GDPR (contract): For the performance of a contract with you or a processor such as a telephone provider, or if we have to process the data for precontractual activities, such as preparing an offer;
- Art. 6 para. 1 lit. f GDPR (legitimate interests): We want to conduct our customer inquiries and business communication in a professional manner. Thus, certain technical facilities such email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.

# **Data Processing Agreement (DPA)**

In this section, we would like to explain what a Data Processing Agreement is and why it is needed. As the term "Data Processing Agreement" is quite lengthy, we will often only use the acronym DPA here in this text. Like most companies, we do not work alone, but also use the services of other companies or individuals. By involving different companies or service providers, we may pass on personal data for processing. These partners then act as processors with whom we conclude a contract, the so-called Data Processing Agreement (DPA). Most importantly for you to know is that any processing of your personal data takes place exclusively according to our instructions and must be regulated by the DPA.

# Who are the processors?

As a company and website owner, we are responsible for any of your data that is processed by us. In addition to the controller, there may also be so-called processors involved. This includes any company or person who processes your personal data. More precisely and according to the GDPR's definition, this means: Any natural or legal person, authority, institution or other entity that processes your personal data is considered a processor. Processors can therefore be service providers such as hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

To make the terminology easier to comprehend, here is an overview of the GDPR's three roles:

**Data subject** (you as a customer or interested party) → **Controller** (we as a company and contracting entity)  $\rightarrow$  **Processors** (service providers such as web hosts or cloud providers)

# **Contents of a Data Processing Agreement**

As mentioned above, we have concluded a DPA with our partners who act as processors. First and foremost, it states that the processor processes the data exclusively in accordance with the GDPR. The contract must be concluded in writing, although an electronic contract completion is also considered a "written contract". Any processing of personal data only takes place after this contract is concluded. The contract must contain the following:

- indication to us as the controller
- obligations and rights of the controller
- categories of data subjects
- type of personal data
- type and purpose of data processing
- subject and duration of data processing
- location of data processing

Furthermore, the contract contains all obligations of the processor. The most important obligations are:

- ensuring data security measures
- taking possible technical and organisational measures to protect the rights of the data subject
- maintaining a data processing record
- cooperation with the data protection authority upon request
- performing a risk analysis for any received personal data
- subprocessors may only be appointed with the written consent of the controller

You can see an example of what a DPA looks like at https://gdpr.eu/data-processingagreement/. This link shows a sample contract.

# **Cookies**

### **Cookies Overview**

Affected parties: visitors to the website

Purpose: depending on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.
Processed data: depends on the cookie used. More details can be found below or
from the manufacturer of the software that sets the cookie.
Storage duration: can vary from hours to years, depending on the respective cookie
Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR
(legitimate interests)

### What are cookies?

Our website uses HTTP-cookies to store user-specific data.

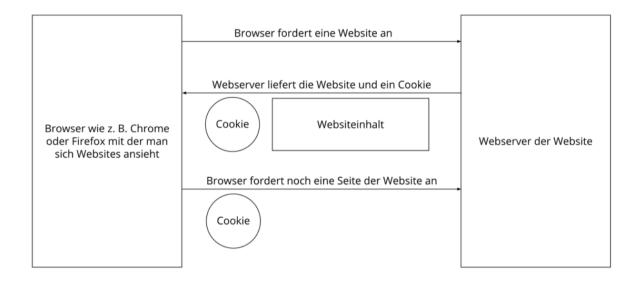
In the following we explain what cookies are and why they are used, so that you can better understand the following privacy policy.

Whenever you surf the Internet, you are using a browser. Common browsers are for example, Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

It is important to note that cookies are very useful little helpers. Almost every website uses cookies. More precisely, these are HTTP cookies, as there are also other cookies for other uses. HTTP cookies are small files that our website stores on your computer. These cookie files are automatically placed into the cookie-folder, which is the "brain" of your browser. A cookie consists of a name and a value. Moreover, to define a cookie, one or multiple attributes must be specified.

Cookies store certain user data about you, such as language or personal page settings. When you re-open our website to visit again, your browser submits these "user-related" information back to our site. Thanks to cookies, our website knows who you are and offers you the settings you are familiar to. In some browsers, each cookie has its own file, while in others, such as Firefox, all cookies are stored in one single file.

The following graphic shows a possible interaction between a web browser such as Chrome and the web server. The web browser requests a website and receives a cookie back from the server. The browser then uses this again as soon as another page is requested.



There are both first-party cookies and third-party cookies. First-party cookies are created directly by our site, while third-party cookies are created by partner-websites (e.g. Google Analytics). Each cookie must be evaluated individually, as each cookie stores different data. The expiry time of a cookie also varies from a few minutes to a few years. Cookies are not software programs and do not contain viruses, trojans or other malware. Cookies also cannot access your PC's information.

This is an example of how cookie-files can look:

Name: ga

Value: GA1.2.1326744211.152122320933-9
Purpose: Differentiation between website visitors

Expiry date: after 2 years

A browser should support these minimum sizes:

- At least 4096 bytes per cookie
- At least 50 cookies per domain
- At least 3000 cookies in total

# Which types of cookies are there?

The exact cookies that we use, depend on the used services, which will be outlined in the following sections of this privacy policy. Firstly, we will briefly focus on the different types of HTTP-cookies.

There are 4 different types of cookies:

### **Essential cookies**

These cookies are necessary to ensure the basic functions of a website. They are needed when a user for example puts a product into their shopping cart, then continues surfing on different websites and comes back later in order to proceed to the checkout. These cookies ensure the shopping cart does not get deleted, even if the user closes their browser window.

### **Purposive cookies**

These cookies collect information about user behaviour and whether the user receives any error messages. Furthermore, these cookies record the website's loading time as well as its behaviour in different browsers.

### **Target-orientated cookies**

These cookies ensure better user-friendliness. Thus, information such as previously entered locations, fonts sizes or data in forms stay stored.

### **Advertising cookies**

These cookies are also known as targeting cookies. They serve the purpose of delivering customised advertisements to the user. This can be very practical, but also rather annoying.

Upon your first visit to a website you are usually asked which of these cookie-types you want to accept. Furthermore, this decision will of course also be stored in a cookie.

If you want to learn more about cookies and do not mind technical documentation, we recommend <a href="https://tools.ietf.org/html/rfc6265">https://tools.ietf.org/html/rfc6265</a>, the Request for Comments of the Internet Engineering Task Force (IETF) called "HTTP State Management Mechanism".

# Purpose of processing via cookies

The purpose ultimately depends on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

# Which data are processed?

Cookies are little helpers for a wide variety of tasks. Unfortunately, it is not possible to tell which data is generally stored in cookies, but in the privacy policy below we will inform you on what data is processed or stored.

### Storage period of cookies

The storage period depends on the respective cookie and is further specified below. Some cookies are erased after less than an hour, while others can remain on a computer for several years.

You can also influence the storage duration yourself. You can manually erase all cookies at any time in your browser (also see "Right of objection" below). Furthermore, the latest instance cookies based on consent will be erased is after you withdraw your consent. The legality of storage will remain unaffected until then.

# Right of objection – how can I erase cookies?

You can decide for yourself how and whether you want to use cookies. Regardless of which service or website the cookies originate from, you always have the option of erasing, deactivating or only partially accepting cookies. You can for example block third-party cookies but allow all other cookies.

If you want to find out which cookies have been stored in your browser, or if you want to change or erase cookie settings, you can find this option in your browser settings:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want cookies, you can set up your browser in a way to notify you whenever a cookie is about to be set. This gives you the opportunity to manually decide to either permit or deny the placement of every single cookie. This procedure varies depending on the browser. Therefore, it might be best for you to search for the instructions in Google. If you are using Chrome, you could for example put the search term "delete cookies Chrome" or "deactivate cookies Chrome" into Google.

# Legal basis

The so-called "cookie directive" has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section 96 (3) of the Telecommunications Act (TKG). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in Section 15 (3) of the Telemedia Act (TMG).

For absolutely necessary cookies, even if no consent has been given, there are legitimate interests (Article 6 (1) (f) GDPR), which in most cases are of an economic nature. We want to offer our visitors a pleasant user experience on our website. For this, certain cookies often are absolutely necessary.

This is exclusively done with your consent, unless absolutely necessary cookies are used. The legal basis for this is Article 6 (1) (a) of the GDPR.

In the following sections you will find more detail on the use of cookies, provided the used software does use cookies.

# **Customer Data**

# Customer Data Overview Affected parties: Customers or business and contractual partners Purpose: Performance of a contract for the provision of agreed services or prior to entering into such a contract, including associated communications. Data processed: name, address, contact details, email address, telephone number, payment information (such as invoices and bank details), contract data (such as duration and subject matter of the contract), IP address, order data Storage period: the data will be erased as soon as they are no longer required for our business purposes and there is no legal obligation to process them.

Legal bases: Legitimate interests (Art. 6 Para. 1 lit. f GDPR), Contract (Art. 6 Para. 1 lit. b GDPR)

### What is customer data?

In order to be able to offer our services and contractual services, we also process data from our customers and business partners. This data always includes personal data. Customer data is all information that is processed on the basis of contractual or pre-contractual agreements so that the offered services can be provided. Customer data is therefore all the information we collect and process about our customers.

# Why do we process customer data?

There are many reasons why we collect and process customer data. The main reason is that we simply need specific data to provide our services. Sometimes for example your email address may be enough. But if you purchase a product or service, we may e. g. also need data such as your name, address, bank details or other contract data. This data will subsequently be used for marketing and sales optimisation so that we can improve our overall service for our customers and clients. Another important reason for data processing is our customer service, which is very important to us. We want you to have the opportunity to contact us at any time with questions about our offers. Thus, we may need certain data such as your email address at the very least.

# What data is processed?

Exactly which data is stored can only be shown by putting them in categories. All in all, it always depends on which of our services you receive. In some cases, you may only give us your email address so that we can e. g. contact you or answer your questions. In other instances, you may purchase one of our products or services. Then we may need significantly more information, such as your contact details, payment details and contract details.

Here is a list of potential data we may receive and process:

- Name
- Contact address
- Email address
- Phone number
- Your birthday
- Payment data (invoices, bank details, payment history, etc.)
- Contract data (duration, contents)
- Usage data (websites visited, access data, etc.)
- Metadata (IP address, device information)

### How long is the data stored?

We erase corresponding customer data as soon as we no longer need it to fulfill our contractual obligations and purposes, and as soon as the data is also no longer necessary for possible warranty and liability obligations. This can for example be the case when a business

contract ends. Thereafter, the limitation period is usually 3 years, although longer periods may be possible in individual cases. Of course, we also comply with the statutory retention requirements. Your customer data will certainly not be passed on to third parties unless you have given your explicit consent.

# **Legal Basis**

The legal basis for the processing of your data is Article 6 Paragraph 1 Letter a GDPR (consent), Article 6 Paragraph 1 Letter b GDPR (contract or pre-contractual measures), Article 6 Paragraph 1 Letter f GDPR (legitimate interests) and in special cases (e. g. medical services) Art. 9 (2) lit. GDPR (processing of special categories).

In the case of protecting vital interests, data processing is carried out in accordance with Article 9 Paragraph 2 Letter c. GDPR. For the purposes of health care, occupational medicine, medical diagnostics, care or treatment in the health or social sectors or for the administration of systems and services in health or social sectors, the processing of personal data takes place in accordance with Art. 9 Para. 2 lit. h. GDPR. If you voluntarily provide data of these special categories, the processing takes place on the basis of Article 9 Paragraph 2 lit. a GDPR.

# Registration

### **Registration Overview**

Affected parties: Anyone who registers to create an account with us, and logs in to use the account.

Processed data: Personal data such as email address, name, password and other data that is collected during registration, login and account use.

Purpose: For the provision of our services, as well as to communicate with clients or customers in the scope of our services.

Storage period: As long as the company account associated with the texts exists, plus a period of usually 3 years.

Legal bases: Article 6 paragraph 1 letter b GDPR (contract), Article 6 paragraph 1 letter a GDPR (consent), Article 6 paragraph 1 letter f GDPR (legitimate interests)

If you register with us and provide any personal data, this data may be processed, possibly along with your IP address. Below you can explore what we mean by the rather broad term "personal data".

Please only enter the data we need for the registration. In case you are registering on behalf of a third party, please only enter data for which you have the approval of the party you are registering for. If possible, use a secure password that you don't use anywhere else and an email address that you check regularly.

In the following, we will inform you about the exact type of data processing we do. After all, we want you to feel at ease with the services we provide!

### What is a registration?

When you register, we retain certain of your data in order to make it easy for you to log in with us online and use your account. An account with us has the advantage that you don't have to re-enter everything every time. It saves time and effort and ultimately prevents any issues with the provision of our services.

# Why do we process personal data?

In short, we process personal data to make account registration and usage possible for you. If we didn't do this, you would have to enter all your data each time, wait for our approval and then enter everything again. This strenuous process would probably not only irritate us a little, but also many of our dear clients and customers.

# Which data is processed?

Any data that you provided during registration or login and any data that you may enter as part of managing your account data.

During registration, we process the following types of data:

- First name
- Last name
- Email address
- Company name
- Street + house number
- Residence
- Postcode
- Country

During your registration, we process any data you enter, such as your username and password, along with data that is collected in the background such as your device information and IP addresses.

When using your account, we process any data you enter while using the account, as well as any data that is created while you use our services.

# **Storage time**

We store the entered data for at least as long as the account associated with the data exists with us and is in use – and as long as there are contractual obligations between you and us. In case the contract ends, we retain the data until the respective claims get time-barred. Moreover, we store your data as long as we are subject to legal storage obligations, if applicable. Following that, we keep any accounting records (invoices, contract documents, account statements, etc.) of the contract for 10 years (§ 147 AO) and other relevant business documents for 6 years (§ 247 HGB) after accrual.

# Right to object

You have registered, entered data and want to revoke the data processing? Not a problem. As you can see above, you retain this right under the General Data Protection Regulation also at and after registration, login or account creation with us. Contact the Data Protection Officer

above to exercise your rights. If you already have an account with us, you can easily view and manage your data and texts in your account.

### **Legal Basis**

By completing the registration process, you enter into a pre-contractual agreement with us, with the intention to conclude a contract of use for our platform (although there is no automatic payment obligation). You invest time to enter data and register and in return, we offer you our services after you log on to our system and view your customer account. We also meet our contractual obligations. Finally, we need to be able to email registered users about important changes. Article 6(1)(b) GDPR (implementation of pre-contractual measures, fulfilment of a contract) applies.

Where applicable, we will ask for your consent, e.g. in case you voluntarily provide more data than is absolutely necessary, or in case we may ask you if we may send you advertising. Article 6 paragraph 1 lit. a GDPR (consent) applies in this matter.

We also have a legitimate interest in knowing who who our clients or customers are, in order to get in touch if required. We also need to know who is using our services and whether they are being used in accordance with our terms of use, i.e. Article 6(1)(f) GDPR (legitimate interests) applies in this matter.

Note: the following sections are to be ticked by users (as required):

### **Registration with real names**

Since business operations require us to know who our clients or customers are, registration is only possible with your real name (full name) and not with a pseudonym.

### Registration with pseudonyms

You can use a pseudonym for the registration, which means you don't have to register with your real name. This ensures that your real name cannot be processed by us.

