

# Privacy Policy

## Legal Notice

Information about the service provider.

ALL MEDIA AI, a product from

**All Media FlexCo**

Gattermeyerweg 38

4040 Linz

Österreich

**UID-Nummer (Steuernummer):** ATU82632849

**Firmenbuchnummer:** FN 664910 i

**Rechtsform:** Flexible Kapitalgesellschaft

**Email:** [office@allmedia.ai](mailto:office@allmedia.ai)

**Business purpose:** Entwicklung, Beratung und Begleitung zeitgemäßer Medien- und Kommunikationsstrategien mit KI

**Supervisory authority:**

Magistrat der LH Linz

**Professional designation:** Unternehmensberatung

**Granting state:** Österreich

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## Privacy Policy Introduction and Overview

We have written this privacy policy (version 05.03.2025-122949477) in order to explain to you, in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#) and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered gender-neutral.

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

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

If you still have questions, we kindly ask you to contact the responsible body named below or in the imprint, follow the existing links and look at further information on third-party sites. You can of course also find our contact details in the imprint.

## Scope

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

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

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

## Legal bases

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

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

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

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

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

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

In **Austria** this is the Austrian Data Protection Act (**Datenschutzgesetz**), in short **DSG**. In **Germany** this is the Federal Data Protection Act (**Bundesdatenschutzgesetz**), in short **BDSG**.

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

## Contact details of the data protection controller

If you have any questions about data protection or the processing of personal data, you will find below the contact details of the controller in accordance with Article 4(7) of the EU General Data Protection Regulation (GDPR):

E-Mail: [office@allmedia.ai](mailto:office@allmedia.ai)

### Storage Period

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

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

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

## Rights in accordance with the General Data Protection Regulation

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

According to Article 15 DSGVO, you have the right to information about whether we are processing data about you. If this is the case, you have the right to receive a copy of the data and to know the following information:

- for what purpose we are processing;
- the categories, i.e. the types of data that are processed;
- who receives this data and if the data is transferred to third countries, how security can be guaranteed;

how long the data will be stored;  
the existence of the right to rectification, erasure or restriction of processing and the right to object to processing;  
that you can lodge a complaint with a supervisory authority (links to these authorities can be found below);  
the origin of the data if we have not collected it from you;  
Whether profiling is carried out, i.e. whether data is automatically evaluated to arrive at a personal profile of you.

You have a right to rectification of data according to Article 16 GDPR, which means that we must correct data if you find errors.

You have the right to erasure (“right to be forgotten”) according to Article 17 GDPR, which specifically means that you may request the deletion of your data.

According to Article 18 of the GDPR, you have the right to restriction of processing, which means that we may only store the data but not use it further.

According to Article 20 of the GDPR, you have the right to data portability, which means that we will provide you with your data in a standard format upon request.

According to Article 21 DSGVO, you have the right to object, which entails a change in processing after enforcement.

If the processing of your data is based on Article 6(1)(e) (public interest, exercise of official authority) or Article 6(1)(f) (legitimate interest), you may object to the processing. We will then check as soon as possible whether we can legally comply with this objection.

If data is used to conduct direct advertising, you may object to this type of data processing at any time. We may then no longer use your data for direct marketing. If data is used to conduct profiling, you may object to this type of data processing at any time. We may no longer use your data for profiling thereafter.

According to Article 22 of the GDPR, you may have the right not to be subject to a decision based solely on automated processing (for example, profiling).

You have the right to lodge a complaint under Article 77 of the GDPR. This means that you can complain to the data protection authority at any time if you believe that the data processing of personal data violates the GDPR.

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

If you believe that the processing of your data violates data protection law or your data protection rights have been violated in any other way, you can complain to the supervisory authority. For Austria, this is the data protection authority, whose website can be found at <https://www.dsb.gv.at/>. In Germany, there is a data protection officer for each federal state. For more information, you can contact the Federal Commissioner for Data Protection and Freedom of Information (BfDI). The following local data protection authority is responsible for our company:

## **Austria Data protection authority**

**Manager:** Dr. Matthias Schmidl

**Address:** Barichgasse 40-42, 1030 Wien

**Phone number.:** +43 1 52 152-0

**E-mail address:** [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

**Website:** <https://www.dsb.gv.at/>

## Data transfer to third countries

We only transfer or process data to countries outside the scope of the GDPR (third countries) if you consent to this processing or if there is another legal permission. This is particularly true when processing is legally required or necessary for the performance of a contractual relationship, and in any case, only to the extent permitted by law. Your consent is in most cases the primary reason for us to process data in third countries. Processing of personal data in third countries such as the USA, where many software providers offer services and have their server locations, may mean that personal data is processed and stored in unexpected ways.

We explicitly point out that, according to the opinion of the European Court of Justice, there is currently only an adequate level of protection for data transfers to the USA if a US company processing personal data of EU citizens in the USA is an active participant in the EU-US Data Privacy Framework. More information can be found at:

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en)

Data processing by US services that are not active participants in the EU-US Data Privacy Framework may result in data not being anonymized and processed, if applicable. Additionally, US government authorities may potentially have access to individual data. Furthermore, it may occur that collected data is linked with data from other services of the same provider, if you have a corresponding user account. Where possible, we try to use server locations within the EU, if offered.

We will inform you in the appropriate sections of this privacy policy in more detail about data transfers to third countries, if applicable.



## Security of data processing operations



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

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

# Communications

## Communications Overview

 Affected parties: Anyone who communicates with us via phone, email or online form  Processed data: e. g. telephone number, name, email address or data entered in forms. You can find more details on this under the respective form of contact

 Purpose: handling communication with customers, business partners, etc.   
Storage duration: for the duration of the business case and the legal requirements  
Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1) (f) GDPR (legitimate interests)

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

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

## Affected persons

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

## Telephone

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

## Email

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

## Online forms

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

## Legal bases

Data processing is based on the following legal bases:

Art. 6 para. 1 lit. a GDPR (consent): You give us your consent to store your data and to continue to use it for the purposes of the business case;

Art. 6 para. 1 lit. b GDPR (contract): For the performance of a contract with you or a processor such as a telephone provider, or if we have to process the data for pre-contractual activities, such as preparing an offer;

Art. 6 para. 1 lit. f GDPR (legitimate interests): We want to conduct our customer inquiries and business communication in a professional manner. Thus, certain technical facilities such as email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.

## Data Processing Agreement (DPA)

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

### Who are the processors?

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

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

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

### Contents of a Data Processing Agreement

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

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

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


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


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


## Cookies

### Cookies Overview

 Affected parties: visitors to the website

 Purpose: depending on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

 Processed data: depends on the cookie used. More details can be found below or from the manufacturer of the software that sets the cookie.

 Storage duration: can vary from hours to years, depending on the respective cookie  
Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What are cookies?

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

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

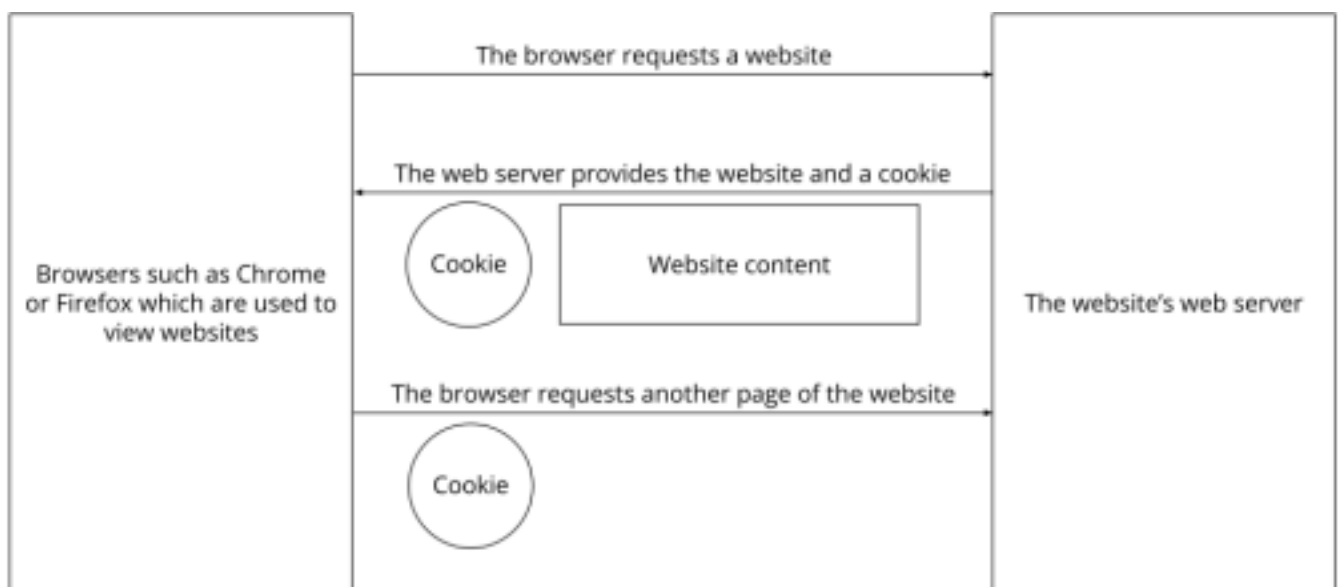
Whenever you surf the Internet, you are using a browser. Common browsers are for example, Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

It is important to note that cookies are very useful little helpers. Almost every website uses cookies. More precisely, these are HTTP cookies, as there are also other cookies for other uses. HTTP cookies are small files that our website stores on your computer. These cookie

files are automatically placed into the cookie-folder, which is the “brain” of your browser. A cookie consists of a name and a value. Moreover, to define a cookie, one or multiple attributes must be specified.

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

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



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

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

**Name:** \_ga

**Value:** GA1.2.1326744211.152122949477-9

**Purpose:** Differentiation between website visitors

**Expiry date:** after 2 years

A browser should support these minimum sizes:

At least 4096 bytes per cookie

At least 50 cookies per domain

At least 3000 cookies in total

## **Which types of cookies are there?**

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

There are 4 different types of cookies:

### **Essential cookies**

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

### **Purposive cookies**

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

### **Target-orientated cookies**

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

### **Advertising cookies**

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

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

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

## **Purpose of processing via cookies**

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

## **Which data are processed?**

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

on what data is processed or stored.

## **Storage period of cookies**

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

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

## **Right of objection – how can I erase cookies?**

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

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

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

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

## **Legal basis**

The so-called “cookie directive” has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section

165 (3) of the Telecommunications Act (2021). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in

Section 15 (3) of the Telemedia Act (TMG), which has been replaced by the Digital Services Act (DSA) since May 2024.


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


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



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

## Customer Data

### Customer Data Overview

 Affected parties: Customers or business and contractual partners

 Purpose: Performance of a contract for the provision of agreed services or prior to entering into such a contract, including associated communications.

 Data processed: name, address, contact details, email address, telephone number, payment information (such as invoices and bank details), contract data (such as duration and subject matter of the contract), IP address, order data  Storage period: the data will be erased as soon as they are no longer required for our business purposes and there is no legal obligation to process them.

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

## What is customer data?

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

## Why do we process customer data?

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

## What data is processed?

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

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

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

## **How long is the data stored?**

We erase corresponding customer data as soon as we no longer need it to fulfill our contractual obligations and purposes, and as soon as the data is also no longer necessary for possible warranty and liability obligations. This can for example be the case when a business contract ends. Thereafter, the limitation period is usually 3 years, although longer periods may be possible in individual cases. Of course, we also comply with the statutory retention requirements. Your customer data will certainly not be passed on to third parties unless you have given your explicit consent.


## **Legal Basis**


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

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

# Registration

## Registration Overview

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

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

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

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

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

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

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

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

## What is a registration?

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

## Why do we process personal data?

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

## Which data is processed?

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

During registration, we process the following types of data:

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

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

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

## **Storage time**

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

## **Right to object**

You have registered, entered data and want to revoke the data processing? Not a problem. As you can see above, you retain this right under the General Data Protection Regulation also at and after registration, login or account creation with us. Contact the Data Protection Officer above to exercise your rights. If you already have an account with us, you can easily view and manage your data and texts in your account.

## **Legal Basis**

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

measures, fulfilment of a contract) applies.

