# **Privacy Policy**

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# **Privacy Policy Introduction and Overview**

We have written this privacy policy (version 20.03.2024-122145356) in order to explain to you, in accordance with the provisions of the <u>General Data Protection Regulation (EU) 2016/679</u> 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 <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679</a>.

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, you will find the contact details of the responsible person or controller below:

Pucher Patentanwalt GmbH DI Dr. Hannes Pucher Merangasse 2/9 8010 Graz Austria

E-Mail: office@pucher-ip.at Phone: +43 664 9314 4031

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

# **Austria Data protection authority**

Manager: Mag. Dr. Andrea Jelinek

Address: Barichgasse 40-42, 1030 Wien

Phone number.: +43 1 52 152-0 E-mail address: 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

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.

# TLS encryption with https

The terms TLS, encryption and https sound very technical, which they are indeed. We use HTTPS (Hypertext Transfer Protocol Secure) to securely transfer data on the Internet.

This means that the entire transmission of all data from your browser to our web server is secured – nobody can "listen in".

We have thus introduced an additional layer of security and meet privacy requirements through technology design <u>Article 25 Section 1 GDPR</u>). With the use of TLS (Transport Layer Security), which is an encryption protocol for safe data transfer on the internet, we can ensure the protection of confidential information.

You can recognise the use of this safeguarding tool by the little lock-symbol , which is situated in your browser's top left corner in the left of the internet address (e.g. examplepage.uk), as well as by the display of the letters https (instead of http) as a part of our web address.

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

# **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.

To 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 email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.

# **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.
- M 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.

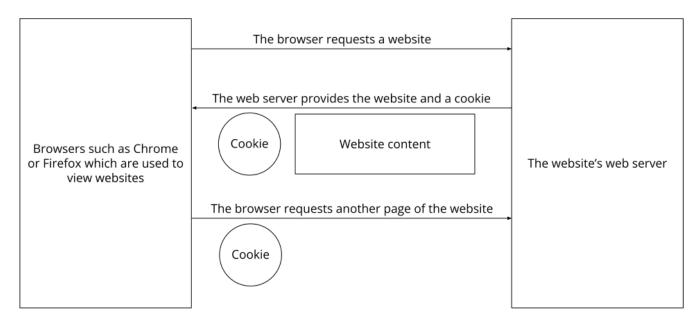
In the following we explain what cookies are and why they are used, so that you can better understand the following privacy policy.

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: GA1.2.1326744211.152122145356-9

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 <a href="https://tools.ietf.org/html/rfc6265">https://tools.ietf.org/html/rfc6265</a>, 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).

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.

# 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.

The 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.

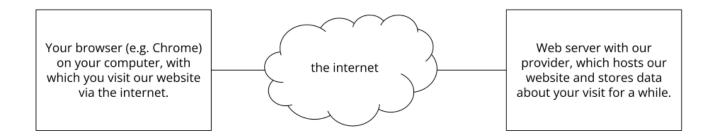
When you want to view a website on a screen, you use a program called a web browser. You probably know the names of some web browsers: Google Chrome, Microsoft Edge, Mozilla Firefox, and Apple Safari.

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=122145356)
- 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.

# **A1 web hosting Privacy Policy**

For our website, we use the hosting service of A1. The provider of this service is the Austrian company A1 Telekom Austria AG, Lassallestrasse 9, A-1020 Vienna, Austria.

You can find out more about the data that is processed by using A1 web hosting in their Privacy Policy at <a href="https://www.a1.net/datenschutz">https://www.a1.net/datenschutz</a>.

## **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.
- Torage 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.

# **Wix Privacy Policy**

#### **Wix 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.

The Storage period: no precise information is known

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

#### What is Wix?

For our website we use the website construction-kit Wix by the Israeli company Wix.com Ltd., 40 Hanamal Tel Aviv St., Tel Aviv 6350671, Israel. In addition to the headquarters in Tel Aviv, the company also has other headquarters such as in Berlin, Dublin, Vancouver, or New York. Due to the use of Wix, your personal data may be collected, stored and processed. In this privacy policy we want to explain why we use Wix, what data is stored, where your data is stored and how you can prevent data retention.