### Storage of the IP address

During registration, login and account use, we store your IP address for security reasons in order to be able to determine legitimate use.

### **Public Profile**

User profiles are publicly visible, i.e. parts of the profiles can also be viewed on the Internet without the need to enter a username and password.

### Two Factor Authentication (2FA)

Two Factor Authentication (2FA) offers additional security when logging in, as it prevents you from logging in without a smartphone, for example. This technical measure to secure your account protects you against the loss of data or unauthorised access, even if your username and password were leaked. During your registration process, login or within the account itself y ou can find out which 2FA is used.

# Web hosting

### **Web hosting Overview**

Affected parties: visitors to the website

Purpose: professional hosting of the website and security of operations

Processed data: IP address, time of website visit, browser used and other data. You can find more details on this below or at the respective web hosting provider.

Storage period: dependent on the respective provider, but usually 2 weeks

Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests)

# What is web hosting?

Every time you visit a website nowadays, certain information – including personal data – is automatically created and stored, including on this website. This data should be processed as sparingly as possible, and only with good reason. By website, we mean the entirety of all websites on your domain, i.e. everything from the homepage to the very last subpage (like this one here). By domain we mean example.uk or examplepage.com.

When you want to view a website on a screen, you use a program called a web browser. You probably know the names of some web browsers: Google Chrome, Microsoft Edge, Mozilla Firefox, and Apple Safari.

The web browser has to connect to another computer which stores the website's code: the web server. Operating a web server is complicated and time-consuming, which is why this is usually done by professional providers. They offer web hosting and thus ensure the reliable and flawless storage of website data.

Whenever the browser on your computer establishes a connection (desktop, laptop, smartphone) and whenever data is being transferred to and from the web server, personal data may be processed. After all, your computer stores data, and the web server also has to retain the data for a period of time in order to ensure it can operate properly.

### Why do we process personal data?

The purposes of data processing are:

- 1. Professional hosting of the website and operational security
- 2. To maintain the operational as well as IT security
- 3. Anonymous evaluation of access patterns to improve our offer, and if necessary, for prosecution or the pursuit of claims.li>

# Which data are processed?

Even while you are visiting our website, our web server, that is the computer on which this website is saved, usually automatically saves data such as

- the full address (URL) of the accessed website (e. g. https://www.examplepage.uk/examplesubpage.html?tid=122320933)
- browser and browser version (e.g. Chrome 87)
- the operating system used (e.g. Windows 10)
- the address (URL) of the previously visited page (referrer URL) (e. g. https://www.examplepage.uk/icamefromhere.html/)
- the host name and the IP address of the device from the website is being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- date and time
- in so-called web server log files

# How long is the data stored?

Generally, the data mentioned above are stored for two weeks and are then automatically deleted. We do not pass these data on to others, but we cannot rule out the possibility that this data may be viewed by the authorities in the event of illegal conduct.

**In short:** Your visit is logged by our provider (company that runs our website on special computers (servers)), but we do not pass on your data without your consent!

# Legal basis

The lawfulness of processing personal data in the context of web hosting is justified in Art. 6 para. 1 lit. f GDPR (safeguarding of legitimate interests), as the use of professional hosting with a provider is necessary to present the company in a safe and user-friendly manner on the internet, as well as to have the ability to track any attacks and claims, if necessary.

# **Webhosting Other**

Contact data for our Webhosting:

easyname GmbH Canettistraße 5/10, 1100 Vienna, Austria

You can learn more about the data processing at this provider in their <u>Privacy Policy</u>.

# **Web Analytics**

# Web Analytics Privacy Policy Overview Affected parties: visitors to the website Purpose: Evaluation of visitor information to optimise the website. Processed data: Access statistics that contain data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this from the respective web analytics tool directly. Storage period: depending on the respective web analytics tool used Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

# What is Web Analytics?

We use software on our website, which is known as web analytics, in order to evaluate website visitor behaviour. Thus, data is collected, which the analytic tool provider (also called tracking tool) stores, manages and processes. Analyses of user behaviour on our website are created with this data, which we as the website operator receive. Most tools also offer various testing options. These enable us, to for example test which offers or content our visitors prefer. For this, we may show you two different offers for a limited period of time. After the test (a so-called A/B test) we know which product or content our website visitors find more interesting. For such testing as well as for various other analyses, user profiles are created and the respective data is stored in cookies.

# Why do we run Web Analytics?

We have a clear goal in mind when it comes to our website: we want to offer our industry's best website on the market. Therefore, we want to give you both, the best and most interesting offer as well as comfort when you visit our website. With web analysis tools, we can observe the behaviour of our website visitors, and then improve our website accordingly for you and for us. For example, we can see the average age of our visitors, where they come from, the times our website gets visited the most, and which content or products are particularly popular. All this information helps us to optimise our website and adapt it to your needs, interests and wishes.

# Which data are processed?

The exact data that is stored depends on the analysis tools that are being used. But generally, data such as the content you view on our website are stored, as well as e. g. which buttons or links you click, when you open a page, which browser you use, which device (PC, tablet, smartphone, etc.) you visit the website with, or which computer system you use. If you have agreed that location data may also be collected, this data may also be processed by the provider of the web analysis tool.

Moreover, your IP address is also stored. According to the General Data Protection Regulation (GDPR), IP addresses are personal data. However, your IP address is usually stored in a pseudonymised form (i.e. in an unrecognisable and abbreviated form). No directly linkable data such as your name, age, address or email address are stored for testing purposes, web analyses and web optimisations. If this data is collected, it is retained in a pseudonymised form. Therefore, it cannot be used to identify you as a person.

The storage period of the respective data always depends on the provider. Some cookies only retain data for a few minutes or until you leave the website, while other cookies can store data for several years.

# **Duration of data processing**

If we have any further information on the duration of data processing, you will find it below. We generally only process personal data for as long as is absolutely necessary to provide products and services. The storage period may be extended if it is required by law, such as for accounting purposes for example for accounting.

# Right to object

You also have the option and the right to revoke your consent to the use of cookies or third-party providers at any time. This works either via our cookie management tool or via other opt-out functions. For example, you can also prevent data processing by cookies by managing, deactivating or erasing cookies in your browser.

# Legal basis

The use of Web Analytics requires your consent, which we obtained with our cookie popup. According to **Art. 6 para. 1 lit. a of the GDPR (consent)**, this consent represents the legal basis for the processing of personal data, such as by collection through Web Analytics tools.

In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors, which enables us to technically and economically improve our offer. With Web Analytics, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f of the GDPR (legitimate interests)**. Nevertheless, we only use these tools if you have given your consent.

Since Web Analytics tools use cookies, we recommend you to read our privacy policy on cookies. If you want to find out which of your data are stored and processed, you should read the privacy policies of the respective tools.

If available, information on special Web Analytics tools can be found in the following sections.

# **Facebook Conversions API Privacy Policy**

On our website we use Facebook Conversions API, which is an event tracking tool. The provider of this service is the American company Facebook Inc. The company also has Irish headquarters at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Facebook also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Facebook uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway, and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip 21 2847

You can find out more about the data that is processed by using Facebook in their Privacy Policy at <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>.

# **Facebook Pixel Privacy Policy**

We use Facebook's Facebook pixel on our website. For that, we have implemented a code on our website. The Facebook pixel is a segment of a JavaScript code, which, in case you came to our website via Facebook ads, loads an array or functions that enable Facebook to track your user actions. For example, if you buy a product on our website, the Facebook pixel is triggered and stores your actions on our website in one or more cookies. These cookies enable Facebook to match your user data (customer data such as IP address, user ID) with the data of your Facebook account. After that, Facebook deletes your data again. The collected data is anonymous as well as inaccessible and can only be used for ad placement purposes. If you are a Facebook user and you are logged in, your visit to our website is automatically assigned to your Facebook user account.

We exclusively want to show our products or services to persons, who are interested in them. With the aid of the Facebook pixel, our advertising measures can get better adjusted to your wishes and interests. Therefore, Facebook users get to see suitable advertisement (if they allowed personalised advertisement). Moreover, Facebook uses the collected data for analytical purposes and for its own advertisements.

In the following we will show you the cookies, which were set on a test page with the Facebook pixel integrated to it. Please consider that these cookies are only examples. Depending on the interaction that is made on our website, different cookies are set.

Name: \_fbp

Value: fb.1.1568287647279.257405483-6122320933-7

**Purpose:** Facebook uses this cookie to display advertising products.

**Expiration date:** after 3 months

Name: fr

Value: 0aPf312HOS5Pboo2r..Bdeiuf...1.0.Bdeiuf.

**Purpose:** This cookie is used for Facebook pixels to function properly.

**Expiration date:** after 3 months

**Name:** comment author 50ae8267e2bdf1253ec1a5769f48e062122320933-3

**Value:** Name of the author

**Purpose:** This cookie saves the text and name of a user who e.g. leaves a comment.

Expiration date: after 12 months

Name: comment\_author\_url\_50ae8267e2bdf1253ec1a5769f48e062 Value: https%3A%2F%2Fwww.testseite...%2F (URL of the author)

Purpose: This cookie saved the URL of the website that the user types into a text box on our

website.

**Expiration date:** after 12 months

**Name:** comment\_author\_email\_50ae8267e2bdf1253ec1a5769f48e062

Value: email address of the author

**Purpose:** This cookie saves the email address of the user, if they provided it on the website.

**Expiration date:** after 12 months

**Note:** The above-mentioned cookies relate to an individual user behaviour. Moreover, especially concerning the usage of cookies, changes at Facebook can never be ruled out.

If you are registered on Facebook, you can change the settings for advertisements yourself at <a href="https://www.facebook.com/ads/preferences/?entry\_product=ad\_settings\_screen">https://www.facebook.com/ads/preferences/?entry\_product=ad\_settings\_screen</a>. If you are not a Facebook user, you can manage your user based online advertising at <a href="https://www.youronlinechoices.com/uk/your-ad-choices">https://www.youronlinechoices.com/uk/your-ad-choices</a>. You have the option to activate or deactivate any providers there.

We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing is done mainly through Facebook Pixel. This may lead to data not being anonymously processed and stored. Furthermore, US government authorities may get access to individual data. The data may also get linked to data from other Facebook services you have a user account with.

If you want to learn more about Facebook's data protection, we recommend you the view the company's in-house data policies at <a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>.

# Privacy Policy for Facebook's Automatic Advanced Matching

Along with Facebook's pixel function, we have also activated Automatic Advanced Matching. This function allows us to send hashed emails, names, genders, cities, states, postcodes and dates of birth or telephone numbers as additional information to Facebook, provided you have made them available to us. This activation gives us the opportunity to customise advertising campaigns even better to persons who are interested in our services or products.

# **Google Analytics Privacy Policy**

# Google Analytics Privacy Policy Overview Affected parties: website visitors Purpose: Evaluation of visitor information to optimise the website. Processed data: Access statistics that contain data such as the location of access, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this in the privacy policy below. Storage period: depending on the properties used Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

# What is Google Analytics?

We use the tracking and analysis tool Google Analytics (GA) of the US-American company Google LLC (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). Google Analytics collects data on your actions on our website. Whenever you click a link for example, this action is saved in a cookie and transferred to Google Analytics. With the help of reports which we receive from Google Analytics, we can adapt our website and our services better to your wishes. In the following, we will explain the tracking tool in more detail, and most of all, we will inform you what data is saved and how you can prevent this.

Google Analytics is a tracking tool with the purpose of conducting data traffic analysis of our website. For Google Analytics to work, there is a tracking code integrated to our website. Upon your visit to our website, this code records various actions you perform on your website. As soon as you leave our website, this data is sent to the Google Analytics server, where it is stored.

Google processes this data and we then receive reports on your user behaviour. These reports can be one of the following:

- Target audience reports: With the help of target audience reports we can get to know our users better and can therefore better understand who is interested in our service.
- Advertising reports: Through advertising reports we can analyse our online advertising better and hence improve it.
- Acquisition reports: Acquisition reports provide us helpful information on how we can get more people enthusiastic about our service.
- Behaviour reports: With these reports, we can find out how you interact with our website. By the means of behaviour reports, we can understand what path you go on our website and what links you click.
- Conversion reports: A conversion is the process of leading you to carry out a desired action due to a marketing message. An example of this would be transforming you from a mere website visitor into a buyer or a newsletter subscriber. Hence, with the help of these reports we can see in more detail, if our marketing measures are successful with you. Our aim is to increase our conversion rate.
- Real time reports: With the help of these reports we can see in real time, what happens on our website. It makes us for example see, we can see how many users are reading this text right now.

# Why do we use Google Analytics on our website?

The objective of our website is clear: We want to offer you the best possible service. Google Analytics' statistics and data help us with reaching this goal.

Statistically evaluated data give us a clear picture of the strengths and weaknesses of our website. On the one hand, we can optimise our page in a way, that makes it easier to be found by interested people on Google. On the other hand, the data helps us to get a better understanding of you as our visitor. Therefore, we can very accurately find out what we must improve on our website, in order to offer you the best possible service. The analysis of that data also enables us to carry out our advertising and marketing measures in a more individual and more cost-effective way. After all, it only makes sense to show our products and services exclusively to people who are interested in them.

# What data is stored by Google Analytics?

With the aid of a tracking code, Google Analytics creates a random, unique ID which is connected to your browser cookie. That way, Google Analytics recognises you as a new user. The next time you visit our site, you will be recognised as a "recurring" user. All data that is collected gets saved together with this very user ID. Only this is how it is made possible for us to evaluate and analyse pseudonymous user profiles.

To analyse our website with Google Analytics, a property ID must be inserted into the tracking code. The data is then stored in the corresponding property. Google Analytics 4-

property is standard for every newly created property. An alternative however, is the Universal Analytics Property. Depending on the property that is being used, data are stored for different periods of time.

Your interactions on our website are measured by tags such as cookies and app instance IDs. Interactions are all kinds of actions that you perform on our website. If you are also using other Google systems (such as a Google Account), data generated by Google Analytics can be linked with third-party cookies. Google does not pass on any Google Analytics data, unless we as the website owners authorise it. In case it is required by law, exceptions can occur.

The following cookies are used by Google Analytics:

Name: \_ga

Value: 2.1326744211.152122320933-5

**Purpose:** By deafault, analytics.js uses the cookie \_ga, to save the user ID. It generally serves

the purpose of differentiating between website visitors.

**Expiration date:** After 2 years

Name: gid

Value: 2.1687193234.152122320933-1

**Purpose:** This cookie also serves the purpose of differentiating between website users

**Expiration date:** After 24 hours

Name: \_gat\_gtag\_UA\_property-id>

Value: 1

**Verwendungszweck:** It is used for decreasing the demand rate. If Google Analytics is provided via Google Tag Manager, this cookie gets the name \_dc\_gtm\_ property-id>.

**Expiration date:** After 1 minute

Name: AMP TOKEN **Value:** No information

**Purpose:** This cookie has a token which is used to retrieve the user ID by the AMP Client ID

Service. Other possible values suggest a logoff, a request or an error.

**Expiration date:** After 30 seconds up to one year

Name: utma

Value: 1564498958.1564498958.1564498958.1

**Purpose:** With this cookie your behaviour on the website can be tracked and the site performance can be measured. The cookie is updated every time the information is sent to

Google Analytics.