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

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

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

### **Registration with real names**

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

### **Registration with pseudonyms**

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

### **Storage of the IP address**

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

### **Public Profile**

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

### **Two Factor Authentication (2FA)**

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

## **Web hosting**

### **Web hosting Overview**

- Affected parties: visitors to the website
- Purpose: professional hosting of the website and security of operations
- Processed data: IP address, time of website visit, browser used and other data. You can find more details on this below or at the respective web hosting provider.
- Storage period: dependent on the respective provider, but usually 2 weeks Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is web hosting?**

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

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

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

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

Illustration:



## **Why do we process personal data?**

The purposes of data processing are:

1. Professional hosting of the website and operational security
2. To maintain the operational as well as IT security

3. Anonymous evaluation of access patterns to improve our offer, and if necessary, for prosecution or the pursuit of claims.li>

## Which data are processed?

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

- the full address (URL) of the accessed website (e. g. <https://www.examplepage.uk/examplesubpage.html?tid=122949477>)
- browser and browser version (e.g. Chrome 87)
- the operating system used (e.g. Windows 10)
- the address (URL) of the previously visited page (referrer URL) (e. g. <https://www.examplepage.uk/icamefromhere.html/>)
- the host name and the IP address of the device from the website is being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- date and time
- in so-called web server log files

## How long is the data stored?

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

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

## Legal basis

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

## Amazon Web Services (AWS) Privacy Policy

We use Amazon Web Services (AWS) for our website, which is a web hosting provider, among other things. The provider of this service is the American company Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA.

Amazon processes data from you, among other things, in the USA. Amazon is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Amazon uses so-called Standard Contractual Clauses (Article 46(2) and (3)

GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Amazon commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

The Amazon data processing terms and conditions (Data Processing Addendum), which correspond to the standard contractual clauses, can be found at

[https://d1.awsstatic.com/legal/aws-gdpr/AWS\\_GDPR\\_DPA.pdf](https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf).

You can find out more about the data that are processed through the use of Amazon Web Services (AWS) in their Privacy Policy at [https://aws.amazon.com/privacy/?nc1=h\\_ls](https://aws.amazon.com/privacy/?nc1=h_ls).

## **Flywheel Privacy Policy**

We use the managed WordPress hosting provider Flywheel for our website. The service provider is the American company WPEngine, Inc., 504 Lavaca St #1000, Austin, TX 78701, USA.

Flywheel and WPEngine process your data, including in the USA. WPEngine is an active participant in the EU-US Data Privacy Framework, which regulates the proper and secure transfer of personal data of EU citizens to the USA. You can find more information on this at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, WPEngine uses so-called Standard Contractual Clauses (SCCs) (= Art. 46 (2) and (3) GDPR). Standard Contractual Clauses are model contracts provided by the EU Commission and are intended to ensure that your data continues to comply with European data protection standards even when transferred to and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and Standard Contractual Clauses, WPEngine commits to maintaining the European data protection standard when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision by the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=de](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de).

The data processing terms (GDPR DATA PROCESSING), which also include the Standard Contractual Clauses, can be found at <https://wpengine.com/legal/dpa/>.

For more information on the data processed through the use of Flywheel, please refer to the privacy policy at <https://wpengine.com/legal/privacy/>.

## **Website Builders Introduction**

### **Website Builders Privacy Policy Overview**

- Affected parties: website visitors
  - Purpose: service optimisation
  - Data processed: The data that is being processed includes but is not limited to technical usage information, browser activity, clickstream activity, session heat maps, contact details, IP addresses or geographic locations. You can find more details in the Privacy Policy below as well as in the providers' Privacy Policies.
  - Storage duration: depends on the provider
- Legal bases: Art. 6 (1) lit. f GDPR (legitimate interests), Art. 6 (1) lit. a GDPR (consent)

## **What are website builders?**

We use a modular website builder for our website. This is a special form of Content Management System (CMS). Website builders enable website operators to create websites very easily and without any programming knowledge. In many cases, web hosts also offer website builders. Your personal data may be collected, stored and processed if a website builder is being used. In this Privacy Policy, you will find general information about data that is processed by such modular website builder systems. You can find more information in the respective provider's Privacy Policy.

## **Why do we use website builders for our website?**

The greatest advantage of modular website builders is their ease of use. We want to offer you a clear, simple and nicely designed website that we can easily operate and maintain by ourselves – without needing any external support. Nowadays website builders offer many helpful functions that we can use even without having any programming knowledge. This enables us to design our website according to our wishes and therefore, to give you an informative and pleasant experience on our website.

## **Which data are stored by website builders?**

First of all, the exact data that is stored depends on the website builder that is being used. Each provider processes and collects different data from website visitors. However, technical usage information such as users' operating system, browser, screen resolution, language and keyboard settings, hosting provider as well as the date of the website visit are usually collected. Moreover, tracking data (e. g. browser activity, clickstream activities, session heat maps, etc.) may also be processed. The same goes for personal data, since data such as contact information e. g. email address, telephone number (if you have provided it), IP address and geographic location data may also be processed and stored. In the respective provider's Privacy Policy you can find out exactly which of your data is getting stored.

## **How long and where are the data stored?**

Provided that we have any further information on this, we will inform you below about the

duration of the data processing associated with the website builder we use. You can find detailed information on this in the provider's Privacy Policy. Generally, we only process personal data for as long as is absolutely necessary to provide our services and products. The provider may store your data according to their own specifications, over which we have no influence.

## Right to object

You always retain the right to information, rectification and erasure of your personal data. If you have any questions, you can also contact the responsible parties at the respective website builder system at any time. You can find the corresponding contact details either in our Privacy Policy or on the website of the respective provider.

What is more, in your browser you can clear, disable or manage cookies that providers use for their functions. Depending on the browser you use, this can be done in different ways. Please note, that this may lead to not all functions working as usual anymore.

## Legal Bases

We have a legitimate interest in using a website builder system to optimise our online service and present it in an efficient and user-friendly way. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use the website builder system if you have consented to it.

If the processing of data is not absolutely necessary for the operation of the website, your data will only be processed on the basis of your consent. This particularly applies to tracking activities. The legal basis for this is Article 6 (1) (a) GDPR.

With this Privacy Policy, we have made you more familiar with the most important general information on data processing. If you want to find out more about this, you will find further information – if available – in the following section or in the Privacy Policy of the provider.

## WordPress.com Privacy Policy

### WordPress.com Privacy Policy Overview

- Affected parties: website visitors
- Purpose: service optimisation
- Processed data: data such as technical usage information like browser activity, clickstream activities, session heat maps and contact details, IP addresses or geographic locations. You can find more details on this in the Privacy Policy below.
- Storage period: It depends primarily on the type of stored data and the specific settings. Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is WordPress?

We use the well-known Content Management System WordPress.com for our website. The service provider is the American company Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA.

Founded in 2003, the company quickly became one of the most renowned Content Management Systems (CMS) worldwide. A CMS is software that helps us design our website and present content in an organized manner. Content can include text, audio, and video.

By using WordPress, personal data may be collected, stored, and processed. Typically, technical data such as operating system, browser, screen resolution, or hosting provider is stored. However, personal data such as IP address, geographical data, or contact information may also be processed.

## **Why do we use WordPress on our website?**

We have many strengths, but real programming is not exactly our core competence.

Nevertheless, we want to have a powerful and attractive website that we can manage and maintain ourselves. With a website builder or Content Management System like WordPress, that's exactly possible. With WordPress, we don't have to be programming experts to offer you a beautiful website. Thanks to WordPress, we can operate our website quickly and easily without technical expertise. If technical problems arise or we have special requests for our website, we still have our experts who feel at home in HTML, PHP, CSS, and the like.

Due to the easy usability and comprehensive features of WordPress, we can design our web presence according to our wishes and provide you with good user-friendliness.

## **What data does WordPress process?**

Non-personal data includes technical usage information such as browser activity, clickstream activities, session heatmaps, and data about your computer, operating system, browser, screen resolution, language and keyboard settings, internet provider, and the date of the page visit.

Personal data is also collected. Primarily, this includes contact details (email address or phone number if you provide them), IP address, or your geographical location.

WordPress may also use cookies to collect data. These often include data about your behavior on our website. For example, it can be recorded which subpages you particularly like to view, how long you stay on individual pages, when you leave a page again (bounce rate), or which preferences (e.g., language selection) you have made. Based on this data, WordPress can better tailor its own marketing measures to your interests and user behavior. The next time you visit our website, WordPress will display our website according to the settings you made beforehand.

WordPress can also use technologies such as pixel tags (web beacons) to clearly identify you as a user and possibly offer interest-based advertising.

## **How long and where are the data stored?**

The storage duration of the data depends on various factors. It mainly depends on the type of data stored and the specific settings of the website. In general, data is deleted by WordPress when it is no longer needed for its own purposes. There are exceptions, especially if legal obligations prescribe a longer retention of data. Web server logs containing your IP address and technical data are deleted by WordPress or Automattic after 30 days. During this time, Automattic uses the data to analyze traffic on its own websites (for example, all WordPress sites) and to address possible issues. Deleted content on WordPress websites is also kept in the trash for 30 days to enable recovery; afterward, they can remain in backups and caches until deleted. The data is stored on American servers by Automattic.

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

You have the right and the opportunity to access your personal data at any time and to object to its use and processing. You can also submit a complaint to a state supervisory authority at any time.

In your browser, you also have the option to individually manage, delete, or deactivate cookies. Please note, however, that deactivated or deleted cookies may have possible negative effects on the functions of our WordPress site. Depending on which browser you use, managing cookies works slightly differently. You can find the respective links to the instructions of the most well known browsers under the "Cookies" section.

## **Legal basis**

If you have given your consent for WordPress to be used, the legal basis for the corresponding data processing is this consent. According to Art. 6 para. 1 lit. a DSGVO (consent), this consent is the legal basis for the processing of personal data, as may occur when collected by WordPress.

From our side, there is also a legitimate interest in using WordPress to optimize our online service and present it beautifully for you. The corresponding legal basis for this is Art. 6 para. 1 lit. f DSGVO (legitimate interests). However, we only use WordPress to the extent that you have given your consent.

WordPress or Automattic also processes data from you in the USA. Automattic is an active participant in the EU-US Data Privacy Framework, regulating the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

In addition, Automattic uses so-called Standard Contractual Clauses (Art. 46 para. 2 and 3 DSGVO). Standard Contractual Clauses (SCC) are model templates provided by the European Commission and are intended to ensure that your data complies with European data protection standards, even when transmitted and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and through the Standard Contractual Clauses, Automattic undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the European Commission. You can find the decision and the corresponding Standard Contractual Clauses, among other places, here:

[https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=de](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de).

More details about the privacy policy and what data is processed in what way by WordPress can be found at <https://automattic.com/privacy/>.

## Web Analytics

### Web Analytics Privacy Policy Overview

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

## What is Web Analytics?

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

## Why do we run Web Analytics?

We have a clear goal in mind when it comes to our website: we want to offer our industry's best website on the market. Therefore, we want to give you both, the best and most interesting offer as well as comfort when you visit our website. With web analysis tools, we can observe the behaviour of our website visitors, and then improve our website

accordingly for you and for us. For example, we can see the average age of our visitors, where they come from, the times our website gets visited the most, and which content or products are particularly popular. All this information helps us to optimise our website and adapt it to your needs, interests and wishes.

## **Which data are processed?**

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

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



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

## **Duration of data processing**

If we have any further information on the duration of data processing, you will find it below.

We generally only process personal data for as long as is absolutely necessary to provide products and services. The storage period may be extended if it is required by law, such as for accounting purposes for example for accounting.

## Right to object

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

## Legal basis

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

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

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

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

sections. **Cloudflare Web Analytics Privacy Policy**

We use the analysis tool Cloudflare Web Analytics for our website. The provider of this service is the American company Cloudflare Inc., 101 Townsend St., San Francisco, CA 94107, USA.

Cloudflare processes data from you, among other things, in the USA. Cloudflare is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Cloudflare uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA).

Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Cloudflare commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

For more information about Cloudflare's Standard Contractual Clauses, visit

[https://www.cloudflare.com/cloudflare\\_customer\\_SCCs.pdf](https://www.cloudflare.com/cloudflare_customer_SCCs.pdf).

You can find out more about the data that is processed by using Cloudflare Web Analytics in their Privacy Policy at <https://www.cloudflare.com/privacypolicy/>.

