

# Privacy Policy

## Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

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## **Controller**

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## **Overview of processing operations**

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

## **Categories of Processed Data**

- Inventory data.
- Employee Data.
- Payment Data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.
- Log data.

## **Categories of Data Subjects**

- Service recipients and clients.
- Employees.
- Prospective customers.
- Communication partner.
- Users.
- Business and contractual partners.
- Third parties.
- Customers.

## **Purposes of Processing**

- Provision of contractual services and fulfillment of contractual obligations.
- Communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Targeting.
- Office and organisational procedures.

- Conversion tracking.
- Affiliate Tracking.
- Organisational and Administrative Procedures.
- Feedback.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Information technology infrastructure.
- Public relations.
- Sales promotion.
- Business processes and management procedures.

## Relevant legal bases

**Relevant legal bases according to the GDPR:** In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - the processing is necessary for the protection of the legitimate interests of the controller or a third party, provided that the interests, fundamental rights, and freedoms of the data subject, which require the protection of personal data, do not prevail.

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data,

processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, data protection laws of the individual federal states may apply.

**Relevant legal basis according to the Swiss Data Protection Act:** If you are located in Switzerland, we process your data based on the Federal Act on Data Protection (referred to as "Swiss DPA"). Unlike the GDPR, for instance, the Swiss DPA does not generally require that a legal basis for processing personal data be stated and that the processing of personal data is conducted in good faith, lawfully and proportionately (Art. 6 para. 1 and 2 of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose recognizable to the data subject and process it only in a manner compatible with this purpose (Art. 6 para. 3 of the Swiss DPA).

**Reference to the applicability of the GDPR and the Swiss DPA:** These privacy policy serves both to provide information pursuant to the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the broader spatial application and comprehensibility, the terms used in the GDPR are applied. In particular, instead of the terms used in the Swiss FADP such as "processing" of "personal data", "predominant interest", and "particularly sensitive personal data", the terms used in the GDPR, namely "processing" of "personal data", as well as "legitimate interest" and "special categories of data" are used. However, the legal meaning of these terms will continue to be determined according to the Swiss FADP within its scope of application.

## Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

Securing online connections through TLS/SSL encryption technology (HTTPS): To

protect the data of users transmitted via our online services from unauthorized access, we employ TLS/SSL encryption technology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are the cornerstones of secure data transmission on the internet. These technologies encrypt the information that is transferred between the website or app and the user's browser (or between two servers), thereby safeguarding the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions conform to the highest security standards. When a website is secured with an SSL/TLS certificate, this is indicated by the display of HTTPS in the URL. This serves as an indicator to users that their data is being securely and encryptedly transmitted.

## **Transmission of Personal Data**

In the course of processing personal data, it may happen that this data is transmitted to or disclosed to other entities, companies, legally independent organizational units, or individuals. Recipients of this data may include service providers tasked with IT duties or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and particularly conclude relevant contracts or agreements that serve to protect your data with the recipients of your data.

**Data Transmission within the Group of Companies:** Data transfer within the corporate group: We may transfer personal data to other companies within our corporate group or grant them access to it. This data sharing is based on our legitimate business and economic interests. By this, we mean, for example, the improvement of business processes, ensuring efficient and effective internal communication, the optimal use of our human and technological resources, as well as the ability to make informed business decisions. In certain cases, data sharing may also be necessary to fulfil our contractual obligations or may be based on the consent of the data subjects or a legal permission.

**Data transfer to sales partners:** In order to achieve the best possible customer service, we may pass on your data and inquiries to our sales partners in Germany and within Europe.

## **International data transfers**

**Data Processing in Third Countries:** If we process data in a third country (i.e., outside the European Union (EU) or the European Economic Area (EEA)), or if the processing is done within the context of using third-party services or the disclosure or transfer of data to other individuals, entities, or companies, this is only done in accordance with legal requirements. If the data protection level in the third country

has been recognized by an adequacy decision (Article 45 GDPR), this serves as the basis for data transfer. Otherwise, data transfers only occur if the data protection level is otherwise ensured, especially through standard contractual clauses (Article 46 (2)(c) GDPR), explicit consent, or in cases of contractual or legally required transfers (Article 49 (1) GDPR). Furthermore, we provide you with the basis of third-country transfers from individual third-country providers, with adequacy decisions primarily serving as the foundation. "Information regarding third-country transfers and existing adequacy decisions can be obtained from the information provided by the EU Commission:

[https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection_en). Within the context of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the data protection level for certain companies from the USA as secure within the adequacy decision of 10th July 2023. The list of certified companies as well as additional information about the DPF can be found on the website of the US Department of Commerce at <https://www.dataprivacyframework.gov/s/>. We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

Disclosure of Personal Data Abroad: In accordance with the Swiss Data Protection Act (Swiss DPA), we only disclose personal data abroad when an appropriate level of protection for the affected persons is ensured (Art. 16 Swiss DPA). If the Federal Council does not determine that there is an adequate level of protection (list of states:

<https://www.bj.admin.ch/bj/de/home/staat/datenschutz/internationales/anererkennung-staaten.html>), we implement alternative security measures. These measures may include international agreements, specific guarantees, data protection clauses in contracts, standard data protection clauses approved by the Federal Data Protection and Information Commissioner (FDPIC), or internal company data protection regulations previously recognised by the FDPIC or a competent data protection authority of another country. Under Art. 16 of the Swiss DPA, exceptions can be made for the disclosure of data abroad if certain conditions are met, including the consent of the affected person, contract execution, public interest, protection of life or physical integrity, publicly made data or data from a legally provided register. Such disclosures always comply with the legal requirements. As part of the so-called "Data Privacy Framework" (DPF), the Switzerland has recognized the data protection level for certain companies from the USA as adequate under the adequacy decision dated June 7, 2024. You can find the list of certified companies and additional information about the DPF on the website of the U.S. Department of Commerce at <https://www.dataprivacyframework.gov/> (in English). We inform you in our privacy notice about which service providers we use are certified under the Data Privacy Framework.

# General Information on Data Retention and Deletion

We delete personal data that we process in accordance with legal regulations as soon as the underlying consents are revoked or no further legal bases for processing exist. This applies to cases where the original purpose of processing is no longer applicable or the data is no longer needed. Exceptions to this rule exist if statutory obligations or special interests require a longer retention or archiving of the data.

In particular, data that must be retained for commercial or tax law reasons, or whose storage is necessary for legal prosecution or protection of the rights of other natural or legal persons, must be archived accordingly.

Our privacy notices contain additional information on the retention and deletion of data specifically applicable to certain processing processes.

In cases where multiple retention periods or deletion deadlines for a date are specified, the longest period always prevails.

If a period does not expressly start on a specific date and lasts at least one year, it automatically begins at the end of the calendar year in which the event triggering the period occurred. In the case of ongoing contractual relationships in the context of which data is stored, the event triggering the deadline is the time at which the termination or other termination of the legal relationship takes effect.

Data that is no longer stored for its originally intended purpose but due to legal requirements or other reasons are processed exclusively for the reasons justifying their retention.

## **Further information on processing methods, procedures and services used:**

- **Data Retention and Deletion:** The following general deadlines apply for the retention and archiving according to German law:
  - 10 Years - Fiscal Code/Commercial Code - Retention period for books and records, annual financial statements, inventories, management reports, opening balance sheet as well as the necessary work instructions and other organisational documents (Section 147 Paragraph 1 No. 1 in conjunction with Paragraph 3 of the German General Tax Code (AO), Section 14b Paragraph 1 of the German VAT Act (UStG), Section 257 Paragraph 1 No. 1 in conjunction with Paragraph 4 of the German Commercial Code (HGB)).
  - 8 years - Accounting documents, such as invoices, booking and expense



receipts (Section 147 Paragraph 1 No. 4 and 4a in conjunction with Paragraph 3 of the German General Tax Code (AO), Section 257 Paragraph 1 No. 4 in conjunction with Paragraph 4 of the German Commercial Code (HGB))

- 6 Years - Other business documents: received commercial or business letters, copies of dispatched commercial or business letters, and other documents to the extent that they are significant for taxation purposes, for example, hourly wage slips, operating accounting sheets, calculation documents, price tags, as well as payroll accounting documents, provided they are not already accounting vouchers and cash register tapes Section (Section 147 Paragraph 1 No. 2, 3, 5 in conjunction with Paragraph 3 of the German General Tax Code (AO), Section 257 Paragraph 1 No. 2 and 3 in conjunction with Paragraph 4 of the German Commercial Code (HGB)).
- 3 Years - Data required to consider potential warranty and compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the regular statutory limitation period of three years. This period begins at the end of the year in which the relevant contractual transaction took place or the contractual relationship ended in the case of ongoing contracts (Sections 195, 199 of the German Civil Code).

• **Data Retention and Deletion:** The following general retention and archiving periods apply under Swiss law:

- 10 years - Retention period for books and records, annual financial statements, inventories, management reports, opening balances, accounting vouchers and invoices, as well as all necessary working instructions and other organizational documents (Article 958f of the Swiss Code of Obligations (OR)).
- 10 years - Data necessary to consider potential claims for damages or similar contractual claims and rights, as well as for the processing of related inquiries based on previous business experiences and usual industry practices, will be stored for the statutory limitation period of ten years, unless a shorter period of five years is applicable, which is relevant in certain cases (Articles 127, 130 OR). Claims for rent, lease, and interest on capital, as well as other periodic services, for the delivery of food, for board and lodging, for innkeeper debts, as well as for craftsmanship, small-scale sales of goods, medical care, professional services by lawyers, legal agents, procurators, and notaries, and from the employment relationship of employees, expire after five years (Article 128 OR).