**Expiration date:** After 2 years

Name: \_\_utmt

Value: 1

**Purpose:** Just like \_gat\_gtag\_UA\_property-id> this cookie is used for keeping the

requirement rate in check.

**Expiration date:** Afer 10 minutes

Name: utmb

Value: 3.10.1564498958

Purpose: This cookie is used to determine new sessions. It is updated every time new data or

information gets sent to Google Analytics.

**Expiration date:** After 30 minutes

**Name:** \_\_utmc **Value:** 167421564

Purpose: This cookie is used to determine new sessions for recurring visitors. It is therefore a

session cookie, and only stays stored until you close the browser again.

Expiration date: After closing the browser

Name: \_\_utmz

**Value:** m|utmccn=(referral)|utmcmd=referral|utmcct=/

**Purpose:** This cookie is used to identify the source of the number of visitors to our website. This means, that the cookie stored information on where you came to our website from. This could be another site or an advertisement.

**Expiration date:** After 6 months

Name: \_\_utmv

Value: No information

**Purpose:** The cookie is used to store custom user data. It gets updated whenever information

is sent to Google Analytics. **Expiration date:** After 2 years

**Note:** This list is by no means exhaustive, since Google are repeatedly changing the use of their cookies.

Below we will give you an overview of the most important data that can be evaluated by Google Analytics:

**Heatmaps:** Google creates so-called Heatmaps an. These Heatmaps make it possible to see the exact areas you click on, so we can get information on what routes you make on our website.

**Session duration:** Google calls the time you spend on our website without leaving it session duration. Whenever you are inactive for 20 minutes, the session ends automatically.

**Bounce rate** If you only look at one page of our website and then leave our website again, it is called a bounce.

**Account creation:** If you create an account or make an order on our website, Google Analytics collects this data.

**IP-Address:** The IP address is only shown in a shortened form, to make it impossible to clearly allocate it.

**Location:** Your approximate location and the country you are in can be defined by the IP address. This process is called IP location determination.

**Technical information:** Information about your browser type, your internet provider and your screen resolution are called technical information.

**Source:** Both, Google Analytics as well as ourselves, are interested what website or what advertisement led you to our site.

Further possibly stored data include contact data, potential reviews, playing media (e.g. when you play a video on our site), sharing of contents via social media or adding our site to your favourites. This list is not exhaustive and only serves as general guidance on Google Analytics' data retention.

# How long and where is the data stored?

Google has servers across the globe. Most of them are in America and therefore your data is mainly saved on American servers. Here you can read detailed information on where Google's data centres are located:

https://www.google.com/about/datacenters/locations/?hl=en

Your data is allocated to various physical data mediums. This has the advantage of allowing to retrieve the data faster, and of protecting it better from manipulation. Every Google data centre has respective emergency programs for your data. Hence, in case of a hardware failure at Google or a server error due to natural disasters, the risk for a service interruption stays relatively low.

The data retention period depends on the properties used. When using the newer Google Analytics 4-properties, the retention period of your user data is set to 14 months. For so-called event data, we have the option of choosing a retention period of either 2 months or 14 months.

Google Analytics has a 26 months standardised period of retaining your user data. After this time, your user data is deleted. However, we have the possibility to choose the retention period of user data ourselves. There are the following five options:

- Deletion after 14 months
- Deletion after 26 months
- Deletion after 38 months
- Deletion after 50 months
- No automatical deletion

Additionally, there is the option for data to be deleted only if you no longer visit our website within a period determined by us. In this case, the retention period will be reset every time you revisit our website within the specified period.

As soon as the chosen period is expired, the data is deleted once a month. This retention period applies to any of your data which is linked to cookies, user identification and advertisement IDs (e.g. cookies of the DoubleClick domain). Any report results are based on aggregated information and are stored independently of any user data. Aggregated information is a merge of individual data into a single and bigger unit.

# How can I delete my data or prevent data retention?

Under the provisions of the European Union's data protection law, you have the right to obtain information on your data and to update, delete or restrict it. With the help of a browser add on that can deactivate Google Analytics' JavaScript (ga.js, analytics.js, dc.js), you can prevent Google Analytics from using your data. You can download this add on at

https://tools.google.com/dlpage/gaoptout?hl=en-GB. Please consider that this add on can only deactivate any data collection by Google Analytics.

If you generally want to deactivate, delete or manage all cookies (independently of Google Analytics), you can use one of the guides that are available for any browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

# Legal basis

The use of Google Analytics requires your consent, which we obtained via our cookie popup. According to **Art. 6 para. 1 lit. a of the GDPR (consent)**, this is the legal basis for the processing of personal data when collected via web analytics tools.

In addition to consent, we have legitimate interest in analysing the behaviour of website visitors, in order to technically and economically improve our offer. With Google Analytics, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f of the GDPR (legitimate interests)**. Nevertheless, we only use Google Analytics if you have given your consent.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Google to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847

The Google Ads Data Processing Terms, which reference the standard contractual clauses, can be found at https://business.safety.google/intl/en/adsprocessorterms/.

We hope we could provide you with the most important information about data processing by Google Analytics. If you want to find out more on the tracking service, we recommend these two links: <a href="https://marketingplatform.google.com/about/analytics/terms/gb/">https://marketingplatform.google.com/about/analytics/terms/gb/</a> and <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>.

# **Google Remarketing Privacy Policy**

We use Google Remarketing, an advertising analysis tool, for our website. The provider of this service is the American company Google Inc. The entity responsible for all Google services in Europe is the company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland).

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as the basis for data processing by recipients based in third countries (i. e. outside the European Union, Iceland, Liechtenstein, Norway, and thus especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). Standard Contractual Clauses (SCC) are legal templates provided by the EU Commission. Their purpose is to ensure that your data complies with European data privacy standards, even if your data is transferred to and stored in third countries (such as the USA). With these clauses, Google commits to comply with the EU's level of data protection when processing relevant data, even if it is stored, processed and managed in the USA. These clauses are based on an implementing order by the EU Commission. You can find the order and the standard contractual clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

Google holds a contract on commissioned processing in accordance with Art. 28 DSGVO, which acts as the data protection law basis for our customer relationship with Google. This refers to the EU standard contractual clauses in terms of content. Here you can find the order processing conditions: <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>

You can find out more about the data that is processed through the use of Google Remarketing in their Privacy Policy at https://policies.google.com/privacy?hl=en.

# **TikTok Pixel Privacy Policy**

On our website we use TikTok Pixel, which is a conversion tracking tool for advertisers. The provider of this service is the Chinese company TikTok. The responsible entity for the European region is the Irish company TikTok Technology Limited (10 Earlsfort Terrace, Dublin, D02 T380, Ireland).

TikTok uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR) as basis for data processing by recipients based in third countries (which are outside the European Union, Iceland, Liechtenstein and Norway) or for data transfer there. These clauses oblige TikTok to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847

You can find out more on the data processed by using TikTok in their Privacy Policy at <a href="https://www.tiktok.com/legal/privacy-policy?lang=de">https://www.tiktok.com/legal/privacy-policy?lang=de</a>.

# YouTube Analytics and Reporting API Privacy Policy

We use the web analysis tool YouTube Analytics and Reporting API on our website. The service provider is the American company YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

YouTube also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

YouTube uses standard contractual clauses approved by the EU Commission (= Art. 46. Para. 2 and 3 GDPR). These clauses oblige YouTube to comply with EU data protection standards when processing relevant data outside the EU. These clauses are based on an implementation order of the EU Commission. You can find the decision and the clauses here: <a href="https://eurlex.europa.eu/eli/dec\_impl/2021/914/oj?locale=en">https://eurlex.europa.eu/eli/dec\_impl/2021/914/oj?locale=en</a>.

You can find more information about the standard contractual clauses at Google at https://business.safety.google/intl/en/adsprocessorterms/.

Since YouTube is a subsidiary of Google, they share the same privacy policy. If you want to find out more about how your data is handled, we recommend you read the privacy policy at <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>.

# **Email-Marketing**

### **Email Marketing Overview**

Affected parties: newsletter subscribers

Purpose: direct marketing via email, notification of events that are relevant to the system

Processed data: data entered during registration, but at least the email address. You can find more details on this in the respective email marketing tool used.

Storage duration: for the duration of the subscription

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

# What is Email-Marketing?

We use email marketing to keep you up to date. If you have agreed to receive our emails or newsletters, your data will be processed and stored. Email marketing is a part of online marketing. In this type of marketing, news or general information about a company, product or service are emailed to a specific group of people who are interested in it.

If you want to participate in our email marketing (usually via newsletter), you usually just have to register with your email address. To do this, you have to fill in and submit an online form. However, we may also ask you for your title and name, so we can address you personally in our emails.

The registration for newsletters generally works with the help of the so-called "double opt-in procedure". After you have registered for our newsletter on our website, you will receive an

email, via which you can confirm the newsletter registration. This ensures that you own the email address you signed up with, and prevents anyone to register with a third-party email address. We or a notification tool we use, will log every single registration. This is necessary so we can ensure and prove, that registration processes are done legally and correctly. In general, the time of registration and registration confirmation are stored, as well as your IP address. Moreover, any change you make to your data that we have on file is also logged.

# Why do we use Email-Marketing?

Of course, we want to stay in contact with you and keep you in the loop of the most important news about our company. For this, we use email marketing – often just referred to as "newsletters" – as an essential part of our online marketing. If you agree to this or if it is permitted by law, we will send you newsletters, system emails or other notifications via email. Whenever the term "newsletter" is used in the following text, it mainly refers to emails that are sent regularly. We of course don't want to bother you with our newsletter in any way. Thus, we genuinely strive to offer only relevant and interesting content. In our emails you can e.g. find out more about our company and our services or products. Since we are continuously improving our offer, our newsletter will always give you the latest news, or special, lucrative promotions. Should we commission a service provider for our email marketing, who offers a professional mailing tool, we do this in order to offer you fast and secure newsletters. The purpose of our email marketing is to inform you about new offers and also to get closer to our business goals.

# Which data are processed?

If you subscribe to our newsletter via our website, you then have to confirm your membership in our email list via an email that we will send to you. In addition to your IP and email address, your name, address and telephone number may also be stored. However, this will only be done if you agree to this data retention. Any data marked as such are necessary so you can participate in the offered service. Giving this information is voluntary, but failure to provide it will prevent you from using this service. Moreover, information about your device or the type of content you prefer on our website may also be stored. In the section "Automatic data storage" you can find out more about how your data is stored when you visit a website. We record your informed consent, so we can always prove that it complies with our laws.

# **Duration of data processing**

If you unsubscribe from our e-mail/newsletter distribution list, we may store your address for up to three years on the basis of our legitimate interests, so we can keep proof your consent at the time. We are only allowed to process this data if we have to defend ourselves against any claims.

However, if you confirm that you have given us your consent to subscribe to the newsletter, you can submit an individual request for erasure at any time. Furthermore, if you permanently object to your consent, we reserve the right to store your email address in a blacklist. But as long as you have voluntarily subscribed to our newsletter, we will of course keep your email address on file.

# Withdrawal – how can I cancel my subscription?

You have the option to cancel your newsletter subscription at any time. All you have to do is revoke your consent to the newsletter subscription. This usually only takes a few seconds or a few clicks. Most of the time you will find a link at the end of every email, via which you will be able to cancel the subscription. Should you not be able to find the link in the newsletter, you can contact us by email and we will immediately cancel your newsletter subscription for you.

# Legal basis

Our newsletter is sent on the basis of your **consent** (Article 6 (1) (a) GDPR). This means that we are only allowed to send you a newsletter if you have actively registered for it beforehand. Moreover, we may also send you advertising messages on the basis of Section 7 (3) UWG (Unfair Competition Act), provided you have become our customer and have not objected to the use of your email address for direct mail.

If available – you can find information on special email marketing services and how they process personal data, in the following sections.

# **AWeber Privacy Policy**

On our website we might use AWeber, which is a service for our email marketing. The provider of this service is the American company AWeber Systems, Inc. 1100 Manor Drive Chalfont, PA 18914, USA.

AWeber also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

AWeber uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige AWeber to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847

In AWeber's privacy policy at <a href="https://www.aweber.com/privacy.htm">https://www.aweber.com/privacy.htm</a>, you can find out more about the data that are being processed by using AWeber.

# **Clickfunnels Privacy Policy**

On our website we might use Clickfunnels, which is a service for our email marketing. The provider of this service is the American company Etison LLC, 3443 W. Bavaria Street, Eagle, ID 83616, USA.

Clickfunnels also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Clickfunnels uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Clickfunnels to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

In Clickfunnels's privacy policy at <a href="https://signup.clickfunnels.com/privacy-policy">https://signup.clickfunnels.com/privacy-policy</a>, you can find out more about the data that are being processed by using Clickfunnels.

# **Systeme.io Privacy Policy**

On our website we might use systeme.io, which is a service for our email marketing and our webpage building. The provider of this service is the American company ITACWT Limited, 3 Cruise Park Rise, Tyrrelstown, Dublin 15, Ireland.

In their privacy policy at <a href="https://systeme.io/privacy-policy">https://systeme.io/privacy-policy</a>, you can find out more about the data that are being processed by using Systeme.io.

# **Social Media**

# **Social Media Privacy Policy Overview**

Affected parties: website visitors

Purpose: Service presentation and optimisation, staying in contact with visitors, interested parties, etc. as well as advertising

Processed data: data such as telephone numbers, email addresses, contact data, data on user behaviour, information about your device and your IP address.

You can find more details on this directly at the respective social media tool used.

Storage period: depending on the social media platforms used

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is Social Media?

In addition to our website, we are also active on various social media platforms. For us to be able to target interested users via social networks, user data may be processed. Additionally, elements of social media platforms may be embedded directly in our website. This is e.g. the case if you click a so-called social button on our website and are forwarded directly to our social media presence. So-called social media are websites and apps on which registered members can produce and exchange content with other members, be it openly or in certain groups and networks.

### Why do we use Social Media?

For years, social media platforms have been the place where people communicate and get into contact online. With our social media presence, we can familiarise interested people better

with our products and services. The social media elements integrated on our website help you switch to our social media content quickly and hassle free.

The data that is retained and processed when you use a social media channel is primarily used to conduct web analyses. The aim of these analyses is to be able to develop more precise and personal marketing and advertising strategies. The evaluated data on your behaviour on any social media platform can help to draw appropriate conclusions about your interests. Moreover, so-called user profiles can be created. Thus, the platforms may also to present you with customised advertisements. For this, cookies are usually placed in your browser, which store data on your user behaviour.

We generally assume that we will continue to be responsible under Data Protection Law, even when using the services of a social media platform. However, the European Court of Justice has ruled that, within the meaning of Art. 26 GDPR, in certain cases the operator of the social media platform can be jointly responsible with us. Should this be the case, we will point it out separately and work on the basis of a related agreement. You will then find the essence of the agreement for the concerned platform below.

Please note that when you use social media platforms or our built-in elements, your data may also be processed outside the European Union, as many social media channels, such as Facebook or Twitter, are American companies. As a result, you may no longer be able to easily claim or enforce your rights regarding your personal data.

# Which data are processed?

Exactly which data are stored and processed depends on the respective provider of the social media platform. But usually it is data such as telephone numbers, email addresses, data you enter in contact forms, user data such as which buttons you click, what you like or who you follow, when you visited which pages, as well as information about your device and IP address. Most of this data is stored in cookies. Should you have a profile on the social media channel you are visiting and are logged in, data may be linked to your profile.