## Google Analytics Privacy Policy

### Google Analytics Privacy Policy Overview

- Affected parties: website visitors
- Purpose: Evaluation of visitor information to optimise the website.
- Processed data: Access statistics that contain data such as the location of access, device data, access duration and time, navigation behaviour and click behaviour. You can find more details on this in the privacy policy below.
- Storage period: Customizable, GA4 stores data for 14 months by default. Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Google Analytics?

On our website, we use the analytics tracking tool Google Analytics in the Google Analytics 4 (GA4) version provided by the American company Google Inc. For the European region, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. Google Analytics collects data about your actions on our website. By combining various technologies such as cookies, device IDs, and login information, you can be identified as a user across different devices. This allows your actions to be analyzed across platforms as well.

For example, when you click on a link, this event is stored in a cookie and sent to Google Analytics. With the reports we receive from Google Analytics, we can better tailor our website and service to your needs. In the following, we will provide more information about the tracking tool and specifically inform you about the data processed and how you can prevent it.

Google Analytics is a tracking tool used for website traffic analysis. The basis for these measurements and analyses is a pseudonymous user identification number. This number does not include personally identifiable information such as name or address but is used to assign events to a device. GA4 utilizes an event-based model that captures detailed

information about user interactions such as page views, clicks, scrolling, and conversion events. Additionally, GA4 incorporates various machine learning features to better understand user behavior and certain trends. GA4 employs modeling through machine learning capabilities, meaning that based on the collected data, missing data can be extrapolated to optimize the analysis and provide forecasts.

In order for Google Analytics to function properly, a tracking code is embedded in the code of our website. When you visit our website, this code records various events that you perform on our website. With GA4's event-based data model, we, as website operators, can define and track specific events to obtain analyses of user interactions. This allows us to track not only general information such as clicks or page views but also specific events that are important for our business, such as submitting a contact form or making a purchase.

Once you leave our website, this data is sent to and stored on Google Analytics servers.

Google processes the data, and we receive reports on your user behavior. These reports can include, among others, the following:

**Audience reports:** Audience reports help us get to know our users better and gain a more precise understanding of who is interested in our service.

**Advertising reports:** Advertising reports make it easier for us to analyze and improve our online advertising.

**Acquisition reports:** Acquisition reports provide helpful information on how we can attract more people to our service.

**Behavior reports:** Here, we learn about how you interact with our website. We can track the path you take on our site and which links you click on.

**Conversion reports:** Conversion refers to an action you take as a result of a marketing message, such as going from being a website visitor to becoming a buyer or newsletter subscriber. Through these reports, we gain insights into how our marketing efforts resonate with you, with the aim of improving our conversion rate.

**Real-time reports:** With real-time reports, we can see what is currently happening on our website. For example, we can see how many users are currently reading this text.

In addition to the above-mentioned analysis reports, Google Analytics 4 also offers the following functions:

**Event-based data model:** This model captures specific events that can occur on our website, such as playing a video, making a purchase, or subscribing to our newsletter.

**Advanced analytics features:** With these features, we can gain a better understanding of your behavior on our website or certain general trends. For example, we can segment user groups, conduct comparative analyses of target audiences, or track your path on our website. **Predictive modeling:** Based on the collected data, missing data can be extrapolated through machine learning to predict future events and trends.

This can help us develop better marketing strategies.

Cross-platform analysis: Data collection and analysis are possible from both websites and apps. This enables us to analyze user behavior across platforms, provided you have consented to data processing.

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

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

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

## **What data is stored by Google Analytics?**

With the help of a tracking code, Google Analytics creates a random, unique ID associated with your browser cookie. This way, Google Analytics recognizes you as a new user, and a user ID is assigned to you. When you visit our site again, you are recognized as a “returning” user. All collected data is stored together with this user ID, making it possible to evaluate pseudonymous user profiles.

To analyze our website with Google Analytics, a property ID must be inserted into the tracking code. The data is then stored in the corresponding property. For each newly created property, the default is Google Analytics 4 Property. The data storage duration varies depending on the property used.

Through identifiers such as cookies, app instance IDs, user IDs, or custom event parameters, your interactions, if you have consented, are measured across platforms. Interactions encompass all types of actions you perform on our website. If you also use other Google systems (such as a Google account), data generated through Google Analytics can be linked to third-party cookies.

Google does not disclose Google Analytics data unless we, as website operators, authorize it, except when required by law.

According to Google, IP addresses are not logged or stored in Google Analytics 4. However, IP address data is used by Google for deriving location data and is immediately deleted thereafter. All IP addresses collected from users in the EU are deleted before the data is stored in a data center or on a server.

Since GA4 focuses on event-based data, the tool uses significantly fewer cookies compared to previous versions such as Google Universal Analytics. However, there are still some

specific cookies used by GA4. These can include:

**Name:** \_ga

**Value:** 2.1326744211.152122949477-5

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

**Expiration:** After 2 years

**Name:** \_gid

**Value:** 2.1687193234.152122949477-1

**Purpose:** This cookie is also used to distinguish website visitors.

**Expiration:** After 24 hours

**Name:** gat\_gtag\_UA Value: 1

**Purpose:** Used to reduce the request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named dc\_gtm .

**Expiration:** After 1 minute

**Note:** This list cannot claim to be exhaustive, as Google may change their choice of cookies from time to time. GA4 aims to improve data privacy and offers several options for controlling data collection. For example, we can determine the storage duration ourselves and control data.

Here we provide an overview of the main types of data collected by Google Analytics:

**Heatmaps:** Google creates heatmaps to show the exact areas you click on. This provides us with information about your interactions on our site.

**Session Duration:** Google refers to session duration as the time you spend on our site without leaving. If you are inactive for 20 minutes, the session automatically ends.

**Bounce Rate:** Bounce rate refers to when you view only one page on our website and then leave.

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

**Location:** IP addresses are not logged or stored in Google Analytics. However, location data is derived shortly before the IP address is deleted.

**Technical Information:** Technical information includes your browser type, internet service provider, and screen resolution, among others.

**Source of Origin:** Google Analytics is interested in the website or advertisement that brought you to our site.

Additional data may include contact information, reviews, media playback (e.g., if you play a video on our site), sharing of content via social media, or adding to favorites. This list is

not exhaustive and serves only as a general guide to the data storage by Google Analytics.

## **Where and how long are the data stored?**

Google has servers distributed worldwide. You can find precise information about the locations of Google data centers at:

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

Your data is distributed across multiple physical storage devices. This ensures faster access to data and better protection against manipulation. Each Google data center has emergency programs in place for your data. In the event of hardware failure or natural disasters, the risk of service interruption at Google remains low.

The retention period of data depends on the properties used. The storage duration is always set separately for each individual property. Google Analytics offers us four options for controlling the storage duration:

2 months: This is the shortest storage period.

14 months: By default, data is stored in GA4 for 14 months.

26 months: Data can also be stored for 26 months.

Data is only deleted manually.

In addition, there is also the option for data to be deleted only if you do not visit our website within the selected time period. In this case, the retention period is reset every time you revisit our website within the defined time frame.

Once the defined period has expired, the data is deleted once a month. This retention period applies to data linked to cookies, user identification, and advertising IDs (e.g., cookies from the DoubleClick domain). Report results are based on aggregated data and are stored independently of user data. Aggregated data is a combination of individual data into larger units.

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

Under the data protection laws of the European Union, you have the right to access, update, delete, or restrict your data. By using the browser add-on to deactivate Google Analytics JavaScript (analytics.js, gtag.js), you can prevent Google Analytics 4 from using your data.

You can download and install the browser add-on at:

<https://tools.google.com/dlpage/gaoptout?hl=en> Please note that this add-on only disables data collection by Google Analytics.

If you want to disable, delete, or manage cookies in general, you can find the respective instructions for the most common browsers in the “Cookies” section.

## **Legal basis**

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

In addition to consent, we also have a legitimate interest in analyzing the behavior of website visitors to improve our offering technically and economically. By using Google Analytics, we can identify website errors, detect attacks, and improve efficiency. The legal basis for this is **Art. 6(1)(f) of the GDPR** (legitimate interests). However, we only use Google Analytics if you have given your consent.

Google processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can find the Google Ads Data Processing Terms, which refer to the Standard Contractual Clauses, at: <https://business.safety.google/intl/en/adsprocessor/terms/>

We hope we have provided you with the most important information regarding the data processing by Google Analytics. If you want to learn more about the tracking service, we recommend the following links:

<https://marketingplatform.google.com/about/analytics/terms/en/> and <https://support.google.com/analytics/answer/6004245?hl=en>

If you want to learn more about data processing, you can refer to the Google Privacy Policy at: <https://policies.google.com/privacy?hl=en>.

## **Data Processing Agreement (DPA) Google Analytics**

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with Google Analytics. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".

This contract is required by law because Google Analytics processes personal data on our

behalf. It clarifies that Google Analytics may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Terms under <https://business.safety.google/intl/en/adsprocessor/terms/>.

## **Google Analytics Reports on demographic characteristics and interests**

We have turned on Google Analytics' functions for advertising reports. These reports on demographic characteristics and interests contain details about age, gender and interests. Through them we can get a better picture of our users – without being able to allocate any data to individual persons. You can learn more about advertising functions at [auf https://support.google.com/analytics/answer/3450482?hl=en&utm\\_id=ad](https://support.google.com/analytics/answer/3450482?hl=en&utm_id=ad).

You can terminate the use of your Google Account's activities and information in "Ads Settings" at <https://adssettings.google.com/authenticated> via a checkbox.

## **Google Analytics e-commerce Measurement**

We also use the e-commerce measurement function of the web analysis tool Google Analytics for our website. This allows us to analyse very precisely how you and all our other customers interact with our website. E-commerce measurement is all about purchasing behaviour. Based on the data

obtained, we can adapt and optimise our service to your wishes and expectations. With this data we can also use our online advertising measures in a more targeted manner, to only show our advertising to people who are interested in our products or services. The e-commerce measurement function records e. g. which orders were placed, how much time you took to decide on purchasing a product, the average order value or the shipping costs. All this data can be recorded and stored under a specific ID.

## **Google Analytics Google Signals Privacy Policy**

We have activated Google signals in Google Analytics. Through this, any existing Google Analytics functions (advertising reports, remarketing, cross-device reports and reports on interests and demographic characteristics) are updated, to result in the summary and anonymisation of your data, should you have permitted personalised ads in your Google Account.

The special aspect of this is that it involves cross-device tracking. That means your data can be analysed across multiple devices. Through the activation of Google signals, data is collected and linked to the Google account. For example, it enables Google to recognise when you look at a product on a smartphone and later buy the product on a laptop. Due to activating Google signals, we can start cross-device remarketing campaigns, which would otherwise not be possible to this extent. Remarketing means, that we can show you our products and services across other websites as well.

Moreover, further visitor data such as location, search history, YouTube history and data about your actions on our website are collected in Google Analytics. As a result, we receive improved advertising reports and more useful information on your interests and demographic characteristics. These include your age, the language you speak, where you live or what your gender is. Certain social criteria such as your job, your marital status or your income are also included. All these characteristics help Google Analytics to define groups of persons or target audiences.

Those reports also help us to better assess your behaviour, as well as your wishes and interests. As a result, we can optimise and customise our products and services for you. By default, this data expires after 26 months. Please consider, that this data is only collected if you have agreed to personalised advertisement in your Google Account. The retained information is always exclusively summarised and anonymous data, and never any data on individual persons. You can manage or delete this data in your Google Account.

## **Google Analytics in Consent Mode**

Depending on your consent, Google Analytics will process your personal data in the so-called “consent mode”. You can choose whether or not you want to accept Google Analytics cookies, and thus which of your data Google Analytics may process. The retained data is mainly used to measure user behaviour on the website, to serve targeted advertising and to provide us with web analysis reports. Usually, you would consent to Google’s data processing via a cookie consent tool. If you do not consent to data processing, only aggregated data will be collected and processed. This means that data cannot be assigned to individual users and therefore no user profile will be created for you. You also have the option to only agree to statistical measurement, meaning that none of your personal data will be processed and used for advertising or advertising measurement sequences.

## **Google Analytics IP Anonymisation**

We implemented Google Analytics’ IP address anonymisation to this website. Google developed this function, so this website can comply with the applicable privacy laws and the local data protection authorities’ recommendations, should they prohibit the retention of any full IP addresses. The anonymisation or masking of IP addresses takes place, as soon as they reach Google Analytics’ data collection network, but before the data would be saved or processed.

You can find more information on IP anonymisation at <https://support.google.com/analytics/answer/2763052?hl=en>.