## Rights of Data Subjects

Rights of the Data Subjects under the GDPR: As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

Rights of the data subjects under the Swiss DPA:

As the data subject, you have the following rights in accordance with the provisions of the Swiss DPA:

- **Right to information:** You have the right to request confirmation as to whether personal data concerning you are being processed, and to receive the information necessary for you to assert your rights under the Swiss DPA and to ensure transparent data processing.
- **Right to data release or transfer:** You have the right to request the release of your personal data, which you have provided to us, in a common electronic format, as well as its transfer to another data controller, provided this does not require disproportionate effort.
- **Right to rectification:** You have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, deletion, and destruction:** You have the right to object to the processing of your data, as well as to request that personal data concerning you be deleted or destroyed.

## Business processes and operations

Personal data of service recipients and clients - including customers, clients, or in specific cases, mandates, patients, or business partners as well as other third parties - are processed within the framework of contractual and comparable legal relationships and pre-contractual measures such as the initiation of business relations. This data processing supports and facilitates business processes in areas such as customer management, sales, payment transactions, accounting, and project management.

The collected data is used to fulfil contractual obligations and make business processes efficient. This includes the execution of business transactions, the management of customer relationships, the optimisation of sales strategies, and ensuring internal invoicing and financial processes. Additionally, the data supports the protection of the rights of the controller and promotes administrative tasks as well as the organisation of the company.

Personal data may be transferred to third parties if necessary for fulfilling the mentioned purposes or legal obligations. After legal retention periods expire or when the purpose of processing no longer applies, the data will be deleted. This also includes data that must be stored for longer periods due to tax law and legal obligations to provide evidence.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment

Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Log data (e.g. log files concerning logins or data retrieval or access times.). Employee Data (Information about employees and other individuals in an employment relationship).

- **Data subjects:** Service recipients and clients; Prospective customers; Communication partner (Recipients of e-mails, letters, etc.); Business and contractual partners; Customers; Third parties; Users (e.g. website visitors, users of online services). Employees (e.g. employees, job applicants, temporary workers, and other personnel.).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Office and organisational procedures; Business processes and management procedures; Security measures; Provision of our online services and usability; Communication; Marketing; Sales promotion. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Customer Management and Customer Relationship Management (CRM):** Processes required in the context of customer management and Customer Relationship Management (CRM) include customer acquisition in compliance with data protection regulations, measures to promote customer retention and loyalty, effective customer communication, complaint management and customer service with consideration of data protection, data management and analysis to support the customer relationship, management of CRM systems, secure account management, customer segmentation and targeting; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Contact management and contact maintenance:** Processes required in the context of organizing, maintaining, and securing contact information (e.g., setting up and maintaining a central contact database, regular updates of

contact information, monitoring data integrity, implementing data protection measures, ensuring access controls, conducting backups and restorations of contact data, training employees in effective use of contact management software, regular review of communication history and adjustment of contact strategies); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

- **Customer Account:** Customers can create an account within our online offer (e.g. customer or user account, "customer account" for short). If the registration of a customer account is required, customers will be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account. If the customer account has been terminated, the customer account data will be deleted after the termination date, unless it is retained for purposes other than provision in the customer account or must be retained for legal reasons (e.g. internal storage of customer data, order transactions or invoices). It is the customers' responsibility to back up their data when terminating the customer Account; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Product List/ Wishlist:** Customers can create a products/wish list In this case, the products are stored within the context of the fulfillment of our contractual obligations until the deletion of the account, unless the product list entries are removed by the customer or we expressly inform the customer of deviating storage periods; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Sales:** Procedures required for the planning, implementation, and control of measures for marketing and selling products or services (e.g., customer acquisition, preparation and tracking of offers, order processing, customer consultation and support, sales promotion, product training, sales controlling and analysis, management of distribution channels); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Marketing, advertising, and sales promotion:** Processes required in the context of marketing, advertising, and sales promotion (e.g., market analysis and audience targeting, development of marketing strategies, planning and execution of advertising campaigns, design and production of advertising materials, online marketing including SEO and social media campaigns, event marketing and trade show participation, customer loyalty programs, sales promotion measures, performance measurement and optimisation of marketing activities, budget management and cost control); **Legal Basis:**

Legitimate Interests (Article 6 (1) (f) GDPR).

## Provision of online services and web hosting

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Log data (e.g. log files concerning logins or data retrieval or access times.); Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers). Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Users (e.g. website visitors, users of online services); Prospective customers. Business and contractual partners.
- **Purposes of processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.); Security measures; Provision of contractual services and fulfillment of contractual obligations; Conversion tracking (Measurement of the effectiveness of marketing activities). Marketing.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Collection of Access Data and Log Files:** Access to our online service is logged in the form of so-called "server log files". Server log files may include the address and name of the accessed web pages and files, date and time of

access, transferred data volumes, notification of successful retrieval, browser type along with version, the user's operating system, referrer URL (the previously visited page), and typically IP addresses and the requesting provider. The server log files can be used for security purposes, e.g., to prevent server overload (especially in the case of abusive attacks, known as DDoS attacks), and to ensure server load management and stability; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.