All data that are collected via social media platforms are also stored on the providers' servers. This means that only the providers have access to the data and can provide you with appropriate information or make changes for you.

If you want to know exactly which data is stored and processed by social media providers and how you can object to the data processing, we recommend you to carefully read the privacy policy of the respective company. We also recommend you to contact the provider directly if you have any questions about data storage and data processing or if you want to assert any corresponding rights.

# **Duration of data processing**

Provided we have any further information on this, we will inform you about the duration of the data processing below. The social media platform Facebook example stores data until they are no longer needed for the company's own purposes. However, customer data that is synchronised with your own user data is erased within two days. Generally, we only process personal data for as long as is absolutely necessary for the provision of our services and products. This storage period can also be exceeded however, if it is required by law, such as e.g. in the case of accounting.

# Right to object

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers such as embedded social media elements at any time. This can be done either via our cookie management tool or via other opt-out functions. You can e.g. also prevent data collection via cookies by managing, deactivating or erasing cookies in your browser.

Since cookies may be used with social media tools, we also recommend you to read our privacy policy on cookies. If you want to find out which of your data is stored and processed, we advise you to read the privacy policies of the respective tools.

### Legal basis

If you have consented to the processing and storage of your data by integrated social media elements, this consent serves as the legal basis for data processing (Art. 6 para. 1 lit. a GDPR). Generally, provided you have given your consent, your data will also be stored and processed on the basis of our legitimate interest (Art. 6 para. 1 lit. f GDPR) in maintaining fast and good communication with you and other customers and business partners. Nevertheless, we only use the tools if you have consented. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy on cookies carefully and to take a look at the privacy policy or cookie policy of the respective service provider.

in the following section you can find information on special social media platforms – provided this information is available.

# **Facebook Privacy Policy**

### **Facebook Privacy Policy Overview**

Affected parties: website visitors

Purpose: service optimisation

Processed data: data such as customer data, data on user behaviour, device information and IP address.

You can find more details in the Privacy Policy below.

Storage period: until the data no longer serves Facebook's purposes

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What are Facebook tools?

We use selected Facebook tools on our website. Facebook is a social media network of the company Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. With the aid of this tool we can provide the best possible offers to you and anyone interested in our products and services.

If your data is collected and forwarded via our embedded Facebook elements or via our Facebook page (fanpage), both we and Facebook Ireland Ltd. are responsible for this.

However, should any further processing occur, then Facebook is solely responsible for this data. Our joint commitments were also set out in a publicly available agreement at <a href="https://www.facebook.com/legal/controller\_addendum">https://www.facebook.com/legal/controller\_addendum</a>. It e.g. states that we must clearly inform you about the use of Facebook tools on our website. We are also responsible for ensuring that the tools are securely integrated into our website and are in accordance with the applicable privacy laws. Facebook, on the other hand, is e.g. responsible for the data security of Facebook's products. If you have any questions about Facebook's data collection and processing, you can contact the company directly. Should you direct the question to us, we are obliged to forward it to Facebook.

In the following we will give you an overview on the different Facebook tools, as well as on what data is sent to Facebook and how you can erase this data.

Along with many other products, Facebook also offers so called "Facebook Business Tools". This is Facebook's official name for its tools, but it is not very common. Therefore, we decided to merely call them "Facebook tools". They include the following:

- Facebook-Pixel
- Social Plugins (e.g. the "Like" or "Share" button)
- Facebook Login
- Account Kit
- APIs (application programming interface)
- SDKs (Softwart development kits)
- Plattform-integrations
- Plugins
- Codes
- Specifications
- Documentations
- Technologies and Services

With these tools Facebook can extend its services and is able to receive information on user activities outside of Facebook.

### Why do we use Facebook tools on our website?

We only want to show our services and products to people who are genuinely interested in them. With the help of advertisements (Facebook Ads) we can reach exactly these people. However, to be able to show suitable adverts to users, Facebook requires additional information on people's needs and wishes. Therefore, information on the user behaviour (and contact details) on our website, are provided to Facebook. Consequently, Facebook can collect better user data and is able to display suitable adverts for our products or services. Thanks to the tools it is possible to create targeted, customised ad campaigns of Facebook.

Facebook calls data about your behaviour on our website "event data" and uses them for analytics services. That way, Facebook can create "campaign reports" about our ad campaigns' effectiveness on our behalf. Moreover, by analyses we can get a better insight in how you use our services, our website or our products. Therefore, some of these tools help us optimise your user experience on our website. With the social plugins for instance, you can share our site's contents directly on Facebook.

# What data is stored by Facebook tools?

With the use of Facebook tools, personal data (customer data) may be sent to Facebook. Depending on the tools used, customer data such as name, address, telephone number and IP address may be transmitted.

Facebook uses this information to match the data with the data it has on you (if you are a Facebook member). However, before the customer data is transferred to Facebook, a so called "Hashing" takes place. This means, that a data record of any size is transformed into a string of characters, which also has the purpose of encrypting data.

Moreover, not only contact data, but also "event data" is transferred. These data are the information we receive about you on our website. To give an example, it allows us to see what subpages you visit or what products you buy from us. Facebook does not disclose the obtained information to third parties (such as advertisers), unless the company has an explicit permission or is legally obliged to do so. Also, "event data" can be linked to contact information, which helps Facebook to offer improved, customised adverts. Finally, after the previously mentioned matching process, Facebook deletes the contact data.

To deliver optimised advertisements, Facebook only uses event data, if they have been combined with other data (that have been collected by Facebook in other ways). Facebook also uses event data for the purposes of security, protection, development and research. Many of these data are transmitted to Facebook via cookies. Cookies are little text files, that are used for storing data or information in browsers. Depending on the tools used, and on whether you are a Facebook member, a different number of cookies are placed in your browser. In the descriptions of the individual Facebook tools we will go into more detail on Facebook cookies. You can also find general information about the use of Facebook cookies at <a href="https://www.facebook.com/policies/cookies">https://www.facebook.com/policies/cookies</a>.

# How long and where are the data stored?

Facebook fundamentally stores data, until they are no longer of use for their own services and products. Facebook has servers for storing their data all around the world. However, customer data is cleared within 48 hours after they have been matched with their own user data.

### How can I erase my data or prevent data retention?

In accordance with the General Data Protection Regulation (GDPR) you have the right of information, rectification, transfer and deletion of your data.

The collected data is only fully deleted, when you delete your entire Facebook account. Deleting your Facebook account works as follows:

- 1) Click on settings in the top right side in Facebook.
- 2) Then, click "Your Facebook information" in the left column.
- 3) Now click on "Deactivation and deletion".
- 4) Choose "Permanently delete account" and then click on "Continue to account deletion".
- 5) Enter your password, click on "continue" and then on "Delete account".

The retention of data Facebook receives via our site is done via cookies (e.g. with social plugins), among others. You can deactivate, clear or manage both all and individual cookies in your browser. How this can be done differs depending on the browser you use. The following instructions show, how to manage cookies in your browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want to allow any cookies at all, you can set up your browser to notify you whenever a cookie is about to be set. This gives you the opportunity to decide upon the permission or deletion of every single cookie.

# Legal basis

If you have consented to your data being processed and stored by integrated Facebook tools, this consent is the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, your data is also stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) to maintain fast and good communication with you or other customers and business partners. Nevertheless, we only use these tools if you have given your consent. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy about cookies carefully and to take a look at the privacy policy or Facebook's cookie policy.

Facebook also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Facebook uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

We hope we could give you an understanding of the most important information about the use of Facebook tools and data processing. If you want to find out more on how Facebook use your data, we recommend reading the data policies at <a href="https://www.facebook.com/about/privacy/update">https://www.facebook.com/about/privacy/update</a>.

# **Instagram Privacy Policy**

### **Instagram Privacy Policy Overview**

Affected parties: website visitors

Purpose: optimising our service

Processed data: includes data on user behaviour, information about your device and

More details can be found in the privacy policy below.

Storage period: until Instagram no longer needs the data for its purposes

Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is Instagram?

We have integrated functions of Instagram to our website. Instagram is a social media platform of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA. Since 2012, Instagram is a subsidiary company of Facebook Inc. and is a part of Facebook's products. The inclusion of Instagram's contents on our website is called embedding. With this, we can show you Instagram contents such as buttons, photos or videos directly on our website. If you open websites of our online presence, that have an integrated Instagram function, data gets transmitted to, as well as stored and processed by Instagram. Instagram uses the same systems and technologies as Facebook. Therefore, your data will be processed across all Facebook firms.

In the following, we want to give you a more detailed insight on why Instagram collects data, what data these are and how you can control data processing. As Instagram belongs to Facebook Inc., we have, on the one hand received this information from the Instagram guidelines, and on the other hand from Facebook's Data Policy.

Instagram is one of the most famous social media networks worldwide. Instagram combines the benefits of a blog with the benefits of audio-visual platforms such as YouTube or Vimeo. To "Insta" (how the platform is casually called by many users) you can upload photos and short videos, edit them with different filters and also share them to other social networks. Also, if you do not want to be active on Instagram yourself, you can just follow other interesting users.

### Why do we use Instagram on our website?

Instagram is a social media platform whose success has skyrocketed within recent years. Naturally, we have also reacted to this boom. We want you to feel as comfortable as possible on our website. Therefore, we attach great importance to diversified contents. With the embedded Instagram features we can enrich our content with helpful, funny or exciting Instagram contents. Since Instagram is a subsidiary company of Facebook, the collected data can also serve us for customised advertising on Facebook. Hence, only persons who are genuinely interested in our products or services can see our ads.

Instagram also uses the collected data for tracking and analysis purposes. We receive summarised statistics and therefore more insight to your wishes and interests. It is important to mention that these reports do not identify you personally.

### What data is stored by Instagram?

Whenever you land on one of our sites, which have Instagram functions (i.e. Instagram photos or plugins) integrated to them, your browser automatically connects with Instagram's servers. Thereby, data is sent to, as well as saved and processed by Instagram. This always happens, whether you have an Instagram account or not. Moreover, it includes information on our website, your computer, your purchases, the advertisements you see and on how you use our offer. The date and time of your interaction is also stored. If you have an Instagram account or are logged in, Instagram saves significantly more data on you.

Facebook distinguishes between customer data and event data. We assume this is also the case for Instagram. Customer data are for example names, addresses, phone numbers and IP addresses. These data are only transmitted to Instagram, if they have been "hashed" first. Thereby, a set of data is transformed into a string of characters, which encrypts any contact data. Moreover, the aforementioned "event data" (data on your user behaviour) is transmitted as well. It is also possible, that contact data may get combined with event data. The collected data data is matched with any data Instagram already has on you.

Furthermore, the gathered data are transferred to Facebook via little text files (cookies) which usually get set in your browser. Depending on the Instagram function used, and whether you have an Instagram account yourself, the amount of data that gets stored varies.

We assume data processing on Instagram works the same way as on Facebook. Therefore, if you have an account on Instagram or have visited <a href="www.instagram.com">www.instagram.com</a>, Instagram has set at least one cookie. If this is the case, your browser uses the cookie to send information to Instagram, as soon as you come across an Instagram function. No later than 90 days (after matching) the data is deleted or anonymised. Even though we have studied Instagram's data processing in-depth, we cannot tell for sure what exact data Instagram collects and retains.

In the following we will show you a list of the least cookies placed in your browser when click on an Instagram function (e.g. button or an Insta picture). In our test we assume you do not have an Instagram account, since if you would be logged in to your Instagram account, your browser would place significantly more cookies.

The following cookies were used in our test:

Name: csrftoken

Value: ""

**Purpose:** This cookie is most likely set for security reasons to prevent falsifications of

requests. We could not find out more information on it.

Expiry date: after one year

Name: mid Value: ""

Purpose: Instagram places this cookie to optimise its own offers and services in- and outside

of Instagram. The cookie allocates a unique user ID.

Expiry date: after end of session

**Name:** fbsr 122320933124024

Value: no information

**Purpose:** This cookie stores the login request of Instagram app users.

Expiry date: after end of session

Name: rur Value: ATN

Purpose: This is an Instagram cookie which guarantees functionality on Instagram.

Expiry date: after end of session

Name: urlgen

Value: "{"194.96.75.33": 1901}:1iEtYv:Y833k2 UjKvXgYe122320933"

Purpose: This cookie serves Instagram's marketing purposes.

Expiry date: after end of session

**Note:** We do not claim this list to be exhaustive. The cookies that are placed in each individual case, depend on the functions embedded as well as on your use of Instagram.

### How long and where are these data stored?

Instagram shares the information obtained within the Facebook businesses with external partners and persons you are globally connected with. Data processing is done according to Facebook's internal data policy. Your data is distributed to Facebook's servers across the world, partially for security reasons. Most of these servers are in the USA.

### How can I erase my data or prevent data retention?

Thanks to the General Data Protection Regulation (GDPR), you have the right of information, rectification, transfer and deletion of your data. Furthermore, you can manage your data in Instagram's settings. If you want to delete your data on Instagram completely, you will have to delete your Instagram account permanently.

And this is how an Instagram account can be deleted:

First, open the Instagram app. Then, navigate to your profile page, select the three bars in the top right, choose "Settings" and then click "Help". Now, you will be redirected to the company's website, where you must click on "Managing Your Account" and then "Delete Your Account".

When you delete your account completely, Instagram deletes posts such as your photos and status updates. Any information other people shared about you are not a part of your account and do therefore not get deleted.

As mentioned before, Instagram primarily stores your data via cookies. You can manage, deactivate or delete these cookies in your browser. Depending on your browser, managing them varies a bit. We will show you the instructions of the most relevant browsers here.

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

Generally, you can set your browser to notify you whenever a cookie is about to be set. Then you can individually decide upon the permission of every cookie.

### Legal basis

If you have consented to the processing and storage of your data by integrated social media elements, this consent is the legal basis for data processing (Art. 6 para. 1 lit. a GDPR). Generally, your data is also stored and processed on the basis of our legitimate interest (Art. 6 para. 1 lit. f GDPR) to maintain fast and good communication with you or other customers and business partners. We only use the integrated social media elements if you have given your consent. Most social media platforms also place cookies in your browser to store data. We therefore recommend you to read our privacy policy about cookies carefully and to take a look at the privacy policy or the cookie policy of the respective service provider.

Instagram and Facebook also process data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. This can be associated with various risks to the legality and security of data processing.

As a basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfers there, Facebook uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

We have tried to give you the most important information about data processing by Instagram. On <a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a> you can take a closer look at Instagram's data guidelines.

### **TikTok Privacy Policy**

We also use TikTok, which is a social media and video channel. The provider of this service is the Chinese company Beijing Bytedance Technology Ltd. The responsible entity for the European area is the Irish company TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland.

TikTok uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR) as basis for data processing by recipients based in third countries (which are outside the European Union, Iceland, Liechtenstein and Norway) or for data transfer there. These clauses oblige TikTok to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

You can find out more about the data processed by TikTok in the Privacy Policy at https://www.tiktok.com/legal/privacy-policy?lang=en#privacy-eea.