## **Google Remarketing Privacy Policy**

### **Google Remarketing Privacy Policy Summary**

- Affected parties: Website visitors
  - Purpose: Economic success and optimization of our service performance.
  - Processed data: Access statistics, including location data, device information, access duration and time, navigation behavior, and click behavior. Personal data such as IP addresses may also be processed.  Storage duration: Conversion cookies usually expire after 30 days.
- Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is Google Remarketing?**

We use Google Remarketing as an online marketing measure to promote our products and services. Our goal is to make more people aware of the high quality of our offerings online. As part of our advertising measures, we use Google Remarketing provided by Google Inc. In Europe, the company responsible for all Google services is Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). This retargeting tool helps us better tailor and deliver our advertising to your interests and needs. In the following article, we will explain why we use Google Remarketing, what data is stored, and how you can prevent data storage.

Google Remarketing is a specialized online advertising method where targeted advertisements are displayed to users who have previously visited a specific website or app. This means that after visiting our website, the system recognizes which pages you viewed and your interests, enabling targeted online ads to be displayed based on this information. This works through the use of cookies and other tracking technologies that record your user behavior on our site and subsequently show relevant ads on other Google platforms (such as YouTube).

We are confident in the quality of our offerings and want as many people as possible to discover our website. In the online domain, Google Ads and its integrated Google Remarketing provide the best platform for this. Naturally, we also want a clear overview of the cost-effectiveness of our advertising campaigns, which is why we use Google Ads' conversion tracking tool.

## **Why do we use Google Remarketing on our website?**

We use Google Remarketing to highlight our offerings on other websites or Google platforms. The goal is to ensure our advertising campaigns reach only those genuinely interested in our offerings. With Google Remarketing, we can deliver targeted ads to you if you have previously visited our website and not completed a desired action. These ads aim to convince you that we have what you are looking for, thereby increasing the likelihood of further interaction or conversion. But what is a conversion? A conversion occurs when a purely interested website visitor becomes an acting visitor. This happens whenever you click on our ad and subsequently take another action, such as visiting our website.

This data helps us calculate our cost-effectiveness, measure the success of individual advertising efforts, and optimize our online marketing strategies. Additionally, the

collected data allows us to make our website more engaging for you and customize our advertising offerings to your needs.

## What data is stored by Google Remarketing?

We have integrated Google Remarketing into our website to analyze certain user actions better and display targeted ads. The data collected varies depending on the functions used and individual settings. Typically, information about which subpages you visit on our website, which products you view or purchase, how long you stay on a page, whether you abandon specific actions, or other conversions (purchase, button click, etc.) is collected.

As you can see, Google Remarketing primarily processes data related to your user behavior and does not process personal data such as names or email addresses. However, Google Remarketing processes your IP address, which is considered personal data under GDPR. Additionally, cookies or other tracking technologies may store information about your devices (browser, operating system, device type, etc.) and demographic data such as age or gender. All data is anonymized and aggregated to protect user privacy.

When you click on one of our Google Ads, the “Conversion” cookie is stored on your computer (usually in your browser) or mobile device. Cookies are small text files that store information on your computer.

Below are the details of the main cookies used for remarketing:

**Name:** Conversion

**Value:** EhML\_aySuoyv4gIVled3Ch0llweVGAEgt-mr6aXd7dYISAGQ122949477-3 **Purpose:** This cookie stores every conversion you make on our site after arriving via a Google Ad.

**Expiration:** after 3 months

**Name:** \_gac

**Value:**

1.1558695989.EAlalQobChMliOmEgYO04gIVj5AYCh2CBAPrEAAAYASAAEgIYQfD\_BwE

**Purpose:** This is a classic Google Analytics cookie used to record various actions on our website. **Expiration:** after 3 months

**Note:** The \_gac cookie appears only in conjunction with Google Analytics. The above list is not exhaustive, as Google regularly uses additional cookies for analytical purposes.

Once you complete an action on our website, Google recognizes the cookie and records your action as a conversion. As long as you browse our site and the cookie has not expired, we and Google can recognize that you returned to our site via a Google Ads ad. The cookie is read and the conversion data is sent back to Google Ads. Other cookies may also be used to measure conversions. Google Remarketing and the associated tracking can be further refined and enhanced with Google Analytics. For ads displayed by Google across the web,

cookies named “\_\_gads” or “\_gac” may be set under our domain. Since September 2017, various campaign information from analytics.js has been stored in the \_gac cookie. This cookie stores this data whenever you visit a page for which automatic tag labeling in Google Ads has been configured. Unlike cookies set for Google domains, Google can only read these conversion cookies while you are on our website.

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

Google has servers distributed worldwide. You can read exactly where Google data centers are located here: <https://www.google.com/about/datacenters/locations/?hl=de>.

In general, Google processes data only as long as necessary to fulfill the purposes and as required by law. Please note that we have no control over how Google uses the data it collects. According to Google, data is encrypted and stored on secure servers. Most conversion cookies expire after 30 days and do not transmit personal data. The cookies named “Conversion” and “\_gac” (used with Google Analytics) have an expiration date of 3 months.

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

You can opt out of Google Remarketing. By disabling Google Remarketing in your browser, you block tracking. In this case, you will not be included in the tool’s statistics. You can also change your browser’s cookie settings at any time. Each browser functions slightly differently. Under the “Cookies” section, you will find the corresponding links to the instructions for the most popular browsers.

If you generally do not want cookies, you can configure your browser to notify you whenever a cookie is set. This way, you can decide whether to allow or block each cookie. By downloading and installing this browser plug-in from <https://support.google.com/ads/answer/7395996>, you can disable all “advertising cookies.” Please note that disabling these cookies does not prevent ads but only personalized advertising.

In your Google account settings, under “Ads” or “Advertising,” you can disable personalized ads based on Google Remarketing. If you do not consent to data processing through Google Remarketing via the consent management tool on our website, no data will be collected.

## **Legal Basis**

If you have consented to the use of Google Remarketing, the legal basis for this data processing is your consent. According to **Art. 6 para. 1 lit. a GDPR (consent)**, this consent serves as the legal basis for processing personal data, such as the IP address collected through Google Remarketing.

We also have a legitimate interest in using Google Remarketing to optimize our online services and marketing measures. The corresponding legal basis for this is **Art. 6 para. 1 lit. f**

**GDPR (legitimate interests).** However, we only use Google Remarketing if you have given your consent.

Google processes your data, among other places, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which ensures the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Google uses so-called Standard Contractual Clauses (= Art. 46 para. 2 and 3 GDPR). Standard Contractual Clauses (SCC) are templates provided by the EU Commission to ensure that your data complies with European data protection standards even when transferred to third countries (such as the USA) and stored there. Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an EU Commission implementation decision. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=de](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de).

Google provides a data processing agreement under Art. 28 GDPR, which serves as the legal basis for our customer relationship with Google. This agreement refers to the EU Standard Contractual Clauses. Here you can find the data processing terms:

<https://business.safety.google/intl/de/adsprocessor/terms/>.

Learn more about the data processed through the use of Google Remarketing in the privacy policy at <https://policies.google.com/privacy?hl=de>.

## Google Site Kit Privacy Policy

### Google Site Kit Privacy Policy Overview

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

## What is Google Site Kit?

We have integrated the WordPress plugin Google Site Kit of the American company Google Inc. to our website. For Europe, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. With Google Site Kit, we can quickly and easily view statistics of various Google products such as Google Analytics directly on our WordPress dashboard. The in Google Site Kit integrated tools also collect your personal

data. In this privacy policy we will explain why we use Google Site Kit, how long and where your data is stored, and which other privacy policies may be relevant to you in this context.

Google Site Kit is a plugin for the WordPress content management system. With this plugin we can view important website analysis statistics directly in our dashboard. These are statistics that are collected by other Google products – primarily by Google Analytics. In addition to Google Analytics, the services Google Search Console, Page Speed Insight, Google AdSense, Google Optimize and Google Tag Manager can also be linked to Google Site Kit.

## **Why do we use Google Site Kit on our website?**

As a service provider, it is our job to offer you the best possible experience on our website. You should feel comfortable on our website. Moreover, you should be able to quickly and easily find exactly what you are looking for. Statistical evaluations help us to get to know you better and to adapt our offer to your wishes and interests. We use various Google tools for these evaluations.

Site Kit makes our work a lot easier because we can view and analyse the statistics of Google products on its dashboard. Therefore, we must no longer register for using the respective tools. Site Kit always provides a good overview of the most important analysis data.

## **What data are stored by Google Site Kit?**

If you have consented to the use of tracking tools in the cookie notice (also called script or banner), cookies will be set by Google products such as Google Analytics. Also, on about you, such as your user behaviour, will be sent to Google, where it is stored and processed. This also includes personal data such as your IP address.

You can find more detailed information on the individual services in the respective separate sections of this privacy policy. In our privacy policy on Google Analytics for example, you will be able to view information on the exact types of data that are collected. You will also learn how long Google Analytics stores, manages and processes data, what cookies can be used and how you can prevent data retention. We also have respective comprehensive privacy policies for other Google services such as Google Tag Manager or Google AdSense.

In the following, we will show you exemplary Google Analytics cookies that may be set in your browser if you have consented to Google's data processing. Please note that this list contains only a selection of potential cookies:

**Name:** \_ga

**Value:**2.1326744211.152122949477-2

**Purpose:**Usually analytics.js uses the \_ga cookie to store the user ID. Therefore, it can differentiate between website visitors.

**Expiry date:** after 2 years

**Name:** \_gid

**Value:**2.1687193234.152122949477-7

**Purpose:** This cookie does also differentiate between website visitors.

**Expiry date:** after 24 hours

**Name:** \_gat\_gtag\_UA\_<property-id>

**Value:** 1

**Purpose:** This cookie is used to lower the request rate.

**Expiry date:** after 1 minute

## How long and where are the data stored?

Google stores the collected data on its own servers, which are distributed all around the world. Most servers are in the United States, so your data may likely be stored there. At <https://www.google.com/about/datacenters/inside/locations/?hl=uk> you can see exactly where the company provides servers.

Data that is collected by Google Analytics is stored for a standard period of 26 months. After this time, your user data will be deleted. This retention period applies to any data linked to cookies, user identification and advertising IDs.

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

You always reserve the right to either receive information about your data, or to have your data deleted, rectified, or reduced. You can also deactivate, delete, or manage cookies in your browser at any time. In the following we will show you the respective instructions to do this in the most common browsers:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

Please note that when using this tool, your data may also be stored and processed outside the EU. Under current European data protection law most third countries (including the USA) are not considered secure for this matter. Data must not be transferred to, stored and processed in such insecure third countries, unless there are suitable guarantees (such as EU standard contractual clauses) between us and the non-European service provider.

## Legal basis

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

In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors, and thus technically and economically improving our offer. With the help of Google Site Kit, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6**

**para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use Google Site Kit if you have given us your consent.

Google processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can find the Google Ads Data Processing Terms, which refer to the Standard Contractual Clauses, at: <https://business.safety.google/intl/en/adsprocessor/terms/>

To find out more about data processing by Google, we recommend Google's comprehensive privacy policy at <https://policies.google.com/privacy?hl=en-GB>

## Google Tag Manager Privacy Policy

### Google Tag Manager Privacy Policy Overview

- Affected parties: website visitors
  - Purpose: Organisation of individual tracking tools
  - Processed data: Google Tag Manager itself does not store any data. The data record tags of the web analytics tools used.
  - Storage period: depending on the web analytics tool used
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Google Tag Manager?

We use Google Tag Manager by the company Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) for our website.

This Tag Manager is one of Google's many helpful marketing products. With it, we can centrally integrate and manage code sections of various tracking tools, that we use on

our website.

In this privacy statement we will explain in more detail, what Google Tag Manager does, why we use it and to what extent your data is processed.

Google Tag Manager is an organising tool with which we can integrate and manage website tags centrally and via a user interface. Tags are little code sections which e.g. track your activities on our website. For this, segments of JavaScript code are integrated to our site's source text. The tags often come from Google's intern products, such as Google Ads or Google Analytics, but tags from other companies can also be integrated and managed via the manager. Since the tags have different tasks, they can collect browser data, feed marketing tools with data, embed buttons, set cookies and track users across several websites.

