

## Privacy Policy

### Preamble

With the following privacy policy, we would like to inform you about what types of your personal data (hereinafter also referred to as "data") we process for what purposes and to what extent in the context of providing our application.

The terms used are not gender-specific.

### Table of contents

#### Preamble

- Controller
- Overview of the processing operations
- Relevant legal bases
- Security measures
- Transfer of personal data
- International data transfers
- Deletion of data
- Rights of the data subjects
- Use of cookies
- Business services
- Use of online platforms for offer and sales purposes
- Providers and services used in the course of business activities
- Payment procedures
- Provision of the online offering and web hosting
- Blogs and publication media
- Contact and inquiry management
- Communication via messenger
- Newsletter and electronic notifications
- Promotional communication via e-mail, post, fax or telephone
- Web analysis, monitoring and optimization
- Online marketing
- Presence in social networks (social media)
- Plugins and embedded functions and content
- Management, organization and support tools
- Changing and updating the privacy policy

#### Responsible person

Dr. Mariana Parvanova-Brett  
Baumkirchner Str. 21A  
81673 Munich  
E-mail address: [kontakt@marianaparvanova.de](mailto:kontakt@marianaparvanova.de)  
Imprint: <https://marianaparvanova.com/impressum>

#### Overview of the processing operations

The following overview summarizes the types of data processed and the purposes of their processing and refers to the data subjects.

#### Types of data processed

- Inventory data

- payment data
- Contact data
- Content data
- contract data
- Usage data.

#### Meta, communication and process data

- Categories of data subjects
- customers
- interested parties
- communication partners
- users
- Business and contractual partners

#### Purposes of the processing

- Provision of contractual services and fulfillment of contractual obligations
- Contact requests and communication
- Security measures
- direct marketing
- Reach measurement
- Tracking
- Office and organizational procedures
- Conversion measurement
- Managing and responding to inquiries
- feedback
- marketing
- Profiles with user-related information
- Provision of our online offering and user-friendliness
- Information technology infrastructure

#### Relevant legal bases

Relevant legal bases according to the GDPR: Below you will find an overview of the legal bases of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. Should more specific legal bases also apply in individual cases, we will inform you of these in the privacy policy.

- Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR) - The data subject has given their consent to the processing of their personal data for one or more specific purposes.
- Performance of a contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR) - Processing is necessary for the 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.
- Legal obligation (Art. 6 para. 1 sentence 1 lit. c) GDPR) - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR) - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national data protection regulations apply in Germany. These include, in particular, the Act on the Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special regulations on the right to information, the right to erasure, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated decision-making in individual cases, including profiling. Furthermore, state data protection laws of the individual federal states may apply.

### **Security measures**

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection 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, input, disclosure, safeguarding availability and separation of the data. Furthermore, we have established procedures that ensure the exercise of data subject rights, the deletion of data and responses to data threats. Furthermore, we take the protection of personal data into account as early as the development and selection of hardware, software and processes in accordance with the principle of data protection, through technology design and data protection-friendly default settings.

TLS/SSL encryption (https): To protect user data transmitted via our online services, we use TLS/SSL encryption. Secure Sockets Layer (SSL) is the standard technology for securing internet connections by encrypting the data transmitted between a website or app and a browser (or between two servers). Transport Layer Security (TLS) is an updated and more secure version of SSL. Hyper Text Transfer Protocol Secure (HTTPS) is displayed in the URL if a website is secured by an SSL/TLS certificate.

### **Transmission of personal data**

As part of our processing of personal data, the data may be transferred to other bodies, companies, legally independent organisational units or persons or disclosed to them. The recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and in particular conclude corresponding contracts or agreements with the recipients of your data that serve to protect your data.

### **International data transfers**

Data processing in third countries: If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third-party services or the disclosure or transfer of data to other persons, bodies or companies, this only takes place in accordance with the legal requirements. If the level of data protection in the third country has been recognised by means of an adequacy decision (Art. 45 GDPR), this serves as the basis for the data transfer. Otherwise, data will only be transferred if the level of data protection is otherwise ensured, in particular through standard contractual clauses (Art. 46 para. 2 lit. c) GDPR), express consent or in the case of contractual or legally required transfer (Art. 49 para. 1 GDPR). In addition, we will inform you of the basis for third country transfers with the individual providers from the third country, whereby the adequacy decisions take precedence. Information on third country transfers and existing adequacy decisions can be found in the information provided by the EU Commission:

[https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection\\_en?prefLang=de](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection_en?prefLang=de).

EU-US Trans-Atlantic Data Privacy Framework: As part of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognised the level of data protection for certain companies from the USA as secure as part of the adequacy decision of 10.07.2023. The list of certified companies and further information on the DPF can be found on the website of the US Department of Commerce at <https://www.dataprivacyframework.gov/>. As part of the data protection information, we will inform you which service providers we use are certified under the Data Privacy Framework.