### **Online Marketing**

## Online Marketing Privacy Policy Overview Affected parties: visitors to the website Purpose: Evaluation of visitor information for website optimisation Processed data: Access statistics containing data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. Personal data such as name or email address may also be processed. You can find more details on this from the respective Online Marketing tool. Storage period: depending on the Online Marketing tools used Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is Online Marketing?

Online Marketing refers to all measures that are carried out online to achieve marketing goals, such as increasing brand awareness or doing business transactions. Furthermore, our Online Marketing measures aim to draw people's attention to our website. In order to be able to show our offer to many interested people, we do Online Marketing. It mostly is about online advertising, content marketing or search engine optimisation. For this, personal data is also stored and processed, to enable us to use Online Marketing efficiently and targeted. On the one hand, the data help us to only show our content to people who are interested in it. On the other hand, it helps us to measure the advertising success of our Online Marketing measures.

### Why do we use Online Marketing tools?

We want to show our website to everyone who is interested in our offer. We are aware that this is not possible without conscious measures being taken. That is why we do Online Marketing. There are various tools that make working on our Online Marketing measures easier for us. These also provide suggestions for improvement via data. Thus, we can target our campaigns more precisely to our target group. The ultimate purpose of these Online Marketing tools is to optimise our offer.

### Which data are processed?

For our Online Marketing to work and to measure its success, user profiles are created and data are e.g. stored in cookies (small text files). With the help of this data, we can not only advertise in the traditional way, but also present our content directly on our website in the way you prefer. There are various third-party tools that offer these functions and thus collect and store your data accordingly. The aforementioned cookies e.g. store the pages you visit on our website, how long you view these pages, which links or buttons you click or which website you came from. What is more, technical information may also be stored. This may include e.g. your IP address, the browser and device you use to visit our website or the time you

accessed our website as well as the time you left. If you have agreed for us to determine your location, we can also store and process it.

Your IP address is stored in pseudonymised form (i.e. shortened). What is more, distinct data that directly identify you as a person, such as your name, address or email address, are only stored in pseudonymised for advertising and Online Marketing purposes. With this data we cannot identify you as a person and only retain the pseudonymised information that is stored in your user profile.

Under certain circumstances, cookies may also be utilised, analysed and used for advertising purposes on other websites that use the same advertising tools. Thus, your data may then also be stored on the servers of the respective provider of the advertising tool.

In rare exceptions, unique data (name, email address, etc.) may also be stored in the user profiles. This can happen, if you are for example a member of a social media channel that we use for our Online Marketing measures and if the network connects previously received data with the user profile.

We only ever receive summarised information from the advertising tools we use that do store data on their servers. We never receive data that can be used to identify you as an individual. What is more, the data only shows how well-placed advertising measures have worked. For example, we can see what measures have caused you or other users to visit our website and purchase a service or product. Based on these analyses we can improve our advertising offer in the future and adapt it more precisely to the needs and wishes of people who are interested.

### **Duration of data processing**

Below we will inform you on the duration of data processing, provided we have this information. In general, we only process personal data for as long as is absolutely necessary to provide our services and products. Data stored in cookies are retained for different lengths of time. Some cookies are deleted after you leave a website, while others may be stored in your browser for a number of years. However, in the respective privacy policies of the respective provider, you will usually find detailed information on the individual cookies this provider uses.

### Right of withdrawal

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers at any time. This can be done either via our cookie management tool or via other opt-out functions. You can for example also prevent data collection by cookies if you manage, deactivate or erase cookies in your browser. The legality of the processing remains unaffected to the point of revocation.

Since Online Marketing tools usually use cookies, we also recommend you to read our privacy policy on cookies. If you want to find out which of your data is stored and processed, you should read the privacy policies of the respective tools.

### Legal basis

If you have consented to the use of third-party providers, then this consent is the legal basis for the corresponding data processing. According to Art. 6 para. 1 lit. a GDPR (consent),

this consent is the legal basis for personal data processing, as may be done when data is collected by online marketing tools.

Moreover, we have a legitimate interest in measuring our online marketing activities in anonymised form, in order to use this data for optimising our offer and our Marketing. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use these tools if you have given your consent.

Information on special online marketing tools can be found in the following sections, provided this information is available.

### **Facebook Custom Audiences Privacy Policy**

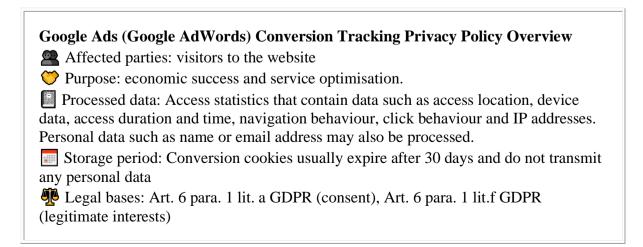
On our website we use Facebook Custom Audiences, a event tracking tool. The provider of this service is the American company Facebook Inc. The company also has Irish headquarters at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland.

Facebook also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Facebook uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway, and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847

You can find out more about the data that is processed by using Facebook in their Privacy Policy at https://www.facebook.com/about/privacy.

### Google Ads (Google AdWords) Conversion Tracking Privacy Policy



### What is Google Ads conversion tracking?

We use Google Ads (previously Google AdWords) as an online marketing measure, to advertise our products and services. Thus, we want to draw more people's attention on the internet to the high quality of our offers. As part of our advertising measures with Google Ads, we use the conversion tracking of Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google") on our website. With the aid of this free tracking tool we can tailor our advertising offer better to your interests and needs. In the following article we will explain, why we use conversion tracking, what data gets saved and how you can prevent this data retention.

Google Ads (previously Google AdWords) is the internal online advertising sxstem of the company Google LLC. We are convinced of our offer's quality and would like as many people as possible to discover our website. For this, Google Ads offers the best platform within the online environment. Of course, we also want to get an overview of the cost-benefit factor of our advertising campaigns. Thence, we use Google Ads' conversion tracking tool.

But what is a conversion actually? A conversion occurs, when you turn from an interested visitor into an acting website visitor. This happens every time you click on our ad and then make another action, such as paying a visit to our website. With Google's conversion tracking tool, we can understand what happens after a user clicks our Google ad. It shows us for instance if products get bought, services are used or whether users have subscribed to our newsletter.

### Why do we use Google Ads conversion tracking on our website?

We use Google Ads to show our offer also across other websites. Our aim is for our advertising campaigns to reach only those people, who are interested in our offers. With the conversion tracking tool, we see what keywords, ads, ad groups and campaigns lead to the desired customer actions. We see how many customers interact with our ads on a device, to then convert. With this data we can calculate our cost-benefit-factor, measure the success of individual ad campaigns and therefore optimise our online marketing measures. With the help of the obtained data we can give our website a more interesting design and customise our advertising offer better to your needs.

### What data is stored with Google Ads conversion tracking?

For a better analysis of certain user actions, we have integrated a conversion tracking tag, or code snippet to our website. Therefore, if you click one of our Google ads, a Google domain stores the cookie "conversion" on your computer (usually in the browser) or on your mobile device. Cookies are little text files that save information on your computer.

Here are data of the most significant cookies for Google's conversion tracking:

Name: Conversion

Value: EhMI\_aySuoyv4gIVled3Ch0llweVGAEgt-mr6aXd7dYlSAGQ122320933-3

**Purpose:** This cookie saves every conversion you make on our website after you came to us

via a Google ad.

Expiry date: after 3 months

Name: \_gac Value:

 $1.1558695989. EAIaIQobChMIiOmEgYO04gIVj5AYCh2CBAPrEAAYASAAEgIYQfD\_BwEGERMER \\ - 1.1558695989. EAIaIQobChMIiOmEgYO04gIVj5AYCh2CBAPrEAAYASAAEgIYQfD\_BwEGERMER \\ - 1.15586959. EAIaIQobChMIiOmEgYO04gIVj5AYCh2CBAPrEAAYASAAEgIYQfD\_BwEGERMER \\ - 1.155869. EAIAIQOBCHAR \\ - 1$ 

**Purpose:** This is a classic Google Analytics Cookie that records various actions on our

website.

**Expiry date:** after 3 months

**Note:** The cookie \_gac only appears in connection with Google Analytics. The above list does not claim to be exhaustive, as Google repeatedly change the cookies they use for analytical evaluation.

As soon as you complete an action on our website, Google identifies the cookie and saves your action as a so-called conversion. For as long as you surf our website, provided the cookie has not expired, both Google and us can determine that you found your way to us via a Google ad. Then, the cookie is read and sent back to Google Ads, together with the conversion data. Moreover, other cookies may also be used for measuring conversions. Google Ads' conversion tracking can be fine-tuned and improved with the aid of Google Analytics. Furthermore, ads which Google displays in various places across the web, might be placed under our domain with the name "\_\_gads" or "\_gac".

Since September 2017, analytics.js retains various campaign information with the \_gac cookie. This cookie stores data, as soon as you open one of our sites that has been set up for Google Ads' auto-tagging. In contrast to cookies that are placed for Google domains, Google can only read these conversion cookies when you are on our website. We do neither collect nor receive any personal data. We do obtain a report with statistical evaluations by Google. With the help thereof, we can not only see the total number of users who clicked our ad, but also what advertising measures were well received.

### How long and where is the data stored?

At this point we want to reiterate, that we have no influence on how Google use the collected data. According to Google, the data are encrypted and stored on a secure server. In most cases, conversion cookies expire after 30 days, and do not transmit any personalised data. The cookies named "conversion" and "\_gac" (which is used with Google Analytics) have an expiry date of 3 months.

### How can I erase my data or prevent data retention?

You have the possibility to opt out of Google Ads' conversion tracking. The conversion tracking can be blocked by deactivating the conversion tracking cookie via your browser. If you do this, you will not be considered for the statistic of the tracking tool. You can change the cookie settings in your browser anytime. Doing so, works a little different in every browser. Hence, in the following you will find an instruction on how to manage cookies in your browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want to allow any cookies at all, you can set up your browser to notify you whenever a potential cookie is about to be set. This lets you decide upon permitting or denying the cookie's placement. By downloading and installing the browser plugin at <a href="https://support.google.com/ads/answer/7395996">https://support.google.com/ads/answer/7395996</a> you can also deactivate all "advertising cookies". Please consider that by deactivating these cookies, you cannot prevent all advertisements, only personalised ads.

### Legal basis

If you have consented to the use of Google Ads Conversion Tracking, your consent is the legal basis for the corresponding data processing. According to **Art. 6 para. 1 lit. a GDPR** (**consent**), this consent is the legal basis for personal data processing, as may be done when collected by Google Ads Conversion Tracking.

We also have legitimate interest in using Google Ads Conversion Tracking to optimise our online service and marketing measures. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR** (**legitimate interests**). Nevertheless, we only use Google Ads Conversion Tracking if you have consented to it.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Google to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

The Google Ads Data Processing Terms, which reference the standard contractual clauses, can be found at <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>

If you would like to find out more about data protection at Google, we recommend Google's privacy policy at: <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>.

### **Google AdSense Privacy Policy**

### **Google AdSense Privacy Policy Overview**

Affected parties: website visitors

Purpose: economic success and service optimisation.

Processed data: Access statistics containing data such as access location, device

data, access duration and time, navigation behaviour, click behaviour and IP addresses. Personal data such as name or email address may also be processed.

Storage duration: depending on the cookies used and on the retained data

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is Google AdSense?

We use Google AdSense on this website. It is an advertising program of the company Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). With Google AdSense we can show advertisements that fit our theme. Thus, we can offer you adverts that ideally give you added value. In this privacy statement on Google AdSense we will explain to you, why we use Google AdSense on our website and which of your data is processed and saved, as well as how you can prevent this data retention.

The advertising program Google AdSense has been around since 2003. As opposed to Google Ads (previously: Google AdWords) it is not possible to advertise on Google AdSense oneself. Google AdSense displays advertisements on websites, such as ours. The biggest advantage of this web service compared to some others, is that Google AdSense only shows ads to you which match our website's contents. Google has its own algorithm which calculates what ads are shown to you. Of course, we only want to show you ads that interest you and provide you added value. Google checks which advertisements are suitable for our users, considering your interests, your user behaviour and our offer. At this point we want to mention that we are not responsible for the choice of the ads. We merely offer advertising space on our website, while Google selects the displayed ads. Moreover, since August 2013 the ads are customised to the respective user interface. This means, that no matter if you visit our website with your smartphone, your PC or your laptop, the ads adjust to your terminal device.

### Why do we use Google AdSense on our website?

The operation of a high-quality website requires tremendous dedication and commitment. We are essentially never finished with working on our website. This is, because we continuously maintain and keep our website up to date. Of course, we want to achieve economic success with this work. Therefore, we decided for to use advertisements as a source of revenue. It is most important to us however, that we do not disrupt your visit to our website with these advertisements. Thence, with the aid of Google AdSense, only adverts that are tailored to you and our themes are shown.

Like with Google's indexation for a website, a bot examines both, the matching content and the offers on our website. Then, the ads are adapted to and presented on the website. Alongside the contextual overlaps between the ads and website offer, AdSense also supports interest-based targeting. This means, that Google also uses your data to offer advertising that is tailored to you. That way you receive ads that ideally offer you added value, and it gives us a higher chance of earning a bit.

### What data is stored by Google AdSense?

Google AdSense uses cookies to display ads that are customised to you. Cookies are little text files, that store certain information on your computer.

Cookies are supposed to enable improved advertisements in AdSense. They do not contain any personally identifiable data. However, it should be considered that Google does not view data such as "Pseudonymous Cookie-IDs" (name or other identification feature is replaced with a pseudonym) or IP addresses as personally identifiable information. Although, within the framework of the GDPR, this data can be classified as personal data. Following every impression (every time you see an ad), every click and any other activity that leads to a call on its servers, Google AdSense sends a cookie to the browser. The cookie is then saved in the browser, provided the browser accepts it.

Under certain circumstances, third parties can place cookies in your browser, and read them or use web beacons, to store data they receive through the display of ads on the website. Web beacons are little graphics that analyse and a record the log file. This analysis allows a statistical evaluation for the online marketing.

Through this cookie, Google can collect certain information on your user behaviour on our website. These include:

- Information on how you interact with an ad (clicks, impressions, mouse movements)
- Information if an ad has already been displayed in your browser. This data helps to prevent an ad from showing multiple times.

Thereby, Google evaluates and analyses data on the displayed advertising material along with your IP address. Primarily, Google uses the data to measure the effectiveness of an ad and improve the advertising offer. Moreover, the data does not get linked to your personal data which Google might have received via other Google services.

In the following we will introduce you to the cookies that Google AdSense uses for tracking purposes. Please note, that we will refer to a test website, which only has Google AdSense installed to it:

Name: uid

Name: uru

Value: 891269189122320933-8

**Purpose:** The cookie is stored under the domain adform.net. It provides a uniquely assigned user ID that is generated automatically and collects data on the activity on our website.

Expiry date: after 2 months

Name: C Value: 1

**Purpose:** This cookie identifies if your browser accepts cookies. The cookie is stored under

the domain track.adform.net. **Expiry date:** after 1 month

Name: cid

Value: 8912691894970695056,0,0,0,0

**Purpose:** This cookie is saved under the domain track.adform.net. It stands for the client ID and is used to offer you improved advertisements. It can forward more relevant adverts to the user and helps to improve reports on campaign performance.

