

# 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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## **Contact information of the data protection officer**

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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.
- Payment Data.
- Location data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.

## Categories of Data Subjects

- Prospective customers.
- Communication partner.
- Users.
- Business and contractual partners.

## Purposes of Processing

- Provision of contractual services and customer support.
- Contact requests and communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Targeting.
- Office and organisational procedures.
- Managing and responding to inquiries.
- Feedback.

- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Information technology infrastructure.

## Legal Bases for the Processing

Below you will find an overview of the legal basis 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. 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.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (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.

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, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

In addition to the data protection regulations of the GDPR, national regulations on data protection apply in Lichtenstein. These include, in particular, the Data Protection Act (Datenschutzgesetz, DSG) and the Data Protection Regulation

(Datenschutzverordnung, DSV).

In addition to the data protection regulations of the GDPR, national regulations on data protection apply in the Netherlands. These include, in particular, the "Implementing Act to the General Data Protection Regulation" (Uitvoeringswet Algemene verordening gegevensbescherming - UAVG).

In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Austria. This includes in particular the Federal Act on the Protection of Individuals with regard to the Processing of Personal Data (Data Protection Act - DSG). In particular, the Data Protection Act contains special provisions on the right of access, rectification or cancellation, processing of special categories of personal data, processing for other purposes and transmission and automated decision making in individual cases.

In addition to the data protection regulations of the GDPR, national regulations on data protection apply in Poland. These include, in particular, the "Data Protection Act" (Ustawa z dnia 10 maja 2018 r. ochronie danych osobowych).

In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Switzerland. This includes in particular the Federal Data Protection Act (DSG). The DSG applies in particular if no EU/EEC citizens are affected and, for example, only data of Swiss citizens are processed.

In addition to the data protection provisions of the GDPR, the respective national data protection provisions, which we also observe, may apply in the case of national references.

## **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.

Masking of the IP address: If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address is shortened (also referred to as "IP masking"). In this process, the last two digits or the last part of the IP address after a full stop are removed or replaced by wildcards. The masking of the IP address is intended to prevent the identification of a person by means of their IP address or to make such identification significantly more difficult.

TLS encryption (https): To protect your data transmitted via our online services, we use TLS encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

## **Transmission of Personal Data**

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such cases, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of your data.

## **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 disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission:

[https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en)).

## Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose). If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person. Our further information on individual processing operations may also contain additional and specific information on data retention and erasure applicable to the respective processing operations.

## Use of Cookies

Cookies are small text files or other data records that store information on end devices and read information from the end devices. For example, to store the login status in a user account, the contents of a shopping cart in an e-shop, the contents accessed or the functions used. Cookies can also be used for various purposes, e.g. for purposes of functionality, security and convenience of online offers as well as the creation of analyses of visitor flows.

**Information on consent:** We use cookies in accordance with the statutory provisions. Therefore, we obtain prior consent from users, except when it is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is strictly necessary in order to provide an information society service explicitly requested by the subscriber or user. The revocable consent will be clearly communicated to the user and will contain the information on the respective cookie use.

**Information on legal bases under data protection law:** The legal basis under data protection law on which we process users' personal data with the use of cookies depends on whether we ask users for consent. If users consent, the legal basis for processing their data is their declared consent. Otherwise, the data processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in a business operation of our online services and improvement of its usability) or, if this is done in the context of the fulfillment of our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. For which purposes the cookies are processed by us, we do clarify in the course of this privacy policy or in the context of our consent and processing procedures.

**Retention period:** With regard to the retention period, a distinction is drawn between the following types of cookies:

- **Temporary cookies (also known as "session cookies"):** Temporary cookies are deleted at the latest after a user has left an online service and closed his or her end device (i.e. browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the terminal device is closed. For example, the login status can be saved, or preferred content can be displayed directly when the user visits a website again. Likewise, user data collected with the help of cookies can be used for reach measurement. Unless we provide users with explicit information about the type and storage duration of cookies (e.g., as part of obtaining consent), users should assume that cookies are permanent and that the storage period can be up to two years.

**General information on revocation and objection (opt-out):** Users can revoke the consent they have given at any time and also file an objection to processing in accordance with the legal requirements in Article 21 GDPR. Users can also declare their objection by means of the settings of their browser, e.g. by deactivating the use of cookies (whereby this may also limit the functionality of our online services). 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.youronlinechoices.com/>.

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

- **Processing Cookie Data on the Basis of Consent:** We use a cookie management solution in which users' consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) in order to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device.



## **Business services**

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

We process this data in order to fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of 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 disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving. The statutory retention period for documents relevant under tax law as well as for commercial books, inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters and reproductions of sent commercial and business letters six years. 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, furthermore the record was made or the other documents were created.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms

shall 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. e-mail, telephone numbers); Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Prospective customers; Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and customer support; Contact requests and communication; Office and organisational procedures; Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR); Legitimate Interests (Article 6 (1) (f) GDPR).