### **Deletion of data**

The data processed by us will be deleted in accordance with the legal requirements as soon as the consent given for processing is revoked or other authorisations cease to apply (e.g. if the purpose for processing this data no longer applies or it is not required for the purpose). If the data is not deleted because it is required for other and legally permissible purposes, its processing is restricted to these purposes, i.e. the data is blocked and not processed for other purposes. This applies, for example, to data that must be stored for reasons of commercial or tax law or whose storage is necessary for the assertion, exercise or defence of legal claims or to protect the rights of another natural or legal person. Our data protection notices may also contain further information on the retention and erasure of data, which take precedence for the respective processing operations.

### **Rights of the data subjects**

Rights of data subjects under the GDPR: As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Art. 15 to 21 GDPR:

- **Right to object:** You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right to withdraw consent:** You have the right to withdraw any consent you have given at any time.
- **Right to information:** You have the right to request confirmation as to whether the data in question is being processed and to request information about this data as well as further information and a copy of the data in accordance with the legal requirements.
- **Right to rectification:** You have the right to request the completion of data concerning you or the rectification of inaccurate data concerning you in accordance with the legal requirements.
- **Right to erasure and restriction of processing:** In accordance with the legal requirements, you have the right to demand that data concerning you be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the legal requirements.
- **Right to data portability:** You have the right to receive the data concerning you that you have provided to us in a structured, commonly used and machine-readable format in accordance with the legal requirements or to request that it be transferred to another controller.
- **Complaint to the supervisory authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the provisions of the GDPR.

### **Use of cookies**

Cookies are small text files or other storage notes that store information on end devices and read information from the end devices, e.g. to store the login status in a user account, the contents of a shopping basket in an e-shop, the content accessed or functions used on an online offer. Cookies can also be used for various purposes, e.g. to ensure the functionality, security and convenience of online offers and to create analyses of visitor flows.

**Notes on consent:** We use cookies in accordance with the statutory provisions. We therefore obtain prior consent from users, unless this is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is absolutely necessary in order to provide users with a telemedia service they have expressly requested (i.e. our online offering). Strictly necessary cookies generally include cookies with functions that serve the display and operability of the online service, load balancing, security, storage of user preferences and selection options or similar purposes related to the provision of the main and secondary functions of the online service requested by the user. The revocable consent is clearly communicated to the users and contains the information on the respective use of cookies.

**Information on legal bases under data protection law:** The legal basis under data protection law on which we process users' personal data with the help of cookies depends on whether we ask users for their consent. If users consent, the legal basis for processing their data is the consent they have given. Otherwise, the data processed using cookies will be processed on the basis of our legitimate interests (e.g. in the commercial operation of our online offering and improving its usability) or, if this is done in the context of the fulfilment of our contractual obligations, if the use of cookies is necessary to fulfil our contractual obligations. We will explain the purposes for which we process cookies in the course of this privacy policy or as part of our consent and processing procedures.

**Storage duration:** With regard to the storage duration, a distinction is made between the following types of cookies

- **Temporary cookies (also: session or session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed their end device (e.g. browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the end device is closed. For example, the login status can be saved or favourite content can be displayed directly when the user visits a website again. The user data collected with the help of cookies can also be used to measure reach. If we do not provide users with explicit information on the type and storage duration of cookies (e.g. when obtaining consent), users should assume that cookies are permanent and can be stored for up to two years.

**General information on revocation and objection (so-called "opt-out"):** Users can revoke the consent they have given at any time and object to processing in accordance with the legal requirements. Among other things, users can restrict the use of cookies in their browser settings (although this may also restrict the functionality of our online offering). An objection to the use of cookies for online marketing purposes can also be declared via the websites <https://optout.aboutads.info> and <https://www.youonlinechoices.com/>.

**Legal bases:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

**Further information on processing processes, procedures and services:**

**Processing of cookie data on the basis of consent: We use a procedure for consent management:** Procedure for obtaining, logging, managing and revoking consent, in particular for the use of cookies and similar technologies for storing, reading and processing information on users' end

devices and their processing, in the context of which the user's consent to the use of cookies, respectively the processing and providers mentioned in the consent management: Procedure for obtaining, logging, managing and revoking consent, in particular for the use of cookies and similar technologies for storing, reading and processing information on users' end devices and their processing procedures, can be obtained and managed and revoked by users. The declaration of consent is stored so that it does not have to be requested again and the consent can be proven in accordance with the legal obligation. Consent can be stored on the server and/or in a cookie (so-called opt-in cookie or with the help of comparable technologies) in order to be able to assign the consent to a user or their device. Subject to individual information on the providers of cookie management services, the following information applies: Consent may be stored for up to two years. A pseudonymous user identifier is created and stored with the time of consent, information on the scope of consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and end device used; **legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

### **Business services**

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") in the context of contractual and comparable legal relationships and associated measures and in the context of communication with the contractual partners (or pre-contractual), e.g. to answer enquiries.

We process this data in order to fulfil our contractual obligations. These include, in particular, the obligations to provide the agreed services, any updating obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to safeguard our rights and for the purpose of the administrative tasks associated with these obligations and the company organisation. In addition, we process the data on the basis of our legitimate interests in proper and efficient business management and in security measures to protect our contractual partners and our business operations from misuse, jeopardising their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only pass on the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfil legal obligations. Contractual partners will be informed about other forms of processing, e.g. for marketing purposes, as part of this privacy policy. We inform the contractual partners which data is required for the aforementioned purposes before or during data collection, e.g. in online forms, by means of special marking (e.g. colours) or symbols (e.g. asterisks or similar), or in person.

