# **Data protection**



ttps://a4ord.com/data-protection-eng

#### Introduction and overview

We have written this privacy statement (version 01.02.2022-321938052) to explain to you, in accordance with the requirements of the General Data Protection Regulation (EU) 2016/679 and applicable national laws, which personal data (data for short) we as the controller - and the processors (e.g. providers) commissioned by us - process, will process in the future and what lawful options you have. The terms used are to be understood as gender-neutral.

**In short:** we provide you with comprehensive information about data we process about you.

Privacy statements usually sound very technical and use legal terminology. This privacy statement, on the other hand, is intended to describe the most important things to you as simply and transparently as possible. To the extent that it is conducive to transparency, technical terms are explained in a reader-friendly manner, links to further information are provided and graphics are used. In this way, we inform you in clear and simple language that we only process personal data in the course of our business activities if there is a corresponding legal basis. This is certainly not possible by providing the most concise, unclear and legalistic explanations possible, as is often standard practice on the Internet when it comes to data protection. I hope you find the following explanations interesting and informative and perhaps there is one or the other piece of information that you did not know yet.

If you still have questions, we would like to ask you to contact the responsible office mentioned below or in the imprint, to follow the existing links and to look at further information on third party sites. Our contact details can of course also be found in the imprint.

# Scope

This data protection declaration applies to all personal data processed by us in the company and to all personal data processed by companies commissioned by us (order processors). By personal data, we mean information within the meaning of Art. 4 No. 1 DSGVO, such as a person's name, e-mail address and postal address. The processing of personal data ensures that we can offer and invoice our services and products, whether online or offline. The scope of this privacy policy includes:

- all online presences (websites, online stores) that we operate
- Social media appearances and e-mail communication
- mobile apps for smartphones and other devices

**In short:** the data protection declaration applies to all areas in which personal data is processed in a structured manner within the company via the aforementioned channels. If we enter into legal relationships with you outside of these channels, we will inform you separately if necessary.

# Legal basis

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

As far as EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016. You can, of course, read this EU General Data Protection Regulation online on EUR-Lex, the access to EU law, at <a href="https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=celex%3A32016R0679">https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=celex%3A32016R0679</a>.

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

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

Further conditions such as the performance of recordings in the public interest and the exercise of official authority as well as the protection of vital interests do not generally occur with us. If such a legal basis should be relevant, it will be indicated at the appropriate place.

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

- In **Austria**, this is the Federal Act on the Protection of Individuals with regard to the Processing of Personal Data (**Data Protection Act**), or **DSG for** short.
- In Germany, the Federal Data Protection Act, or BDSG for short, applies.

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

## Contact details of the responsible person

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

A4ord FT7 GmbH

Torstrasse 177, 10115, Berlin, Deutschland

E-Mail: office@a4ord.com

Imprint: https://www.a4ord.com/impressum/

# Storage duration

The fact that we only store personal data for as long as is absolutely necessary for the provision of our services and products applies as a general criterion at our company. This means that we delete personal data as soon as the reason for processing the data no longer exists. In some cases, we are required by law to store certain data even after the original purpose has ceased to exist, for example for accounting purposes.

Should you wish your data to be deleted or revoke your consent to data processing, the data will be deleted as soon as possible and insofar as there is no obligation to store it.

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

# **Rights under the General Data Protection Regulation**

According to Article 13 of the GDPR, you have the following rights to ensure fair and transparent processing of data:

- According to Article 15 of the GDPR, you have the right to know whether we are
  processing data about you. If this is the case, you have the right to receive a copy of
  the data and the following information:
  - the purpose for which we carry out the processing;
  - 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;
  - 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;
  - that you can complain to a supervisory authority (links to these authorities can be found below);
  - 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 in order to arrive at a personal profile of you.

- You have a right to rectify data according to Article 16 of the GDPR, which means that we must correct data if you find errors.
- According to Article 17 of the GDPR, you have the right to erase ("right to be forgotten"), which specifically means that you may request the deletion of your data.
- According to Article 18 of the GDPR, you have the right to restrict processing, which means that we may only store the data but not use it any further.
- According to Article 19 of the GDPR, you have the right to data portability, which
  means that we will provide you with your data in a common format upon request.
- According to Article 21 of the GDPR, you have a right to object, which, once enforced, entails a change in processing.
  - 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 marketing, you may object to this type of data processing at any time. We may not use your data for direct marketing thereafter.
  - If data is used to perform profiling, you can object to this type of data processing at any time. We may not 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).

**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 that 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> In Germany, there is a data protection officer for each federal state. For more information, you can contact the <a href="Federal Commissioner for Data">Federal Commissioner for Data</a> <a href="Protection">Protection and Freedom of Information (BfDI)</a>. The following local data protection authority is responsible for our company:

# Berlin data protection authority

State Commissioner for Data Protection: Maja Smoltczyk

Address: Friedrichstraße 219, 10969 Berlin

**Telephone no.:** 030/138 89-0

**E-mail address:** mailbox@datenschutz-berlin.de

Website: <a href="https://www.datenschutz-berlin.de/">https://www.datenschutz-berlin.de/</a>

# Data processing security

To protect personal data, we have implemented both technical and organizational measures. Where possible, we encrypt or pseudonymize personal data. In this way, we make it as difficult as possible for third parties to infer personal information from our data.

Article 25 of the GDPR refers to "data protection through technical design and data protection-friendly default settings" and thus means that both software (e.g., forms) and hardware (e.g., access to the server room) should always be designed with security in mind and that appropriate measures should be taken. If necessary, we will go into more detail on specific measures below.

# TLS encryption with https

TLS, encryption and https sound very technical and they are. We use HTTPS (the Hypertext Transfer Protocol Secure stands for "secure hypertext transfer protocol") to transfer data over the Internet in a tap-proof way.

This means that the complete transmission of all data from your browser to our web server is secured - no one can "listen in".

We have thus introduced an additional layer of security and comply with Data Protection by Design (<u>Article 25(1) DSGVO</u>). By using TLS (Transport Layer Security), an encryption protocol for secure data transmission on the Internet, we can ensure the protection of confidential data.

You can recognize the use of this data transmission protection by the small lock symbol links in the upper left corner of the browser, to the left of the Internet address (e.g. examplepage.de) and the use of the scheme https (instead of http) as part of our Internet address.

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

#### Communication

#### **Communication summary**

- Affected parties: All those who communicate with us by telephone, e-mail or online form
- Data processed: e.g. phone number, name, e-mail address, form data entered. You can find more details on this in the respective contact type used
- Purpose: Handling communication with customers, business partners, etc.
- Storage period: duration of the business case and legal requirements
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. b DSGVO (Contract), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

When you contact us and communicate by phone, e-mail or online form, personal data may be processed.

The data will be processed for the handling and processing of your question and the related business transaction. The data will be stored for the same period or as long as required by law.

#### Persons concerned

All those who seek contact with us via the communication channels provided by us are affected by the aforementioned processes.

#### **Phone**

When you call us, the call data is stored pseudonymously on the respective terminal device and with the telecommunications provider used. In addition, data such as name and telephone number may subsequently be sent by e-mail and stored for the purpose of responding to inquiries. The data is deleted as soon as the business case has been terminated and legal requirements permit.

#### E-Mail

If you communicate with us by e-mail, data may be stored on the respective end device (computer, laptop, smartphone,...) and data is stored on the e-mail server. The data is deleted as soon as the business case has been terminated and legal requirements allow it.

#### Online forms

If you communicate with us using an online form, data is stored on our web server and, if necessary, forwarded to an e-mail address of ours. The data is deleted as soon as the business case has been terminated and legal requirements permit.

## Legal basis

The processing of the data is based on the following legal bases:

- Art. 6 para. 1 lit. a DSGVO (consent): You give us your consent to store your data and to further use it for purposes related to the business case;
- Art. 6 para. 1 lit. b DSGVO (contract): There is a need for the performance of a contract with you or a processor such as the telephone provider or we need to process the data for pre-contractual activities, such as the preparation of an offer;
- Art. 6 para. 1 lit. f DSGVO (Legitimate Interests): We want to operate customer inquiries and business communication in a professional framework. For this purpose, certain technical facilities such as e-mail programs, exchange servers and mobile network operators are necessary in order to be able to operate the communication efficiently.

#### Cookies

#### **Cookies summary**

- Parties concerned: Visitors to the website
- Purpose: depends on the respective cookie. You can find more details below or from the manufacturer of the software that sets the cookie.
- Data processed: Depending on the cookie used in each case. More details can be found below or from the manufacturer of the software that sets the cookie.
- Storage duration: depends on the respective cookie, can vary from hours to years
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit.f DSGVO (Legitimate Interests).

#### What are cookies?

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

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

Whenever you browse the Internet, you use a browser. Popular browsers include Chrome, Safari, Firefox, Internet Explorer, and Microsoft Edge. Most websites store small text files in your browser. These files are called cookies.

One thing cannot be denied: Cookies are really useful little helpers. Almost all websites use cookies. More precisely, they are HTTP cookies, as there are other cookies for other applications. HTTP cookies are small files that are stored on your computer by our website. These cookie files are automatically placed in the cookie folder, effectively the "brain" of your browser. A cookie consists of a name and a value. When defining a cookie, one or more attributes must also be specified.

Cookies store certain user data about you, such as language or personal page settings. When you return to our site, your browser transmits the "user-related" information back to our site. Thanks to cookies, our site knows who you are and offers you the setting you are used to. In some browsers, each cookie has its own file, in others, such as Firefox, all cookies are stored in a single file.

The following graphic shows a possible interaction between a web browser such as Chrome and the web server. Here, the web browser requests a website and receives a cookie back from the server, which the browser uses 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, third-party cookies are created by partner websites (e.g. Google Analytics). Each cookie must be evaluated individually, as each cookie stores different data. Also, the expiration time of a cookie varies from a few minutes to a few years. Cookies are not software programs and do not contain viruses, Trojans or other "pests". Cookies also cannot access information on your PC.

For example, cookie data can look like this:

Name: \_ga

Value: GA1.2.1326744211.152321938052-9

Intended use: differentiation of website visitors

Expiration date: after 2 years

A browser should be able to support these minimum sizes:

• At least 4096 bytes per cookie

- At least 50 cookies per domain
- At least 3000 cookies in total

## What are the types of cookies?

The question of which cookies we use in particular depends on the services used and is clarified in the following sections of the privacy policy. At this point, we would like to briefly discuss the different types of HTTP cookies.

We can distinguish 4 types of cookies:

#### **Essential cookies**

These cookies are necessary to ensure basic functions of the website. For example, these cookies are needed when a user adds a product to the shopping cart, then continues surfing on other pages and later goes to the checkout. Through these cookies, the shopping cart is not deleted even if the user closes his browser window.

#### **Purpose cookies**

These cookies collect information about user behavior and whether the user receives any error messages. In addition, these cookies are also used to measure the loading time and the behavior of the website with different browsers.

#### **Targeting cookies**

These cookies provide a better user experience. For example, entered locations, font sizes or form data are stored.

#### Advertising cookies

These cookies are also called targeting cookies. They are used to deliver customized advertising to the user. This can be very convenient, but also very annoying.

Usually, when you visit a website for the first time, you are asked which of these cookie types you want to allow. And, of course, this decision is also stored in a cookie.

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

## Purpose of processing via cookies

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

## What data is processed?

Cookies are small helpers for many different tasks. Unfortunately, it is not possible to generalize what data is stored in cookies, but we will inform you about the processed or stored data in the following privacy policy.

## Cookies storage duration

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

You can also influence the storage period yourself. You can manually delete all cookies at any time via your browser (see also "Right of objection" below). Furthermore, cookies that are based on consent will be deleted at the latest after revocation of your consent, whereby the legality of the storage remains unaffected until then.

# Right to object - how can I delete cookies?

How and whether you want to use cookies, you decide. Regardless of which service or website the cookies come from, you always have the option to delete, disable or only partially allow cookies. For example, you can block third-party cookies, but allow all other cookies.

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

Chrome: Delete, enable and manage cookies in Chrome

Safari: Managing cookies and website data with Safari

Firefox: Delete cookies to remove data that websites have placed on your computer

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete and manage cookies

If you do not want to have cookies in principle, you can set up your browser so that it always informs you when a cookie is to be set. In this way, you can decide for each individual cookie whether you allow the cookie or not. The procedure varies depending on the browser. It is best to search for the instructions in Google using the search term "delete cookies Chrome" or "disable cookies Chrome" in the case of a Chrome browser.

## Legal basis

The so-called "Cookie Guidelines" have been in place since 2009. These state that the storage of cookies requires your **consent** (Article 6 (1) a DSGVO). Within the EU countries, however, there are still very different reactions to these directives. In Austria, however, this directive was implemented in Section 96 (3) of the Telecommunications Act (TKG). In Germany, the Cookie Directives were not implemented as national law. Instead, this directive was largely implemented in Section 15 (3) of the German Telemedia Act (TMG).

For absolutely necessary cookies, even in the absence of consent. there are **legitimate interests** (Article 6(1)(f) DSGVO), which in most cases are economic in nature. We want to provide visitors to the website with a pleasant user experience and for this purpose certain cookies are often absolutely necessary.

If cookies are used that are not absolutely necessary, this only happens in the case of your consent. The legal basis in this respect is Art. 6 para. 1 lit. a DSGVO.

In the following sections, you will be informed in more detail about the use of cookies, if used software uses cookies.