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

- **Consulting:** We process the data of our clients, clients as well as interested parties and other clients or contractual partners (uniformly referred to as "clients") in order to provide them with our consulting services. The data processed, the type, scope and purpose of the processing and the necessity of its processing are determined by the underlying contractual and client relationship. Insofar as it is necessary for the fulfilment of our contract, for the protection of vital interests or by law, or with the consent of the client, we disclose or transfer the client's data to third parties or agents, such as authorities, courts, subcontractors or in the field of IT, office or comparable services, taking into account the professional requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Technical and Engineering services:** We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works as well as associated activities and to pay for and make available such services or works or to perform such services or works. The required information is indicated as such within the framework of the conclusion of the agreement, order or equivalent contract and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations. Insofar as we gain access to the information of end customers, employees or other persons, we process it in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) 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. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status); Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **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.
- **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:** The access to our online services is logged in the form of so-called "server log files". Server log files may include the address and name of the web pages and files accessed, the 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 general rule, IP addresses and the requesting provider. The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal load balancing of the servers; **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.
- **E-mail Sending and Hosting:** The web hosting services we use also include sending, receiving and storing e-mails. For these purposes, the addresses of

the recipients and senders, as well as other information relating to the sending of e-mails (e.g. the providers involved) and the contents of the respective e-mails are processed. The above data may also be processed for SPAM detection purposes. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received (unless a so-called end-to-end encryption method is used). We can therefore accept no responsibility for the transmission path of e-mails between the sender and reception on our server; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

- **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).
- **Service Provider:** .
- **Wix:** Hosting and software for the creation, provision and operation of websites, blogs and other online services; **Service provider:** Wix.com Ltd., Nermal St. 40, 6350671 Tel Aviv, Israel; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.wix.com>; **Privacy Policy:** <https://wix.com/about/privacy>; **Data Processing Agreement:** <https://www.wix.com/about/privacy-dpa-users>; **Further Information:** Within the scope of the aforementioned services provided by Wix, data may also be transferred to Wix Inc., 500 Terry A. Francois Boulevard, San Francisco, California 94158, USA on the basis of standard contractual clauses or an equivalent data protection guarantee as part of further processing on behalf of Wix.

## 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:** Contact data (e.g. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).

- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication; Managing and responding to inquiries; Feedback (e.g. collecting feedback via online form); Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) 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 (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers).
- **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); Legitimate Interests (Article 6 (1) (f) GDPR).

## Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require

optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components.

Unless otherwise stated below, profiles, i.e. data aggregated 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 from it. The information collected includes, in particular, websites visited and 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 agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

Unless otherwise stated below, profiles, that is data summarized for a usage process or user, may be created for these purposes and stored in a browser or terminal device (so-called "cookies") or similar processes may be used for the same purpose. The information collected includes, in particular, websites visited and 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 or profiles to us or to the providers of the services we use, these may also be processed, depending on the provider.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as 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 processes.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, 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); Profiles with user-related information (Creating user profiles); Targeting (e.g. profiling based on interests and behaviour, use of cookies); Provision of our online services and usability.
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

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

- **Google Analytics:** Web analytics, reach measurement and measurement of user traffic; **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/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessor/terms/>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://business.safety.google/adsprocessor/terms/>; **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>; **Further Information:** <https://privacy.google.com/businesses/adsservices> (Types of processing and data processed).

## 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. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, 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 (Article 6 (1) (f) GDPR).

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

- **Instagram:** Social network; **Service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.instagram.com>; **Privacy Policy:** <https://instagram.com/about/legal/privacy>.
- **LinkedIn:** Social network; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Plaza 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>; **Data Processing Agreement:** <https://legal.linkedin.com/dpa>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://legal.linkedin.com/dpa>; **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **Social Media Wall / Social Media Newsroom:** A " Social Media Wall " or " Social Media Newsroom " is a compilation of certain posts from various social networks in which we are mentioned or which contain a hashtag with our name or the name of a campaign. This includes mentions of posts we publish on social networks and posts published by users. The content of the posts is automatically obtained from the respective social networks in accordance with the terms and permissions of the authors, and users may object to the display at any time. The authors are generally responsible for the content of the posts. The providers of the respective social networks are responsible for the processing of data in connection with the display of the posts and their content. We refer to the information on the respective social networks within the scope of this privacy policy. Without prejudice to the data subject rights of users, we recommend that users (also) contact the respective authors or providers of the respective social networks in the event of requests for information and complaints about posts that were not written by us, in order to remove the posts at the source or to assert their data protection rights;



**Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## **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. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status); Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos); Location data (Information on the geographical position of a device or person).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability; Marketing; Profiles with user-related information (Creating user profiles).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