We delete the data after the expiry of statutory warranty and comparable obligations, i.e. generally after 4 years, unless the data is stored in a customer account, e.g. as long as it must be retained for legal archiving reasons. The statutory retention period is ten years for documents relevant under tax law and for trading books, inventories, opening balance sheets, annual financial statements, the work instructions required to understand these documents and other organisational documents and accounting records, and six years for commercial and business letters received and reproductions of commercial and business letters sent. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent or the accounting document was created, the record was made or the other documents were created.

Insofar as we use third-party providers or platforms to provide our services, the terms and conditions and data protection notices of the respective third-party providers or platforms apply in the relationship between the users and the providers.

- Processed data types: Inventory data (e.g. names, addresses); Payment data (e.g. bank details, invoices, payment history); Contact data (e.g. email, telephone numbers); Contract data (e.g. subject matter of the contract, duration, customer category); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Customers; interested parties. Business and contractual partners.
- Purposes of processing: Provision of contractual services and fulfilment of contractual obligations; security measures; contact requests and communication; office and organisational procedures. Managing and responding to enquiries.
- Legal bases: Contract fulfilment and pre-contractual enquiries (Art. 6 Para. 1 S. 1 lit. b) GDPR); Legal obligation (Art. 6 Para. 1 S. 1 lit. c) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **Further information on processing operations, procedures and services:**

**Online shop, order forms, e-commerce and delivery:** We process the data of our customers to enable them to select, purchase or order the selected products, goods and associated services, as well as their payment and delivery or fulfilment. If necessary for the fulfilment of an order, we use service providers, in particular postal, forwarding and shipping companies, to carry out the delivery or fulfilment for our customers. We use the services of banks and payment service providers to process payment transactions. The required information is marked as such in the context of the order or comparable purchase process and includes the information required for delivery or provision and billing as well as contact information in order to be able to hold any consultation; **legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

#### **Use of online platforms for offer and sales purposes**

We offer our services on online platforms operated by other service providers. In this context, the data protection notices of the respective platforms apply in addition to our data protection notices. This applies in particular with regard to the execution of the payment process and the procedures used on the platforms to measure reach and for interest-based marketing.

- Processed data types: Inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contact data (e.g. email, telephone numbers); contract data (e.g. subject matter of the contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Customers.
- Purposes of processing: Provision of contractual services and fulfilment of contractual obligations. Marketing.
- Legal bases: Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **Further information on processing operations, procedures and services:**

- Amazon: Online marketplace for e-commerce; Service provider: Amazon EU S.à r.l. (Société à responsabilité limitée), 38 avenue John F. Kennedy, L-1855 Luxembourg; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.amazon.de/>; Privacy Policy: <https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010>. Basis for transfer to third countries: EU-US Data Privacy Framework (DPF).
- eBay: Online marketplace for e-commerce; Service provider: eBay Marketplaces GmbH, Helvetiastrasse 15/17, 3005 Bern, Switzerland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.ebay.de/>. Privacy Policy: <https://www.ebay.de/help/policies/member-behavior-policies/datenschutzerklrung?id=4260>.

### **Providers and services used in the course of business activities**

As part of our business activities, we use additional services, platforms, interfaces or plug-ins from third-party providers ("services" for short) in compliance with legal requirements. Their use is based on our interests in proper, lawful and efficient business operations (e.g. accounting).

- Processed data types: Inventory data (e.g. names, addresses); Payment data (e.g. bank details, invoices, payment history); Contact data (e.g. email, telephone numbers); Contract data (e.g. subject matter of contract, duration, customer category); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Customers; interested parties; users (e.g. website visitors, users). Business and contractual partners.
- Purposes of processing: Provision of contractual services and fulfilment of contractual obligations. Office and organisational procedures.
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Further information on processing processes, procedures and services:**

- Lexoffice: Cloud-based accounting software; Service provider: Haufe-Lexware GmbH & Co. KG, Ein Unternehmen der Haufe Group SE, Munzinger Straße 9, 79111 Freiburg, Germany; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.lexoffice.de/>; Privacy Policy: <https://www.lexoffice.de/datenschutz/>.

### **Payment procedures**

As part of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our legitimate interests, we offer the data subjects efficient and secure payment options and use other service providers in addition to banks and credit institutions (collectively referred to as "payment service providers").

The data processed by the payment service providers includes inventory data, such as the name and address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as contract, total and recipient-related information. The information is required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored by them, i.e. we do not receive any account or credit card-related information, but only information with confirmation or negative information about the payment. Under certain circumstances, the data may be transmitted by the payment service providers to credit agencies. The purpose of this transmission is to check identity and creditworthiness. Please refer to the payment service providers' terms and conditions and data protection information.

Payment transactions are subject to the terms and conditions and data protection notices of the respective payment service providers, which can be accessed on the respective websites or transaction applications. We also refer to these for further information and the assertion of cancellation, information and other data subject rights.