- **Content-Delivery-Network:** We use a so-called "Content Delivery Network" (CDN). A CDN is a service with whose help contents of our online services, in particular large media files, such as graphics or scripts, can be delivered faster and more securely with the help of regionally distributed servers connected via the Internet; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **1&1 IONOS:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** 1&1 IONOS SE, Elgendorfer Str. 57, 56410 Montabaur, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.ionos.com>; **Privacy Policy:** <https://www.ionos.com/terms-gtc/privacy-policy/>; **Data Processing Agreement:** <https://www.ionos.de/hilfe/datenschutz/allgemeine-informationen-zur-datenschutz-grundverordnung-dsgvo/auftragsverarbeitung/>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Germany).
- **Friendly Captcha:** CAPTCHA service that is used to verify whether the data entered within our online services (e.g., on a login page or contact form) was entered by a human or an automated program. To this end, the service analyzes the behavior of the users of our online services based on various characteristics. This analysis starts automatically as soon as a user uses our online services. Various pieces of information are evaluated for the analysis (IP address, the visitor's dwell time on the website or app, or mouse movements of the user, as well as technical information about the device and browser used by the user); **Service provider:** Friendly Captcha GmbH, Am Anger 3-5, 82237 Woerthsee, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://friendlycaptcha.com/>; **Privacy Policy:** <https://friendlycaptcha.com/legal/privacy-end-users/>; **Data Processing Agreement:** <https://friendlycaptcha.com/legal/>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Germany).
- **Shopware:** Platform for offering and performing e-commerce services. The services and processes carried out in connection with them include, in

particular, online stores, websites, their offers and content, community elements, purchase and payment transactions, customer communication, as well as analysis and marketing; **Service provider:** shopware AG, Ebbinghoff 10, 48624 Schöppingen, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.shopware.com/en/>; **Privacy Policy:** <https://www.shopware.com/en/privacy/>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Germany).

## Use of Cookies

The term "cookies" refers to functions that store information on users' devices and read it from them. Cookies can also be used for different purposes, such as ensuring the functionality, security, and convenience of online services, as well as analyzing visitor traffic. We use cookies in accordance with legal regulations. If necessary, we obtain users' consent in advance. If consent is not required, we rely on our legitimate interests. This applies when storing and reading information is essential to provide explicitly requested content and functions. This includes, for example, saving settings and ensuring the functionality and security of our online services. Consent can be withdrawn at any time. We clearly inform users about the scope of the consent and which cookies are used.

**Information on legal data protection bases:** Whether we process personal data using cookies depends on users' consent. If consent is given, it serves as the legal basis. Without consent, we rely on our legitimate interests, as outlined in this section and in the context of the respective services and procedures.

**Storage duration:** The following types of cookies are distinguished based on their storage duration:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user leaves an online service and closes their device (e.g., browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the device is closed. For example, the login status can be saved, and preferred content can be displayed directly when the user revisits a website. Additionally, the user data collected with cookies may be used for audience measurement. Unless we provide explicit information to users about the type and storage duration of cookies (e.g., when obtaining consent), users should assume that these are permanent and may have a storage duration of up to two years.

**General information on withdrawal and objection (opt-out):** Users can withdraw their consent at any time and also object to the processing according to legal regulations, including through the privacy settings of their browser.



- **Processed data types:** Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Consent (Article 6 (1) (a) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Processing Cookie Data on the Basis of Consent:** We implement a consent management solution that obtains users' consent for the use of cookies or for the processes and providers mentioned within the consent management framework. This procedure is designed to solicit, log, manage, and revoke consents, particularly regarding the use of cookies and similar technologies employed to store, read from, and process information on users' devices. As part of this procedure, user consents are obtained for the use of cookies and the associated processing of information, including specific processing and providers named in the consent management process. Users also have the option to manage and withdraw their consents. Consent declarations are stored to avoid repeated queries and to provide proof of consent according to legal requirements. The storage is carried out server-side and/or in a cookie (so-called opt-in cookie) or by means of comparable technologies in order to associate the consent with a specific user or their device. If no specific details about the providers of consent management services are provided, the following general notes apply: The duration of consent storage is up to two years. A pseudonymous user identifier is created, which is stored along with the time of consent, details on the scope of consent (e.g., relevant categories of cookies and/or service providers), as well as information about the browser, system, and device used; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).
- **Cookie-Opt-Out:** In the footer of our website you will find a link that allows you to change your cookie settings as well as revoke corresponding consents.