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

Everybody knows: Being organised is important! Of course, this also applies to maintenance of our website. In order to organise and design our website as well as possible for you and anyone who is interested in our products and services, we rely on various tracking tools, such as Google Analytics. The collected data shows us what interests you most, which of our services we should improve, and

which other persons we should also display our services to. Furthermore, for this tracking to work, we must implement relevant JavaScript Codes to our website. While we could theoretically integrate every code section of every tracking tool separately into our source text, this would take too much time and we would lose overview. This is the reason why we use Google Tag Manager. We can easily integrate the necessary scripts and manage them from one place. Additionally, Google Tag Manager's user interface is easy to operate, and requires no programming skills. Therefore, we can easily keep order in our jungle of tags.

## **What data is stored by Google Tag Manager?**

Tag Manager itself is a domain that neither uses cookies nor stores data. It merely functions as an "administrator" of implemented tags. Data is collected by the individual tags of the different web analysis tools. Therefore, in Google Tag Manager the data is sent to the individual tracking tools and does not get saved.

However, with the integrated tags of different web analysis tools such as Google Analytics, this is quite different. Depending on the analysis tool used, various data on your internet behaviour is collected, stored and processed with the help of cookies. Please read our texts on data protection for more information on the articular analysis and tracking tools we use on our website.

We allowed Google via the account settings for the Tag Manager to receive anonymised data from us. However, this exclusively refers to the use of our Tag Manager and not to your data, which are saved via code sections. We allow Google and others, to receive selected

data in anonymous form.

Therefore, we agree to the anonymised transfer of our website data. However, even after extensive research we could not find out what summarised and anonymous data it is exactly that gets transmitted. What we do know is that Google deleted any info that could identify our website. Google combines the data with hundreds of other anonymous website data and creates user trends as part of benchmarking measures. Benchmarking is a process of comparing a company's results with the ones of competitors. As a result, processes can be optimised based on the collected information.

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

When Google stores data, this is done on Google's own servers. These servers are located all over the world, with most of them being in America. At <https://www.google.com/about/datacenters/inside/locations/?hl=en> you can read in detail where Google's servers are.

In our individual data protection texts on the different tools you can find out how long the respective tracking tools store your data.

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

Google Tag Manager itself does not set any cookies but manages different tracking websites' tags. In our data protection texts on the different tracking tools you can find detailed information on how you can delete or manage your data.

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

## **Legal basis**

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

In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors and thus technically and economically improving our offer. With the help of Google Tag Managers we can also improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. We only use Google Tag Manager if you have given us your consent.

Google processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can find the Google Ads Data Processing Terms, which refer to the Standard Contractual Clauses, at: <https://business.safety.google/intl/en/adsprocessor/terms/>

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

## Meta Conversions API Privacy Policy

### Meta Conversions API Privacy Policy Summary

- Affected parties: Website visitors
  - Purpose: Optimization of our service performance
  - Processed data: Data such as customer information, user behavior, device information, and your IP address.  
More details can be found below in the privacy policy.
  - Storage duration: Until the data is no longer useful for Meta's purposes
- Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is the Meta Conversions API?

We use Meta Conversions API on our website, a server-side event tracking tool. The service provider is the American company Meta Platforms Inc. For the European region, the responsible company is Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland).

The Meta Conversions API is a tool or function that can measure the performance of our advertising campaigns in real time. The API is an interface that connects our website with Meta and thus measures certain actions on our website. A conversion occurs when you, as a visitor to a website, perform a desired action. This can be, for example, clicking a button or filling out a registration form. This conversion tracking method is an alternative to the Meta Pixel and aims to optimize conversion tracking through precision and reliability. The API sends data directly from our server to Meta server-side. Personal data may also be processed in the

process. In this privacy policy, we delve deeper into the data processing by us and Meta.

## **Why do we use the Meta Conversions API on our website?**

We use the Meta Conversions API to improve the quality of our website, our offerings, and our advertising campaigns. Our goal is to provide you with the best possible service. We want you to feel comfortable on our website and get exactly what you expect. To achieve this, we need to tailor our offerings as closely as possible to your needs and preferences. The Meta Conversions API helps us adapt to this effectively and customize content and offers. This flexibility allows us to consider various needs while improving our online presence. The data also helps us conduct our advertising measures more economically and individually. We aim to present our offerings only to people who are genuinely interested in them.

## **What data is stored by the Meta Conversions API?**

Using the Meta Conversions API, we can collect and provide Meta with various data on events occurring on our website. The specific data stored and processed depends on our individual settings and the specific events and parameters. Generally, event data, user data, device data, and the time at which an event (e.g., button click) occurred are recorded and sent to Meta. Event data includes actions such as registration, product purchase, page views, or button clicks on our website. User data may include personal information such as IP address, name, address, or email address. Device data refers to your device type, operating system, browser, and screen resolution.

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

In general, Meta stores data until it is no longer needed for its own services and Meta products. Meta has servers distributed worldwide where data is stored. Customer data, however, is deleted within 48 hours after being matched with its user data.

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

You have the right and opportunity to access your personal data at any time and object to its use and processing. You can also file a complaint with a government supervisory authority at any time. You can generally prevent data storage by not consenting to data processing via the Consent Management Tool. Meta Conversions API operates server-side, making data deletion different from client-side methods. Nevertheless, you can review and adjust the privacy and security settings in your browser and, if possible, block tracking resources (pixels, cookies, scripts).

## **Legal Basis**

If you have consented to your data being processed and stored by the Meta Conversions API, this consent serves as the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**).  
Your data is also generally stored and processed based on our legitimate interest (**Art. 6 para. 1 lit. f**

**GDPR)** in effective and efficient communication with you or other customers and business partners. However, we only use the Meta Conversions API if you have given your consent.

Metaprocesses your data in the USA, among other places. Meta Platforms is an active participant in the EU-US Data Privacy Framework, which governs the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Meta also uses so-called Standard Contractual Clauses (= Art. 46 para. 2 and 3 GDPR). Standard Contractual Clauses (SCC) are templates provided by the EU Commission to ensure that your data also complies with European data protection standards when transferred to third countries (such as the USA) and stored there. Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Meta commits to complying with the European level of data protection when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an EU Commission implementation decision. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=de](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de).

You can find Meta's data processing terms, which refer to the Standard Contractual Clauses, at <https://www.facebook.com/legal/terms/dataprocessing>.

Learn more about the data processed through the use of the Meta Conversions API in the privacy policy at <https://www.facebook.com/about/privacy>.

## **Meta-Pixel Privacy Policy**

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

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

In the following we will show you the cookies, which were set on a test page with the Meta

pixel integrated to it. Please consider that these cookies are only examples. Depending on the interaction that is made on our website, different cookies are set.

**Name:** \_fbp

**Value:** fb.1.1568287647279.257405483-6122949477-7

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

**Expiration date:** after 3 months

**Name:** fr

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

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

**Expiration date:** after 3 months

**Name:**

comment\_author\_50ae8267e2bdf1253ec1a5769f48e062122949477-3

**Value:** Name of the author

**Purpose:** This cookie saves the text and name of a user who e.g. leaves a comment. **Expiration date:** after 12 months

**Name:** comment\_author\_url\_50ae8267e2bdf1253ec1a5769f48e062

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

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

**Expiration date:** after 12 months

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

**Value:** email address of the author

**Purpose:** This cookie saves the email address of the user, if they provided it on the website. **Expiration date:** after 12 months

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

If you are registered on Facebook, you can change the settings for advertisements yourself at

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). If you are not a Facebook user, you can manage your user based online advertising at <https://www.youronlinechoices.com/uk/your-ad-choices>. You have the option to activate or deactivate any providers there.

Facebook processes data from you, among other things, in the USA. Facebook respectively Meta Platforms is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Facebook uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Facebook commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

The Facebook Data Processing Term, which references the Standard Contractual Clauses, can be found at <https://www.facebook.com/legal/terms/dataprocessing>.

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

## Email-Marketing

### Email Marketing Overview

- Affected parties: newsletter subscribers
  - Purpose: direct marketing via email, notification of events that are relevant to the system
  - Processed data: data entered during registration, but at least the email address. You can find more details on this in the respective email marketing tool used.
  - Storage duration: for the duration of the subscription
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Email-Marketing?

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

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

The registration for newsletters generally works with the help of the so-called "double opt-in procedure". After you have registered for our newsletter on our website, you will receive an email, via which you can confirm the newsletter registration. This ensures that you own the email address you signed up with, and prevents anyone to register with a third-party email

address. We or a notification tool we use, will log every single registration. This is necessary so we can ensure and prove, that registration processes are done legally and correctly. In general, the time of registration and registration confirmation are stored, as well as your IP address. Moreover, any change you make to your data that we have on file is also logged.

## **Why do we use Email-Marketing?**

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

## **Which data are processed?**

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

## **Duration of data processing**

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

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

## Withdrawal – how can I cancel my subscription?

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

## Legal basis

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

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

## HubSpot Email Privacy Policy

We also use the email marketing tool HubSpot Email. The provider of this service is the American company HubSpot Inc., 25 First Street, Cambridge, MA 02141, USA.

HubSpot processes data from you, among other things, in the USA. HubSpot is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, HubSpot uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, HubSpot commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can learn more about the data and Standard Contractual Clauses processed through the use of HubSpot Email in the privacy policy at <https://legal.hubspot.com/privacy-policy>.

## Data Storage by HubSpot Email in the EU

HubSpot stores and processes your data within the European Union (EU). The data is hosted in a data center in Germany, with a backup location in Ireland. This ensures that HubSpot processes your personal data in compliance with the requirements of the General Data Protection Regulation (GDPR).

For more information on how HubSpot processes data, please visit:

<https://legal.hubspot.com/dpa>. **SendGrid Privacy Policy**

### SendGrid Privacy Policy Summary

Data subjects: Website visitors  
 Purpose: Website storage and internet accessibility  Processed data: IP address, primarily technical data  Storage duration: Depends on individual settings Legal bases: Art. 6 (1) lit. f DSGVO (Legitimate interests)

## What is SendGrid?

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

Founded in 2009, SendGrid aims to provide companies with powerful APIs and tools for sending, receiving, and tracking emails. Since its inception, the company has continuously grown, offering features such as email sending, spam filtering, mail processing, real-time tracking, and automatic scaling. In 2020, Twilio, the cloud communications platform, acquired SendGrid. SendGrid is now one of the largest providers globally, assisting businesses worldwide in efficient email communication.

By using SendGrid, personal data such as your IP address, geographical data, or contact information may be collected, stored, and processed. In this privacy policy, we provide detailed information on data processing through SendGrid to keep you well-informed.

## Why do we use SendGrid on our website?

Primarily, we use an email marketing service to stay in touch with you, informing you about updates and attractive offers in our program. For our marketing efforts, we always seek the simplest and best solutions. Therefore, we chose the SendGrid service. Despite its user-friendly interface, the software offers a plethora of helpful features.

Using design templates, we customize each newsletter, and thanks to “Responsive

Design,” our content is readable and visually appealing on your smartphone or any other mobile device.

The email marketing service also provides valuable analytical capabilities. When sending a newsletter, we can track whether and when you opened it. The software also recognizes and records if you clicked on any links in the newsletter. This information is crucial in tailoring and optimizing our service to your needs and preferences. Ultimately, we aim to provide you with the best possible service. In addition to the data mentioned earlier, information about your user behavior is also stored.

## **What data does SendGrid process?**

When you subscribe to our newsletter through our website, you confirm your membership in a SendGrid email list via email. To prove that you have subscribed to the “list provider,” SendGrid stores the date of registration, the time, and your IP address.

With SendGrid’s help, we can keep you updated firsthand on what’s happening in our company. However, during the newsletter registration process, all data you enter (such as your email address or your first and last name) is stored and managed on our server and at SendGrid. This includes personal data. During the registration, you also consent to receiving the newsletter, and this privacy policy is referenced. Furthermore, data such as click behavior (open rates, click rates, and conversion data) in the newsletter may be processed. This information is used to send you emails and utilize specific other SendGrid functions, such as newsletter evaluation.

## **How long and where are the data stored?**

In general, data at SendGrid is deleted when it is no longer needed for their purposes. Exceptions may occur, especially if legal obligations require longer retention of the data. Web server logs containing your IP address and technical data are also deleted by SendGrid when you unsubscribe from our newsletter. If you request SendGrid to delete specific data, they will comply with your request unless deleting this information prevents the company from performing necessary business functions. After closing our SendGrid account, customer data is deleted or at least transformed within 60 days, making it no longer identifiable. However, exceptions include, for example, invoice records that can be retained for up to 7 years after account closure or information that, for security reasons, can be kept for up to three years after account closure.