# Web hosting introduction

#### Web hosting summary

- Affected parties: Visitors to the website
- Purpose: professional hosting of the website and safeguarding of the operation
- Processed data: IP address, time of website visit, browser used and other data. More details can be found below or at the respective web hosting provider used.
- Storage period: depending on the respective provider, but usually 2 weeks
- Legal basis: Art. 6 para. 1 lit.f DSGVO (Legitimate Interests)

## What is web hosting?

When you visit websites 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 justification. By the way, by website we mean the entirety of all web pages on a domain, i.e. everything from the home page (homepage) to the very last subpage (like this one). By domain, we mean, for example, example.de or sampleexample.com.

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

This web browser must connect to another computer where the website's code is stored: the web server. Operating a web server is a complicated and costly task, which is why this is usually done by professional providers, the providers. These offer web hosting and thus ensure reliable and error-free storage of website data.

When the browser on your computer (desktop, laptop, smartphone) connects and during data transfer to and from the web server, personal data may be processed. On the one hand, your computer stores data, on the other hand, the web server must also store data for a while to ensure proper operation.

To illustrate:

## Why do we process personal data?

The purposes of data processing are:

- 1. Professional hosting of the website and securing its operation
- 2. to maintain operational and IT security
- 3. Anonymous evaluation of access behavior to improve our offering and, if necessary, for criminal prosecution or the pursuit of claims

#### What data is processed?

Even while you are visiting our website right now, our web server, which is the computer on which this website is stored, usually automatically stores data such as

- the complete Internet address (URL) of the accessed web page
- 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. <a href="https://www.beispielquellsite.de/vondabinichgekommen.html/">https://www.beispielquellsite.de/vondabinichgekommen.html/</a>)
- the hostname and IP address of the device being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- Date and time
- in files, the so-called web server log files

## How long is data stored?

As a rule, the above data is stored for two weeks and then automatically deleted. We do not pass on this data, but we cannot rule out the possibility that this data may be viewed by authorities in the event of unlawful conduct.

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

#### Legal basis

The lawfulness of the processing of personal data in the context of web hosting results from Art. 6 para. 1 lit. f DSGVO (protection of legitimate interests), because the use of professional hosting with a provider is necessary to present the company on the Internet in a secure and user-friendly manner and to be able to pursue attacks and claims from this if necessary.

As a rule, there is a contract between us and the hosting provider for commissioned processing pursuant to Art. 28 f. DSGVO, which ensures compliance with data protection and guarantees data security.

## **DomainFactory Privacy Policy**

We use DomainFactory, a web hosting provider among others, for our website. The service provider is the German company domainfactory GmbH, Oskar-Messter-Str. 33, 85737 Ismaning, Germany. You can learn more about the data processed by using DomainFactory in the privacy policy at <a href="https://www.df.eu/de/datenschutz/">https://www.df.eu/de/datenschutz/</a>.

# **Facebook Pixel Privacy Policy**

We use the Facebook pixel from Facebook on our website. For this purpose, we have implemented a code on our website. The Facebook pixel is a snippet of JavaScript code that loads a collection of functions that allow Facebook to track your user actions if you came to our website via Facebook ads. For example, when you purchase a product on our website, the Facebook pixel is triggered and stores your actions on our website in one or more cookies. These cookies allow Facebook to match your user data (customer data such as IP address, user ID) with your Facebook account data. Then Facebook deletes this data again.

The collected data is anonymous and not visible to us and can only be used in the context of ad placements. If you are a Facebook user yourself and are logged in, your visit to our website is automatically assigned to your Facebook user account.

We want to show our services or products only to those people who are really interested in them. With the help of Facebook pixels, our advertising measures can be better tailored to your wishes and interests. Thus, Facebook users (if they have allowed

personalized advertising) get to see suitable advertising. Furthermore, Facebook uses the collected data for analysis purposes and its own advertisements.

Below we show you those cookies that were set by embedding Facebook Pixel on a test page. Please note that these are only sample cookies. Different cookies are set depending on the interaction on our website.

Name: \_fbp

Value: fb.1.1568287647279.257405483-6321938052-7

**Purpose:** This cookie is used by Facebook to display promotional products.

Expiration date: after 3 months

Name: fr

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

**Purpose:** This cookie is used to make Facebook Pixel work properly.

Expiration date: after 3 months

Name: comment author 50ae8267e2bdf1253ec1a5769f48e062321938052-3

Value: Author name

Purpose: This cookie stores the text and name of a user who leaves a comment, for

example.

Expiration date: after 12 months

Name: comment author url 50ae8267e2bdf1253ec1a5769f48e062

**Value:** https%3A%2F%2Fwww.testseite...%2F (author's URL)

**Purpose:** This cookie stores the URL of the website that the user enters in a text field on

our website.

Expiration date: after 12 months

Name: comment\_author\_email\_50ae8267e2bdf1253ec1a5769f48e062

Value: Author's e-mail address

Purpose: This cookie stores the user's email address if he/she has provided it on the

website.

Expiration date: after 12 months

**Note:** The above cookies refer to an individual user behavior. Especially with the use of cookies, Facebook changes can never be ruled out.

If you are logged in to Facebook, you can change your settings for advertisements yourself at <a href="https://www.facebook.com/adpreferences/advertisers/?">https://www.facebook.com/adpreferences/advertisers/?</a> entry\_product=ad\_settings\_screen If you are not a Facebook user, you can basically manage your usage-based online advertising at <a href="https://www.youronlinechoices.com/de/praferenzmanagement/?tid=321938052">https://www.youronlinechoices.com/de/praferenzmanagement/?tid=321938052</a> There you have the option to deactivate or activate providers.

Facebook also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Facebook uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Facebook undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

Facebook's data processing terms and conditions, which comply with the standard contractual clauses, can be found at https://www.facebook.com/legal/terms/dataprocessing https://www.facebook.com/legal/terms/dataprocessing.

If you want to learn more about Facebook's privacy policy, we recommend that you read the company's own data policy at <a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>.

# **Facebook Automatic Advanced Match Privacy Policy**

We have also enabled Automatic Advanced Matching as part of the Facebook Pixel feature. This feature of the pixel allows us to send hashed emails, name, gender, city, state, zip code and date of birth or phone number as additional information to Facebook if you have provided us with this data. This activation allows us to tailor advertising campaigns on Facebook even more precisely to people who are interested in our services or products.

# **Google Analytics Privacy Policy**

#### **Google Analytics Privacy Policy Summary**

- Affected parties: Visitors to the website
- Purpose: Evaluation of visitor information to optimize the web offer.
- Processed data: Access statistics, which include data such as locations of accesses, device data, access duration and time, navigation behavior, click behavior, and IP addresses. More details can be found below in this Privacy Policy.
- Storage duration: depending on the properties used
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

## What is Google Analytics?

We use on our website the analysis tracking tool Google Analytics (GA) of 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 Analytics collects data about your actions on our website. For example, when you click on a link, this action is stored in a cookie and sent to Google Analytics. Using the reports we receive from Google Analytics, we can better tailor our website and service to your preferences. In the following, we will go into more detail about the tracking tool and, in particular, inform you about what data is stored and how you can prevent this.

Google Analytics is a tracking tool used for traffic analysis of our website. In order for Google Analytics to work, a tracking code is built into the code of our website. When you visit our website, this code records various actions you take on our website. Once you leave our website, this data is sent to the Google Analytics servers and stored there.

Google processes the data and we receive reports about your user behavior. These reports may include, but are not limited to, the following:

- Target group reports: Through target group reports, we get to know our users better and know more precisely who is interested in our service.
- Ad reports: Ad reports make it easier for us to analyze and improve our online advertising.
- Acquisition reports: Acquisition reports give us helpful information on how to get more people interested in our service.
- Behavior reports: This is where we learn how you interact with our website. We can track which path you take on our site and which links you click.
- Conversion reports: Conversion is the name given to a process in which you take a
  desired action as a result of a marketing message. For example, when you go from
  being just a website visitor to a buyer or newsletter subscriber. These reports help
  us learn more about how our marketing efforts are working for you. This is how we
  aim to increase our conversion rate.

 Real-time reports: Here we always know immediately what is happening on our website. For example, we can see how many users are reading this text.

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

Our goal with this website is clear: we want to provide you with the best possible service. The statistics and data from Google Analytics help us achieve this goal.

The statistically evaluated data shows us a clear picture of the strengths and weaknesses of our website. On the one hand, we can optimize our site so that it is found more easily by interested people on Google. On the other hand, the data helps us to better understand you as a visitor. We thus know exactly what we need to improve on our website in order to provide you with the best possible service. The data also helps us to carry out our advertising and marketing measures in a more individual and cost-effective way. After all, it only makes sense to show our products and services to people who are interested in them.

## What data is stored by Google Analytics?

Google Analytics uses a tracking code to create a random, unique ID associated with your browser cookie. This is how Google Analytics recognizes you as a new user. The next time you visit our site, you will be recognized as a "returning" user. All collected data is stored together with this user ID. This is how it is possible to evaluate pseudonymous user profiles in the first place.

To be able to analyze our website with Google Analytics, a property ID must be inserted into the tracking code. The data is then stored in the corresponding property. For each newly created property, the Google Analytics 4 property is default. Alternatively, you can also create the Universal Analytics property. Depending on the property used, data is stored for different lengths of time.

Identifiers such as cookies and app instance IDs measure your interactions on our website. Interactions are all types of actions you take on our website. If you also use other Google systems (such as a Google account), data generated through Google Analytics may be linked to third-party cookies. Google does not share Google Analytics data unless we, as the website operator, authorize it. Exceptions may occur if required by law.

The following cookies are used by Google Analytics:

Name: ga

Value: 2.1326744211.152321938052-5

**Purpose:** By default, analytics.js uses the \_ga cookie to store the user ID. Basically, it is used to distinguish the website visitors.

Expiration date: after 2 years

Name: gid

Value: 2.1687193234.152321938052-1

**Purpose:** The cookie is also used to distinguish the website visitors

**Expiration date:** after 24 hours

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

Value: 1

Purpose: lower the request rate. When Google Analytics is deployed via Google Tag

Manager, this cookie is named \_dc\_gtm\_ property-id>.

Expiration date: after 1 minute

Name: AMP\_TOKEN

Value: no data

Purpose: The cookie has a token that can be used to retrieve a user ID from the AMP

client ID service. Other possible values indicate a logout, a request, or an error.

Expiration date: after 30 seconds up to one year

Name: utma

Value: 1564498958.1564498958.1564498958.1

Purpose: This cookie is used to track your behavior on the website and measure

performance. The cookie is updated every time information is sent to Google Analytics.

**Expiration date:** after 2 years

Name: utmt

Value: 1

**Purpose:** The cookie is used like gat gtag UA property-id> to throttle the request

rate.

Expiration date: after 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 info is sent to Google Analytics.

**Expiration date:** after 30 minutes

Name: utmc

Value: 167421564

Purpose: This cookie is used to set new sessions for returning visitors. This is a session

cookie and is only stored until you close the browser again.

**Expiration date:** After closing the browser

Name: utmz

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

**Purpose:** The cookie is used to identify the source of traffic to our website. That is, the cookie stores from where you came to our website. This may have been another page or

an advertisement.

Expiration date: after 6 months

Name: utmv

Value: not specified

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

information is sent to Google Analytics.

**Expiration date:** after 2 years

**Note:** This list cannot claim to be complete, as Google also changes the choice of its cookies again and again.

Here we show you an overview of the most important data collected with Google Analytics:

**Heatmaps:** Google creates so-called heatmaps. Heatmaps allow you to see exactly those areas that you click on. This gives us information about where you are "on the move" on our site.

**Session duration:** Google defines session duration as the time you spend on our site without leaving. If you have been inactive for 20 minutes, the session ends automatically.

**Bounce rate:** A bounce is when you view only one page on our website and then leave our website again.

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

**IP** address: The IP address is only shown in abbreviated form so that no clear assignment is possible.

**Location:** The IP address can be used to determine the country and your approximate location. This process is also called IP location determination.

**Technical information:** Technical information may include your browser type, Internet service provider, or screen resolution.

**Source of origin:** Google Analytics or, of course, we are also interested in which website or which advertisement you came to our site from.

Other data include contact details, any ratings, playing media (e.g., when you play a video via our site), sharing content via social media, or adding to your favorites. The enumeration does not claim to be complete and only serves as a general orientation of the data storage by Google Analytics.

## How long and where is the data stored?

Google has your servers spread all over the world. Most servers are located in America and consequently your data is mostly stored on American servers. Here you can read exactly where Google data centers are located:

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

Your data is distributed on different physical data carriers. This has the advantage that the data can be retrieved more quickly and is better protected against manipulation. In every Google data center, there are corresponding emergency programs for your data. If, for example, the hardware at Google fails or natural disasters paralyze servers, the risk of a service interruption at Google still remains 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 other so-called event data, we have the option to choose a retention period of 2 months or 14 months.

For Universal Analytics properties, Google Analytics has a default retention period of 26 months for your user data. Then your user data is deleted. However, we have the option to choose the retention period of user data ourselves. We have five variants available for this purpose:

- · Deletion after 14 months
- Deletion after 26 months
- Deletion after 38 months
- · Deletion after 50 months
- · No automatic deletion

In addition, there is also the option that data will only be deleted if you no longer visit our website within the period we have selected. In this case, the retention period is reset each time you visit our website again within the specified period.

Once the specified period has expired, the data is deleted once a month. This retention period applies to your data associated with cookies, user recognition and advertising IDs (e.g. DoubleClick domain cookies). Reporting results are based on aggregated data and are stored separately from user data. Aggregated data is a merging of individual data into a larger unit.