## **Registration, Login and User Account**

Users can create a user account. Within the scope of registration, the required mandatory information is communicated to the users and processed for the purposes of providing the user account on the basis of contractual fulfilment of obligations. The processed data includes in particular the login information (name,

password and an e-mail address).

Within the scope of using our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the user's protection against misuse and other unauthorized use. This data will not be passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

Users may be informed by e-mail of information relevant to their user account, such as technical changes.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Log data (e.g. log files concerning logins or data retrieval or access times.).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Security measures; Organisational and Administrative Procedures. Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Deletion after termination.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Registration with a real name:** Due to the nature of our community, we ask users to use our services only with their real names. This means that the use of pseudonyms is not permitted; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Users' profiles are public:** The users' profiles are not publicly visible or accessible.
- **Deletion of data after termination:** If users have terminated their user account, their data relating to the user account will be deleted, subject to any legal permission, obligation or consent of the users; **Legal Basis:**

Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **No obligation to retain data:** It is the responsibility of the users to secure their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

## Contact and Inquiry Management

When contacting us (e.g. via mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested measures.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Communication; Organisational and Administrative Procedures; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

### Further information on processing methods, procedures and services used:

- **Contact form:** Upon contacting us via our contact form, email, or other means of communication, we process the personal data transmitted to us for the purpose of responding to and handling the respective matter. This typically includes details such as name, contact information, and possibly additional information provided to us that is necessary for appropriate processing. We use this data exclusively for the stated purpose of contact and communication; **Legal Basis:** Performance of a contract and prior requests

(Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Newsletter and Electronic Communications

We send newsletters, emails, and other electronic notifications (hereinafter "newsletters") exclusively with the consent of the recipients or based on a legal basis. If the contents of the newsletter are specified during registration for the newsletter, these contents are decisive for the users' consent. Normally, providing your email address is sufficient to sign up for our newsletter. However, to offer you a personalised service, we may ask for your name for personal salutation in the newsletter or for additional information if necessary for the purpose of the newsletter.

**Deletion and restriction of processing:** We may store unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to be able to demonstrate previously given consent. The processing of these data is limited to the purpose of potentially defending against claims. An individual request for deletion is possible at any time, provided that at the same time the former existence of consent is confirmed. In case of obligations to permanently observe objections, we reserve the right to store the email address solely for this purpose in a blocklist.

The logging of the registration process is based on our legitimate interests for the purpose of proving its proper execution. If we commission a service provider to send emails, this is done based on our legitimate interests in an efficient and secure mailing system.

### **Contents:**

Information about us, our services, products, trade fairs, promotions and offers.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke

your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

#### **Further information on processing methods, procedures and services used:**

- **Measurement of opening rates and click rates:** The newsletters contain a so-called "web beacons", which is a pixel-sized file that is retrieved from our server, or the server of the dispatch service provider if one is used, when the newsletter is opened. In the course of this retrieval, technical information such as details about the browser and your system, as well as your IP address and the time of access are collected. This information is used to technically improve our newsletter based on technical data or target audiences and their reading behavior, which can be determined by their access locations (identifiable by IP address) or access times. This analysis also includes determining whether and when newsletters are opened and which links are clicked. The information is assigned to individual newsletter recipients and stored in their profiles until deletion. The evaluations serve to recognize the reading habits of our users and adjust our content to them or send different content according to the interests of our users. The measurement of opening and click rates, as well as the storage of the measurement results in user profiles and their further processing, are based on user consent. Unfortunately, it is not possible to revoke success measurement separately; in this case, the entire newsletter subscription must be cancelled or objected to. In that case, stored profile information will be deleted; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

## **Commercial communication by E-Mail, Postal Mail, Fax or Telephone**

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After revocation or objection, we store the data required to prove the past authorization to contact or send up to three years from the end of the year of revocation or objection on the basis of our legitimate interests. The processing of this data is limited to the purpose of a possible defense against claims. Based on the legitimate interest to permanently observe the revocation, respectively objection of the users, we further store the data necessary to avoid a renewed contact (e.g.

depending on the communication channel, the e-mail address, telephone number, name).

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by e-mail or postal); Marketing. Sales promotion.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

## Web Analysis, Monitoring and Optimization

Web analytics (also referred to as "reach measurement") is used to evaluate the visitor flows of our online services and may include pseudonymous values related to visitor behavior, interests, or demographic information such as age or gender. Through reach analysis, we can, for example, identify when our online services or their functions and content are most frequently used or likely to encourage repeat visits. It also enables us to determine which areas need optimization.

In addition to web analytics, we may also use testing procedures to test and optimize different versions of our online services or their components.

Unless otherwise specified below, profiles (i.e., data combined from a usage process) may be created for these purposes, and information can be stored in and later retrieved from a browser or device. The data collected includes, in particular, visited websites and elements used on them, as well as technical information such as the browser used, the computer system, and information about usage times. If users have given consent to the collection of their location data to us or to the providers of the services we use, the processing of location data is also possible.