SendGrid is an American company, and consequently, the data is stored and processed in the United States. More details can be found in the section “Legal Basis” below.

## **Right to object**

You have the option to unsubscribe from our newsletter at any time. To do this, you only need to revoke your consent to newsletter registration. This usually takes only a few seconds or one or two clicks. Most newsletters contain a link at the end of each email to unsubscribe

from the newsletter. If the link is not found in the newsletter, please contact us by email, and we will promptly cancel your newsletter subscription. After unsubscribing, personal data is deleted from our server and SendGrid servers. You have the right to free information about your stored data and, if necessary, the right to deletion, blocking, or correction.

## **Legal basis**

If you have consented to the use of SendGrid, the legal basis for the corresponding data processing is this consent. According to Art. 6 (1) lit. a DSGVO (Consent), this consent constitutes the legal basis for the processing of personal data that may occur during the collection by SendGrid.

From our side, there is also a legitimate interest in using SendGrid to optimize our online service and create beautiful and informative newsletters for you. The corresponding legal basis is Art. 6 (1) lit. f DSGVO (Legitimate interests). If consent is not required, newsletter dispatch is based on the legitimate interest in direct marketing (Article 6 (1) lit. f), if legally permitted. We record your registration process to always demonstrate compliance with our laws.

Twilio processes data from you, among other places, in the USA. SendGrid or Twilio is an active participant in the EU-US Data Privacy Framework, regulating the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Twilio uses so-called standard contractual clauses (= Art. 46 (2) and 3 DSGVO). Standard contractual clauses (SCC) are model templates provided by the EU Commission and are intended to ensure that your data also complies with European data protection standards when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the standard contractual clauses, Twilio commits to maintaining the European level

of data protection when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding standard contractual clauses, among other places, here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=de](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=de).

The data processing conditions (Data Processing Addendum), corresponding to the standard contractual clauses, can be found at

<https://www.twilio.com/legal/data-protection-addendum>.

Learn more about the data processed by using SendGrid in the Privacy Policy at <https://www.twilio.com/legal/privacy>.

## **Messenger & Communication Introduction**

### **Messenger & Communication Privacy Statement Overview**

Affected parties: website visitors

Purpose: for contact requests and general communications between yourself and us  Processed data: Data such as name, address, email address, telephone number, general content data, plus IP address if applicable

You can find more details on this under the respective tools used.

Storage duration: depends on the messenger & communication functions Legal bases: Article 6 paragraph 1 letter a GDPR (consent), Article 6 paragraph 1 letter f GDPR (legitimate interests), Article 6 paragraph 1 sentence 1 letter b. GDPR (contractual or pre contractual obligations)

## **What are Messenger & Communication functions?**

We offer you various options on our website to communicate with us (e.g. messenger and chat functions, online or contact forms, email, telephone). With the use of these functions, your data will be processed and stored insofar as it is necessary to answer your inquiry and conduct any of our subsequent measures.

In addition to classic means of communication such as email, contact forms or telephone, we also use chats or messengers. The most commonly used messenger function at the moment is WhatsApp, but of course, there are many different providers who offer messenger functions for websites. If content is end-to-end encrypted, it will be indicated in our individual privacy policies or in the privacy policy of the respective provider. End-to-end encryption means that the content of a message is not visible to the provider themselves. However, information about your device, location settings and other technical data can still be processed and stored.

## **Why do we use Messenger & Communication functions?**

The ability to communicate with you is very important to us. After all, we want to keep the conversation with you going and answer any questions you may have about our service as best we can. Needless to say, smooth communication is an important part of our service. With our practical messenger & communication functions, you always have the option to choose the ones you prefer most. In exceptional cases, however, we may not be able to answer certain questions via chat or messenger. This may be the case for internal contractual matters, for example. For matters like these, we recommend you to use other communication options such as email or telephone.

We generally assume our responsibility under data protection law, even if we use the services of any social media platform. However, the European Court of Justice has decided that in certain cases the operator of the social media platform be jointly responsible alongside us in the scope of Art. 26 GDPR. Should this be the case, we will point it out separately and work on the basis of a relevant agreement. You will find the essence of the agreement for the respective platforms below.

Please note that when using our integrated elements, your data may also be processed outside the European Union, since many providers, such as Facebook Messenger or WhatsApp, are American companies. As a result, you may not be able to claim or enforce your rights in relation to your personal data as easily.

## **Which data is processed?**

Exactly which data is retained and processed depends on the respective messenger & communication function provider. In general, it is data such as your name, address, telephone number, email address and content data such as any information you enter into a contact form. In most cases, information about your device and IP address are also stored. Moreover, data that are transmitted via a messenger & communication function are also stored on the providers' servers.

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

## **How long is data stored?**

How long data is processed and stored depends primarily on the tools we use. Below you can find out more about the data processing of individual tools. The providers' privacy policies usually state exactly which data is stored and processed and for how long. In general, we only process personal data for as long as necessary to provide our services. When data is stored in cookies, the storage period varies greatly. Data may e.g. be deleted immediately after leaving a website, or they may be stored for several years. Therefore, you should study each individual cookie in detail if you want to know more about data storage. In most cases, you will also find helpful information about individual cookies in the privacy policies of the individual providers.

## **Right to object**

You also have the right and the option to revoke your consent to the use of cookies or third-party providers at any time. This can be done either via our cookie management tool or via other opt-out functions. For example, you can also prevent data collection by cookies by managing, deactivating or deleting the cookies in your browser. For more information, we recommend you to read the Consent section.

Since cookies may be in use with messenger & communication functions, we recommend you to read our general privacy policy on cookies. To find out exactly which of your data is stored and processed, please read the privacy policies of the respective tools.

## **Legal Basis**

If you have consented to the data processing and storage by integrated messenger & communication functions, this consent is the legal basis for data processing (**Art. 6 Para. 1 lit. a GDPR**). We process your request and manage your data within the framework of contractual or pre-contractual relationships in order to fulfill our pre-contractual and contractual obligations or to answer inquiries. The basis for this is **Art. 6 Para. 1 section 1 lit. b GDPR**. In general, if you have given your consent, your data will also be stored and processed on the basis of our legitimate interest (**Art. 6 Para. 1 lit. f GDPR**) in quick and smooth communication with you or other customers and business partners.

## HubSpot Customer Service Privacy Policy

We use HubSpot on our website, which is a customer service tool among other things. The provider of this service is the American company HubSpot, Inc., 25 First St 2nd Floor Cambridge, MA, USA. The company also has headquarters in Ireland at 1 Sir John Rogerson's Quay, Dublin 2, Ireland.

You can find out more about the data that is processed by using HubSpot in their Privacy Policy at <https://legal.hubspot.com/privacy-policy>.

## Data Processing Agreement (DPA) HubSpot Customer Service

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with HubSpot. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".

This contract is required by law because HubSpot processes personal data on our behalf. It clarifies that HubSpot may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <https://legal.hubspot.com/dpa>.

## Data Storage by HubSpot Customer Service in the EU

HubSpot stores and processes your data within the European Union (EU). The data is hosted in a data center in Germany, with a backup location in Ireland. This ensures that HubSpot processes your personal data in compliance with the requirements of the General Data Protection Regulation (GDPR).

For more information on how HubSpot processes data, please visit:

<https://legal.hubspot.com/dpa>. **Chatbots Overview**

### **Chatbots Privacy Policy Overview**

Affected parties: website visitors

Purpose: for contact requests and general communications between you and ourselves  Processed data: Data such as name, address, email address, telephone number, general content data, IP address if applicable

You can find more details on this under the respective tools used.

Storage duration: depending on the chatbots & chat functions used

Legal basis: Article 6 paragraph 1 letter a GDPR (consent), Article 6 paragraph 1 letter f GDPR (legitimate interests), Article 6 paragraph 1 sentence 1 letter b. GDPR (contractual or pre contractual obligations)

## **What are chatbots?**

You can communicate with us also via chatbots or similar chat functions. A chat offers the possibility to write or talk to one another with only a very small time delay. A chatbot is software that tries to answer your question and, if necessary, informs you about any news. By using these means of communication, your personal data may also be processed and stored.

## **Why do we use chatbots?**

Our ability to communicate with you is important to us. After all, we want to talk to you and answer any questions about our service in the best possible way. Thus, well-functioning communication is an important part of our service. Chatbots have the great advantage that they can automatically answer frequently asked questions. This saves us time and you will still receive detailed and helpful answers. If the chatbot cannot help, you can of course contact us directly at any time.

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

## **What data is processed?**

You may also use the chat services on other websites/platforms. In this case, your user ID will also be stored on the servers of this website. We may also be informed about which user used the chat at what time. The chat content is also stored. Exactly which data is stored depends on the respective service. As a rule, however, it is contact data such as your email address or telephone number, IP address and various usage data.

If you have consented to the use of the chat function, this consent will also be stored or retained along with any registration. We do this so that we can also show your registration or consent if required by law.

The provider of a chat platform can also find out when you are chatting and also receive technical information about the device you are using. Exactly what information is stored and processed also depends on your PC settings. In many cases, data about your approximate location may be collected. This is done to optimise the chat services and to ensure more security. Furthermore, the information may also be used to set personalised advertising and marketing measures.

If you agree that a chatbot can send you messages, you can deactivate this activation at any time. The chatbot also serves as a help for this and shows you how to unsubscribe from this function. All your relevant data will then be deleted from the recipient directory.

We use the above data to be able to address you personally via the chat, to be able to answer your questions and inquiries or to send you any content. It also allows us to fundamentally improve our chat services.

## **How long is data stored?**

How long the data is processed and stored depends primarily on the tools we use. Below you can find out more about the data processing of individual tools. The privacy policies of the providers usually state exactly which data is stored and processed for how long. Generally, personal data is only processed for as long as is necessary to provide our services. When data is stored in cookies, the storage period varies greatly. Data can be erased immediately after leaving a website, but it may also be stored for several years. You should therefore research every single cookie in detail if you want to know more about data retention. In most cases, you will also find helpful information about the individual cookies in the privacy policies of the individual providers.

## **Right to object**

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

Since cookies can be used for chat services, we also recommend our Privacy Policy on cookies. To find out exactly which of your data is stored and processed, you should read the privacy policies of the respective tools.

## **Legal Basis**

Via a pop-up window, we ask for your permission to process your data within the framework of the chat services. If you consent, this consent is also the legal basis (**Art. 6 Para. 1 lit. a GDPR**) for data processing. In addition, we process your inquiries and manage your data within the framework of contractual or pre-contractual relationships in order to fulfill our pre-contractual and contractual obligations or to answer inquiries. The basis for this is **Art. 6 paragraph 1 sentence 1 letter b. GDPR**. In principle, your data will also be stored and

processed on the basis of our legitimate interest (**Art. 6 Para. 1 lit. f GDPR**) in quick and smooth communication with you or other customers and business partners. However, we only use the tools if you have given your consent.

## HubSpot (Chatbot) Privacy Policy

We also use the chatbot function HubSpot. The provider of this service is the American company HubSpot, Inc., 25 First Street, 2nd floor, Cambridge, Massachusetts 02141, USA. You can find out more about the data that is processed by using HubSpot in their Privacy Policy at <https://legal.hubspot.com/privacy-policy>.

## Data Processing Agreement (DPA) HubSpot (Chatbot)

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with HubSpot. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section “Data Processing Agreement (DPA)”.

This contract is required by law because HubSpot processes personal data on our behalf. It clarifies that HubSpot may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <https://legal.hubspot.com/dpa>.

## Data Storage by HubSpot (Chatbox) in the EU

HubSpot stores and processes your data within the European Union (EU). The data is hosted in a data center in Germany, with a backup location in Ireland. This ensures that HubSpot processes your personal data in compliance with the requirements of the General Data Protection Regulation (GDPR).

For more information on how HubSpot processes data, please visit:

<https://legal.hubspot.com/dpa>. **Social Media**

### Social Media Privacy Policy Overview

- Affected parties: website visitors
  - Purpose: Service presentation and optimisation, staying in contact with visitors, interested parties, etc. as well as advertising
  - Processed data: data such as telephone numbers, email addresses, contact data, data on user behaviour, information about your device and your IP address. You can find more details on this directly at the respective social media tool used.
  - Storage period: depending on the social media platforms used
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is Social Media?**

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

## **Why do we use Social Media?**

For years, social media platforms have been the place where people communicate and get into contact online. With our social media presence, we can familiarise interested people better with our products and services. The social media elements integrated on our website help you switch to our social media content quickly and hassle free.