- Processed data types: Inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contract data (e.g. subject matter of the contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Customers. Interested parties.



- Purposes of processing: Provision of contractual services and fulfilment of contractual obligations.
- Legal bases: Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

#### **Further information on processing operations, procedures and services:**

- PayPal: Payment services (technical connection of online payment methods) (e.g. PayPal, PayPal Plus, Braintree); Service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; Legal basis: Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); Website: <https://www.paypal.com/de>. Privacy Policy: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.
- GooglePay: Payment services (technical connection of online payment methods); Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Contract fulfilment and pre-contractual enquiries (Art. 6 Para. 1 S. 1 lit. b) GDPR); Website: [https://pay.google.com/intl/de\\_de/about/](https://pay.google.com/intl/de_de/about/). Privacy Policy: <https://policies.google.com/privacy>.
- ApplePay: Payment services (technical connection of online payment methods); Service provider: Apple Inc., with registered office at One Apple Park Way, Cupertino, California, USA; Legal basis: Contract fulfilment and pre-contractual enquiries (Art. 6 Para. 1 S. 1 lit. b) GDPR); Website: <https://www.apple.com/de/apple-pay/>. Privacy Policy: <https://www.apple.com/de/legal/privacy/>.
- Klarna: Payment services (technical connection of online payment methods); Service provider: Klarna Bank AB (publ), Sveavägen 46, 111 34 Stockholm, Sweden; Legal basis: Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); Website: <https://www.klarna.com/sofort/>. Privacy Policy: <https://www.klarna.com/sofort/datenschutz/>.
- WIXPayments: Payment services (technical connection of online payment methods); Service provider: Wix.com Ltd, Nermal St. 40, 6350671 Tel Aviv, Israel; Legal basis: Contract fulfilment and pre-contractual enquiries (Art. 6 Para. 1 S. 1 lit. b) GDPR); Website: <https://de.wix.com/payments>. Privacy Policy: <https://de.wix.com/about/privacy>.

#### **Provision of the online offer and web hosting**

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

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Provision of our online offer and user-friendliness; information technology infrastructure (operation and provision of information systems and technical devices (computers, servers, etc.)). Security measures.
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **Further information on processing processes, procedures and services:**

- Collection of access data and log files: Access to our online offering is logged in the form of so-called "server log files". The server log files may include the address and name of the websites and files accessed, date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. The

server log files may be used for security purposes, e.g. to avoid overloading the servers (especially in the event of abusive attacks, so-called DDoS attacks) and to ensure the utilisation of the servers and their stability; legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Deletion of data: Log file information is stored for a maximum of 30 days and then deleted or anonymised. Data whose further retention is required for evidentiary purposes is exempt from deletion until the respective incident has been finally clarified.

### **Blogs and publication media**

We use blogs or comparable means of online communication and publication (hereinafter "publication medium"). Readers' data is only processed for the purposes of the publication medium to the extent necessary for its presentation and communication between authors and readers or for security reasons. For further information, please refer to the information on the processing of visitors to our publication medium in this data protection notice.

- Processed data types: Inventory data (e.g. names, addresses); contact data (e.g. email, telephone numbers); content data (e.g. entries in online forms); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of Processing: Provision of contractual services and fulfilment of contractual obligations; Feedback (e.g. collecting feedback via online form); Provision of our online services and usability; Security measures. Managing and responding to enquiries.
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Further information on processing operations, procedures and services:**

- Comments and contributions: When users leave comments or other contributions, their IP addresses may be stored on the basis of our legitimate interests. This is done for our security in case someone leaves illegal content in comments and posts (insults, prohibited political propaganda, etc.). In this case, we ourselves may be prosecuted for the comment or post and are therefore interested in the identity of the author.

Furthermore, we reserve the right to process user data for the purpose of spam detection on the basis of our legitimate interests.

On the same legal basis, we reserve the right to store users' IP addresses for the duration of surveys and to use cookies in order to avoid multiple votes.

The personal information provided in the context of comments and contributions, any contact and website information as well as the content information will be stored permanently by us until the user objects; legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

- **Customer reviews:** We may contact you by email to invite you to rate the service and/or products you have received from us and to improve our products] . As we work with an external company, Trustpilot A/S ("Trustpilot"), to collect customer feedback, we will share your name, email address and reference number with Trustpilot for this purpose. If you would like to know more about how Trustpilot processes your data, you can view the company's privacy policy here. <https://de.legal.trustpilot.com/for-reviewers/end-user-privacy-terms> An agreement on processing orders with "Trustpilot is available; legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Contact and enquiry management**

When contacting us (e.g. by post, contact form, email, telephone or via social media) and as part of existing user and business relationships, the details of the enquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested measures.

- Processed data types: Contact data (e.g. email, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Communication partners.
- Purposes of Processing: Contact requests and communication; Managing and responding to enquiries; Feedback (e.g. collecting feedback via online form). Provision of our online services and user-friendliness.
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

### **Live chat**

For the live chat on our website, we use the Wix Chat of our website provider [www.wix.com](https://www.wix.com), <https://de.wix.com/about/privacy> as part of our legitimate interest in a technically flawless online offer and its economically efficient design and optimisation in accordance with Art. 6 para. 1 lit. f GDPR

When Live Chat is called up, Live Chat temporarily collects the IP address at the beginning in order to determine the country from which the live chat was started. This makes it possible to offer visitors customer service tailored to their needs. The collection of the IP address is solely for this purpose and is not permanently stored by Live Chat.