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

Under European Union data protection law, you have the right to access, update, delete, or restrict your data. Using the browser add-on to disable Google Analytics JavaScript (ga.js, analytics.js, dc.js), you can prevent Google Analytics from using your data. You can download and install the browser add-on at <a href="https://tools.google.com/dlpage/gaoptout?hl=de">https://tools.google.com/dlpage/gaoptout?hl=de</a> Please note that this add-on only disables data collection by Google Analytics.

If you basically want to disable, delete or manage cookies, you can find the corresponding links to the respective instructions of the most popular browsers under the section "Cookies".

## Legal basis

The use of Google Analytics requires your consent, which we have obtained with our cookie popup. According to **Art. 6 Abs. 1 lit. a DSGVO (consent)** this **consent constitutes** the legal basis for the processing of personal data as it may occur during the collection by web analytics tools.

In addition to the consent, there is a legitimate interest on our part to analyze the behavior of website visitors and thus to improve our offer technically and economically. With the help of Google Analytics, we detect website errors, can identify attacks and improve economic efficiency. The legal basis for this is **Art. 6 Abs. 1 lit. f DSGVO (Legitimate Interests)**. Nevertheless, we only use Google Analytics if you have given your consent.

Google also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Google uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and

stored there. Through these clauses, Google undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The Google Ads Data Processing Terms, which correspond to the standard contractual clauses and are also applicable to Google Analytics, can be found at <a href="https://business.safety.google/adsprocessorterms/">https://business.safety.google/adsprocessorterms/</a>.

We hope we have been able to provide you with the most important information about Google Analytics data processing. If you want to learn more about the tracking service, we recommend these two links:

<u>https://marketingplatform.google.com/about/analytics/terms/de/</u> und <u>https://support.google.com/analytics/answer/6004245?hl=de</u>.

# Google Analytics reports on demographic characteristics and interests

We have turned on the advertising reports features in Google Analytics. The demographic and interest reports contain information on age, gender and interests. This allows us - without being able to assign this data to individual persons - to get a better picture of our users. You can learn more about the advertising functions at <a href="https://support.google.com/analytics/answer/3450482?hl=de\_AT&utm\_id=ad">https://support.google.com/analytics/answer/3450482?hl=de\_AT&utm\_id=ad</a>.

You can stop the use of the activities and information of your Google account under "Advertising settings" on <a href="https://adssettings.google.com/authenticated">https://adssettings.google.com/authenticated</a> via checkbox.

# Google Analytics IP anonymization

We have implemented Google Analytics IP address anonymization on this website. This feature was developed by Google to enable this website to comply with applicable data protection regulations and recommendations of local data protection authorities when they prohibit storage of the full IP address. The anonymization or masking of the IP takes place as soon as the IP addresses arrive in the Google Analytics data collection network and before any storage or processing of the data takes place.

For more information on IP anonymization, please visit <a href="https://support.google.com/analytics/answer/2763052?hl=de">https://support.google.com/analytics/answer/2763052?hl=de</a>.

# **Google Analytics Data Processing Addendum**

We have entered into a direct customer agreement with Google for the use of Google Analytics by accepting the "Data Processing Addendum" in Google Analytics.

You can find out more about the data processing addendum for Google Analytics here: <a href="https://support.google.com/analytics/answer/3379636?hl=de&utm\_id=ad">https://support.google.com/analytics/answer/3379636?hl=de&utm\_id=ad</a>

# **Web Analytics Introduction**

## **Web Analytics Privacy Policy Summary**

- Affected parties: Visitors to the website
- Purpose: Evaluation of visitor information to optimize the web offer.
- Processed data: Access statistics, which include data such as locations of accesses, device data, access duration and time, navigation behavior, click behavior, and IP addresses. You can find more details on this in the respective web analytics tool used.
- Storage duration: depending on the web analytics tool used.
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

# What is Web Analytics?

We use software on our website to evaluate the behavior of website visitors, known as web analytics for short. This involves collecting data that is stored, managed and processed by the respective analytic tool provider (also known as a tracking tool). The data is used to create analyses of user behavior on our website and made available to us as the website operator. In addition, most tools offer various testing options. For example, we can test which offers or content are best received by our visitors. To do this, we show you two different offers for a limited period of time. After the test (so-called A/B test), we know which product or content our website visitors find more interesting. For such test procedures, as for other analytical procedures, user profiles can also be created and the data stored in cookies.

# Why do we run web analytics?

With our website we have a clear goal in mind: we want to deliver the best web offer on the market for our industry. To achieve this goal, we want to offer the best and most interesting offer on the one hand, and on the other hand, make sure that you feel completely comfortable on our website. With the help of web analysis tools, we can take a closer look at the behavior of our website visitors and then improve our web offer for you and us accordingly. For example, we can see how old our visitors are on average, where they come from, when our website is most visited or which content or products are particularly popular. All this information helps us to optimize the website and thus best adapt it to your needs, interests and wishes.

# What data is processed?

Exactly what data is stored depends, of course, on the analysis tools used. But as a rule, for example, which content you view on our website, which buttons or links you click on, when you access a page, which browser you use, which device (PC, tablet, smartphone, etc.) you use to visit the website or which computer system you use is stored. If you agreed that location data may also be collected, these may also be processed by the web analytics tool provider.

In addition, your IP address is also stored. According to the General Data Protection Regulation (DSGVO), IP addresses are personal data. However, your IP address is usually stored pseudonymously (i.e. in an unrecognizable and shortened form). For the purpose of testing, web analysis and web optimization, no direct data, such as your name, age, address or email address are stored as a matter of principle. All this data, if collected, is stored pseudonymously. This means that you cannot be identified as a person.

The following example shows schematically how Google Analytics works as an example of client-based web tracking with Java Script code.

How long the respective data is stored always depends on the provider. Some cookies store data only for a few minutes or until you leave the website again, other cookies can store data for several years.

## **Duration of data processing**

We will inform you about the duration of data processing below, provided we have further information on this. In general, we process personal data only as long as it is absolutely necessary for the provision of our services and products. If it is required by law, as for example in the case of accounting, this storage period may also be exceeded.

# Right of objection

You also have the right and the possibility 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 collection through cookies by managing, disabling or deleting cookies in your browser.

## Legal basis

The use of web analytics requires your consent, which we have obtained with our cookie popup. According to **Art. 6 Abs. 1 lit. a DSGVO (consent)** this **consent constitutes** the legal basis for the processing of personal data as it may occur during the collection by web analytics tools.

In addition to consent, there is a legitimate interest on our part to analyze the behavior of website visitors and thus to improve our offer technically and economically. With the help of web analytics, we detect errors of the website, can identify attacks and improve the

economic efficiency. The legal basis for this is Art. 6 Abs. 1 lit. f DSGVO (Legitimate **Interests**). Nevertheless, we use the tools only insofar as they have given consent.

Since web analytics tools use cookies, we also recommend that 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 statements of the respective tools.

Information on specific web analytics tools, if any, is provided in the following sections.

# **Google Optimize Privacy Policy**

We use Google Optimize, a website optimization tool, on our website. 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 from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Google uses so-called standard contractual clauses (= Art. 46, para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Google undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: https://eurlex.europa.eu/eli/dec impl/2021/914/oj?locale=de

The Google Ads Data Processing Terms, which correspond to the standard contractual clauses and are also applicable to Google Optimize, can be found at https://business.safety.google/adsprocessorterms/.

To learn more about the data processed through the use of Google Optimize, please see the Privacy Policy at <a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>.

# **Google Tag Manager Privacy Policy**

Google Tag Manager Privacy Policy Summary

Affected parties: Visitors to the website

- Purpose: Organization of the individual tracking tools
- Data processed: Google Tag Manager does not store any data itself. The data is collected by the tags of the web analytics tools used.
- Storage duration: depending on the web analytics tool used.
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

## What is Google Tag Manager?

For our website we use the Google Tag Manager of the 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. This Tag Manager is one of many helpful marketing products from Google. Through the Google Tag Manager, we can centrally incorporate and manage code sections from various tracking tools that we use on our website.

In this privacy policy, we want to explain in more detail what Google Tag Manager does, why we use it, and in what form data is processed.

Google Tag Manager is an organizational tool that allows us to include and manage website tags centrally and via a user interface. Tags are small sections of code that, for example, record (track) your activities on our website. For this purpose, JavaScript code sections are inserted into the source code of our page. The tags often come from Google-internal products such as Google Ads or Google Analytics, but tags from other companies can also be included and managed via the manager. Such tags perform different tasks. They can collect browser data, feed marketing tools with data, embed buttons, set cookies, and also track users across multiple websites.

## Why do we use Google Tag Manager for our website?

As the saying goes: organization is half the battle! And that of course also applies to the maintenance of our website. In order to make our website as good as possible for you and all the people who are interested in our products and services, we need various tracking tools such as Google Analytics. The collected data from these tools show us what you are most interested in, where we can improve our services and which people we should still show our offers to. And for this tracking to work, we need to embed appropriate JavaScript codes into our website. In principle, we could include each code section of each tracking tool separately in our source code. However, this requires a relatively large amount of time and it's easy to lose track. That's why we use the Google Tag Manager. We can easily incorporate the necessary scripts and manage them from one place. Moreover, Google Tag Manager offers an easy-to-use interface and you don't need any programming skills. This is how we manage to keep order in our tag jungle.

# What data is stored by Google Tag Manager?

The Tag Manager itself is a domain that does not set any cookies or store any data. It acts as a mere "manager" of the implemented tags. The data is collected by the individual tags of the various web analytics tools. The data is virtually passed through to the individual tracking tools in the Google Tag Manager and is not stored.

However, the situation is quite different with the embedded tags of the various web analysis tools, such as Google Analytics. Depending on the analysis tool, various data about your web behavior is usually collected, stored and processed with the help of cookies. For this, please read our privacy texts on the individual analysis and tracking tools that we use on our website.

In the Tag Manager account settings, we have allowed Google to receive anonymized data from us. However, this is only the use and usage of our Tag Manager and not your data stored via the code sections. We allow Google and others to receive selected data in anonymized form. We thus consent to the anonymous sharing of our website data. Which summarized and anonymous data is forwarded exactly, we could not find out - despite long research. In any case, Google deletes all information that could identify our website. Google combines the data with hundreds of other anonymous website data and creates user trends as part of benchmarking measures. Benchmarking compares our own results with those of our competitors. Processes can be optimized on the basis of the information collected.

## How long and where is the data stored?

When Google stores data, this data is stored on Google's own servers. The servers are distributed all over the world. Most of them are located in America. At <a href="https://www.google.com/about/datacenters/locations/?hl=de">https://www.google.com/about/datacenters/locations/?hl=de</a> you can read exactly where the Google servers are located.

How long the individual tracking tools store data from you can be found in our individual privacy texts for the individual tools.

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

The Google Tag Manager itself does not set cookies, but manages tags from various tracking websites. In our privacy texts for the individual tracking tools, you will find detailed information on how to delete or manage your data.

Please note that when using this tool, data from you may also be stored and processed outside the EU. Most third countries (including the USA) are not considered secure under current European data protection law. Data to insecure third countries may therefore not simply be transferred, stored and processed there unless there are suitable safeguards (such as EU standard contractual clauses) between us and the non-European service provider.

## Legal basis

The use of Google Tag Manager requires your consent, which we have obtained with our cookie popup. According to **Art. 6 Abs. 1 lit. a DSGVO (consent)** this consent constitutes the legal basis for the processing of personal data as it may occur during the collection by web analytics tools.

In addition to consent, there is a legitimate interest on our part to analyze the behavior of website visitors and thus improve our offer technically and economically. With the help of Google Tag Managers can improve the economic efficiency. The legal basis for this is **Art. 6 Abs. 1 lit. f DSGVO (BLegitimate Interests)**. Nevertheless, we use the Google Tag Manager only insofar as you have given consent.

Google also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Google uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Google undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The Google Ads Data Processing Terms, which correspond to the standard contractual clauses and are also applicable to Google Tag Manager, can be found at <a href="https://business.safety.google/adsprocessorterms/">https://business.safety.google/adsprocessorterms/</a>.

If you want to learn more about Google Tag Manager, we recommend the FAQs at <a href="https://support.google.com/tagmanager/?hl=de#topic=3441530">https://support.google.com/tagmanager/?hl=de#topic=3441530</a>.

# **GoSquared Analytics Privacy Policy**

We use GoSquared Analytics, a website analytics software, on our website. The service provider is the British company Go Squared Ltd, 3 Barn Hawe, High Street, Edenbridge, Kent, England. You can learn more about the data processed through the use of GoSquared Analytics in the Privacy Policy at <a href="https://www.gosquared.com/legal/privacy/">https://www.gosquared.com/legal/privacy/</a>.

# **Email marketing introduction**

#### **Email Marketing Summary**

- Affected parties: Newsletter subscribers
- Purpose: direct advertising by e-mail, notification of system-relevant events.
- Processed data: Data entered during registration, but at least the e-mail address. You can find more details on this in the respective email marketing tool used.
- Storage period: duration of the existence of the subscription
- Legal basis: Art. 6 para. 1 lit. a DSGVO (consent), Art. 6 para. 1 lit. f DSGVO (legitimate interests).

## What is email marketing?

In order to keep you always up to date, we also use the possibility of e-mail marketing. If you have agreed to receive our e-mails or newsletters, your data will also be processed and stored. E-mail marketing is a sub-area of online marketing. It involves sending news or general information about a company, products or services by e-mail to a specific group of people who are interested in them.