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

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

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

## **Which data are processed?**

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

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

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

### **Duration of data processing**

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

### **Right to object**

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

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

### **Legal basis**

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

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

# Facebook Privacy Policy

## Facebook Privacy Policy Overview

- Affected parties: website visitors
- Purpose: service optimisation
- Processed data: data such as customer data, data on user behaviour, device information and IP address.

You can find more details in the Privacy Policy below.

- Storage period: until the data no longer serves Facebook's purposes
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What are Facebook tools?

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

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

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

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

- Facebook-Pixel
- Social Plugins (e.g. the "Like" or "Share" button)
- Facebook Login
- Account Kit
- APIs (application programming interface)
- SDKs (Software development kits)
- Plattform-integrations

- Plugins
- Codes
- Specifications
- Documentations
- Technologies and Services

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

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

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

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

## **What data is stored by Facebook tools?**

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

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

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

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

## **How long and where are the data stored?**

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

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

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

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

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

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

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

## Microsoft Edge: Delete cookies in Microsoft Edge

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

## **Legal basis**

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

Facebook processes data from you, among other things, in the USA. Facebook respectively Meta Platforms is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Facebook uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Facebook commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

The Facebook Data Processing Term, which references the Standard Contractual Clauses, can be found at <https://www.facebook.com/legal/terms/dataprocessing>.

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

## **Facebook Fanpage Privacy Policy**

We also have a Facebook fan page for our website. The provider of this service is the American company Meta Platforms Inc. The responsible entity for the European area is the company Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland).

Facebook processes data from you, among other things, in the USA. Facebook respectively Meta Platforms is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Facebook uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Facebook commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

The Facebook Data Processing Term, which references the Standard Contractual Clauses, can be found at <https://www.facebook.com/legal/terms/dataprocessing>.

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

## Instagram Privacy Policy

### Instagram Privacy Policy Overview

- Affected parties: website visitors
- Purpose: optimising our service
- Processed data: includes data on user behaviour, information about your device and IP address.  
More details can be found in the privacy policy below.
- Storage period: until Instagram no longer needs the data for its purposes  
Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Instagram?

We have integrated functions of Instagram to our website. Instagram is a social media platform of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA. Since 2012, Instagram is a subsidiary company of Facebook Inc. and is a part of Facebook's products. The inclusion of Instagram's contents on our website is called embedding. With

this, we can show you Instagram contents such as buttons, photos or videos directly on our website. If you open websites of our online presence, that have an integrated Instagram function, data gets transmitted to, as well as stored and processed by Instagram. Instagram uses the same systems and technologies as Facebook. Therefore, your data will be processed across all Facebook firms.

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

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

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

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

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

## **What data is stored by Instagram?**

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

Facebook distinguishes between customer data and event data. We assume this is also the case for Instagram. Customer data are for example names, addresses, phone numbers and IP addresses. These data are only transmitted to Instagram, if they have been "hashed" first. Thereby, a set of data is transformed into a string of characters, which encrypts any contact

data. Moreover, the aforementioned “event data“ (data on your user behaviour) is transmitted as well. It is also possible, that contact data may get combined with event data. The collected data data is matched with any data Instagram already has on you.

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

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

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

The following cookies were used in our test:

**Name:** csrftoken

**Value:** “”

**Purpose:** This cookie is most likely set for security reasons to prevent falsifications of requests. We could not find out more information on it.

**Expiry date:** after one year

**Name:** mid

**Value:** “”

**Purpose:** Instagram places this cookie to optimise its own offers and services in- and outside of Instagram. The cookie allocates a unique user ID.

**Expiry date:** after end of session

**Name:** fbsr\_122949477124024

**Value:** no information

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

**Expiry date:** after end of session

**Name:** rur

**Value:** ATN

**Purpose:** This is an Instagram cookie which guarantees functionality on Instagram. **Expiry date:** after end of session

**Name:** urlgen

**Value:** "{194.96.75.33": 1901};liEtYv:Y833k2\_UjKvXgYe122949477"

**Purpose:** This cookie serves Instagram's marketing purposes.

**Expiry date:** after end of session

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

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

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

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

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

And this is how an Instagram account can be deleted:

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

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

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

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

Generally, you can set your browser to notify you whenever a cookie is about to be set.

Then you can individually decide upon the permission of every cookie.

## Legal basis

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

Instagram processes data from you, among other things, in the USA. Instagram respectively Meta Platforms is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Instagram uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Instagram commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

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

## LinkedIn Privacy Policy

### LinkedIn Privacy Policy Overview

- Affected parties: website visitors
- Purpose: optimisation of our service
- Processed data: includes data on user behaviour, information about your device and IP address.

More details can be found in the privacy policy below.

- Storage period: the data is generally deleted within 30 days
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is LinkedIn?**

On our website we use social plugins from the social media network LinkedIn, of the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Social plugins can be feeds, content sharing or a link to our LinkedIn page. Social plugins are clearly marked with the well known LinkedIn logo and for example allow sharing interesting content directly via our website. Moreover, LinkedIn Ireland Unlimited Company Wilton Place in Dublin is responsible for data processing in the European Economic Area and Switzerland.

By embedding these plugins, data can be sent to, as well as stored and processed by LinkedIn. In this privacy policy we want to inform you what data this is, how the network uses this data and how you can manage or prevent data retention.

LinkedIn is the largest social network for business contacts. In contrast to e.g. Facebook, LinkedIn focuses exclusively on establishing business connections. Therefore, companies can present services and products on the platform and establish business relationships. Many people also use LinkedIn to find a job or to find suitable employees for their own company. In Germany alone, the network has over 11 million members. In Austria there are about 1.3 million.

## **Why do we use LinkedIn on our website?**

We know how busy you are. You just cannot keep up with following every single social media channel. Even if it would really be worth it, as it is with our channels, since we keep posting interesting news and articles worth spreading. Therefore, on our website we have created the opportunity to share interesting content directly on LinkedIn, or to refer directly to our LinkedIn page. We consider built-in social plugins as an extended service on our website. The data LinkedIn collects also help us to display potential advertising measures only to people who are interested in our offer.

## **What data are stored by LinkedIn?**

LinkedIn stores no personal data due to the mere integration of social plugins. LinkedIn calls the data generated by plugins passive impressions. However, if you click on a social plugin to e.g. share our content, the platform stores personal data as so-called "active impressions". This happens regardless of whether you have a LinkedIn account or not. If you are logged in, the collected data will be assigned to your account.

When you interact with our plugins, your browser establishes a direct connection to LinkedIn's servers. Through that, the company logs various usage data. These may include your IP address, login data, device information or information about your internet or cellular provider. If you use LinkedIn services via your smartphone, your location may also be identified (after you have given permission). Moreover, LinkedIn can share these data with

third-party advertisers in “hashed” form. Hashing means that a data set is transformed into a character string. This allows data to be encrypted, which prevents persons from getting identified.

Most data on of your user behaviour is stored in cookies. These are small text files that usually get placed in your browser. Furthermore, LinkedIn can also use web beacons, pixel tags, display tags and other device recognitions.

Various tests also show which cookies are set when a user interacts with a social plug-in. We do not claim for the information we found to be exhaustive, as it only serves as an example. The following cookies were set without being logged in to LinkedIn:

**Name:** bcookie

**Value:** =2&34aab2aa-2ae1-4d2a-8baf-c2e2d7235c16122949477-

**Purpose:** This cookie is a so-called “browser ID cookie” and stores your identification number (ID). **Expiry date:** after 2 years

**Name:** lang

**Value:** v=2&lang=en-gb

**Purpose:** This cookie saves your default or preferred language.

**Expiry date:** after end of session

**Name:** lidc

**Value:** 1818367:t=1571904767:s=AQF6KNnJ0G122949477...

**Purpose:** This cookie is used for routing. Routing records how you found your way to LinkedIn and how you navigate through the website.

**Expiry date:** after 24 hours

**Name:** rtc

**Value:** kt0Irv3NF3x3t6xvDgGrZGDKkX

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

**Expiry date:** after 2 minutes

**Name:** JSESSIONID

**Value:** ajax:1229494772900777718326218137

**Purpose:** This is a session cookie that LinkedIn uses to maintain anonymous user sessions through the server.

**Expiry date:** after end of session

**Name:** bscookie

**Value:** “v=1&201910230812...

**Purpose:** This cookie is a security cookie. LinkedIn describes it as a secure browser ID cookie. **Expiry date:** after 2 years

**Name:** fid

**Value:** AQHj7Ii23ZBcqAAAA...

**Purpose:** We could not find any further information about this cookie.

**Expiry date:** after 7 days

**Note:** LinkedIn also works with third parties. That is why we identified the Google Analytics cookies `_ga` and `_gat` in our test.

## **How long and where are the data stored?**

In general, LinkedIn retains your personal data for as long as the company considers it necessary for providing its services. However, LinkedIn deletes your personal data when you delete your account. In some exceptional cases, LinkedIn keeps some summarised and anonymised data, even account deletions. As soon as you delete your account, it may take up to a day until other people can no longer see your data. LinkedIn generally deletes the data within 30 days. However, LinkedIn retains data if it is necessary for legal reasons. Also, data that can no longer be assigned to any person remains stored even after the account is closed. The data are stored on various servers in America and presumably also in Europe.

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

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

How to access account data in your LinkedIn profile:

In LinkedIn, click on your profile icon and select the “Settings & Privacy” section. Now click on “Privacy” and then on the section “How LinkedIn uses your data on”. Then, click “Change” in the row with “Manage your data and activity”. There you can instantly view selected data on your web activity and your account history.

In your browser you also have the option of preventing data processing by LinkedIn. As mentioned above, LinkedIn stores most data via cookies that are placed in your browser. You can manage, deactivate or delete these cookies. Depending on which browser you have, these settings work a little different. You can find the instructions for the most common browsers here:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

You can generally set your browser to always notify you when a cookie is about to be set. Then you

can always decide individually whether you want to allow the cookie

or not. **Legal basis**

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

LinkedIn processes data from you, among other things, in the USA. LinkedIn is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, LinkedIn uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, LinkedIn commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can find more information about the standard contractual clauses at LinkedIn here: <https://www.linkedin.com/legal/l/customer-sccs>.

You can find out more about the data that is processed by LinkedIn in their Privacy Policy at <https://www.linkedin.com/legal/privacy-policy>.

## **Data Processing Agreement (DPA) LinkedIn**

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with LinkedIn. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".

This contract is required by law because LinkedIn processes personal data on our behalf. It clarifies that LinkedIn may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <https://www.linkedin.com/legal/l/dpa?>

# Blogs and Publication Media Introduction

## **Blogs and Publication Media Privacy Policy Overview**

- Affected parties: website visitors
  - Purpose: Presentation and optimisation of our service, along with communication between website visitors, as well as security measures and administration
  - Data processed: Data such as contact details, IP address and published content. More details can be found under the tools used.
  - Storage duration: depending on the tools used
- Legal basis: Article 6 paragraph 1 letter a GDPR (consent), Article 6 paragraph 1 letter f GDPR (legitimate interests), Article 6 paragraph 1 sentence 1 letter b. GDPR (contract)

## **What are blogs and publishing media?**

We use blogs or other means of communication on our website through which we can communicate with you – and through which you can communicate with us. Your data may also be stored and processed by us. This may be necessary in order for us to display content appropriately, make communication work smoothly and increase security. In this privacy policy, we will show you general information on which of your data may be processed. The exact information on data processing, however, always depends on the tools and functions used. You will find detailed information about data processing in the privacy policies of the individual providers.

## **Why do we use blogs and publication media?**

Our greatest motivation for our website is to offer you interesting and exciting content. At the same time, your opinions and your content are important to us. That's why we want to create a good interactive exchange between you and ourselves. With various blogs and publication options, we can achieve exactly that. You can e. g. post comments about our content, reply to others' comments or, in some cases, make posts yourself.

## **Which data is processed?**

Exactly which data is processed always depends on the communication functions we use. Very often IP address, username and published content are stored. This is done primarily to ensure security protection, prevent spam, and for us to be able to take action against any illegal content. What is more, cookies may also be used for data retention. They are small text files that are stored as information in your browser. You can find more details about the collected and stored data in our individual sections and in the privacy policies of the respective providers.