If you do not want Wix Chat to transmit data, you can prevent Wix Chat from setting cookies by selecting the appropriate settings in your browser. Your browser allows you to prevent the use of cookies completely or in individual cases. Please refer to the operating instructions for your browser for more information. Blocking cookies may restrict the function of our website and other websites you visit. You can permanently prevent the storage of cookies in your browser by downloading and installing the plugin linked below. You can find more information here.

In addition, Wix Chat saves the communication in the live chats. This can save you extensive explanations of your enquiry. If you do not wish this to happen, please let us know using the contact details above. Saved live chats will then be deleted by us immediately.

Stored live chats will then be deleted by us immediately. They will also be deleted by us after your enquiry has been dealt with, unless they are required for legal defence and no contract has been initiated or concluded as part of the chat and we (must) retain this data as contract data.

### **Further information on processing operations, procedures and services:**

- Contact form: If users contact us via our contact form, e-mail or other communication channels, we process the data provided to us in this context to process the communicated request; legal basis: fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR), legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- HubSpot: Customer management as well as process and sales support with personalised customer care with multi-channel communication, i.e. management of customer enquiries from different channels as well as analysis and feedback functions; Service provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; Legal basis: Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.hubspot.de>;

Privacy Policy: <https://legal.hubspot.com/de/privacy-policy>; Data processing agreement: <https://legal.hubspot.com/dpa>. Basis for third country transfers: EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://legal.hubspot.com/dpa>).

### **Communication via messenger**

We use messengers for communication purposes and therefore ask you to observe the following information on the functionality of the messengers, encryption, the use of communication metadata and your options to object.

You can also contact us by alternative means, e.g. by telephone or email. Please use the contact options provided to you or the contact options provided within our online offering.

In the case of end-to-end encryption of content (i.e. the content of your message and attachments), we would like to point out that the communication content (i.e. the content of the message and attached images) is encrypted from end to end. This means that the content of the messages cannot be viewed, not even by the messenger providers themselves. You should always use a current version of the messenger with encryption enabled to ensure that the message content is encrypted.

However, we would also like to point out to our communication partners that although the messenger providers cannot view the content, they can find out that and when communication partners communicate with us and that technical information about the device used by the communication partners and, depending on the settings of their device, location information (so-called metadata) is also processed.

**Notes on legal bases:** If we ask communication partners for permission before communicating with them via Messenger, the legal basis for our processing of their data is their consent. Otherwise, if we do not ask for consent and you contact us, for example, on your own initiative, we use Messenger in relation to our contractual partners and in the context of contract initiation as a contractual measure and, in the case of other interested parties and communication partners, on the basis of our legitimate interests in fast and efficient communication and fulfilment of the needs of our communication partners in communication via Messenger. We would also like to point out that we will not transmit the contact data provided to us to the messengers for the first time without your consent.

**Revocation, objection and deletion:** You can revoke your consent at any time and object to communication with us via Messenger at any time. In the case of communication via Messenger, we delete the messages in accordance with our general deletion guidelines (i.e., for example, as described above, after the end of contractual relationships, in the context of archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information from the communication partners, if no reference to a previous conversation is to be expected and the deletion does not conflict with any statutory retention obligations.

- Processed data types: Contact data (e.g. e-mail, telephone numbers); Usage data (e.g. websites visited, interest in content, access times); Meta/communication data (e.g. device information, IP addresses); Content data (e.g. entries in online forms).
- Data subjects: Communication partners.
- Purposes of processing: Contact enquiries and communication; direct marketing (e.g. by email or post).
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Newsletter and electronic notifications**

We only send newsletters, emails and other electronic notifications (hereinafter "newsletter") with the consent of the recipient or with legal authorisation. If the contents of the newsletter are specifically described when registering for the newsletter, they are decisive for the user's consent. Otherwise, our newsletters contain information about our services and us.

To subscribe to our newsletters, it is generally sufficient to provide your e-mail address. However, we may ask you to provide a name so that we can address you personally in the newsletter, or other information if this is necessary for the purposes of the newsletter.

**Double opt-in procedure:** Registration for our newsletter is always carried out in a so-called double opt-in procedure, i.e. after registration you will receive an e-mail asking you to confirm your registration. This confirmation is necessary to ensure that no-one can register using other people's e-mail addresses. Subscriptions to the newsletter are logged in order to be able to prove the registration process in accordance with legal requirements. This includes storing the time of registration and confirmation as well as the IP address. Changes to your data stored by the mailing service provider are also logged.

**Deletion and restriction of processing:** We may store the unsubscribed email addresses for up to three years on the basis of our legitimate interests before deleting them in order to be able to prove that consent was previously given. The processing of this data is limited to the purpose of a possible defence against claims. An individual request for erasure is possible at any time, provided that the former existence of consent is confirmed at the same time. In the event of obligations to permanently observe objections, we reserve the right to store the e-mail address in a block list solely for this purpose.