If you want to participate in our email marketing (mostly via newsletter), you usually just have to register with your email address. To do this, you fill out an online form and send it off. However, it may also happen that we ask you for your salutation and name, for example, so that we can also write to you personally.

Basically, the registration for newsletters works with the help of the so-called "double optin procedure". After you have registered for our newsletter on our website, you will receive an e-mail via which you confirm the newsletter registration. This ensures that the e-mail address belongs to you and that no one has registered with a third-party e-mail address. We or a notification tool we use logs each individual subscription. This is necessary so that we can also prove the legally correct registration process. As a rule, the time of registration, the time of the registration confirmation and your IP address are stored. In addition, it is also logged when you make changes to your stored data.

## Why do we use email marketing?

Of course, we want to stay in touch with you and always present you with the most important news about our company. To do this, we use, among other things, e-mail marketing - often just referred to as "newsletters" - as an essential part of our online marketing. Provided you agree to this or it is legally permitted, we will send you newsletters, system e-mails or other notifications by e-mail. When we use the term "newsletter" in the following text, we mainly mean regularly sent e-mails. Of course, we do not want to bother you in any way with our newsletters. That's why we really always try to provide only relevant and interesting content. For example, you will learn more about our company, our services or products. Since we are always improving our offers, our newsletter will also tell you when there is news or when we are offering special, lucrative promotions. If we use a service provider that offers a professional mailing tool for our e-

mail marketing, we do so in order to be able to offer you fast and secure newsletters. The purpose of our email marketing is basically to inform you about new offers and also to get closer to our business goals.

#### What data is processed?

When you become a subscriber to our newsletter via our website, you confirm by e-mail that you are a member of an e-mail list. In addition to IP address and e-mail address, your title, name, address and telephone number may also be stored. However, only if you agree to this data storage. The data marked as such are necessary for you to participate in the service offered. Providing this information is voluntary, but failure to provide it will result in you not being able to use the service. In addition, information about your device or your preferred content on our website may be stored. You can find out more about the storage of data when you visit a website in the section "Automatic data storage". We record your declaration of consent so that we can always prove that this complies with our laws.

#### **Duration of data processing**

If you unsubscribe your e-mail address from our e-mail/newsletter distribution list, we may store your address for up to three years based on our legitimate interests so that we can still prove your consent at that time. We may only process this data if we need 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 deletion request at any time. If you permanently object to the consent, we reserve the right to store your e-mail address in a blacklist. As long as you have voluntarily subscribed to our newsletter, we will of course also keep your e-mail address.

## Right of objection

You have the option to cancel your newsletter subscription at any time. To do this, you only need to revoke your consent to the newsletter subscription. This usually only takes a few seconds or one or two clicks. Most of the time, you will find a link to cancel your newsletter subscription right at the end of each email. If you really can't find the link in the newsletter, please contact us by mail and we will cancel your newsletter subscription immediately.

## Legal basis

The sending of our newsletter is based on your **consent** (Article 6 para. 1 lit. a DSGVO). This means that we may only send you a newsletter if you have actively registered for it beforehand. If applicable, we may also send you advertising messages on the basis of Section 7 (3) of the German Unfair Competition Act (UWG), provided that you have become our customer and have not objected to the use of your e-mail address for direct advertising.

Information about specific email marketing services and how they process personal data, if any, is provided in the following sections.

# **SendGrid Privacy Policy**

We use SendGrid, an e-mail delivery service, on our website. The service provider is the American company Twilio Inc, 889 Winslow St, Redwood City, California 94063, USA.

SendGrid also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

SendGrid uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing with recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data comply with European data protection standards even if they are transferred to third countries (such as the USA) and stored there. Through these clauses, SendGrid undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The Data Processing Addendum, which corresponds to the standard contractual clauses, can be found at <a href="https://www.twilio.com/legal/data-protection-addendum">https://www.twilio.com/legal/data-protection-addendum</a>.

To learn more about the data processed through the use of SendGrid, please see the Privacy Policy at <a href="https://www.twilio.com/legal/privacy.">https://www.twilio.com/legal/privacy.</a>

# **MailChimp Privacy Policy**

#### **MailChimp Privacy Policy Summary**

- Affected parties: Newsletter subscribers
- Purpose: direct advertising by e-mail, notification of system-relevant events.
- Processed data: Data entered during registration but at least the e-mail address.
- Storage period: duration of the existence of the subscription
- Legal basis: Art. 6 para. 1 lit. a DSGVO (consent), Art. 6 para. 1 lit. f DSGVO (legitimate interests).

# What is MailChimp?

Like many other websites, we also use the services of the newsletter company MailChimp on our website. The operator of MailChimp is the company The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA. Thanks to MailChimp, we can send you interesting news very easily via newsletter. With MailChimp, we don't have to install anything and can still draw from a pool of really useful features. In the following, we will go into more detail about this email marketing service and inform you about the most important privacy-relevant aspects.

MailChimp is a cloud-based newsletter management service. "Cloud-based" means that we do not need to install MailChimp on our own computer or server. Instead, we use the service via an IT infrastructure - which is available over the Internet - on an external server. This way of using a software is also called SaaS (Software as a Service). The following graphic shows schematically how MailChimp distributes emails to newsletter recipients.

With MailChimp we can choose from a wide range of different email types. Depending on what we want to achieve with our newsletter, we can run single campaigns, regular campaigns, autoresponders (automatic emails), A/B tests, RSS campaigns (sending in predefined time and frequency) and follow-up campaigns.

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

Basically, we use a newsletter service to keep in touch with you. We want to tell you what's new with us or what attractive offers we currently have in our program. For our marketing activities we always look for the simplest and best solutions. And for this reason we have also chosen the newsletter management service from MailChimp. Although the software is very easy to use, it offers a large number of helpful features. Thus, we can design interesting and beautiful newsletters in just a short time. Through the design templates offered, we design each newsletter completely individually and thanks to the "Responsive Design", our content is also displayed legibly and beautifully on your smartphone (or other mobile device).

Through tools such as the A/B test or the extensive analysis options, we see very quickly how our newsletters are received by you. This allows us to react if necessary and improve our offer or our services.

Another advantage is the "cloud system" of MailChimp. The data is not stored and processed directly on our server. We can retrieve the data from external servers and save our storage space in this way. In addition, the maintenance effort is significantly reduced.

# What data is stored by MailChimp?

Rocket Science Group LLC (MailChimp) maintains online platforms that allow us to contact you (if you have subscribed to our newsletter). When you become a subscriber to our newsletter via our website, you confirm by email that you are a member of a MailChimp email list. So that MailChimp can also prove that you have subscribed to the

"list provider", the date of subscription and your IP address are stored. Furthermore, MailChimp stores your email address, name, physical address and demographic information, such as language or location.

This information is used to send you emails and enable certain other MailChimp features (such as newsletter evaluation).

MailChimp also shares information with third parties to provide better services. MailChimp also shares some information with third-party advertising partners to better understand its customers' interests and concerns in order to provide more relevant content and targeted advertising.

Through so-called "web beacons" (these are small graphics in HTML emails) MailChimp can determine whether the email has arrived, whether it has been opened and whether links have been clicked. All this information is stored on the MailChimp servers. This gives us statistical evaluations and allows us to see exactly how well our newsletter was received by you. This way we can adapt our offer much better to your wishes and improve our service.

MailChimp may also use this data to improve its own service. This means, for example, that the dispatch can be technically optimized or the location (country) of the recipients can be determined.

The following cookies can be set by MailChimp. This is not a complete cookie list, but rather an exemplary selection:

Name: AVESTA ENVIRONMENT

Value:Prod

**Purpose:** This cookie is necessary to provide the Mailchimp services. It is always set when a user registers for a newsletter mailing list.

Expiration date: after end of session

Name: ak bmsc

Value:F1766FA98C9BB9DE4A39F70A9E5EEAB55F6517348A7000001321938052-3

**Purpose:** The cookie is used to distinguish a human from a bot. This way, secure reports about the usage of a website can be created.

**Expiration date:** after 2 hours

Name: bm sv

Value: A5A322305B4401C2451FC22FFF547486~FEsKGvX8eovCwTeFTzb8//I3ak2Au...

**Purpose:** The cookie is from MasterPass Digital Wallet (a MasterCard service) and is used to offer a visitor a virtual payment transaction securely and easily. For this purpose, the user is anonymously identified on the website.

Expiration date: after 2 hours

Name: \_abck

Value:8D545C8CCA4C3A50579014C449B045321938052-9

**Purpose:** We could not find out more information about the purpose of this cookie.

**Expiration date:** after one year

Sometimes it may happen that you open our newsletter via a specified link for better display. This is the case, for example, if your email program does not work or the newsletter is not displayed properly. The newsletter is then displayed via a MailChimp website. MailChimp also uses cookies (small text files that store data on your browser) on its own websites. In the process, personal data may be processed by MailChimp and its partners (e.g. Google Analytics). This data collection is the responsibility of MailChimp and we have no influence on it. In MailChimp's "Cookie Statement" (at: <a href="https://mailchimp.com/legal/cookies/">https://mailchimp.com/legal/cookies/</a>) you can find out exactly how and why the company uses cookies.

# How long and where is the data stored?

Since MailChimp is an American company, all collected data is also stored on American servers.

In principle, the data remains permanently stored on MailChimp's servers and is only deleted when a request is made by you. You can have us delete your contact. This permanently removes all your personal data for us and anonymizes you in the MailChimp reports. However, you can also request MailChimp to delete your data directly. Then all your data will be removed there and we will receive a notification from MailChimp. After we receive the email, we have 30 days to delete your contact from all connected integrations.

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

You can withdraw your consent to receive our newsletter at any time within the received email by clicking on the link at the bottom. Once you have unsubscribed by clicking on the unsubscribe link, your data will be deleted from MailChimp.

If you reach a MailChimp website via a link in our newsletter and cookies are set in your browser, you can delete or deactivate and manage these cookies at any time. Under the section "Cookies" you will find the corresponding links to the respective instructions of the most popular browsers.

If you do not want to have cookies in principle, you can set up your browser so that it always informs you when a cookie is to be set. This way, you can decide for each individual cookie whether you allow it or not.

#### Legal basis

The sending of our newsletter by MailChimp is based on your **consent** (Artikel 6 Abs. 1 lit. a DSGVO). This means that we may only send you a newsletter if you have actively registered for it beforehand. If consent is not required, then the newsletter is sent on the basis of **legitimate interest in** direct marketing (Article 6 (1) (f)), provided this is legally permitted. We record your registration process so that we can always prove that it complies with our laws.

MailChimp also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of the data processing.

MailChimp uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data comply with European data protection standards even if they are transferred to third countries (such as the USA) and stored there. Through these clauses, MailChimp undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The Mailchimp data processing terms and conditions (Data Processing Addendum), which correspond to the standard contractual clauses, can be found at <a href="https://mailchimp.com/legal/data-processing-addendum/#Annex\_C\_-">https://mailchimp.com/legal/data-processing-addendum/#Annex\_C\_-</a>
\_ Standard Contractual Clauses.

You can find out more about MailChimp's use of cookies at <a href="https://mailchimp.com/legal/cookies/">https://mailchimp.com/legal/cookies/</a>, and information about data protection at MailChimp (Privacy) can be found at <a href="https://www.intuit.com/privacy/statement/">https://www.intuit.com/privacy/statement/</a>

# MailChimp order data processing contract

We have concluded an order data processing contract (Data Processing Addendum) with MailChimp. This contract serves to safeguard your personal data and ensures that MailChimp adheres to the applicable data protection regulations and does not disclose your personal data to third parties.

For more information on this contract, visit <a href="https://mailchimp.com/legal/data-processing-addendum/">https://mailchimp.com/legal/data-processing-addendum/</a>.

# **Messenger & Communication Introduction**

#### **Messenger & Communication Privacy Policy Summary**

- Affected parties: Visitors to the website
- Purpose: Contact inquiries and general communication between us and you.
- Processed data: Data such as name, address, e-mail address, telephone number, general content data, IP address if applicable.

You can find more details about this in the respective tools used.

- Storage duration: depending on the messenger & communication functions used
- Legal basis: Art. 6 para. 1 lit. a DSGVO (consent), Art. 6 para. 1 lit. f DSGVO (legitimate interests), Art. 6 para. 1 p. 1 lit. b. DSGVO (contractual or pre-contractual obligations).

## What are messenger & communication functions?

We offer various options on our website (such as messenger and chat functions, online or contact forms, e-mail, telephone) to communicate with us. In this context, your data will also be processed and stored to the extent necessary to respond to your inquiry and our subsequent measures.

In addition to classic means of communication such as e-mail, contact forms or telephone, we also use chats or messengers. The most commonly used messenger function at present is WhatsApp, but there are of course many different providers that offer messenger functions specifically for websites. If content is encrypted end-to-end, this is indicated in the individual privacy texts or in the privacy policy of the respective provider. End-to-end encryption means nothing other than that content of a message itself is not visible to the provider. However, information about your device, location settings and other technical data can still be processed and stored.

# Why do we use messenger & communication features?

Communication possibilities with you are of great importance for us. After all, we want to talk to you and answer all possible questions about our service in the best possible way. Well-functioning communication is an important part of our service. With the convenient messenger & communication functions, you can always choose the ones you prefer. In exceptional cases, however, we may not be able to answer certain questions via chat or messenger. This is the case, for example, when it comes to internal contractual matters. In this case, we recommend other communication options such as e-mail or telephone.