## **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. For example, post and comment functions store data until

you revoke data storage. In general, personal data is only stored for as long as is absolutely necessary for us to provide you with our services.

## **Right to object**

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

Since cookies can also be used in publication media, we also recommend you read our general privacy policy on cookies. To find out exactly which of your data is stored and processed, you should read the privacy policies of the respective tools.

## **Legal Basis**

We use this means of communication mainly on the basis of our legitimate interests (Art. 6 Para. 1 lit. f GDPR) in fast and good communication with you or other customers, business partners and visitors. Provided the use serves to process or initiate contractual relationships, the legal basis also extends to Article 6 Paragraph 1 Sentence 1 lit. b. GDPR.

Certain types of processing require your consent – in particular the use of cookies and comment or message functions. Provided you have consented to your data being processed and stored by integrated publication media, this consent is the legal basis for any data processing (Article 6 (1) (a) GDPR). Most communication features we use set cookies in your browser to store data. We therefore recommend you read our privacy policy on cookies carefully and consult the privacy policy or cookie policy of the relevant service provider.

Information on specific tools – if available – can be found in the following

sections. **WordPress-Emojis Privacy Policy**

In our blog, we also use emojis and smilies. We most probably don't need to explain in more detail what emojis are. After all, you know those smiling, angry or sad faces. They are graphic elements or files that we make available, which are loaded from another server. The service provider for WordPress emojis and smilies is Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA. This third-party provider stores your IP address in order to be able to transmit the emoji files to your browser.

Automattic processes data from you, among other things, in the USA. Automattic is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at

[https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, Automattic uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when

transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Automattic commits to maintaining the

European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can find more information about the standard contractual clauses at Automattic at <https://wordpress.com/support/data-processing-agreements/>.

You can find out more about the data that is processed by using WordPress-Emojis in their Privacy Policy at <https://automattic.com/privacy/>.

## Content Delivery Networks

### Content Delivery Networks Privacy Policy Overview

Affected parties: website visitors

Purpose: Service performance optimisation (to increase website loading speeds)  Processed data: data such as your IP address

You can find more details on this below as well as in the individual Privacy Policies.  Storage period: most data is stored until it is no longer needed for the provision of the service.

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

## What is a Content Delivery Network?

On our website we use a so-called content delivery network or CDN. This helps to load our website quickly and easily, regardless of your location. Moreover, your personal data will also be stored, managed and processed on the respective CDN provider's servers. In the following, we will go into more general detail on this service and the data processing associated with it. You can find detailed information on how your data is handled in the provider's Privacy Policy.

Each content delivery network (CDN) is a network of regionally distributed servers that are connected to each other via the internet. Through this network, website content (especially very large files) can be delivered quickly and smoothly, even when large loading peaks occur. To make this possible, CDNs create a copy of our website on their servers. The website can be delivered quickly because these servers are distributed all

around the world. Any data transfer to your browser is therefore significantly shortened by the CDN.

## **Why do we use a Content Delivery Network for our website?**

A fast loading website is part of our service. Of course, we know how annoying it is when a website loads at a snail's pace. Most of the time, you lose your patience and click away before the website is fully loaded. But of course we want to avoid that. Therefore, to us a fast loading website is an obligatory part of our website offer. With the use of a content delivery network, our website loads significantly faster in your browser. Furthermore, CDNs are particularly helpful when you are abroad, as the website is always delivered from a server in your area.

## **Which data are processed?**

If you access a website or its content and it gets cached in a CDN, the CDN forwards the request to the server closest to you which then delivers the content. Content delivery networks are built in a way that JavaScript libraries can be downloaded and hosted on npm and Github servers. Alternatively, WordPress plugins can also be loaded on most CDNs, provided they are hosted on [WordPress.org](https://WordPress.org). Moreover, your browser can send personal data to the content delivery network we use. This includes data such as IP addresses, browser type, browser version, the accessed website or the time and date of the page visit. This data is collected and stored by the CDN. Whether cookies are used for data storage depends on the network that is being used. For more information on this, please read the Privacy Policy of the respective service.

## **Right to object**

If you want to prevent this data transfer altogether, you can use a JavaScript blocker (see for example <https://noscript.net/>) on your computer. However, our website can then of course no longer offer its usual service (such as a fast loading speeds).

## **Legal basis**

If you have consented to the use of a content delivery network, your consent represents the the legal basis for the corresponding data processing. According to **Art. 6 paragraph 1 lit. a (consent)** your consent represents the legal basis for the processing of personal data, as it can occur when collected by a content delivery network.

We also have a legitimate interest in using a content delivery network to optimise our online service and make it more secure. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use the tool if you have consented to it.

Provided this information is available, you can find out more about the particular content delivery networks in the following sections.

## **Cookie Consent Management Platform**

### **Cookie Consent Management Platform Overview**

- Affected parties: Website visitors
- Purpose: Obtaining and managing consent to certain cookies and thus the use of certain tools
- Processed data: data for managing cookie settings such as IP address, time of consent, type of consent and individual consent. You can find more details on this directly with the tool that is being used.
- Storage period: depends on the tool used, periods of several years can be assumed  
Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is a cookie consent management platform?**

We use a Consent Management Platform (CMP) software on our website that makes it easier for us and you to handle the scripts and cookies used correctly and securely. The software automatically creates a cookie pop-up, scans and controls all scripts and cookies, provides you with the cookie consent required under data protection law and helps you and us to keep track of all cookies. Most cookie consent management tools identify and categorize all existing cookies. As a website visitor, you then decide for yourself whether and which scripts and cookies you allow or not. The following graphic shows the relationship between browser, web server and CMP.



## **Why do we use a cookie management tool?**

Our goal is to offer you the best possible transparency in the area of data protection. We are also legally obliged to do so. We want to inform you as well as possible about all tools and all cookies that can save and process your data. It is also your right to decide for yourself which cookies you accept and which you do not. In order to grant you this right, we first need to know exactly which

cookies actually landed on our website. Thanks to a cookie management tool, which regularly scans the website for all cookies present, we know about all cookies and can

provide you with GDPR compliant information. You can then use the consent system to accept or reject cookies.

## **Which data are processed?**

As part of our cookie management tool, you can manage each individual cookie yourself and have complete control over the storage and processing of your data. The declaration of your consent is stored so that we do not have to ask you every time you visit our website and we can also prove your consent if required by law. This is saved either in an opt-in cookie or on a server. The storage time of your cookie consent varies depending on the provider of the cookie management tool. Usually this data (e.g. pseudonymous user ID, time of consent, detailed information on the cookie categories or tools, browser, device information) is stored for up to two years.

## **Duration of data processing**

We will inform you below about the duration of the data processing if we have further information. In general, we only process personal data for as long as is absolutely necessary for the provision of our services and products. Data stored in cookies are stored for different lengths of time. Some cookies are deleted after you leave the website, others may be stored in your browser for a few years. The exact duration of the data processing depends on the tool used, in most cases you should be prepared for a storage period of several years. In the respective data protection declarations of the individual providers, you will usually receive precise information about the duration of the data processing.

## **Right of objection**

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

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

## **Legal basis**

If you agree to cookies, your personal data will be processed and stored via these cookies. If we are allowed to use cookies with your **consent** (Article 6 paragraph 1 lit. a GDPR), this consent is also the legal basis for the use of cookies and the processing of your data. In order to be able to manage the consent to cookies and to enable you to give your consent, a cookie consent management platform software is used. The use of this software enables us to operate the website in an efficient and legally compliant manner, which is a **legitimate interest** (Article 6 paragraph 1 lit. f

## GDPR). **Real Cookie Banner Privacy Policy**

We use the consent management tool Real Cookie Banner on our website. The service provider is the German company devowl.io GmbH, located at Tannet 12, 94539 Grafing, Germany.

To learn more about the data processed through the use of Real Cookie Banner, please refer to the privacy policy at <https://devowl.io/privacy-policy/>.

### **Security & Anti-spam**

#### **Security & Anti-Spam Privacy Policy Overview**

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

### **What is Security & Anti-spam software?**

So-called security & Anti-spam software can protect you and us from various spam or phishing emails and other potential cyber-attacks. Spam includes advertising emails from mass mailings that you did not sign up for yourself. Such emails are also called data garbage and can also cause costs. Other spam such as phishing emails, on the other hand, are messages that aim to gain trust via fake messages or websites in order to obtain personal information. Anti-spam software usually protects against unwanted spam messages or malicious emails that could inject viruses into our system. We also use general firewall and security systems that protect our devices from unwanted network attacks.

### **Why do we use Security & Anti-spam software?**

We put great importance on our website's security. After all, this is not just about our safety, but also about your safety. Unfortunately, cyber threats are now part of everyday life in the world of IT and the internet. Hackers e. g. often try to steal personal data from IT systems with the help of cyber attacks. And therefore a good defence system is absolutely necessary. A security system monitors all incoming and outgoing connections to our network or computer. In order to achieve even greater security against cyber attacks, we also use other external security services on our devices in addition to standardised security systems. Unauthorised data transmissions are thus better prevented and this is how we protect ourselves from cybercrime.

### **Which data are processed by Security & Anti-spam software?**

The data that is collected and stored of course depends on the respective service. However,

we always try to only use programs that collect data very sparingly or only store data that is necessary for the fulfilment of the offered service. In general, the service may store data such as name, address, IP address, email address and technical data such as browser type or browser version. Any performance and log data may also be collected in order to identify possible incoming threats in good time. This data will be processed as part of the provided services and in compliance with applicable laws. This also includes the GDPR for US providers (via the Standard Contractual Clauses). In some cases, security services also work with third parties who may store and/or process data under instructions and in accordance with privacy policies and other security measures. Data is usually stored using cookies.

## **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. For example, security programs store data until you or we revoke data storage. In general, personal data is only stored for as long as is absolutely necessary for the provision of the services. Unfortunately, in many cases, we do not have precise information from the providers about their data storage periods.

## **Right to object**

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

Since cookies may also be used with security services, we recommend you read our privacy policy on cookies. To find out exactly which of your data is stored and processed, you should read the privacy policies of the respective tools.

## **Legal Basis**

We use security services mainly on the basis of our legitimate interests (Art. 6 Para. 1 lit. f GDPR) in a good security system and protection against various cyber attacks.

Certain data processing requires your consent – in particular, the use of cookies and security functions. If you have agreed to the processing and storage of your data by integrated security services, your consent is the legal basis for data processing (Article 6 (1) (a) GDPR). Most of the services we use set cookies on your browser to store data. We, therefore, recommend you read our privacy policy on cookies carefully and consult the privacy policy or cookie policy of the relevant service provider.

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

sections. **FriendlyCaptcha Privacy Policy**

We also use the anti-bot tool FriendlyCaptcha for our business. The service provider is the German company Friendly Captcha GmbH, Am Anger 3-5, 82237 Woerthsee, Germany.

You can find out more about the data processed by using FriendlyCaptcha in the privacy policy at <https://friendlycaptcha.com/legal/privacy-end-users/>.

## **Wordfence Privacy Policy**

We use Wordfence, a WordPress security plug-in, for our website. The service provider is the American company Defiant, Inc., 1700 Westlake Ave N Ste 200, Seattle, WA 98109, USA.

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

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

[https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=en](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=en)

The General Data Protection Regulation, which corresponds to the standard contractual clauses, can be found at

<https://www.wordfence.com/help/general-data-protection-regulation/>.

You can learn more about the data processed using Wordfence in the Privacy Policy at <https://www.wordfence.com/privacy-policy/>.

## **Cloud Services**

### **Cloud Services Privacy Policy Overview**

Affected parties: We as the website operator and you as the website visitor  Purpose: security and data storage

Processed data: Data such as your IP address, name or technical data such as your browser version

More details can be found below and in the individual privacy policies or in the privacy policies of the providers

Duration of storage: In most cases, data is stored until it is no longer required in order to provide the service

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

## **What are cloud services?**

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

## **Why do we use cloud services?**

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

As website operator or company, we use cloud services primarily for our own purposes. We e. g. manage our calendar and store documents or other important information in the cloud. However, your personal data may also be stored. This can take place if you provide us with your contact details (e.g. name and email address) while we store our customer data with a cloud provider. Consequently, any of your data we process may also be stored and processed on external servers.