Additionally, users' IP addresses are stored. However, we use an IP masking process (i.e., pseudonymization by shortening the IP address) to protect users. In general, no clear user data (such as email addresses or names) is stored as part of web analytics, A/B testing, or optimization. Instead, pseudonyms are used. This means that neither we nor the providers of the software used know the actual identity of the users, only the information stored in their profiles for the respective

procedures.

Legal basis information: If we ask users for their consent to use third-party providers, the legal basis for data processing is consent. Otherwise, user data is processed based on our legitimate interests (i.e., our interest in efficient, economic, and user-friendly services). In this context, we would also like to point out the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Profiles with user-related information (Creating user profiles). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Google Analytics:** We use Google Analytics to perform measurement and analysis of the use of our online services by users based on a pseudonymous user identification number. This identification number does not contain any unique data, such as names or email addresses. It is used to assign analysis information to an end device in order to recognize which content users have accessed within one or various usage processes, which search terms they have used, have accessed again or have interacted with our online services. Likewise, the time of use and its duration are stored, as well as the sources of users referring to our online services and technical aspects of their end devices and browsers.

In the process, pseudonymous profiles of users are created with information from the use of various devices, and cookies may be used. Google Analytics does not log or store individual IP addresses. Analytics does provide coarse geo-location data by deriving the following metadata from IP addresses: City (and the derived latitude, and longitude of the city), Continent, Country,

Region, Subcontinent (and ID-based counterparts). For EU-based traffic, IP-address data is used solely for geo-location data derivation before being immediately discarded. It is not logged, accessible, or used for any additional use cases. When Analytics collects measurement data, all IP lookups are performed on EU-based servers before forwarding traffic to Analytics servers for processing; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com/intl/en/about/analytics/>; **Security measures:** IP Masking (Pseudonymization of the IP address); **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessor/terms/>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland); **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://myadcenter.google.com/personalizationoff>. **Further Information:** <https://business.safety.google/adsservices/> (Types of processing and data processed).

- **Google Tag Manager:** We use Google Tag Manager, a software provided by Google, which enables us to manage so-called website tags centrally via a user interface. Tags are small code elements on our website that serve to record and analyse visitor activities. This technology assists us in improving our website and the content offered on it. Google Tag Manager itself does not create user profiles, store cookies with user profiles, or perform any independent analyses. Its function is limited to simplifying and making the integration and management of tools and services we use on our website more efficient. Nevertheless, when using Google Tag Manager, users' IP addresses are transmitted to Google, which is technically necessary to implement the services we use. Cookies may also be set in this process. However, this data processing only occurs if services are integrated via the Tag Manager. For more detailed information about these services and their data processing, please refer to the further sections of this privacy policy; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessor/terms/>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

## Online Marketing

We process personal data for the purposes of online marketing, which may include



in particular the marketing of advertising space or the display of advertising and other content (collectively referred to as "Content") based on the potential interests of users and the measurement of their effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar procedure is used by which the relevant user information for the display of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, communication partners and technical information such as the browser used, computer system used and information on usage times and used functions. If users have consented to the collection of their sideline data, these can also be processed.

The IP addresses of the users are also stored. However, we use provided IP masking procedures (i.e. pseudonymisation by shortening the IP address) to ensure the protection of the user's by using a pseudonym. In general, within the framework of the online marketing process, no clear user data (such as e-mail addresses or names) is secured, but pseudonyms. This means that we, as well as the providers of online marketing procedures, do not know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or similar memorizing procedures. These cookies can later, generally also on other websites that use the same online marketing technology, be read and analyzed for purposes of content display, as well as supplemented with other data and stored on the server of the online marketing technology provider.

Exceptionally, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

As a matter of principle, we only gain access to summarised information about the performance of our advertisements. However, within the framework of so-called conversion measurement, we can check which of our online marketing processes have led to a so-called conversion, i.e. to the conclusion of a contract with us. The conversion measurement is used alone for the performance analysis of our marketing activities.

Unless otherwise stated, we kindly ask you to consider that cookies used will be stored for a period of two years.

#### **Notes on revocation and objection:**

We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called "opt-out"). If no explicit opt-out option has been

specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area:

- a) Europe: <https://www.youronlinechoices.eu>.
- b) Canada: <https://www.youradchoices.ca/choices>.
- c) USA: <https://www.aboutads.info/choices>.
- d) Cross-regional: <https://optout.aboutads.info>.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behaviour, use of cookies); Affiliate Tracking; Marketing; Profiles with user-related information (Creating user profiles); Conversion tracking (Measurement of the effectiveness of marketing activities). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Google Ad Manager:** We use the service "Google Ad Manager" to place ads in the Google advertising network (e.g. in search results, videos, websites, etc.). The Google Ad Manager stands out because ads are displayed in real time based on users' presumed interests. This allows us to display ads for our online offering to users who may have a potential interest in our offering or who have previously shown interest, and measure the success of the ads;  
**Service provider:** Google Ireland Limited, Gordon House, Barrow Street,

Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>; Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>. where Google acts as processor, Data Processing Conditions for Google Advertising Products and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adsprocessorterms> apply.