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

- **Integration of third-party software, scripts or frameworks:** We incorporate into our online services software which we retrieve from servers of other providers (e.g. function libraries which we use for the purpose of displaying or user-friendliness of our online services). The respective providers collect the user's IP address and can process it for the purposes of transferring the software to the user's browser as well as for security purposes and for the evaluation and optimisation of their services; **Legal**

**Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

- **Google Fonts (from Google Server):** Obtaining fonts (and symbols) for the purpose of a technically secure, maintenance-free and efficient use of fonts and symbols with regard to timeliness and loading times, their uniform presentation and consideration of possible restrictions under licensing law. The provider of the fonts is informed of the user's IP address so that the fonts can be made available in the user's browser. In addition, technical data (language settings, screen resolution, operating system, hardware used) are transmitted which are necessary for the provision of the fonts depending on the devices used and the technical environment. This data may be processed on a server of the provider of the fonts in the USA - When visiting our online services, users' browsers send their browser HTTP requests to the Google Fonts Web API. The Google Fonts Web API provides users with Google Fonts' cascading style sheets (CSS) and then with the fonts specified in the CCS. These HTTP requests include (1) the IP address used by each user to access the Internet, (2) the requested URL on the Google server, and (3) the HTTP headers, including the user agent describing the browser and operating system versions of the website visitors, as well as the referral URL (i.e., the web page where the Google font is to be displayed). IP addresses are not logged or stored on Google servers and they are not analyzed. The Google Fonts Web API logs details of HTTP requests (requested URL, user agent, and referring URL). Access to this data is restricted and strictly controlled. The requested URL identifies the font families for which the user wants to load fonts. This data is logged so that Google can determine how often a particular font family is requested. With the Google Fonts Web API, the user agent must match the font that is generated for the particular browser type. The user agent is logged primarily for debugging purposes and is used to generate aggregate usage statistics that measure the popularity of font families. These aggregate usage statistics are published on Google Fonts' Analytics page. Finally, the referral URL is logged so that the data can be used for production maintenance and to generate an aggregate report on top integrations based on the number of font requests. Google says it does not use any of the information collected by Google Fonts to profile end users or serve targeted ads; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://fonts.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Further Information:** <https://developers.google.com/fonts/faq/privacy?hl=en>.
- **Google Maps:** We integrate the maps of the service "Google Maps" from the provider Google. The data processed may include, in particular, IP addresses and location data of users; **Service provider:** Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://mapsplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>.

- **Google Maps APIs and SDKs:** Interfaces to the map and location services provided by Google, which, for example, allow the addition of address entries, location determinations, distance calculations or the provision of supplementary information on locations and other places; **Service provider:** Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://mapsplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>.
- **Instagram plugins and contents:** Instagram plugins and contents - This can include content such as images, videos or text and buttons with which users can share content from this online service within Instagram . - We are jointly responsible (so-called "joint-controllership") with Meta Platforms Ireland Limited for the collection or transmission (but not further processing) of "Event Data" that Facebook collects or receives as part of a transmission using Instagram functions that run on our website for the following purposes: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)), which specifically addresses the security measures that Facebook must take ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", <https://www.facebook.com/legal/terms/dataprocessing/update>), the "Data Security Conditions" ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum, [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)). 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; **Service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.instagram.com>; **Privacy Policy:** <https://instagram.com/about/legal/privacy>.

- **LinkedIn plugins and contents:** LinkedIn plugins and contents - This can include content such as images, videos or text and buttons with which users can share content from this online service within LinkedIn; **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>; **Data Processing Agreement:** <https://legal.linkedin.com/dpa>; **Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries):** <https://legal.linkedin.com/dpa>; **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **MyFonts:** fonts; data processed in the font request process includes the identification number of the web font project (anonymized), the URL of the licensed website associated with our number to identify the licensee and the licensed web fonts, and the referrer URL; the anonymized web font project identification number is stored in encrypted log files with such data for 30 days to determine the monthly number of page views; after such extraction and storage of the number of page views the log files are deleted; **Service provider:** Monotype Imaging Holdings Inc., 600 Unicorn Park Drive, Woburn, Massachusetts 01801, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.myfonts.co>; **Privacy Policy:** <https://www.myfonts.com/info/legal/#Privacy>.
- **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:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.youtube.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

## Changes and Updates to the Privacy Policy

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.

## Rights of Data Subjects

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:** Without prejudice to any other administrative or judicial remedy, you shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her 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 GDPR.

# Terminology and Definitions

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- **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.
- **Location data:** Location data is created when a mobile device (or another device with the technical requirements for a location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data serve to indicate the geographically determinable position of the earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- **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.

- **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 allows them, for example, to optimize the content of the website to better meet the needs of their visitors. For purposes of web analytics, pseudonymous cookies and web beacons are frequently used in order to recognise returning visitors and thus obtain more precise analyses of the use of an online service.