Expiry date: after 2 months

Name: IDE

Value: zOtj4TWxwbFDjaATZ2TzNaQmxrU122320933-1

**Purpose:** The cookie is stored under the domain doubleclick.net. It serves the purpose of registering your actions following an impression or a click on the ad. Thus, it can be measured

how our visitors like an ad. **Expiry date:** after 1 month

Name: test\_cookie Value: not specified

**Purpose:** With the "test cookies" it can be verified, if your browser even supports cookies.

The cookie is saved under the domain doubleclick.net.

Expiry date: after 1 month

Name: CT592996 Value:733366

Purpose: It is saved under the domain adform.net. The cookie is placed upon your click on an

ad. We could not find any further information on the use of this cookie.

Expiry date: after one hour

Note: This list does not claim to be exhaustive, as Google frequently change the choice of

their cookies.

### How long and where is the data stored?

Google retains your IP address, as well as various activities you perform on the website. Cookies store this information with the interactions on our website. According to Google, the company collects and saves the given information securely on its internal servers in the USA.

If you do not have a Google account or are not logged in, Google usually stores the collected data on your browser with a unique identification (ID). The IDs saved in cookies serve e.g. for providing personalised advertisements. If you are logged into a Google account, Google can gather personal information.

You can delete certain data that is saved by Google anytime (see next section). Much of the information saved in cookies get automatically deleted after a specific time. However, there are also data which are retained by Google for a longer period. This is the case, when Google must store certain data for an undefined, longer period due to economical or legal necessities.

### How can I erase my data or prevent data retention?

You can always clear or deactivate cookies that are on your computer. How exactly this can be done depends on the browser.

Here you can find an instruction on how you can manage cookies in your browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

### Internet Explorer: Delete and manage cookies

### Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want to allow any cookies, you can set your browser to notify you whenever a potential cookie is about to be set. This lets you decide to either permit or deny the placement of every single cookie. By downloading and installing the browser plugin at <a href="https://support.google.com/ads/answer/7395996">https://support.google.com/ads/answer/7395996</a>, any advertising cookies get deactivated as well. Please note, that deactivating these cookies does not stop advertisements, it only inhibits personalised adverts.

If you have a Google account, you can deactivate personalised adverts on the website <a href="https://adssettings.google.com/authenticated">https://adssettings.google.com/authenticated</a>. You will continue to see ads, but they will stop being customised to your interests. Nevertheless, the ads are displayed based on a few factors, such as your location, the browser type and the used search terms.

### Legal basis

If you have consented to the use of Google AdSense, your consent is the legal basis for the corresponding data processing. According to **Art. 6 paragraph 1 lit. a (Consent)** your consent is the legal basis for the processing of personal data as may occur when collected by Google AdSense.

We also have a legitimate interest in using Google AdSense to optimise our online service and our marketing measures. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR** (**legitimate interests**). Nevertheless, we only use Google AdSense if you have given your consent to it.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Google to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

The Google Ads Data Processing Terms, which reference the standard contractual clauses, can be found at https://business.safety.google/intl/en/adsprocessorterms/.

You can learn more about what data Google generally collects and what they are used for at <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>.

### **Affiliate Programs Introduction**

### Affiliate Programs Privacy Policy Overview Affected parties: website visitors Purpose: economic success and the optimisation of our service. Data processed: Access statistics, including data such as access locations, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. Personal data such as your name or email address may also be processed. Duration of storage: personal data is usually stored by affiliate programs until it is no longer needed Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

### What are affiliate programs?

We use affiliate programs of different providers on our website. By using an affiliate program, your data may be transferred to the respective affiliate program provider, where it can be stored and processed. In this privacy policy, we will give you a general overview of data processing by partner programs and show you how you can prevent or revoke this data transmission. Every affiliate program (also called partner program) is based on the principle of commission. For this, a link or an advertisement with a link is placed on our website and if you are interested, click on it and purchase a product or service this way, we receive a commission for this (reimbursement of advertising costs)

### Why do we use affiliate programs on our website?

Our goal is to provide you with a pleasant time with lots of helpful content. We put a lot of work and time into the development of our website. With the help of partner programs, we have the opportunity to be paid a little for our efforts. Every partner link is of course always related to our theme and shows offers that might interest you.

### Which data is processed?

In order to trace whether you have clicked on one of our placed links, the affiliate program provider needs to know that it was you who followed the link via our website. Any affiliate program links used must therefore be correctly assigned to the following actions (business deal, purchase, conversion, impression, etc.). Only then can the allocation of the commission take place.

For this mapping to work, a value may be appended to a link (in the URL) or certain information may be stored in cookies. This may for example be, data on which page you came from (referrer), when you clicked on the link, an identifier for our website, which offer it is as well a specific user identifier.

Therefore, whenever you interact with an affiliate program's products and services, the provider also retains your data. Exactly which data is stored depends on the individual providers. For example, the Amazon affiliate program distinguishes between active and automatic data. Active data include name, email address, phone number, age, payment information, or location information. In the case of the Amazon affiliate program, automatically stored data include user behaviour, IP address, device information and the URL.

### **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. In general, personal data is only processed for as long as is necessary to provide the services and products. Data stored in cookies are retained for different lengths of time. Some cookies are deleted as soon as you leave the website, while others may be stored in your browser for several years if they are not actively erased. The exact duration of data processing depends on the provider used. But in most cases you should account for a storage period of several years. In the respective privacy policies of the individual providers, you will most probably find precise information about the duration of data processing.

### Right to object

You always have the right to information, rectification and erasure of your personal data. If you have any questions, you can also contact the person responsible for the partner program provider used at any time. Contact details can be found either in our specific data protection declaration or on the website of the relevant provider.

You can erase, disable or manage cookies that providers use for their functions in your browser. Depending on which browser you use, this can be done in different ways.

### **Legal Basis**

If you have consented to the use of the affiliate program, the legal basis for the corresponding data processing is this consent. According to **Art. 6 Paragraph 1 lit. a GDPR (consent)** your consent represents the legal basis for the processing of personal data, as may occur when collected by an affiliate program.

We also have a legitimate interest in using an affiliate program to optimise our online service and our marketing activities. The corresponding legal basis for this is **Art. 6 Paragraph 1 lit. f GDPR (legitimate interests)**. However, we only use the partner program if you have given your consent.

Information on special affiliate programs, if available, can be found in the following sections.

### **Amazon Associates Program Privacy Policy**

### Amazon Affiliate Program Privacy Policy Overview Affected parties: visitors to the website Purpose: economic success and the optimisation of our service. Processed data: Access statistics that contain data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. Personal data such as name or email address can also be processed. Storage period: personal data is stored by Amazon until it is no longer needed Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit.f GDPR (legitimate interests)

### What is the Amazon Associates Program?

We use the Amazon Associates Program of the company Amazon.com Inc on our website. The responsible bodies for the privacy statement are Amazon Europe Core S.à.r.l., Amazon EU S.à.r.l, Amazon Services Europe S.à.r.l. as well as Amazon Media EU S.à.r.l., which are based at 5, Rue Plaetis, L-2338 Luxemburg, along with Amazon Instant Video Germany Ltd., which is located at Domagkstraße 28, 80807 Munich. Thereby, Amazon Germany Services Ltd. at Marcel-Breuer-Straße 12, 80807 Munich is responsible for data processing. Due to the use of the Amazon Associates Program, Amazon can receive, store and process your data.

In this privacy statement we will inform you on what data this can be, why we use the program and how you can manage or prevent the data transmission.

The Amazon Associates Program is an affiliate marketing program of the online shipping company <a href="Marzon.co.uk">Amazon.co.uk</a>. Like any affiliate program, the Amazon Associates Program is also based on the principle of intermediation commissions. Amazon (or we) place advertisements or partner links on our website, which let us receive a reimbursement of advertising costs (commission) if you click on them and buy a product on Amazon.

### Why do we use the Amazon Associates Program on our website?

Our aim is to provide you a pleasant time with extensive, helpful content. Therefore, we put a lot of work and energy into the development of our website. With the aid of the Amazon Associates Program, we can receive a little remuneration for our work. Of course, every affiliate link to Amazon is related with our theme and shows offers that may interest you.

### What data is stored by the Amazon Associates Program?

As soon as you interact with the products and services of Amazon, the company collects your data. Amazon differentiates between information you actively gave to the business and information that is collected and retained automatically. "Active information" include name, email address, telephone number, age, payment details or location information. So-called "automatic information" are primarily saved by cookies. This includes information, user behaviour, IP address, device information (browser type, operating systems) or the URL. Moreover, Amazon also saves the clickstream, which is the path (order of pages) you make as a user in order to get to a product. Amazon also stores cookies in your browser to retrace the origin of an order. This enables the company to identify if you clicked an Amazon ad or an affiliate link on our website.

If you have an Amazon account and are logged in to it while you surf our website, the collected data can be allocated to your account. You can prevent this by logging out of Amazon before surfing our website.

In the following we will show you exemplary cookies that are placed in your browser when you click an Amazon link on our website.

Name: uid

Value: 3230928052675285215122320933-9

Purpose: This cookie stores a unique user ID and collects information on your website

activity.

Expiry date: after 2 months

Name: ad-id

Value: AyDaInRV1k-Lk59xSnp7h5o

Purpose: This cookie is provided by amazon-adsystem.com and serves the company

regarding various advertising purposes.

Expiry date: after 8 months

Name: uuid2

Value: 8965834524520213028122320933-2

**Purpose:** This cookie allows targeted and interest-based advertising via the AppNexus platform. By the IP address it collects and retains anonymous data on what ads you clicked

and which sites you opened. **Expiry date:** after 3 months

Name: session-id

Value: 262-0272718-2582202122320933-1

Purpose: This cookie stores a unique user ID that the server assigns to you for the duration of

a website visit (session). If you visit the site again, the information saved in there gets

retrieved again.

Expiry date: after 15 years

Name: APID

Value: UP9801199c-4bee-11ea-931d-02e8e13f0574

**Purpose:** This cookie stores information on how you use a website, and on what ads you

looked at before your visit to the website.

Expiry date: after one year

Name: session-id-time

**Value:** tb:s-STNY7ZS65H5335FZEVPE|1581329862486&t:1581329864300&adb:adblk\_no **Purpose:** This cookie records the time you spend on a website with a unique cookie ID.

Expiry date: after 2 years

**Name**: csm-hit **Value:** 20827548011

**Purpose:** We could not find any detailed information on this cookie.

Expiry date: after 15 years

Note: Please note, that this list merely shows examples of cookies and does not claim to be

exhaustive.

Amazon use the obtained information to better tailor their advertisements to their users'

interests.

### How long and where is my data stored?

Amazon saves personal data for as long as it is required for both Amazon's business services, and for legal reasons. As the company's headquarters are in the USA, any collected data is stored on American servers.

### How can I delete my data or prevent data retention?

You always have the right to access your personal data and clear it. If you have an Amazon account, you can manage or delete many of the collected data.

Furthermore, your browser offers another option for managing Amazon's processing and retention of data according to your preferences. There you can manage, clear or delete cookies. This works a little different on every browser. Here you can find instructions for the most common browsers:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

### Legal basis

If you have consented to the use of the Amazon Associates Program, then your consent is the the legal basis for the corresponding data processing. According to **Art. 6 para. 1 lit. a GDPR (consent)**, this consent represents the legal basis for personal data processing, as may be done when it is collected by the Amazon Associates program.

We also have legitimate interest in using the Amazon Associates Program to optimise our online service and marketing measures. The corresponding legal basis for this is **Art. 6 para. 1 lit.f GDPR (legitimate interests)**. Nevertheless, we only use the Amazon Associates Program if you have consented to it.

Amazon also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Amazon uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Amazon to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

We hope we have brought you the most important information about data transfer by the Amazon Affiliate Program. You can find more information on this at <a href="https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010">https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010</a>.

### **ClickBank Affiliate Programme Privacy Policy**

We use the affiliate program of ClickBank for our website. The service provider is the American company Click Sales Inc., 1444 South Entertainment Avenue, Suite 410, Boise, ID 83709, USA.

ClickBank also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

ClickBank uses standard contractual clauses approved by the EU Commission as the basis for data processing by recipients based in third countries (i. e. outside the European Union, Iceland, Liechtenstein, Norway, and thus especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). Standard Contractual Clauses (SCC) are legal templates provided by the EU Commission. Their purpose is to ensure that your data complies with European data privacy standards, even if your data is transferred to and stored in third countries (such as the USA). With these clauses, ClickBank commits to comply with the EU's level of data protection when processing relevant data, even if it is stored, processed and managed in the USA. These clauses are based on an implementing order by the EU Commission. You can find the order and the standard contractual clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

For more information on ClickBank's standard contractual clauses, please visit <a href="https://support.clickbank.com/hc/en-us/articles/4411665630996-ClickBank-Client-Data-Transfer-Addendum-">https://support.clickbank.com/hc/en-us/articles/4411665630996-ClickBank-Client-Data-Transfer-Addendum-</a>.

You can learn more about the data processed through the use of ClickBank in the privacy policy on <a href="https://support.clickbank.com/hc/en-us/articles/360004057131-ClickBank-Privacy-Policy">https://support.clickbank.com/hc/en-us/articles/360004057131-ClickBank-Privacy-Policy</a>.

### JVZoo Affiliate Programme Privacy Policy

We use the affiliate programme JVZoo for our website. The provider of this service is the American company BBC Systems Inc., 1945 W. County Road 419, Suite 1141-212, Oviedo, FL 32766, USA.

We would like to point out that according to the opinion of the European Court of Justice, there is currently no adequate level of protection for the transfer of data to the USA. The data processing is essentially carried out by JVZoo. This may result in data not being processed and stored anonymously. Furthermore, US government authorities may have access to individual data. It may also happen that this data is linked to data from possible other JVZoo services where you have a user account.

You can learn more about the data processed through the use of JVZoo in the privacy policy on <a href="https://www.jvzoo.com/privacy">https://www.jvzoo.com/privacy</a>.

### **Zooplus affiliate program Privacy Policy**

We use the affiliate program of Zooplus for our website. Service provider is the German company zooplus SE, Sonnenstraße 15, 80331 München, Germany.

You can learn more about the data processed through the use of Zooplus in the privacy policy <a href="https://www.zooplus.co.uk/info/legal/privacy">https://www.zooplus.co.uk/info/legal/privacy</a>.

### **Cloud Services**

# Cloud Services Privacy Policy Overview Affected parties: We as the website operator and you as the website visitor Purpose: security and data storage Processed data: Data such as your IP address, name or technical data such as your browser version More details can be found below and in the individual privacy policies or in the privacy policies of the providers Duration of storage: In most cases, data is stored until it is no longer required in order to provide the service Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

### What are cloud services?

As a website operator, cloud services provide us with storage space and computing power via the internet. Data can be transmitted to an external system, where it may be processed and stored via the internet. The relevant cloud provider manages this data. Depending on specific requirements, an individual or a company can choose storage space or computing power. Cloud storage is accessed via an API or via storage protocols. API stands for Application Programming Interface, which is a programming interface that connects software with hardware components.

### Why do we use cloud services?

We use cloud services for several reasons. A cloud service offers us the opportunity to store our data securely. In addition, we can access the data from different locations and devices, giving us more flexibility and simplifying our work processes. Cloud storage also saves us costs because we don't have to set up and manage our own infrastructure for data storage and data security. By storing our data centrally in the cloud, we can also expand our application fields and manage our information much better.