We generally assume that we remain responsible under data protection law, even if we use services of a social media platform. However, the European Court of Justice has ruled that in certain cases the operator of the social media platform may be jointly responsible with us within the meaning of Art. 26 DSGVO. Insofar as this is the case, we point this out separately and work on the basis of an agreement in this regard. The essence of the agreement is reproduced below for the platform concerned.

Please note that when using our built-in elements, data of you may also be processed outside the European Union, as many providers, for example Facebook Messenger or WhatsApp are American companies. This may make it less easy for you to claim or enforce your rights regarding your personal data.

## What data is processed?

Exactly which data is stored and processed depends on the respective provider of the messenger & communication functions. Basically, it is data such as name, address, phone number, email address and content data such as all information you enter in a contact form. In most cases, information about your device and the IP address are also stored. Data that is collected via a messenger - & communication function is also stored on the servers of the providers.

If you want to know exactly what data is stored and processed by the respective providers and how you can object to the data processing, you should carefully read the respective privacy policy of the company.

# How long is data stored?

How long the data is processed and stored depends primarily on the tools we use. You can learn more about the data processing of the individual tools below. The privacy statements of the providers usually state exactly which data is stored and processed and for how long. In principle, personal data is only processed for as long as is necessary to provide our services. If data is stored in cookies, the storage period varies greatly. The data can be deleted immediately after leaving a website, but it can also remain stored for several years. Therefore, you should look at each individual cookie in detail if you want to know more about the data storage. In most cases, you will also find informative information about the individual cookies in the privacy statements of the individual providers.

# Right of objection

You also have the right and the possibility 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 collection through cookies by managing, disabling or deleting cookies in your browser. For more information, please refer to the consent section.

Since Messenger- & Communication functions may use cookies, we also recommend that 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 statements of the respective tools.

## Legal basis

If you have consented that data from you can be processed and stored by integrated messenger- & communication functions, this consent is considered the legal basis for data processing (Art. 6 Abs. 1 lit. a DSGVO). We process your request and manage your data in the context of contractual or pre-contractual relationships in order to fulfill our pre-contractual and contractual obligations or to respond to requests. The basis for this is Art. 6 Abs. 1 S. 1 lit. b. DSGVO. In principle, your data will also be stored and processed on the basis of our legitimate interest (Art. 6 Abs. 1 lit. f DSGVO) in fast and good communication with you or other customers and business partners, if consent has been given.

# Facebook privacy policy

#### **Facebook Privacy Policy Summary**

- Affected parties: Visitors to the website
- Purpose: Optimization of our service performance
- Processed data: Data such as customer data, user behavior data, information about your device and your IP address.

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

- Storage duration: until the data is no longer useful for Facebook's purposes.
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

#### What are Facebook tools?

We use selected tools from Facebook 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 help of these tools we can offer you and people who are interested in our products and services the best possible offer.

If data is collected from you and forwarded via our embedded Facebook elements or via our Facebook page (Fanpage), both we and Facebook Ireland Ltd. are responsible for this. Facebook is solely responsible for the further processing of this data. Our joint obligations have also been 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> This states, for example, that we must clearly inform you about the use of Facebook tools on our site. Furthermore, we are also responsible for ensuring that the tools are securely integrated into our website in

accordance with data protection law. Facebook, on the other hand, is responsible for the data security of Facebook products, for example. If you have any questions about data collection and data processing by Facebook, you can contact the company directly. If you direct the question to us, we are obliged to forward it to Facebook.

Below we provide an overview of the different Facebook tools, what data is sent to Facebook and how you can delete this data.

Among many other products, Facebook also offers the so-called "Facebook Business Tools". This is the official name of Facebook. However, since the term is hardly known, we have decided to simply call them Facebook Tools. Among them are:

- Facebook-Pixel
- Facebook Login
- Account Kit
- APIs (Application Programming Interface)
- SDKs (collection of programming tools)
- Platform integrations
- Plugins
- Codes
- Specifications
- Documentations
- · Technologies and services

Through these tools, Facebook extends services and has the ability to obtain information about user activity outside of Facebook.

# Why do we use Facebook tools on our website?

We want to show our services and products only to people who are really interested in them. With the help of advertisements (Facebook ads), we can reach precisely these people. However, in order to show users suitable ads, Facebook needs information about people's wishes and needs. Thus, information about user behavior (and contact data) on our website is made available to the company. As a result, Facebook collects better user data and can show interested people the appropriate advertising about our products or services. The tools thus enable tailored advertising campaigns on Facebook.

Data about your behavior on our website is called "event data" by Facebook. This is also used for measurement and analysis services. Facebook can thus create "campaign reports" on our behalf about the impact of our advertising campaigns. Furthermore, analytics give us better insight into how you use our services, website or products. As a result, we use some of these tools to optimize your user experience on our website. For example, social plug-ins allow you to share content on our site directly on Facebook.

# What data is stored by Facebook tools?

By using individual Facebook tools, personal data (customer data) can be sent to Facebook. Depending on the tools used, customer data such as name, address, phone number and IP address may be sent.

Facebook uses this information to match the data with the data it itself has from you (if you are a Facebook member). Before customer data is transmitted to Facebook, a so-called "hashing" takes place. This means that a data record of any size is transformed into a character string. This also serves to encrypt data.

In addition to contact data, "event data" is also transmitted. Event data" refers to the information that we receive about you on our website. For example, which subpages you visit or which products you buy from us. Facebook does not share the information it receives with third parties (such as advertisers) unless it has explicit permission or is legally required to do so. "Event data" may also be associated with contact information. This allows Facebook to offer better personalized advertising. After the matching process already mentioned, Facebook deletes the contact data again.

In order to deliver ads in an optimized manner, Facebook uses Event Data only when it has been aggregated with other data (collected by Facebook in other ways). Facebook also uses this event data for security, protection, development, and research purposes. Much of this data is transferred to Facebook via cookies. Cookies are small text files used to store data or information in browsers. Depending on the tools you use and whether you are a Facebook member, different numbers of cookies are created in your browser. We go into more detail about individual Facebook cookies in the descriptions of each Facebook tool. General information about the use of Facebook cookies can also be found at <a href="https://www.facebook.com/policies/cookies">https://www.facebook.com/policies/cookies</a>.

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

Basically, Facebook stores data until it is no longer needed for its own services and Facebook products. Facebook has servers all over the world where its data is stored. However, customer data is deleted within 48 hours after it has been compared with its own user data.

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

In accordance with the Basic Data Protection Regulation, you have the right to information, correction, transferability and deletion of your data.

A complete deletion of the data will only occur if you delete your Facebook account completely. And this is how deleting your Facebook account works:

- 1) Click Settings on the right side of Facebook
- 2) Then click "Your Facebook information" in the left column.
- 3) Now click "Deactivation and deletion".

- 4) Now select "Delete account" and then click "Next and delete account".
- 5) Now enter your password, click "Next" and then click "Delete account".

The storage of data that Facebook receives via our site takes place, among other things, via cookies (e.g. for social plugins). In your browser, you can deactivate, delete or manage individual or all cookies. Depending on which browser you use, this works in different ways. Under the section "Cookies" you will find the corresponding links to the respective instructions of the most popular browsers.

If you do not want to have cookies in principle, you can set up your browser so that it always informs you when a cookie is to be set. This way, you can decide for each individual cookie whether you allow it or not.

#### Legal basis

If you have consented that data from you can be processed and stored by integrated Facebook tools, this consent is considered the legal basis for data processing (Art. 6 Abs. 1 lit. a DSGVO). In principle, your data will also be stored and processed on the basis of our legitimate interest (Art. 6 Abs. 1 lit. f DSGVO)in fast and good communication with you or other customers and business partners. Nevertheless, we only use the tools insofar as you have given your consent. Most social media platforms also set cookies in your browser to store data. That is why we recommend that you read our privacy text about cookies carefully and view Facebook's privacy policy or cookie policy.

Facebook also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Facebook uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Facebook undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

Facebook's data processing terms and conditions, which comply with the standard contractual clauses, can be found at <a href="https://www.facebook.com/legal/terms/dataprocessing">https://www.facebook.com/legal/terms/dataprocessing</a>.

We hope we have brought you closer to the most important information about the use and data processing by Facebook tools. If you want to learn more about how Facebook uses your data, we recommend that you read the data policies at <a href="https://www.facebook.com/about/privacy/update">https://www.facebook.com/about/privacy/update</a>.

So-called social plug-ins of the company Facebook Inc. are installed on our website. You can recognize these buttons by the classic Facebook logo, such as the "Like" button (the hand with raised thumb) or by a clear "Facebook Plug-in" label. A social plug-in is a small part of Facebook that is integrated into our site. Each plug-in has its own function. The most commonly used functions are the well-known "Like" and "Share" buttons.

The following social plug-ins are offered by Facebook:

- "Save"-Button
- "Like" button, share, send and quote
- Page plug-in
- Comments
- Messenger plug-in
- Embedded posts and video player
- Group plug-in

At <a href="https://developers.facebook.com/docs/plugins">https://developers.facebook.com/docs/plugins</a> you will find more detailed information on how the individual plug-ins are used. We use the social plug-ins on the one hand to offer you a better user experience on our site, and on the other hand because Facebook can optimize our advertisements.

If you have a Facebook account or have visited <a href="https://www.facebook.com/">https://www.facebook.com/</a> before, Facebook has already set at least one cookie in your browser. In this case, your browser sends information to Facebook via this cookie as soon as you visit our site or interact with social plug-ins (e.g. the "Like" button).

The information obtained is deleted or anonymized again within 90 days. According to Facebook, this data includes your IP address, which website you visited, the date, the time and other information concerning your browser.

To prevent Facebook from collecting a lot of data during your visit to our website and connecting it with Facebook data, you must log out of Facebook while visiting the website.

If you are not logged into Facebook or do not have a Facebook account, your browser sends less information to Facebook because you have fewer Facebook cookies. Nevertheless, data such as your IP address or which website you visit may be transmitted to Facebook. We would still like to explicitly point out that we do not know exactly about the exact content of the data. However, we try to inform you as best as possible about the data processing according to our current state of knowledge. You can also read how Facebook uses the data in the company's data policy at <a href="https://www.facebook.com/about/privacy/update">https://www.facebook.com/about/privacy/update</a>

The following cookies are set in your browser at least when you visit a website with social plug-ins from Facebook:

Name: dpr

Value: not specified

**Purpose:** This cookie is used to enable the social plug-ins on our website to function.

Expiration date: after end of session

Name: fr

Value: 0jieyh4321938052c2GnlufEJ9..Bde09j...1.0.Bde09j

**Purpose:** The cookie is also necessary for the plug-ins to work properly.

Expiration date: after 3 months

**Note:** These cookies were set after a test, even if you are not a Facebook member.

If you are logged in to Facebook, you can change your settings for advertisements yourself at <a href="https://www.facebook.com/adpreferences/advertisers/?">https://www.facebook.com/adpreferences/advertisers/?</a> entry\_product=ad\_settings\_screen If you are not a Facebook user, you can basically manage your usage-based online advertising at <a href="https://www.youronlinechoices.com/de/praferenzmanagement/?tid=321938052">https://www.youronlinechoices.com/de/praferenzmanagement/?tid=321938052</a> There you have the option to deactivate or activate providers.

If you want to learn more about Facebook's privacy policy, we recommend that you read the company's own data policy at <a href="https://www.facebook.com/policy.php?tip=321938052">https://www.facebook.com/policy.php?tip=321938052</a>.

#### Social media introduction

#### **Social Media Privacy Policy Summary**

Affected parties: Visitors to the website

Purpose: Presentation and optimization of our service performance, contact with visitors, interested parties, etc., advertising.

Processed data: Data such as phone numbers, email addresses, contact details, user behavior data, information about your device and your IP address.

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

Storage duration: depending on the social media platforms used

Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

#### What is social media?

In addition to our website, we are also active on various social media platforms. In this context, user data may be processed so that we can target users who are interested in us via the social networks. In addition, elements of a social media platform may also be embedded directly in our website. This is the case, for example, when you click on a socialled social button on our website and are redirected directly to our social media presence. So-called social media or social media are websites and apps through which registered members can produce content, share content openly or in specific groups, and network with other members.

# Why do we use social media?

For years, social media platforms have been the place where people communicate and get in touch online. Our social media presences enable us to bring our products and services closer to prospective customers. The social media elements embedded on our website help you switch to our social media content quickly and without complications.

The data that is stored and processed through your use of a social media channel is primarily for the purpose of being able to perform web analyses. The aim of these analyses is to be able to develop more precise and personalized marketing and advertising strategies. Depending on your behavior on a social media platform, appropriate conclusions can be drawn about your interests with the help of the evaluated data and so-called user profiles can be created. This also enables the platforms to present you with tailored advertisements. In most cases, cookies are set in your browser for this purpose, which store data about your usage behavior.

We generally assume that we remain responsible under data protection law, even if we use services of a social media platform. However, the European Court of Justice has ruled that in certain cases the operator of the social media platform may be jointly responsible with us within the meaning of Art. 26 DSGVO. Insofar as this is the case, we point this out separately and work on the basis of an agreement in this regard. The essence of the agreement is then reproduced below for the platform concerned.

Please note that when using the social media platforms or our built-in elements, data about you may also be processed outside the European Union, as many social media channels, for example Facebook or Twitter, are American companies. This may make it less easy for you to claim or enforce your rights regarding your personal data.