The registration process is logged on the basis of our legitimate interests for the purpose of verifying that it is carried out properly. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests in an efficient and secure dispatch system.

#### **Contents:**

Information about us, our services, promotions and offers.

- Processed data types: Inventory data (e.g. names, addresses); contact data (e.g. email, telephone numbers); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status); usage data (e.g. websites visited, interest in content, access times).
- Data subjects: Communication partners; users (e.g. website visitors, users of online services).
- Purposes of processing: Direct marketing (e.g. by email or post). Provision of contractual services and fulfilment of contractual obligations.
- Legal bases: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- Possibility of objection (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 operations, procedures and services:**

Measurement of opening and click rates: The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file that is retrieved from our server when the newsletter is opened or, if we use a dispatch service provider, from their server. As part of this retrieval, technical information, such as information about the browser and your system, as well as your IP address and the time of retrieval, is initially collected.

This information is used for the technical improvement of our newsletter based on the technical data or the target groups and their reading behaviour based on their retrieval locations (which can be determined with the help of the IP address) or the access times. This analysis also includes determining whether the newsletters are opened, when they are opened and which links are clicked. This information is assigned to the individual newsletter recipients and stored in their profiles until they are deleted. The analyses help us to recognise the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The measurement of opening rates and click rates as well as the storage of the measurement results in the user profiles is necessary to operate a newsletter economically.

We receive summarised statistics and thus more insight into your wishes and interests. It is important to note that these reports do not identify you personally; legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

- Prerequisite for the use of free services: Consent to the sending of mailings can be made dependent as a prerequisite for the use of free services (e.g. access to certain content or participation in certain promotions). If users wish to take advantage of the free service without subscribing to the newsletter, please contact us.
- Brevo: E-mail dispatch and automation services; service provider: Sendinblue GmbH
- Address: Köpenicker Straße 126, 10179 Berlin, Germany; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.brevo.com/de/>; Privacy Policy: <https://www.brevo.com/de/legal/privacypolicy/>. Data processing agreement: Provided by the service provider.
- CleverReach: E-mail dispatch and automation services; Service provider: CleverReach GmbH & Co. KG, //CRASH Building, Schafjückenweg 2, 26180 Rastede, Germany; Legal basis: Legitimate interests (Art. 6 Para. 1 S. 1 lit. f) GDPR); Website: <https://www.cleverreach.com/de/>; Privacy Policy: <https://www.cleverreach.com/de/datenschutz/>. Data processing agreement: Provided by the service provider.
- HubSpot: Email delivery and automation services; Service provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.hubspot.de/>; Privacy Policy: <https://legal.hubspot.com/de/privacy-policy/>; Data processing agreement: <https://legal.hubspot.com/dpa>. Basis for transfer to third countries: EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://legal.hubspot.com/dpa>).

### **Advertising communication via email, post, fax or telephone**

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

Recipients have the right to revoke their consent at any time or to object to advertising communication at any time.

After revocation or objection, we store the data required to prove the previous authorisation for contacting or sending for up to three years after 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 defence against claims. On the basis of the legitimate interest in permanently observing the revocation or objection of the user, we also store the data required to avoid renewed contact (e.g. depending on the communication channel, the e-mail address, telephone number, name).

- Processed data types: Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers).
- Data subjects concerned: Communication partner.
- Purposes of processing: Direct marketing (e.g. by email or post).
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Web analysis, monitoring and optimisation**

Web analysis (also referred to as "reach measurement") is used to evaluate the flow of visitors to our online offering and may include behaviour, interests or demographic information about visitors, such as age or gender, as pseudonymous values. With the help of reach analysis, we can, for example, recognise at what time our online offering or its functions or content are most frequently used or invite visitors to reuse them. We can also understand which areas require optimisation.

In addition to web analysis, we may also use test procedures, e.g. to test and optimise different versions of our online offering or its components.

Unless otherwise stated below, profiles, i.e. data summarised for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read out from it. The information collected includes, in particular, websites visited and the elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

The IP addresses of users are also stored. However, we use an IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect users. In general, no clear user data (such as e-mail addresses or names) is stored in the context of web analysis, A/B testing and optimisation, but pseudonyms, i.e. we and the providers of the software used do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective procedures.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Reach measurement (e.g. access statistics, recognition of returning visitors); profiles with user-related information (creation of user profiles). Provision of our online services and user-friendliness.
- Security measures: IP masking (pseudonymisation of the IP address).
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