As website operator or company, we use cloud services primarily for our own purposes. We e. g. manage our calendar and store documents or other important information in the cloud. However, your personal data may also be stored. This can take place if you provide us with your contact details (e.g. name and email address) while we store our customer data with a cloud provider. Consequently, any of your data we process may also be stored and processed on external servers. Provided we offer certain forms of content by cloud services on our website, cookies can also be set for web analysis and advertising purposes. Furthermore, such cookies retain your settings (e.g. the language used) so you will be provided with your usual web environment next time you visit our website.

### Which data is processed by cloud services?

Much of the data we store in the cloud cannot be used to identify you as a person, but some data is personal data as defined by the GDPR. This is often customer data such as name, address, IP address or telephone number or technical device information. Videos, images and audio files may also be stored in the cloud. Exactly how the data is collected and stored depends on the respective service. We only try to use services that handle your data in a very reliable and professional manner. Generally, services such as Amazon Drive, have access to the stored files in order to be able to offer their own service accordingly. For this, however, the services require consent (such as for the right to copy files for security reasons). The data will be processed and handled as part of the provided services and in compliance with applicable laws. This also includes compliance with the GDPR for US providers (via the standard contractual clauses). In some cases, cloud services also cooperate with third parties who may process data under instructions and in accordance with privacy policies and other security measures. At this point we would like to emphasise again that all well-known cloud services (such as Amazon Drive, Google Drive or Microsoft OneDrive) obtain the right to access stored content in order to be able to offer and optimise their own services accordingly.

### **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. In general, cloud services store data until you or we revoke the data storage or erase the retained data. In general, personal data is only stored for as long as it is necessary for the provision of the respective services. However, it may take up to several months to erase your data from the cloud. This may occur because data is usually not only stored on one server but divided between different servers.

### Right to object

You also have the right and the opportunity to revoke your consent to data storage in a cloud at any time. If cookies are used, you also have a right to withdraw your consent. This can be done either via our cookie management tool or via other opt-out functions. For example, you can also prevent data collection through cookies by managing, deactivating or erasing the cookies in your browser. We also recommend you read our general privacy policy on cookies. To find out exactly which of your data is stored and processed, you should read the privacy policy of the respective cloud provider.

### **Legal Basis**

We use cloud services mainly on the basis of our legitimate interests (Art. 6 Para. 1 lit. f GDPR) in good security and storage systems.

Certain types of processing, in particular the use of cookies and storage functions, require your consent. If you have consented to your data being processed and stored by cloud services, this consent is the legal basis for data processing (Article 6 (1) (a) GDPR). Most of the services we use place cookies in your browser to store data. Thus, we recommend you read our privacy policy on cookies carefully and study the privacy policy or cookie policy of the relevant service provider.

Information on special tools – if available – can be found in the following sections.

### **Google Cloud Privacy Policy**

We use Google Cloud for our website, which is a cloud service for data storage and data exchange. The service provider is the American company Google Inc. For the European area, the company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as the basis for data processing by recipients based in third countries (i. e. outside the European Union, Iceland, Liechtenstein, Norway, and thus especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). Standard Contractual Clauses (SCC) are legal templates provided by the EU Commission. Their purpose is to ensure that your data complies with European data privacy standards, even if your data is transferred to and stored in third countries (such as the USA). With these clauses, Google commits to comply with the EU's level of data protection when processing relevant data, even if it is stored, processed and managed in the USA. These clauses are based on an implementing order by the EU Commission. You can find the order and the standard contractual clauses here: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=en">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=en</a>

Google holds a contract on commissioned processing in accordance with Art. 28 DSGVO, which acts as the data protection law basis for our customer relationship with Google. This refers to the EU standard contractual clauses in terms of content. You can find the order processing conditions here:

You can learn more about the data processed using Google in the privacy policy at <a href="https://policies.google.com/privacy?hl=de">https://policies.google.com/privacy?hl=de</a>.

### **External Online Platforms Introduction**

## External Online Platforms Privacy Policy Overview Affected parties: website visitors or visitors to the external online platforms Purpose: Presentation and optimisation of our service, as well as establishing contact with visitors & interested parties Data processed: data such as phone numbers, email addresses, contact details, user behaviour data, information about your device and your IP address. More details can be found directly with the respective platform used. Storage duration: depends on the platforms used Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

### What are external online platforms?

In order to be able to offer our services or products outside of our website, we also use external platforms. These are mostly online marketplaces such as Amazon or eBay. In addition to our responsibility for data protection, the data privacy regulations of the external

platforms used also apply. This especially applies when our products are purchased via such a platform, i. e. if there is a payment process. Furthermore, most platforms also use your data to optimise their own marketing measures. For example, the platform can use the collected data to tailor advertisements to the interests of customers and website visitors.

### Why do we use external online platforms?

In addition to our website, we also want to display our offer on other platforms in order to reach more customers. External online marketplaces such as Amazon, eBay or Digistore24 offer large sales websites that show our products to people who may not know our website. Moreover, built-in elements on our site may also lead to an external online platform. Any data that is processed and stored by the respective online platform is used by the business to log the payment process and also to conduct web analyses.

The aim of these analyses is to enable the development of more precise and personal marketing and advertising strategies. Depending on your interaction with a platform, the evaluated data may be used to draw appropriate conclusions about your interests and to create a so-called user profile on you. This also allows the platforms to show customised advertisements or products to you. For this purpose, cookies are usually set in your browser in order to store data on your usage behaviour.

Please note that when using the platforms or our built-in elements, your data may also be processed outside the European Union, since online platforms such as Amazon or eBay are American companies. As a result, you may not be able to claim or enforce your rights in relation to your personal data as easily.

### Which data is processed?

Exactly which data is stored and processed depends on the respective external platform. But usually, it is data such as phone numbers, email addresses, data you enter in a contact form, along with user data (e. g. which buttons you click and which pages you view during your visit), as well as information about your device and IP address. In most cases, the majority of this data is stored in cookies. If you have a profile on an external platform and are logged in there, your data can be linked to any such profile. The collected data is stored on the servers of the platforms used, where it is processed. You can find out exactly how an external platform stores, manages and processes data in the respective privacy policy. If you have any questions about data storage and data processing, or if you want to assert corresponding rights, we recommend that you contact the platform directly.

### **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. For example, Amazon stores data until it is no longer needed for its own purposes. Generally, we only process your personal data as long as is absolutely necessary for the provision of our services and products.

### Right to object

You also have the right and the opportunity to revoke your consent to the use of cookies at any time. This can be done either via our cookie management tool or via opt-out functions on

the respective external platform. You can also prevent data collection through cookies by managing, deactivating or erasing the cookies in your browser.

As cookies may be used, we also recommend our general privacy policy on cookies. To find out exactly which of your data is stored and processed, you should read the privacy policies of the respective external platforms.

### **Legal Basis**

If you have consented to your data being processed and stored by external platforms, this **consent** is the legal basis for data processing (**Art. 6 Para. 1 lit. a GDPR**). In general, if you have consented, your data will also be stored and processed on the basis of our **legitimate interest** (**Art. 6 Para. 1 lit. f GDPR**) in fast and good communication with you as well as other customers and business partners. If there are integrated elements of external platforms on our website, we only use them if you have given your consent.

Information on specific external platforms – if available – can be found in the following sections.

### **Amazon (Europe) Privacy Policy**

We also use the online trading platform Amazon (Europe). The provider of this service is the American company Amazon Inc. The responsible entity for the European region is the company Amazon Europe Core S.à r.l. (Société à responsabilité limitée), 38 avenue John F. Kennedy, L-1855 Luxembourg.

Amazon also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Amazon uses standard contractual clauses approved by the EU Commission as the basis for data processing by recipients based in third countries (i. e. outside the European Union, Iceland, Liechtenstein, Norway, and thus especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). Standard Contractual Clauses (SCC) are legal templates provided by the EU Commission. Their purpose is to ensure that your data complies with European data privacy standards, even if your data is transferred to and stored in third countries (such as the USA). With these clauses, Amazon commits to comply with the EU's level of data protection when processing relevant data, even if it is stored, processed and managed in the USA.

These clauses are based on an implementing order by the EU Commission. You can find the order and the standard contractual clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847.

Amazon's data processing addendum (AWS GDPR DATA PROCESSING), which corresponds to the standard contractual clauses, can be found at <a href="https://dl.awsstatic.com/legal/aws-gdpr/AWS\_GDPR\_DPA.pdf">https://dl.awsstatic.com/legal/aws-gdpr/AWS\_GDPR\_DPA.pdf</a>.

You can find out more about the data that is processed by Amazon in their Privacy Policy at <a href="https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010&ref\_=footer\_privacy\_">https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010&ref\_=footer\_privacy\_</a>.

### Audio & Video

### Audio & Video Privacy Policy Overview

Affected parties: website visitors

Purpose: service optimisation

Processed data: Data such as contact details, user behaviour, device information and IP addresses can be stored.

You can find more details in the Privacy Policy below.

Storage period: data are retained for as long as necessary for the provision of the service

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What are audio and video elements?

We have integrated audio and video elements to our website. Therefore, you can watch videos or listen to music/podcasts directly via our website. This content is delivered by service providers and is obtained from the respective providers' servers.

Audio and video elements are integrated functional elements of platforms such as YouTube, Vimeo or Spotify. It is usually free of charge to use these portals, but they can also contain paid content. With the integrated elements, you can listen to or view any of their content on our website.

If you use audio or video elements on our website, your personal data may get transmitted to as well as processed and retained by service providers.

### Why do we use audio & video elements on our website?

We of course want to provide you with the best offer on our website. And we are aware that content is no longer just conveyed in text and static images. Instead of just giving you a link to a video, we offer you audio and video formats directly on our website. These are entertaining or informative, but ideally they are both. Our service therefore gets expanded and it gets easier for you to access interesting content. In addition to our texts and images, we thus also offer video and/or audio content.

### Which data are retained by audio & video elements?

When you visit a page on our website with e.g. an embedded video, your server connects to the service provider's server. Thus, your data will also be transferred to the third-party provider, where it will be stored. Certain data is collected and stored regardless of whether you have an account with the third party provider or not. This usually includes your IP address, browser type, operating system and other general information about your device.

Most providers also collect information on your web activity. This e.g. includes the session duration, bounce rate, the buttons you clicked or information about the website you are using the service on. This data is mostly stored via cookies or pixel tags (also known as web beacons). Any data that is pseudonymised usually gets stored in your browser via cookies. In the respective provider's Privacy Policy, you can always find more information on the data that is stored and processed.

### **Duration of data processing**

You can find out exactly how long the data is stored on the third-party provider's servers either in a lower point of the respective tool's Privacy Policy or in the provider's Privacy Policy. Generally, personal data is only processed for as long as is absolutely necessary for the provision of our services or products. This usually also applies to third-party providers. In most cases, you can assume that certain data will be stored on third-party providers' servers for several years. Data can be retained for different amounts of time, especially when stored in cookies. Some cookies are deleted after you leave a website, while others may be stored in your browser for a few years.

### Right to object

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers at any time. This can be done either via our cookie management tool or via other opt-out functions. You can e.g. also prevent data retention via cookies by managing, deactivating or erasing cookies in your browser. The legality of the processing up to the point of revocation remains unaffected.

Since the integrated audio and video functions on our site usually also use cookies, we recommend you to also read our general Privacy Policy on cookies. You can find out more about the handling and storage of your data in the Privacy Policies of the respective third party providers.

### Legal basis

If you have consented to the processing and storage of your data by integrated audio and video elements, your consent is considered the legal basis for data processing (Art. 6 Para. 1 lit. a GDPR). Generally, your data is also stored and processed on the basis of our legitimate interest (Art. 6 Para. 1 lit. f GDPR) in maintaining fast and good communication with you or other customers and business partners. We only use the integrated audio and video elements if you have consented to it.

### Vimeo Privacy Policy

### **Vimeo Privacy Policy Overview**

Affected parties: website visitors

Purpose: optimising our service

Processed data: Data such as contact details, data on user behaviour, information about your device and IP address may be stored.

You can find more details on this in privacy policy below.

Storage period: data are generally stored for as long as is necessary for the purpose of the service

Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is Vimeo?

On our website, we use videos of the company Vimeo. This video portal is operated by Vimeo LLC, 555 West 18th Street, New York, New York 10011, USA. With the help of a plug-in, we can display interesting video material directly on our website. Consequently, some of your data may be transmitted to Vimeo. In this privacy policy we want to explain to you what data this is, why we use Vimeo and how you can manage your data or prevent data transmission.

Vimeo is a video platform that was founded in 2004 and introduced video streaming in HD quality in 2007. Since 2015 it has been possible to stream in 4k Ultra HD. The use of the portal is free of charge, but it also contains certain paid content. Compared to the market leader YouTube, Vimeo attaches great importance to valuable content in good quality. On the one hand, the portal offers a lot of artistic content such as music videos and short films. On the other hand, it also offers useful documentaries on a broad spectrum of topics.

### Why do we use Vimeo on our website?

The aim of our website is to provide you the best possible content, in the easiest and most accessible way we can. We will only be satisfied with our service, once we have reached that goal. The video service Vimeo supports us in achieving this goal. Vimeo gives us the opportunity to present high quality content to you directly on our website. Instead of us merely giving you a link to an interesting video, you can watch the video here with us. This extends our service and makes it easier for you to access interesting content. Therefore, in addition to our texts and images, we can also offer video content.

### What data is stored on Vimeo?

When you open a site on our website that has a Vimeo video embedded to it, your browser will connect to Vimeo's servers, and a data transmission will take place. The data are then collected, stored and processed on Vimeo's servers. Regardless of whether you have a Vimeo account or not, Vimeo collects data about you. This includes your IP address, technical information about your browser type, your operating system or very basic device information. Furthermore, Vimeo store information on what website you use their service on and which actions (web activities) you carry out on our website. These web activities include e.g. session duration, bounce rate or which button you clicked on our site that contains a Vimeo function. Vimeo can track and store these actions using cookies and similar technologies.

If you are logged in as a registered member of Vimeo, more data may be collected, since a bigger number of cookies may already have been set in your browser. Furthermore, your actions on our website are directly linked to your Vimeo account. To prevent this, you must log out of Vimeo while "surfing" our website.

Below we will show you an array of cookies Vimeo sets when you are on a website containing an integrated Vimeo function. This list is not exhaustive and assumes that you do not have a Vimeo account.

Name: player Value: ""

**Purpose:** This cookie saves your settings before you play an embedded Vimeo video. This will ensure you to receive your preferred settings again next time you watch a Vimeo video.

Expiry date: after one year

Name: vuid

Value: pl1046149876.614422590122320933-4

Purpose: This cookie collects information about your actions on websites that have a Vimeo

video embedded to them. **Expiry date:** after 2 years

**Note:** These two cookies are set every time as soon as you are on a website that has a Vimeo video embedded to it. If you watch the video and click a button such as "share" or "like", additional cookies will be set. These can also be third-party cookies such as \_ga or \_gat\_UA-76641-8 from Google Analytics or \_fbp from Facebook. The exact cookies that are set depends on your interaction with the video.

The following list will show a selection of cookies that could be placed when you interact with a Vimeo video:

Name: \_abexps Value: %5B%5D

**Purpose:** This Vimeo cookie helps Vimeo to remember your settings. For example, this can be a pre-set language, a region or a username. The cookie generally stores data on how you use Vimeo.