## What data is processed?

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

All data collected via a social media platform is also stored on the servers of the providers. Thus, only the providers have access to the data and can give you the appropriate information or make changes.

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

## **Duration of data processing**

We will inform you about the duration of data processing below, provided we have further information on this. For example, the social media platform Facebook stores data until it is no longer needed for its own purpose. However, customer data that is matched with our own user data is already deleted within two days. In general, we only process personal data for as long as is absolutely necessary for the provision of our services and products. If it is required by law, for example in the case of accounting, this storage period may be exceeded.

## Right of objection

You also have the right and the possibility to revoke your consent to the use of cookies or third-party providers such as embedded social media elements at any time. This works either via our cookie management tool or via other opt-out functions. For example, you can also prevent data collection through cookies by managing, disabling or deleting cookies in your browser.

Since social media tools may use cookies, we also recommend that 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 statements of the respective tools.

## Legal basis

If you have consented that data from you can be processed and stored by integrated social media elements, this consent is considered the legal basis of the data processing (Art. 6 Abs. 1 lit. a DSGVO). In principle, if consent is given, your data will also be stored and processed on the basis of our legitimate interest(Art. 6 Abs. 1 lit. f DSGVO) in fast and good communication with you or other customers and business partners. Nevertheless, we only use the tools insofar as you have given your consent. Most social media platforms also set cookies in your browser to store data. That is why we recommend that you read our privacy text about cookies carefully and view the privacy policy or cookie policy of the respective service provider.

Information on specific social media platforms - if available - can be found in the following sections.

# Instagram privacy policy

#### **Instagram Privacy Policy Summary**

- Affected parties: Visitors to the website
- Purpose: Optimization of our service performance
- Processed data: Data such as user behavior data, information about your device, and your IP address.

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

- Storage period: until Instagram no longer needs the data for its purposes
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

## What is Instagram?

We have integrated Instagram functions on our website. Instagram is a social media platform of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA. Instagram has been a subsidiary of Facebook Inc. since 2012 and is one of the Facebook products. Embedding Instagram content on our website is called embedding. This allows us to show you content such as buttons, photos or videos from Instagram directly on our website. When you call up web pages on our website that have an Instagram function integrated, data is transmitted to Instagram, stored and processed. Instagram uses the same systems and technologies as Facebook. Your data is thus processed across all Facebook companies.

In the following, we want to give you a more detailed insight into why Instagram collects data, what kind of data it is and how you can largely control the data processing. Since Instagram belongs to Facebook Inc., we obtain our information from the Instagram policies on the one hand, but also from the Facebook data policies themselves on the other hand.

Instagram is one of the most popular social media networks in the world. Instagram combines the advantages of a blog with those of audiovisual platforms like YouTube or Vimeo. You can upload photos and short videos on "Insta" (as many of the users casually call the platform), edit them with various filters and also distribute them on other social networks. And if you don't want to be active yourself, you can just follow other interesting users.

# Why do we use Instagram on our website?

Instagram is the social media platform that has really gone through the roof in recent years. And of course we have also responded to this boom. We want you to feel as comfortable as possible on our website. That's why a varied preparation of our content is

a matter of course for us. Through the embedded Instagram features, we can enrich our content with helpful, funny or exciting content from the Instagram world. Since Instagram is a subsidiary of Facebook, the data collected can also serve us for personalized advertising on Facebook. This way, only people who are really interested in our products or services receive our ads.

Instagram also uses the collected data for measurement and analytics purposes. We get aggregate statistics and thus more insight about your likes and interests. It's important to note that these reports do not identify you personally.

#### What data is stored by Instagram?

When you come across one of our pages that have Instagram features (such as Instagram images or plug-ins) built in, your browser automatically connects to Instagram's servers. In the process, data is sent to Instagram, stored and processed. And this is regardless of whether you have an Instagram account or not. This includes information about our website, about your computer, about purchases made, about advertisements you see and how you use our offer. Furthermore, the date and time of your interaction with Instagram is also stored. If you have an Instagram account or are logged in, Instagram stores significantly more data about you.

Facebook distinguishes between customer data and event data. We assume that this is exactly the same for Instagram. Customer data are, for example, name, address, phone number and IP address. This customer data is only transmitted to Instagram after it has been hashed. Hashing means that a data record is transformed into a character string. This makes it possible to encrypt the contact data. In addition, the "event data" mentioned above is also transmitted. By "event data" Facebook - and consequently Instagram - understands data about your user behavior. It may also happen that contact data is combined with event data. The collected contact data is matched with the data that Instagram already has from you.

Via small text files (cookies), which are usually set in your browser, the collected data is transmitted to Facebook. Depending on the Instagram functions used and whether you yourself have an Instagram account, different amounts of data are stored.

We assume that Instagram's data processing works in the same way as Facebook's. This means that if you have an Instagram account or have visited <a href="www.instagram.com">www.instagram.com</a> Instagram has at least set a cookie. If this is the case, your browser sends info to Instagram via the cookie as soon as you come into contact with an Instagram function. After 90 days at the latest (after matching), this data is deleted again or anonymized. Although we have intensively studied Instagram's data processing, we cannot say exactly what data Instagram collects and stores.

Below we show you cookies that are set in your browser at least when you click on an Instagram feature (such as a button or an Insta image). In our test, we assume that you do not have an Instagram account. Of course, if you are logged in to Instagram, significantly more cookies are set in your browser.

These cookies were used in our test:

Name: csrftoken

Value: ""

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

requests. However, we could not find out more precisely.

Expiration date: after one year

Name: mid

Value: ""

Purpose: Instagram sets this cookie to optimize its own services and offers on and off

Instagram. The cookie sets a unique user ID.

**Expiration date:** after the end of the session

Name: fbsr\_321938052124024

Value: no data

**Purpose:** This cookie stores the log-in request for users of the Instagram app.

**Expiration date:** after the end of the session

Name: rur

Value: ATN

**Purpose:** This is an Instagram cookie that ensures functionality on Instagram.

**Expiration date:** after the end of the session

Name: urlgen

Value:: "{"194.96.75.33": 1901}:1iEtYv:Y833k2\_UjKvXgYe321938052"

**Purpose:** This cookie is used for Instagram's marketing purposes.

**Expiration date:** after the end of the session

Note: We cannot claim completeness here. Which cookies are set in individual cases

depends on the embedded features and your use of Instagram.

How long and where is the data stored?

Instagram shares the information it receives between Facebook companies with external partners and with people you connect with around the world. The data processing is done in compliance with its own data policy. Your data is distributed, among other things for security reasons, on Facebook servers around the world. Most of these servers are located in the USA.

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

Thanks to the Basic Data Protection Regulation, you have the right of access, portability, rectification and deletion of your data. You can manage your data in the Instagram settings. If you want to completely delete your data on Instagram, you must permanently delete your Instagram account.

And this is how the deletion of the Instagram account works:

First, open the Instagram app. On your profile page, go down and click on "Help section". Now you will get to the company's website. On the webpage, click "Manage account" and then click "Delete your account"

When you delete your account entirely, Instagram deletes posts such as your photos and status updates. Information that other people have shared about you does not belong to your account and consequently will not be deleted.

As mentioned above, Instagram stores your data primarily via cookies. You can manage, disable or delete these cookies in your browser. Depending on your browser, the management always works a bit differently. Under the section "Cookies" you will find the corresponding links to the respective instructions of the most popular browsers.

You can also basically set up your browser so that you are always informed when a cookie is to be set. Then you can always decide individually whether you want to allow the cookie or not.

## Legal basis

If you have consented that data from you can be processed and stored by integrated social media elements, this consent is considered the legal basis of the data processing (Art. 6 Abs. 1 lit. a DSGVO). In principle, your data will also be stored and processed on the basis of our legitimate interest (Art. 6 Abs. 1 lit. f DSGVO) in fast and good communication with you or other customers and business partners. Nevertheless, we only use the integrated social media elements insofar as you have given your consent. Most social media platforms also set cookies in your browser to store data. That is why we recommend that you read our privacy text about cookies carefully and view the privacy policy or cookie policy of the respective service provider.

Instagram and Facebook, respectively, also process data in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Facebook uses standard contractual clauses approved by the EU Commission (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing at recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. These clauses oblige Facebook to comply with the EU level of data protection when processing relevant data outside the EU as well. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the clauses here, among other places:

https://germany.representation.ec.europa.eu/index\_de.

We have tried to bring you closer to the most important information about Instagram's data processing. At <a href="https://help.instagram.com/519522125107875">https://help.instagram.com/519522125107875</a>

you can take a closer look at Instagram's data policies.

# **LinkedIn Privacy Policy**

#### **LinkedIn Privacy Policy Summary**

Affected parties: Visitors to the website

Purpose: Optimization of our service performance

Processed data: Data such as user behavior data, information about your device, and your IP address.

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

Storage period: the data is basically deleted within 30 days

Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

#### What is LinkedIn?

We use social plug-ins of the social media network LinkedIn, of the company LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA on our website. The social plug-ins can be feeds, sharing of content or links to our LinkedIn page. The social plug-ins are clearly marked with the familiar LinkedIn logo and allow, for example, interesting content to be shared directly via our website. For the European Economic Area and Switzerland, LinkedIn Ireland Unlimited Company Wilton Place in Dublin is responsible for data processing.

By embedding such plug-ins, data can be sent to LinkedIn, stored and processed there. In this privacy policy, we want to inform you about what data is involved, how the network uses this data and how you can manage or prevent the data storage.

LinkedIn is the largest social network for business contacts. Unlike Facebook, for example, the company focuses exclusively on building business contacts. Companies can present services and products on the platform and establish business relationships. Many people also use LinkedIn to look for jobs or to find suitable employees for their own company. In Germany alone, the network has over 11 million members. In Austria, there are around 1.3 million.

## Why do we use LinkedIn on our website?

We know how busy you are. You can't follow all the social media channels individually. Even if it would be worth it, as in our case. Because time and again we post interesting news or reports that are worth spreading. That's why we've made it possible on our website to share interesting content directly on LinkedIn or to link directly to our LinkedIn page. We consider built-in social plug-ins as an extended service on our website. The data that LinkedIn collects also helps us to show possible advertising measures only to people who are interested in our offer.

## What data is stored by LinkedIn?

Only through the mere integration of the social plug-ins LinkedIn does not store any personal data. LinkedIn calls this data generated by plug-ins passive impressions. However, when you click on a social plug-in, for example to share our content, the platform stores personal data as so-called "active impressions". And this is regardless of whether you have a LinkedIn account or not. If you are logged in, the collected data is assigned to your account.

Your browser establishes a direct connection to LinkedIn's servers when you interact with our plug-ins. In this way, the company logs various usage data. In addition to your IP address, this may include login data, device information, or information about your Internet or mobile provider. If you access LinkedIn services via your smartphone, your location (after you have allowed this) can also be determined. LinkedIn may also share this data in "hashed" form with third-party advertisers. Hashing means turning a record into a string of characters. This makes it possible to encrypt the data in such a way that people can no longer be identified.

Most data about your user behavior is stored in cookies. These are small text files that are usually set in your browser. LinkedIn may also use web beacons, pixel tags, display tags, and other device identifiers.

Various tests also show which cookies are set when a user interacts with a social plug-in. The data found cannot claim to be complete and only serves as an example. The following cookies were set without being logged in to LinkedIn:

Name: bcookie

Value: =2&34aab2aa-2ae1-4d2a-8baf-c2e2d7235c16321938052-

Purpose: The cookie is a so-called "browser ID cookie" and consequently stores your

identification number (ID).

Expiration date: After 2 years

Name: lang

Value: v=2&lang=de-de

**Purpose:** This cookie stores your preset or preferred language.

**Expiration date:** after end of session

Name: lidc

Value: 1818367:t=1571904767:s=AQF6KNnJ0G321938052...

Purpose: This cookie is used for routing. Routing records the ways you came to LinkedIn

and how you navigate through the website there.

Expiration date: after 24 hours

Name: rtc

Value: kt0lrv3NF3x3t6xvDgGrZGDKkX

**Purpose:** No further information could be obtained about this cookie.

Expiration date: after 2 minutes

Name: JSESSIONID

**Value:** ajax:3219380522900777718326218137

Purpose: This is a session cookie that LinkedIn uses to maintain anonymous user

sessions through the server.

Expiration date: after end of session

Name: bscookie

**Value:** "v=1&201910230812...

Purpose: This cookie is a security cookie. LinkedIn describes it as a Secure Browser ID

cookie.

**Expiration date:** after 2 years

Name: fid

Value: AQHj7li23ZBcqAAAA...

**Purpose:** No further information could be found about this cookie.

Expiration date: after 7 days

Note: LinkedIn also works with third-party providers. That is why we also detected the

two Google Analytics cookies \_ga and \_gat during our test.

## How long and where is the data stored?

In principle, LinkedIn retains your personal data for as long as the company deems it necessary to provide its own services. However, LinkedIn deletes your personal data when you delete your account. In some exceptional cases, LinkedIn retains some data in aggregate and anonymized form even after you delete your account. Once you delete your account, other people will not be able to see your data within one day. LinkedIn generally deletes data within 30 days. However, LinkedIn retains data if it is necessary due to legal obligation. Data that can no longer be assigned to individuals remain stored even after the account is closed. The data is stored on various servers in America and presumably also in Europe.

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

You have the right to access and also delete your personal data at any time. In your LinkedIn account you can manage, change and delete your data. In addition, you can also request a copy of your personal data from LinkedIn.