### **Further information on processing processes, procedures and services:**

- Google Analytics: We use Google Analytics to measure and analyse the use of our online offering on the basis of 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 recognise which content users have called up within one or more usage processes, which search terms they have used, which they have called up again or which they have interacted with our online offering. The time of use and its duration are also stored, as well as the sources of the users who refer to our online offering and technical aspects of their end devices and browsers. Pseudonymous profiles of users are created with information from the use of various devices, whereby cookies can be used. Google Analytics does not log or store individual IP addresses

for EU users. However, Analytics provides rough geographic location data by deriving the following metadata from IP addresses: City (and the city's inferred latitude and longitude), Continent, Country, Region, Subcontinent (and ID-based counterparts). For EU traffic, the IP address data is used exclusively for this derivation of geolocation data before it is immediately deleted. It is not logged, is not accessible and is not used for other purposes. When Google Analytics collects measurement data, all IP queries are performed on EU-based servers before the traffic is forwarded to Analytics servers for processing; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR); Website: <https://marketingplatform.google.com/intl/de/about/analytics/>; Security measures: IP masking (pseudonymisation of the IP address); Privacy Policy: <https://policies.google.com/privacy>; Data processing agreement: <https://business.safety.google/adsprocessor/terms/>; Basis for transfer to third countries: EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://business.safety.google/adsprocessor/terms/>); Option to object (opt-out): Opt-out plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>, settings for the display of adverts: <https://myadcenter.google.com/personalizationoff>. Further information: <https://business.safety.google/adsservices/> (types of processing and processed data).

### **Online marketing**

We process personal data for online marketing purposes, which may include in particular the marketing of advertising space or the presentation 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 procedures are used, by means of which the user data relevant for the presentation of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, but also communication partners and technical information such as the browser used, the computer system used and information on usage times and functions used. If users have consented to the collection of their location data, this can also be processed.

The IP addresses of users are also stored. However, we use available IP masking procedures (i.e. pseudonymisation by shortening the IP address) to protect users. In general, no clear user data (such as e-mail addresses or names) is stored as part of the online marketing process, but pseudonyms, i.e. we and the providers of the online marketing processes do not know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is generally stored in cookies or by means of similar procedures. These cookies can generally also be read later on other websites that use the same online marketing process and analysed for the purpose of displaying content, as well as supplemented with further data and stored on the server of the online marketing process provider.

In exceptional cases, 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 process we use and the network links the user profiles with the aforementioned data. Please note that users can make additional agreements with the providers, e.g. by giving their consent during registration.

In principle, we only receive access to summarised information about the success of our advertisements. However, as part of so-called conversion measurements, we can check which of our online marketing procedures have led to a so-called conversion, i.e., for example, to the conclusion of



a contract with us. The conversion measurement is used solely to analyse the success of our marketing measures.

Unless otherwise stated, we ask you to assume that cookies used are stored for a period of two years.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- 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); Marketing; Profiles with user-related information (Creating user profiles). Conversion measurement (measurement of the effectiveness of marketing measures).
- Security measures: IP masking (pseudonymisation of the IP address).
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Possibility of objection (opt-out): We refer you to the data protection notices of the respective providers and the opt-out options specified for the providers (so-called "opt-out"). If no explicit opt-out option has been specified, you have the option of switching off cookies in your browser settings. However, this may restrict the functions of our online offering. We therefore recommend the following additional opt-out options, which are summarised for the respective areas:

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

#### **Further information on processing operations, procedures and services:**

- Google Ads and conversion measurement: Online marketing process for the purpose of placing content and adverts within the service provider's advertising network (e.g. in search results, in videos, on websites, etc.) so that they are displayed to users who have a presumed interest in the adverts. In addition, we measure the conversion of the adverts, i.e. whether users have taken them as an opportunity to interact with the adverts and use 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 (Art. 6 para. 1 sentence 1 lit. a) GDPR), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://marketingplatform.google.com>; Privacy Policy: <https://policies.google.com/privacy>; Basis for third country transfer: EU-US Data Privacy Framework (DPF); Further information: Types of processing and data processed: <https://business.safety.google/adsservices/>. Data processing conditions between controllers and standard contractual clauses for third country transfers of data: <https://business.safety.google/adscontrollerterms>.
- Google AdSense with non-personalised ads: We use the Google AdSense service with non-personalised ads, with the help of which ads are displayed within our online offer and we receive remuneration for their display or other use; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR); Website: <https://marketingplatform.google.com>; Privacy Policy: <https://policies.google.com/privacy>; Basis for transfer to third countries: EU-US Data Privacy Framework (DPF); 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>.

### **Presence 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 result in risks for users because, for example, it could make it more difficult to enforce users' rights.

Furthermore, user data within social networks is generally processed for market research and advertising purposes. For example, user profiles can be created based on user behaviour and the resulting interests of users. The user profiles can in turn be used, for example, to place adverts within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are generally stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can also be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective platforms and are logged in to them).

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

In the case of requests for information and the assertion of data subject rights, we would also like to point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. Should you nevertheless require assistance, you can contact us.