- **Google Ads and Conversion Tracking:** Online marketing process for purposes of placing content and advertisements within the provider's advertising network (e.g., in search results, in videos, on web pages, etc.) so that they are displayed to users who have a presumed interest in the ads. Furthermore, we measure the conversion of the ads, i.e. whether the users took them as a reason to interact with the ads and make use of the advertised offers (so-called conversion). However, we only receive anonymous information and no personal information about individual users; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>.

## Profiles in Social Networks (Social Media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights.

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created on the basis of user behaviour and the associated interests of users. The user profiles can then be used, for example, to place advertisements within and outside the

networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

For a detailed description of the respective processing operations and the opt-out options, please refer to the respective data protection declarations and information provided by the providers of the respective networks.

Also in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

- **Processed data types:** Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Communication; Feedback (e.g. collecting feedback via online form). Public relations.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Facebook Pages:** Profiles within the social network Facebook - We are jointly responsible (so called "joint controller") with Meta Platforms Ireland Limited for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site operators to help them understand how people interact with

their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfill the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information about Page Insights" ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)). The joint controllership is limited to the collection and transfer of the data to Meta Platforms Ireland Limited, a company located in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited; **Service provider:** Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.facebook.com>; **Privacy Policy:** <https://www.facebook.com/privacy/policy/>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

- **LinkedIn:** Social network - We are jointly responsible with LinkedIn Ireland Unlimited Company for the collection (but not the further processing) of visitor data, which is used to create "Page Insights" (statistics) for our LinkedIn profiles. This data includes information about the types of content users view or interact with, as well as the actions they take. It also includes details about the devices used, such as IP addresses, operating systems, browser types, language settings, and cookie data, as well as profile details of users, such as job function, country, industry, seniority, company size, and employment status. Privacy information regarding the processing of user data by LinkedIn can be found in LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>. We have entered into a special agreement with LinkedIn Ireland ("Page Insights Joint Controller Addendum", <https://legal.linkedin.com/pages-joint-controller-addendum>), which specifically regulates the security measures LinkedIn must comply with and in which LinkedIn has agreed to fulfill the rights of data subjects (i.e., users can, for example, direct requests for information or deletion directly to LinkedIn). The rights of users (particularly the right to information, deletion, objection, and to lodge a complaint with the competent supervisory authority) are not restricted by our agreements with LinkedIn. The joint responsibility is limited to the collection of data and its transmission to LinkedIn Ireland Unlimited Company, a company based in the EU. Further processing of the data is the sole responsibility of LinkedIn Ireland Unlimited Company, particularly concerning the transfer of data to the parent company LinkedIn Corporation in the USA; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton

Place, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland). **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

- **YouTube:** Social network and video platform; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland). **Opt-Out:** <https://myadcenter.google.com/personalizationoff>.

## Plugins and embedded functions and content

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be graphics, videos or city maps (hereinafter uniformly referred to as "Content").

The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability; Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behaviour, use of cookies); Affiliate

Tracking; Marketing. Security measures.

- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **YouTube videos:** Video contents; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://www.youtube.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Data Privacy Framework (DPF). **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://myadcenter.google.com/personalizationoff>.
- **Friendly Captcha:** CAPTCHA service that is used to verify whether the data entered within our online services (e.g., on a login page or contact form) was entered by a human or an automated program. To this end, the service analyzes the behavior of the users of our online services based on various characteristics. This analysis starts automatically as soon as a user uses our online services. Various pieces of information are evaluated for the analysis (IP address, the visitor's dwell time on the website or app, or mouse movements of the user, as well as technical information about the device and browser used by the user); **Service provider:** Friendly Captcha GmbH, Am Anger 3-5, 82237 Woerthsee, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://friendlycaptcha.com/>; **Privacy Policy:** <https://friendlycaptcha.com/legal/privacy-end-users/>; **Data Processing Agreement:** <https://friendlycaptcha.com/legal/>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Germany).

## **Management, Organization and Utilities**

We use services, platforms and software from other providers (hereinafter referred to as " third-party providers") for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of

third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include in particular master data and contact data of users, data on processes, contracts, other processes and their contents.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third party providers.

- **Processed data types:** Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.). Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Office and organisational procedures; Web Analytics (e.g. access statistics, recognition of returning visitors). Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.)).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Issuu:** Online service for electronic publishing of content; **Service provider:** Issuu Inc., 131 Lytton Ave, Palo Alto, CA 94301 USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://issuu.com/>. **Privacy Policy:** <https://issuu.com/legal/privacy>.