Expiry date: after one year

Name: continuous\_play\_v3

Value: 1

**Purpose:** This cookie is a first-party cookie from Vimeo. The cookie collects information on how you use Vimeo's service. For example, the cookie stores details on when you pause a video and resume it.

Expiry date: after one year

Name: \_ga

Value: GA1.2.1522249635.1578401280122320933-7

**Purpose:** This cookie is a third-party cookie from Google. By default, analytics.js uses the \_ga cookie to store the user ID. Thus, it serves to differentiate between website visitors.

Expiry date: after 2 years

Name: \_gcl\_au

Value: 1.1.770887836.1578401279122320933-3

Purpose: This third-party cookie from Google AdSense is used to improve the efficiency of

ads on websites.

Expiry date: after 3 months

Name: \_fbp

Value: fb.1.1578401280585.310434968

Purpose: This is a Facebook cookie. It is used to display adverts or advertising products from

Facebook or other advertisers. **Expiry date:** after 3 months

Vimeo use this data to improve their own service, to communicate with you and to implement their own targeted advertising measures. On their website they emphasise that only first-party cookies (i.e. cookies from Vimeo itself) are used for embedded videos, provided you do not interact with the video.

### How long and where is the data stored?

Vimeo is headquartered in White Plains, New York (USA). However, their services are offered worldwide. For this, the company uses computer systems, databases and servers in the United States and other countries. Thus, your data may also be stored and processed on servers in America. Vimeo stores the data until the company no longer has an economical reason for keeping it. Then the data will be deleted or anonymised. Vimeo correspond to the EU-U.S. Privacy Shield Framework and are therefore allowed to collect and use information from users within the EU, and to transfer this data to the USA.

### How can I erase my data or prevent data retention?

You always have the option to manage cookies in your browser. If you do not want Vimeo to set cookies and collect information about you for example, you can delete or deactivate cookies in your browser settings at any time. These settings vary a little depending on the browser. Please note that after deactivating/deleting cookies, various functions may no longer be fully available. The following instructions show how you can manage or delete cookies in your browser.

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

<u>Internet Explorer: Delete and manage cookies</u>

Microsoft Edge: Delete cookies in Microsoft Edge

If you are a registered Vimeo member, you can also manage cookies in Vimeo's settings.

### Legal basis

If you have consented to the processing and storage of your data by integrated Vimeo elements, this consent is the legal basis for data processing (Art. 6 para. 1 lit. a GDPR). Generally, your data is also stored and processed on the basis of our legitimate interest (Art. 6 para. 1 lit. f GDPR) to maintain fast and good communication with you or other customers and business partners. Nevertheless, we only use integrated Vimeo elements if you have given your consent. Vimeo also sets cookies in your browser to store data. We therefore recommend

you to read our privacy policy on cookies carefully and to take a look at the privacy policy or the cookie policy of the respective service provider.

Vimeo also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Vimeo uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway, and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Vimeo to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847

You can find out more about the use of cookies at Vimeo at <a href="https://vimeo.com/cookie\_policy">https://vimeo.com/cookie\_policy</a>. Furthermore, you can find more information on privacy at Vimeo at <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>.

### **YouTube Privacy Policy**

### **YouTube Privacy Policy Overview**

Affected parties: website visitors

Purpose: optimising our service

Processed data: Data such as contact details, data on user behaviour, information about your device and IP address may be stored.

You can find more details on this in the privacy policy below.

Storage period: data are generally stored for as long as is necessary for the purpose of the service

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is YouTube?

We have integrated YouTube videos to our website. Therefore, we can show you interesting videos directly on our site. YouTube is a video portal, which has been a subsidiary company of Google LLC since 2006. The video portal is operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. When you visit a page on our website that contains an embedded YouTube video, your browser automatically connects to the servers of YouTube or Google. Thereby, certain data are transferred (depending on the settings). Google is responsible for YouTube's data processing and therefore Google's data protection applies.

In the following we will explain in more detail which data is processed, why we have integrated YouTube videos and how you can manage or clear your data.

On YouTube, users can watch, rate, comment or upload videos for free. Over the past few years, YouTube has become one of the most important social media channels worldwide. For

us to be able to display videos on our website, YouTube provides a code snippet that we have integrated to our website.

### Why do we use YouTube videos on our website?

YouTube is the video platform with the most visitors and best content. We strive to offer you the best possible user experience on our website, which of course includes interesting videos. With the help of our embedded videos, we can provide you other helpful content in addition to our texts and images. Additionally, embedded videos make it easier for our website to be found on the Google search engine. Moreover, if we place ads via Google Ads, Google only shows these ads to people who are interested in our offers, thanks to the collected data.

### What data is stored by YouTube?

As soon as you visit one of our pages with an integrated YouTube, YouTube places at least one cookie that stores your IP address and our URL. If you are logged into your YouTube account, by using cookies YouTube can usually associate your interactions on our website with your profile. This includes data such as session duration, bounce rate, approximate location, technical information such as browser type, screen resolution or your Internet provider. Additional data can include contact details, potential ratings, shared content via social media or YouTube videos you added to your favourites.

If you are not logged in to a Google or YouTube account, Google stores data with a unique identifier linked to your device, browser or app. Thereby, e.g. your preferred language setting is maintained. However, many interaction data cannot be saved since less cookies are set.

In the following list we show you cookies that were placed in the browser during a test. On the one hand, we show cookies that were set without being logged into a YouTube account. On the other hand, we show you what cookies were placed while being logged in. We do not claim for this list to be exhaustive, as user data always depend on how you interact with YouTube.

Name: YSC

Value: b9-CV6ojI5Y122320933-1

**Purpose:** This cookie registers a unique ID to store statistics of the video that was viewed.

Expiry date: after end of session

Name: PREF

**Value:** f1=50000000

**Purpose:** This cookie also registers your unique ID. Google receives statistics via PREF on

how you use YouTube videos on our website.

Expiry date: after 8 months

Name: GPS Value: 1

**Purpose:** This cookie registers your unique ID on mobile devices to track GPS locations.

Expiry date: after 30 minutes

Name: VISITOR\_INFO1\_LIVE

Value: 95Chz8bagyU

**Purpose:** This cookie tries to estimate the user's internet bandwith on our sites (that have

built-in YouTube videos). **Expiry date:** after 8 months

Further cookies that are placed when you are logged into your YouTube account:

Name: APISID

Value: zILlvClZSkqGsSwI/AU1aZI6HY7122320933-

Purpose: This cookie is used to create a profile on your interests. This data is then used for

personalised advertisements. **Expiry date:** after 2 years

Name: CONSENT

**Value:** YES+AT.de+20150628-20-0

**Purpose:** The cookie stores the status of a user's consent to the use of various Google

services. CONSENT also provides safety measures to protect users from unauthorised attacks.

Expiry date: after 19 years

Name: HSID

Value: AcRwpgUik9Dveht0I

**Purpose:** This cookie is used to create a profile on your interests. This data helps to display

customised ads.

Expiry date: after 2 years

Name: LOGIN\_INFO

Value: AFmmF2swRQIhALl6aL...

**Purpose:** This cookie stores information on your login data.

Expiry date: after 2 years

Name: SAPISID

Value: 7oaPxoG-pZsJuuF5/AnUdDUIsJ9iJz2vdM

**Purpose:** This cookie identifies your browser and device. It is used to create a profile on your

interests.

Expiry date: after 2 years

Name: SID

Value: oQfNKjAsI122320933-

Purpose: This cookie stores your Google Account ID and your last login time, in a digitally

signed and encrypted form. **Expiry date:** after 2 years

Name: SIDCC

Value: AN0-TYuqub2JOcDTyL

Purpose: This cookie stores information on how you use the website and on what

advertisements you may have seen before visiting our website.

Expiry date: after 3 months

### How long and where is the data stored?

The data YouTube receive and process on you are stored on Google's servers. Most of these servers are in America. At <a href="https://www.google.com/about/datacenters/locations/?hl=en">https://www.google.com/about/datacenters/locations/?hl=en</a> you

can see where Google's data centres are located. Your data is distributed across the servers. Therefore, the data can be retrieved quicker and is better protected against manipulation.

Google stores collected data for different periods of time. You can delete some data anytime, while other data are automatically deleted after a certain time, and still other data are stored by Google for a long time. Some data (such as elements on "My activity", photos, documents or products) that are saved in your Google account are stored until you delete them. Moreover, you can delete some data associated with your device, browser, or app, even if you are not signed into a Google Account.

### How can I erase my data or prevent data retention?

Generally, you can delete data manually in your Google account. Furthermore, in 2019 an automatic deletion of location and activity data was introduced. Depending on what you decide on, it deletes stored information either after 3 or 18 months.

Regardless of whether you have a Google account or not, you can set your browser to delete or deactivate cookies placed by Google. These settings vary depending on the browser you use. The following instructions will show how to manage cookies in your browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want to allow any cookies, you can set your browser to always notify you when a cookie is about to be set. This will enable you to decide to either allow or permit each individual cookie.

### Legal basis

If you have consented processing and storage of your data by integrated YouTube elements, this consent is the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, your data is also stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) to maintain fast and good communication with you or other customers and business partners. Nevertheless, we only use integrated YouTube elements if you have given your consent. YouTube also sets cookies in your browser to store data. We therefore recommend you to read our privacy policy on cookies carefully and to take a look at the privacy policy or the cookie policy of the respective service provider.

YouTube also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of the data processing.

YouTube uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR) as basis for data processing by recipients based in third countries (which are outside the European Union, Iceland, Liechtenstein and Norway) or for data transfer there. These clauses oblige YouTube to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>

Since YouTube is a subsidiary company of Google, Google's privacy statement applies to both. If you want to learn more about how your data is handled, we recommend the privacy policy at <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>.

### YouTube Subscribe Button Privacy Policy

We have integrated the YouTube subscribe button to our website, which you can recognise by the classic YouTube logo. The logo shows the words "Subscribe" or "YouTube" in white letters against a red background, with a white "Play" symbol on the left. The button may also be displayed in a different design.

Our YouTube channel consistently offers you funny, interesting or exciting videos. With the built-in "Subscribe" button you can subscribe to our channel directly via our website and do not need to go to YouTube's website for it. With this feature, we want to make it as easy as possible for you to access our comprehensive content. Please note that YouTube may save and process your data.

If you see a built-in subscription button on our page, YouTube sets at least one cookie, according to Google. This cookie stores your IP address and our URL. It also allows YouTube to receive information about your browser, your approximate location and your default language. In our test the following four cookies were placed, without us being logged into YouTube:

Name: YSC

Value: b9-CV6ojI5122320933Y

**Purpose:** This cookie registers a unique ID, which stores statistics of the viewed video.

Expiry date: after end of session

Name: PREF

**Value:** f1=50000000

**Purpose:** This cookie also registers your unique ID. Google uses PREF to get statistics on

how you interact with YouTube videos on our website.

Expiry date: after 8 months

Name: GPS Value: 1

Purpose: This cookie registers your unique ID on mobile devices to track your GPS location.

Expiry date: after 30 minutes

Name: VISITOR\_INFO1\_LIVE Value: 12232093395Chz8bagyU

Purpose: This cookie tries to estimate the user's internet bandwith on our website (that

contain built-in YouTube video). **Expiry date:** after 8 months

**Note:** These cookies were set after a test, thus we do not claim for the list to be exhaustive.

If you are logged into your YouTube account, YouTube may store many of the actions and interactions you make on our website via cookies, to then assign them to your YouTube account. This gives YouTube information on e.g. how long you have been browsing our website, which browser type you use, which screen resolution you prefer or what actions you take.

On the one hand, YouTube uses this data to improve its own services and offers, and on the other hand to provide analyses and statistics for advertisers (who use Google Ads).

### **Explanation of the terminology used**

We always strive to make our privacy policy as clear and comprehensible as possible. However, this is not always easy, especially when it comes to technical and legal matters. It is often sensible to use legal terms (such as 'personal data)' or certain technical terms (such as 'cookies' or 'IP address'). But we don't want to use such terms without any explanation. This is why you will find an alphabetical list of important terms used below. These are terms we may not yet have sufficiently explained in the privacy policy. In case we have adopted any of these terms from the GDPR which are definitions, we will also list the GDPR texts here and add our own further explanations if necessary.

### **Processor**

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**Explanation:** As a company and a website owner, we are responsible for all your data we process (i. e. the 'controller'). In addition to the controller, there may also be so-called processors. This includes any company or person who processes personal data on our behalf. In addition to service providers such as tax consultants, processors can also be hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

### **Consent**

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear

affirmative action, signifies agreement to the processing of personal data relating to him or her;

**Explanation:** With websites, such consent is usually given via a cookie consent tool. You've most certainly come across these. Whenever you visit a website for the first time, you will usually be asked via a banner whether you agree or consent to the data processing. You can usually also make individual settings and thus decide for yourself which level of data processing you want to allow. If you do not give your consent, no personal data may be processed. Consent can of course also be given in writing, i.e. not via a tool.

### **Personal Data**

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"personenal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Explanation:** Personal data is all data that can identify you as a person. This is usually data such as:

- name
- address
- email address
- postal address
- phone number
- birthday
- identification numbers such as social security number, tax identification number, ID card number or matriculation number
- banking data such as account number, credit information, account balances and more.

According to the European Court of Justice (ECJ), your **IP** address is also personal data. IT experts can use your IP address to determine at least the approximate location of your device and subsequently your location as the connection owner. Therefore, storing an IP address also requires a legal basis within the scope of the GDPR. There are also so-called "special categories" of personal data, which are particularly worthy of protection. These include:

- racial and ethnic origin
- political opinions
- religious or ideological beliefs
- Union membership
- genetic data such as data obtained from blood or saliva samples
- biometric data (this is information about psychological, physical or behavioural characteristics that can identify an individual). health Data
- Data relating to sexual orientation or sex life

### **Profiling**

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"Profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

**Explanation:** Profiling collects various personal data about an individual in order to learn more about that individual. On the internet, profiling is often used for advertising purposes or for credit checks. Web and advertising analysis programs e. g. collect data about your behaviour and interests on a website. This results in a special user profile that can be used to target advertising to specific target groups.

### Controller

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**Explanation:** In our example, we are responsible for the processing of your personal data and are therefore the "controller". If we pass on collected data to other service providers for processing, they are considered "contract processors". For this, a "Data Processing Agreement (DPA)" must be concluded.

### **Closing Remarks**

Congratulations! If you are reading these lines, you have most likely familiarised yourself with our entire Privacy Policy – or at least scrolled down here. As you can see from the scope of our Privacy Policy, we do not take the protection of your personal data lightly. We find it important to inform you about the processing of your personal data to the best of our abilities. In doing so, we not only want to tell you which data is processed but also explain to you why we use various software programs. In general, Privacy Policies have very technical and legal jargon. However, since most of you are not web developers or solicitors, we wanted to take a different approach and explain the facts in simple and clear language. Of course, this is not always possible due to the subject matter. Therefore, you can also find a

more detailed explanation of the most important terms at the end of the Privacy Policy. If you have any questions about data protection on our website, please do not hesitate to contact us or the responsible body. We wish you all the best and hope to soon welcome you to our website again.

All texts are copyrighted.