- Processed data types: Contact data (e.g. e-mail, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of Processing: Contact requests and communication; Feedback (e.g. collecting feedback via online form). Marketing.
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### **Further information on processing operations, procedures and services:**

- Instagram: Social network; Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.instagram.com>; Privacy Policy: <https://instagram.com/about/legal/privacy>. Basis for transfer to third countries: EU-US Data Privacy Framework (DPF).
- Facebook pages: Profiles within the social network Facebook; Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Basis for third country transfer: EU-US Data Privacy Framework (DPF), Standard Contractual Clauses ([https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)); Further information: We are jointly responsible with Meta Platforms Ireland Limited for the collection (but not the further processing) of data from visitors to our Facebook page (so-called "fan page"). This data includes information about the types of content users view or interact with, or the actions they take (see "Things you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), as well as information about the devices used by users (e.g. IP addresses, operating system, browser type, language settings, cookie data; see "Device information" in the Facebook Data Policy: <https://www.facebook.com/policy>). As

explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and uses information to provide analytics services, known as "Page Insights", for page operators so that they can gain insights into how people interact with their pages and the content associated with them. We have concluded a special agreement with Facebook ("Information on Page Insights", [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which regulates in particular which security measures Facebook must observe and in which Facebook has agreed to fulfil the rights of data subjects (i.e. users can, for example, send information or deletion requests directly to Facebook). The rights of users (in particular to information, deletion, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information on 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 responsibility is limited to the collection by and transfer of data to Meta Platforms Ireland Limited, a company based in the EU. The further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which in particular concerns the transfer of data to the parent company Meta Platforms, Inc. in the USA.

- LinkedIn: Social network; service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Basis for third country transfer: EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://legal.linkedin.com/dpa>); Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>; Further information: We are jointly responsible with LinkedIn Ireland Unlimited Company for the collection (but not the further processing) of visitor data for the purpose of creating the "page insights" (statistics) of our LinkedIn profiles.

This data includes information about the types of content that users view or interact with, or the actions they take, as well as information about the devices used by users (e.g. IP addresses, operating system, browser type, language settings, cookie data) and information from the user's profile, such as job function, country, industry, hierarchy level, company size and employment status. Data protection information on the processing of user data by LinkedIn can be found in LinkedIn's privacy policy:

<https://www.linkedin.com/legal/privacy-policy>

We have concluded a special agreement with LinkedIn Ireland ("Page Insights Joint Controller Addendum (the 'Addendum')", <https://legal.linkedin.com/pages-joint-controller-addendum>), which regulates in particular which security measures LinkedIn must observe and in which LinkedIn has agreed to fulfil the rights of data subjects (i.e. users can, for example, send information or deletion requests directly to LinkedIn). The rights of users (in particular to information, deletion, objection and complaint to the competent supervisory authority) are not restricted by the agreements with LinkedIn. The joint responsibility is limited to the collection of data by and transfer to Ireland Unlimited Company, a company based in the EU. The further processing of the data is the sole responsibility of Ireland Unlimited Company, which in particular concerns the transmission of the data to the parent company LinkedIn Corporation in the USA.

### **Plugins and embedded functions and content**

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

The integration always requires that the third-party providers of this content process the IP address of the user, as they would not be able to send the content to their browser without the IP address. The IP

address is therefore required to display this content or function. We endeavour to only use content whose respective providers only use the IP address to deliver the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags can be used to analyse 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 contain, among other things, technical information about the browser and operating system, referring websites, visiting time and other information about the use of our online offer, as well as being linked to such information from other sources.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status); inventory data (e.g. names, addresses); contact data (e.g. email, telephone numbers); content data (e.g. entries in online forms).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Provision of our online services and user-friendliness.
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

#### **Further information on processing processes, procedures and services:**

YouTube videos: Video content; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR); Website: <https://www.youtube.com>; Privacy Policy: <https://policies.google.com/privacy>; Basis for third country transfer: EU-US Data Privacy Framework (DPF). Possibility of objection (opt-out): Opt-out plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>, settings for the display of adverts: <https://myadcenter.google.com/personalizationoff>.

#### **Management, organisation and support tools**

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

In this context, personal data may be processed and stored on the servers of the third-party providers. This may affect 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 transactions, contracts, other processes and their content.

If users are referred to third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party providers may process usage data and metadata for security purposes, service optimisation or marketing purposes.

We therefore ask you to observe the data protection notices of the respective third-party providers.

- Processed data types: Content data (e.g. entries in online forms); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- Data subjects: Communication partners; users (e.g. website visitors, users of online services).
- Purposes of processing: contact requests and communication; provision of contractual services and fulfilment of contractual obligations. Office and organisational procedures.
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **Further information on processing operations, procedures and services:**

- WeTransfer: Transfer of files via the Internet; Service provider: WeTransfer BV, Oostelijke Handelskade 751, Amsterdam, 1019 BW, Netherlands; Legal basis: Legitimate interests (Art.

6 para. 1 sentence 1 lit. f) GDPR); Website: <https://wetransfer.com>. Privacy Policy: <https://wetransfer.com/legal/privacy>.

### **Google Web Fonts**

This website uses so-called web fonts provided by Google for the standardised display of fonts. The Google fonts are installed locally by our hosting operator Wix.com Ltd, Nemaal St. 40, 6350671 Tel Aviv, Israel. There is no connection to Google servers.

We have concluded a data processing agreement with WIX in accordance with Art. 28 GDPR. Further information about data protection at Wix.com: <https://de.wix.com/about/privacy-dpa-users>

### **Changing and updating the privacy policy**

We ask you to inform yourself regularly about the content of our privacy policy. We will amend the privacy policy as soon as changes to the data processing carried out by us 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 organisations in this privacy policy, please note that the addresses may change over time and please check the information before contacting us.

Version: 23.02.2024