## **Changes and Updates**

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.



If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

## Terminology and Definitions

In this section, you will find an overview of the terminology used in this privacy policy. Where the terminology is legally defined, their legal definitions apply. The following explanations, however, are primarily intended to aid understanding.

- **Affiliate Tracking:** Custom Audiences refers to the process of determining target groups for advertising purposes, e.g. the display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to conclude that the user is interested in advertisements for similar products or the online store in which the user viewed the products. "Lookalike Audiences" is the term used to describe content that is viewed as suitable by users whose profiles or interests presumably correspond to the users for whom the profiles were created. For the purposes of creating custom audiences and lookalike audiences, cookies and web beacons are typically used.
- **Contact data:** Contact details are essential information that enables communication with individuals or organizations. They include, among others, phone numbers, postal addresses, and email addresses, as well as means of communication like social media handles and instant messaging identifiers.
- **Content data:** Content data comprise information generated in the process of creating, editing, and publishing content of all types. This category of data may include texts, images, videos, audio files, and other multimedia content published across various platforms and media. Content data are not limited to the content itself but also include metadata providing information about the content, such as tags, descriptions, authorship details, and publication dates.
- **Contract data:** Contract data are specific details pertaining to the formalisation of an agreement between two or more parties. They document the terms under which services or products are provided, exchanged, or sold. This category of data is essential for managing and fulfilling contractual obligations and includes both the identification of the contracting parties and the specific terms and conditions of the agreement. Contract data may encompass the start and end dates of the contract, the nature of the agreed-upon services or products, pricing arrangements, payment terms, termination rights, extension options, and special conditions or clauses. They serve as the legal foundation for the relationship between the parties and are crucial for clarifying rights and duties, enforcing claims, and resolving disputes.

- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- **Employees:** As employees, individuals are those who are engaged in an employment relationship, whether as staff, employees, or in similar positions. Employment refers to a legal relationship between an employer and an employee, established through an employment contract or agreement. It entails the obligation of the employer to pay the employee remuneration while the employee performs their work. The employment relationship encompasses various stages, including establishment, where the employment contract is concluded, execution, where the employee carries out their work activities, and termination, when the employment relationship ends, whether through termination, mutual agreement, or otherwise. Employee data encompasses all information pertaining to these individuals within the context of their employment. This includes aspects such as personal identification details, identification numbers, salary and banking information, working hours, holiday entitlements, health data, and performance assessments.
- **Inventory data:** Inventory data encompass essential information required for the identification and management of contractual partners, user accounts, profiles, and similar assignments. These data may include, among others, personal and demographic details such as names, contact information (addresses, phone numbers, email addresses), birth dates, and specific identifiers (user IDs). Inventory data form the foundation for any formal interaction between individuals and services, facilities, or systems, by enabling unique assignment and communication.
- **Log data:** Protocol data, or log data, refer to information regarding events or activities that have been logged within a system or network. These data typically include details such as timestamps, IP addresses, user actions, error messages, and other specifics about the usage or operation of a system. Protocol data is often used for analyzing system issues, monitoring security, or generating performance reports.
- **Meta, communication and process data:** Meta-, communication, and procedural data are categories that contain information about how data is processed, transmitted, and managed. Meta-data, also known as data about data, include information that describes the context, origin, and structure of other data. They can include details about file size, creation date, the author of a document, and modification histories. Communication data capture the

exchange of information between users across various channels, such as email traffic, call logs, messages in social networks, and chat histories, including the involved parties, timestamps, and transmission paths. Procedural data describe the processes and operations within systems or organisations, including workflow documentations, logs of transactions and activities, and audit logs used for tracking and verifying procedures.

- **Payment Data:** Payment data comprise all information necessary for processing payment transactions between buyers and sellers. This data is crucial for e-commerce, online banking, and any other form of financial transaction. It includes details such as credit card numbers, bank account information, payment amounts, transaction dates, verification numbers, and billing information. Payment data may also contain information on payment status, chargebacks, authorizations, and fees.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Targeting:** "Tracking" is the term used when the behaviour of users can be traced across several websites. As a rule, behavior and interest information with regard to the websites used is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users presumably corresponding to their interests.
- **Usage data:** Usage data refer to information that captures how users interact with digital products, services, or platforms. These data encompass a wide range of information that demonstrates how users utilise applications, which features they prefer, how long they spend on specific pages, and through what paths they navigate an application. Usage data can also include the

frequency of use, timestamps of activities, IP addresses, device information, and location data. They are particularly valuable for analysing user behaviour, optimising user experiences, personalising content, and improving products or services. Furthermore, usage data play a crucial role in identifying trends, preferences, and potential problem areas within digital offerings

- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This enables them, for example, to better adapt the content of their websites to the needs of their visitors. For the purposes of web analytics , pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online service.