Here's how to access the account information in your LinkedIn profile:

In LinkedIn, click on your profile icon and select the "Settings and Privacy" section. Now click "Privacy" and then click "Change" in the "How LinkedIn uses your data" section. In just a short time, you will be able to download selected data about your web activity and account history.

You also have the option in your browser to prevent data processing by LinkedIn. As mentioned above, LinkedIn stores most data via cookies that are set in your browser. You can manage, deactivate or delete these cookies. Depending on which browser you have, the management works slightly differently. Under the section "Cookies" you will find the corresponding links to the respective instructions of the most popular browsers.

You can also basically set up your browser so that you are always informed when a cookie is to be set. Then you can always decide individually whether you want to allow the cookie or not.

## Legal basis

If you have consented that data from you can be processed and stored by integrated social media elements, this consent is considered the legal basis of the data processing (Art. 6 Abs. 1 lit. a DSGVO). In principle, your data will also be stored and processed on the basis of our legitimate interest (Art. 6 Abs. 1 lit. f DSGVO) in fast and good

communication with you or other customers and business partners. Nevertheless, we only use the integrated social media elements insofar as you have given your consent. Most social media platforms also set cookies in your browser to store data. That is why we recommend that you read our privacy text about cookies carefully and view the privacy policy or cookie policy of the respective service provider.

LinkedIn also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

LinkedIn uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data comply with European data protection standards even if they are transferred to third countries (such as the USA) and stored there. Through these clauses, LinkedIn undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

For more information about LinkedIn's standard contractual clauses, please visit <a href="https://de.linkedin.com/legal/l/dpa">https://de.linkedin.com/legal/l/dpa</a> or <a href="https://www.linkedin.com/legal/l/eu-sccs">https://www.linkedin.com/legal/l/eu-sccs</a>.

We have tried to bring you closer to the most important information about data processing by LinkedIn. At <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a> you can learn even more about the data processing of the social media network LinkedIn.

# Online marketing introduction

#### Online Marketing Privacy Policy Summary

- Affected parties: Visitors to the website
- Purpose: Evaluation of visitor information to optimize the web offer.
- Processed data: Access statistics, which include data such as access locations, device data, access duration and time, navigation behavior, click behavior, and IP addresses. Personal data such as name or email address may also be processed. More details on this can be found with the respective online marketing tool used.
- Storage duration: depending on the online marketing tools used.

Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit.f DSGVO (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 closing a deal. Furthermore, our online marketing measures aim to draw people's attention to our website. In order to be able to show our offering to many interested people, we therefore engage in online marketing. This usually involves online advertising, content marketing or search engine optimization. To enable us to use online marketing efficiently and in a targeted manner, personal data is also stored and processed. On the one hand, the data helps us to show our content only to those people who are really interested in it, and on the other hand, we can measure the advertising success of our online marketing measures.

## Why do we use online marketing tools?

We want to show our website to every person who is interested in our offer. We are aware that this is not possible without consciously set measures. That's why we do online marketing. There are various tools that make it easier for us to work on our online marketing measures and, in addition, always provide suggestions for improvement via data. This allows us to target our campaigns more precisely to our target group. So the purpose of these online marketing tools we use is ultimately to optimize our offering.

## What data is processed?

In order for our online marketing to work and the success of the measures can be measured, user profiles are created and data is stored, for example, in cookies (these are small text files). With the help of this data, we can not only place advertisements in the classic sense, but also directly on our website, display our content in the way you prefer. For this purpose, there are various third-party tools that offer these functions and accordingly also collect and store data from you. In the named cookies are stored, for example, which web pages you have visited on our website, how long you have viewed these pages, which links or buttons you click or from which website you have come to us. In addition, technical information may also be stored. For example, your IP address, which browser you use, from which device you visit our website or the time when you accessed our website and when you left it again. If you have consented that we may also determine your location, we may also store and process this.

Your IP address is stored in pseudonymized form (i.e., shortened). Unique data that directly identifies you as a person, such as name, address or e-mail address, is also only stored in pseudonymized form as part of the advertising and online marketing processes. We can therefore not identify you as a person, but we have only the pseudonymized stored information in the user profiles.

The cookies may also be deployed, analyzed and used for advertising purposes on other websites that use the same advertising tools. The data may then also be stored on the servers of the advertising tools providers.

In exceptional cases, unique data (name, e-mail address, etc.) may also be stored in the user profiles. This data is stored, for example, if you are a member of a social media channel that we use for our online marketing measures and the network links previously received data with the user profile.

With all the advertising tools we use, which stores data from you on their servers, we only ever receive aggregate information and never data that makes you recognizable as an individual. The data only shows how well set advertising measures worked. For example, we see which measures have persuaded you or other users to come to our website and purchase a service or product there. Based on the analyses, we can improve our advertising offer in the future and adapt it even more precisely to the needs and wishes of interested persons.

## **Duration of data processing**

We will inform you about the duration of data processing below, provided we have further information on this. In general, we process personal data only as long as it is absolutely necessary for the provision of our services and products. Data that is stored in cookies is stored for different lengths of time. Some cookies are deleted as soon as you leave the website, others may be stored in your browser for several years. In the respective privacy statements of the individual providers, you will usually receive detailed information about the individual cookies used by the provider.

# Right of objection

You also have the right and the possibility 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 collection through cookies by managing, disabling or deleting cookies in your browser. The lawfulness of the processing until the revocation remains unaffected.

Since online marketing tools may generally use cookies, we also recommend that 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 statements of the respective tools.

# Legal basis

If you have consented that third-party providers may be used, the legal basis of the corresponding data processing is this consent. According to **Art. 6 Abs. 1 lit. a DSGVO** (**consent**) this consent constitutes the legal basis for the processing of personal data as it may occur when collected by online marketing tools.

We also have a legitimate interest in measuring online marketing measures in anonymized form in order to optimize our offer and our measures with the help of the data obtained. The corresponding legal basis for this is **Art. 6 Abs. 1 lit. f DSGVO (Legitimate Interests)**. Nevertheless, we only use the tools if you have given your consent.

Information on specific online marketing tools - if available - can be found in the following sections.

# **Facebook Custom Audiences privacy policy**

We use Facebook Custom Audiences, a server-side event tracking tool, on our website. The service provider is the American company Facebook Inc. The company responsible for the European region is Facebook Ireland Ltd (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland).

Facebook also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Facebook uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Facebook undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

Facebook's data processing terms and conditions, which comply with the standard contractual clauses, can be found at <a href="https://www.facebook.com/legal/terms/dataprocessing">https://www.facebook.com/legal/terms/dataprocessing</a>.

You can learn more about the data processed through the use of Facebook Custom Audiences in the Privacy Policy at <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>.

# Google Ads (Google AdWords) Conversion Tracking Privacy Policy

Google Ads (Google AdWords) Conversion Tracking Privacy Policy Summary

Affected parties: Visitors to the website

- Purpose: economic success and the optimization of our service performance.
- Processed data: Access statistics, which include data such as access locations, device data, access duration and time, navigation behavior, click behavior, and IP addresses. Personal data such as name or e-mail address may also be processed.
- Storage period: Conversion cookies usually expire after 30 days and do not transmit any personal data
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit.f DSGVO (Legitimate Interests).

## What is Google Ads conversion tracking?

We use Google Ads (formerly Google AdWords) as an online marketing measure to promote our products and services. In this way, we want to draw more people's attention to the high quality of our offerings on the Internet. As part of our advertising measures through Google Ads, we use the conversion tracking of the company Google Inc. on our website. In Europe, however, the company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. With the help of this free tracking tool, we can better adapt our advertising offer to your interests and needs. In the following article, we will go into more detail about why we use conversion tracking, what data is stored in the process, and how you can prevent this data storage.

Google Ads (formerly Google AdWords) is the in-house online advertising system of Google Inc. We are convinced of the quality of our offer and want as many people as possible to get to know our website. In the online sector, Google Ads offers the best platform for this. Of course, we also want to get an accurate overview of the cost-benefit factor of our advertising campaigns. That's why we use the conversion tracking tool from Google Ads.

But what is a conversion actually? A conversion occurs when you go from being a purely interested website visitor to an active visitor. This happens whenever you click on our ad and then perform another action, such as visiting our website. With Google's conversion tracking tool, we record what happens after a user clicks on our Google Ads ad. For example, we can see whether products are purchased, services are used or whether users have signed up for our newsletter.

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

We use Google Ads to draw attention to our offer on other websites as well. The goal is to ensure that our advertising campaigns really only reach those people who are interested in our offers. With the conversion tracking tool we see which keywords, ads, ad groups and campaigns lead to the desired customer actions. We see how many customers interact with our ads on a device and then make a conversion. Through this data, we can calculate our cost-benefit factor, measure the success of individual advertising measures

and consequently optimize our online marketing measures. We can also use the data obtained to make our website more interesting for you and adapt our advertising offer even more individually to your needs

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

We have included a conversion tracking tag or code snippet on our website to better analyze certain user actions. If you now click on one of our Google Ads ads, the cookie "Conversion" is stored on your computer (mostly in the browser) or mobile device by a Google domain. Cookies are small text files that store information on your computer.

Here are the data of the most important cookies for conversion tracking by Google:

Name: Conversion

Value: EhMI\_aySuoyv4gIVled3Ch0llweVGAEgt-mr6aXd7dYISAGQ321938052-3

**Purpose:** This cookie stores every conversion you make on our site after coming to us through a Google Ad.

Expiration date: nach 3 Monaten

Name: gac

#### value

1.1558695989.EAlalQobChMliOmEgYO04glVj5AYCh2CBAPrEAAYASAAEglYQfD BwE

**Purpose:** This cookie stores every conversion you make on our site after coming to us through a Google Ad.

Expiration date: after 3 months

**Note:** The cookie \_gac only appears in connection with Google Analytics. The above list does not claim to be complete, as Google also uses other cookies for analytical evaluation.

As soon as you complete an action on our website, Google recognizes the cookie and saves your action as a so-called conversion. As long as you surf our website and the cookie has not yet expired, we and Google recognize that you have found us via our Google Ads ad. The cookie is read and sent back to Google Ads with the conversion data. It is also possible that other cookies are used to measure conversions. The conversion tracking of Google Ads can be further refined and improved with the help of Google Analytics. For ads that Google displays in various locations on the web, cookies named "\_\_gads" or "\_gac" may be set under our domain. Since September 2017, various campaign information from analytics.js is stored with the \_gac cookie. The cookie stores this data as soon as you visit one of our pages for which the automatic tagging of Google Ads has been set up. Unlike cookies set for Google domains, Google can only read these conversion cookies when you are on our website. We do not collect or receive any

personal data. We receive a report from Google with statistical evaluations. For example, we learn the total number of users who clicked on our ad and we see which advertising measures were well received.

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

At this point, we would like to point out that we have no influence on how Google uses the collected data. According to Google, the data is encrypted and stored on secure servers. In most cases, conversion cookies expire after 30 days and do not transmit any personal data. The cookies named "Conversion" and "\_gac" (which is used in conjunction with Google Analytics) have an expiration date of 3 months.

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

You have the option not to participate in Google Ads conversion tracking. If you deactivate the Google conversion tracking cookie via your browser, you block conversion tracking. In this case, you will not be included in the statistics of the tracking tool. You can change the cookie settings in your browser at any time. For each browser, this works slightly differently. Under the section "Cookies" you will find the corresponding links to the respective instructions of the most popular browsers.

If you do not want to have cookies in principle, you can set up your browser so that it always informs you when a cookie is to be set. In this way, you can decide for each individual cookie whether you allow the cookie or not. Downloading and installing this browser plug-in at <a href="https://support.google.com/ads/answer/7395996">https://support.google.com/ads/answer/7395996</a> will also disable all "advertising cookies". Keep in mind that by disabling these cookies you do not prevent the ads, only the personalized ads.

#### Legal basis

If you have consented to the use of Google Ads Conversion Tracking, the legal basis for the corresponding data processing is this consent. According to **Art. 6 Abs. 1 lit. a DSGVO (consent)** this consent constitutes the legal basis for the processing of personal data as it may occur during the collection by Google Ads Conversion Tracking.

We also have a legitimate interest in using Google Ads Conversion Tracking to optimize our online service and our marketing measures. The corresponding legal basis for this is **Art. 6 Abs. 1 lit. f DSGVO (Legitimate Interests)**. Nevertheless, we only use Google Ads Conversion Tracking if you have given your consent.

Google also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Google uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Google undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The data processing terms for Google advertising products (Google Ads Controller Data Protection Terms), which correspond to the standard contractual clauses and are also applicable to Google Ads, can be found at <a href="https://business.safety.google/adscontrollerterms/">https://business.safety.google/adscontrollerterms/</a>.

If you would like to learn more about Google's privacy policy, we recommend Google's general privacy policy: <a href="https://policies.google.com/privacy?hl=de">https://policies.google.com/privacy?hl=de</a>.

## Google AdSense Privacy Policy

## Google AdSense Privacy Policy Summary

- Affected parties: Visitors to the website
- Purpose: economic success and the optimization of our service performance.
- Processed data: Access statistics, which include data such as access locations, device data, access duration and time, navigation behavior, click behavior, and IP addresses. Personal data such as name or e-mail address may also be processed
- Storage duration: depending on the cookies used and data stored
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit.f DSGVO (Legitimate Interests).

## What is Google AdSense?

We use Google AdSense on this website. This is an advertising program of the company Google Inc. In Europe, the company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. Google AdSense allows us to display ads on this website that match our theme. In this way, we offer you ads that ideally represent a real added value for you. In the course of this privacy text about Google AdSense, we explain why we use Google AdSense on our website, which of your data is processed and stored, and how you can prevent this data storage.

The Google AdSense advertising program has been around since 2003, but unlike Google AdS (formerly Google AdWords), you can't place ads yourself. Google AdSense displays advertisements on websites, such as ours. The biggest advantage of this advertising service compared to some others is that Google AdSense only shows you ads that match our content. Google has its own algorithm that calculates which ads you will see. Of course, we only want to show you ads that you are interested in and that add value. Google checks which ads are suitable for our website and for our users based on your interests or user behavior and based on our offer. At this point, we would like to mention that we are not responsible for the selection of the advertisements. We only offer the advertising space with our website. The selection of the displayed advertising is made by Google. Since August 2013, the ads are also adapted to the respective user interface. This means that no matter whether you visit our website from your smartphone, your PC or laptop, the ads adapt to your end device.

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

Running a quality website requires a lot of dedication and great effort. Basically, we are never done working on our website. We always try to maintain our site and keep it as upto-date as possible. Of course, we also want to achieve economic success with this work. That's why we decided to use advertisements as a source of income. However, the most important thing for us is not to disturb your visit on our website by these ads. With the help of Google AdSense, you will only be offered advertising that fits our topics and your interests.

Similar to Google indexing for a website, a bot examines the relevant content and offers on the page. Then the ads are adjusted and presented according to content. In addition to the content overlap between the ad and the website offer, AdSense also supports interest-based targeting. This means that Google also uses your data to offer advertising tailored to you. So you get advertising that ideally offers you real added value and we have a higher chance of earning a little something.

## What data is stored by Google AdSense?

In order for Google AdSense to display customized advertising tailored to you, cookies are used, among other things. Cookies are small text files that store certain information on your computer.

In AdSense, cookies are intended to enable better advertising. The cookies do not contain any personally identifiable data. However, it should be noted that Google considers data such as "pseudonymous cookie IDs" (name or other identifier is replaced by a pseudonym) or IP addresses as non-personally identifiable information. However, under the GDPR, this data may be considered personal data. Google AdSense sends a cookie to the browser after every impression (this is always the case when you see an ad), every click and every other activity that leads to a call to the Google AdSense servers. If the browser accepts the cookie, it will be stored there.

Third-party vendors may place and read cookies in your browser or use web beacons as part of AdSense to store data they receive from ad delivery on the site. Web beacons are small graphics that do log file analysis and log file recording. This analysis enables statistical analysis for online marketing.

Google may collect certain information about your user behavior on our website through these cookies. This includes:

- Information on how you interact with an ad (clicks, impression, mouse movements)
- Information about whether an ad has already appeared in your browser at an earlier time. This data helps to avoid showing you an ad more than once.

In the process, Google analyzes and evaluates the data on the displayed advertising media and your IP address. Google uses the data primarily to measure the effectiveness of an ad and to improve the advertising offer. This data is not linked to personal data that Google may have about you via other Google services.

In the following, we present cookies that Google AdSense uses for tracking purposes. Here we refer to a test website that has Google AdSense installed exclusively:

Name: uid

Value: 891269189321938052-8

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

Expiration date: after 2 months

Name: C

Value: 1

**Purpose:** This cookie identifies whether your browser accepts cookies. The cookie is stored under the domain track.adform.net.

Expiration date: after 1 month

Name: cid

Value: 8912691894970695056,0,0,0,0

**Purpose:** This cookie is stored at the domain track.adform.net, stands for Client ID and is used to improve advertising to you. It can deliver more relevant ads to the visitor and helps improve campaign performance reports.

Expiration date: after 2 months

Name: IDE

Value: zOtj4TWxwbFDjaATZ2TzNaQmxrU321938052-1

**Purpose:** The cookie is stored under the domain doubleclick.net. It is used to register your actions after the ad or after clicking on the ad. This allows us to measure how well an ad is received by our visitors.

Expiration date: after 1 month

Name: test\_cookie

Value: not specified

Purpose: With the help of the "test cookies" you can check if your browser supports

cookies at all. The cookie is stored under the domain doubleclick.net.

Expiration date: after 1 month

Name: CT592996

Value:733366

**Purpose:** Stored under the domain adform.net. The cookie is set as soon as you click on an advertisement. We could not find out more detailed information about the use of this cookie.

Expiration date: after one hour

**Note:** This list cannot claim to be exhaustive, as experience has shown that Google is always changing its choice of cookies.

## How long and where is the data stored?

Google collects your IP address and various activities you perform on the website. Cookies store this information about interactions on our website. According to Google, the company collects and stores the specified information in a secure manner on Google's inhouse servers in the USA.

If you do not have a Google account or are not logged in, Google stores the collected data with a unique identifier (ID) mostly on your browser. The unique IDs stored in cookies are used, for example, to ensure personalized advertising. If you are logged into a Google account, Google may also collect personal data.

You can delete some of the data that Google stores at any time (see next section). Much of the information stored in cookies is automatically deleted after a certain period of time. However, there is also data that is stored by Google for a longer period of time. This is the case when Google, due to economic or legal necessities, has to store certain data over an indefinite longer period of time.

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

You always have the option to delete or disable cookies that are on your computer. How exactly this works depends on your browser. Under the section "Cookies" you will find the corresponding links to the respective instructions of the most popular browsers.

If you do not want to have cookies in principle, you can set up your browser so that it always informs you when a cookie is to be set. In this way, you can decide for each individual cookie whether you allow the cookie or not. Downloading and installing this browser plug-in at <a href="https://support.google.com/ads/answer/7395996">https://support.google.com/ads/answer/7395996</a> will also disable all "advertising cookies". Keep in mind that by disabling these cookies you do not prevent the ads, only the personalized ads.

If you have a Google account, you can deactivate personalized advertising on the <a href="https://adssettings.google.com/authenticated">https://adssettings.google.com/authenticated</a> website. You will continue to see ads here as well, but they will no longer be customized to your interests. Nevertheless, the ads are displayed based on a few factors, such as your location, browser type and the search terms used.

#### Legal basis

If you have consented to Google AdSense being used, the legal basis for the corresponding data processing is this consent. According to **Art. 6 Abs. 1 lit. a DSGVO** (**consent**) this consent constitutes the legal basis for the processing of personal data as it may occur during the collection by Google AdSense.

On our part, there is also a legitimate interest in using Google AdSense to optimize our online service and our marketing measures. The corresponding legal basis for this is **Art. 6 Abs. 1 lit. f DSGVO (Legitimate Interests)**. Nevertheless, we only use Google AdSense if you have given your consent.

Google also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Google uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Google undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The data processing terms for Google advertising products (Google Ads Controller Data Protection Terms), which correspond to the standard contractual clauses and are also applicable to Google AdSense, can be found at <a href="https://business.safety.google/adscontrollerterms/">https://business.safety.google/adscontrollerterms/</a>.

You can find out what data Google basically collects and what they use this data for at <a href="https://www.google.com/intl/de/policies/privacy/">https://www.google.com/intl/de/policies/privacy/</a>

# Google Marketing Platform (formerly: DoubleClick) Privacy Policy

We use Google Marketing Platform products on our website. These include various marketing tools such as Data Studio, Surveys, Campaign Manager 360, Display & Video 360 or Search Ads 360. The service provider is the American company Google Inc. For the European region, the company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services.

Google also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

Google uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing for recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data complies with European data protection standards even if it is transferred to third countries (such as the USA) and stored there. Through these clauses, Google undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

The Google Ads Data Processing Terms, which correspond to the standard contractual clauses and also apply to Google Marketing Platform products, can be found at <a href="https://business.safety.google/adsprocessorterms/">https://business.safety.google/adsprocessorterms/</a>.

You can learn more about the data processed through the use of Google Marketing Platform products in the Privacy Policy at <a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>.

# **LinkedIn Insight Tag Privacy Policy**

We use the conversion tracking tool LinkedIn Insight Tag on our website. The service provider is the American company LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. The company LinkedIn Ireland Unlimited (Wilton Place, Dublin 2,

Ireland) is responsible for the data protection-relevant aspects in the European Economic Area (EEA), the EU and Switzerland.

LinkedIn also processes data from you in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing.

LinkedIn uses so-called standard contractual clauses (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing with recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. Standard Contractual Clauses (SCC) are templates provided by the EU Commission and are intended to ensure that your data comply with European data protection standards even if they are transferred to third countries (such as the USA) and stored there. Through these clauses, LinkedIn undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed and managed in the US. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses here, among other places: <a href="https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de">https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de</a>

More information about LinkedIn's standard contractual clauses can be found at <a href="https://de.linkedin.com/legal/l/dpa">https://de.linkedin.com/legal/l/dpa</a> oder <a href="https://www.linkedin.com/legal/l/eu-sccs">https://www.linkedin.com/legal/l/eu-sccs</a>

You can learn more about LinkedIn Insight-Tag at <a href="https://www.linkedin.com/help/linkedin/answer/a427660">https://www.linkedin.com/help/linkedin/answer/a427660</a>. You can also learn more about the data processed through the use of LinkedIn Insight-Tag in the privacy policy at <a href="https://de.linkedin.com/legal/privacy-policy">https://de.linkedin.com/legal/privacy-policy</a>.

# Survey and polling systems Introduction

#### Survey and polling systems Privacy Policy Summary

- Affected parties: Visitors to the website
- Purpose: evaluation of surveys on the website
- Processed data: Contact data, device data, access duration and time, IP addresses. More details can be found in the respective survey and polling system used.
- Storage duration: depending on the tool used
- Legal basis: Art. 6 para. 1 lit. a DSGVO (Consent), Art. 6 para. 1 lit. f DSGVO (Legitimate Interests).

## What are survey and polling systems?

We are also happy to conduct various surveys and polls via our website. These are always evaluated anonymously. A survey or poll system is a tool integrated into our website that asks you questions (about our products or services, for example), which you can answer if you participate. Your answers are always evaluated anonymously. However, personal data may also be stored and processed after you have given your consent to data processing.

## Why do we use survey and polling systems?

We want to offer you the best products and services in our industry. With surveys we get perfect feedback from you and learn what you expect from us or our services. On the basis of these anonymous evaluations, we can adapt our products and services to your wishes and ideas. Furthermore, the information also helps us to target our advertising and marketing measures more precisely to those people who are really interested in our offer.

## What data is processed?

Personal data is only processed if it is necessary for the technical implementation or if you have consented to personal data being processed. Then, for example, your IP address is stored so that the survey can be displayed in your browser. Cookies may also be used so that you can continue your survey without problems after a later date.

If you have consented to data processing, contact data such as your e-mail address or telephone number may be processed in addition to your IP address. Data that you enter in an online form, for example, is also stored and processed. Some providers also store information about the web pages you have visited (on our website), when you started and ended the survey and various technical information about your computer.

## How long is data stored?

How long the data is processed and stored depends primarily on the tools we use. You can learn more about the data processing of the individual tools below. The privacy statements of the providers usually state exactly which data is stored and processed and for how long. In principle, personal data is only processed for as long as is necessary to provide our services. If data is stored in cookies, the storage period varies greatly. The data can be deleted immediately after leaving a website, but it can also remain stored for several years. Therefore, you should look at each individual cookie in detail if you want to know more about the data storage. In most cases, you will also find informative information about the individual cookies in the privacy statements of the individual providers.

## Right of objection

You also have the right and the possibility to revoke your consent to the use of cookies or embedded survey systems at any time. This works either via our cookie management tool or via other opt-out functions. For example, you can also prevent data collection through

cookies by managing, disabling or deleting cookies in your browser.

Since survey systems may use cookies, we also recommend that 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 statements of the respective tools.

#### Legal basis

The use of survey systems requires your consent, which we have obtained with our cookie popup. According to **Art. 6 Abs. 1 lit. a DSGVO (consent)** this consent constitutes the legal basis for the processing of personal data as it may occur during the collection by survey and polling systems.

In addition to the consent, there is a legitimate interest on our part to conduct survey on our topic. The legal basis for this is **Art. 6 Abs. 1 lit. f DSGVO (Legitimate Interests)**. Nevertheless, we only use the tools insofar as they have given consent.

Since survey systems use cookies, we also recommend that 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 statements of the respective tools.

Information on the individual survey systems, if available, can be found in the following sections.

# SurveyMonkey Privacy Policy

We use SurveyMonkey, a survey management software for our website. The service provider is the American company Momentive Inc. The Irish company Momentive Europe UC (2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland) is responsible for the European Economic Area.

SurveyMonkey also processes data in the USA, among other places. 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. This may be associated with various risks for the legality and security of data processing

SurveyMonkey uses standard contractual clauses approved by the EU Commission (= Art. 46. para. 2 and 3 DSGVO) as the basis for data processing at recipients located in third countries (outside the European Union, Iceland, Liechtenstein, Norway, i.e. in particular in the USA) or a data transfer there. These clauses require SurveyMonkey to comply with the EU level of data protection when processing relevant data outside the EU. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the clauses here, among other places:

https://ec.europa.eu/germany/news/20210604-datentransfers-eu\_de.

To learn more about the data processed through the use of SurveyMonkey, please see the privacy policy at <a href="https://www.surveymonkey.de/mp/legal/privacy/">https://www.surveymonkey.de/mp/legal/privacy/</a>.

All texts are protected by copyright.