Wix is a website construction-kit that makes it very easy to create HTML5 websites as well as mobile websites. The online platform is based on the cloud principle and allows easy integration of various Wix or third-party provider functions into your own website.

## Why do we use Wix on our website?

For working on our website, we need an easy-to-use system, that allows us to present you a beautiful design and interesting content quickly and easily. We have found Wix to be the right system for this. Thanks to both, Wix's easy operation and its extensive functions, we can design our website as we wish, while ensuring its user-friendliness.

# What data is stored by Wix?

Non-personal data include for example technical usage information such as browser activity, clickstream activity, session heat maps, as well as data about your computer, operating system, browser, screen resolution, language and keyboard settings, internet provider and date of the page visit.

Personal data are also recorded. These are primarily contact details (email address or telephone number, if you have provided them), IP address or your geographical location.

Tracking systems such as cookies are used to collect data about your behaviour on our website. For example, it records which sub-pages you take a particular interest in, how much time you spend on individual pages, when you leave a page (bounce rate) or which pre-sets (e.g. language settings) you have made. Based on this data, <u>Wix.com</u> can adjust their marketing measures better to your

interests and your user behaviour. Therefore, the next time you visit our website, you will get to view it with the settings you have chosen priorly. <u>Wix.com</u> may also forward personal data to third parties (such as service providers).

Below we will show you a list of exemplary cookies that are placed due to the use of Wix:

Name: XSRF-TOKEN

**Value:** 1591628008 | P01ovn-JtsrK

**Purpose:** This cookie is a security cookie and prevents the so-called cross-site request forgery,

which is an attack on a computer system.

Expiry date: after end of session

Name: \_wixCIDX

Value: b2474394-b64f-4c7a-a598-16b9043a8938122145356-9

**Purpose:** This cookie appropriately stores data when you to log in to our website, to shorten the

logon process the following time.

**Expiry date:** after 3 months

Name: AWSELB

Value: EB626B5A40C80CEFD0EB26286F9684716FECD023880992D31DEC38122145356-1

**Purpose:** This cookie is used to distribute the website's load across multiple servers. Therefore, the

page loading speed gets increased.

**Expiry date:** after one hour

Name: AWSELBCORS

Value: 85FDC7C91873988D19D2D53305AA8CAB73AF02FCEAEB626B5A40C

Purpose: We have not yet been able to find out more information on this cookie. We will inform

you as soon as we know more. **Expiry date:** after one hour

**Note:** Please note that the cookies shown above are examples and that this list does not claim to be exhaustive.

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

Your data can be stored on various servers that are distributed across the globe. For example, the data can be stored in the USA, Ireland, South Korea, Taiwan, or Israel.

Wix always stores data until it is no longer required for their provided service. We have not yet been able to find out more about the period the data is stored for.

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

You have the option to update, correct or delete your personal data at any time. You can also contact Wix's data protection department directly at <a href="mailto:privacy@wix.com">privacy@wix.com</a>.

To deactivate, delete, or manage cookies you have to select the appropriate settings in your browser. Depending on which browser you use, the cookie settings work a little differently. The

following instructions show how you can set or manage cookies 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

Wix.com Ltd. is headquartered in Israel. The European Commission declared Israel to be a country that provides adequate protection for personal data of EU citizens.

#### **Legal basis**

If you have consented to the use of Wix, your consent is the legal basis for the corresponding data processing. According to **Art. 6 Paragraph 1 lit. (Consent)** your consent is the legal basis for the processing of personal data as may occur when collected by Wix.

We also have a legitimate interest in using Wix to optimise our online service and to present our services nicely for you. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR** (**legitimate interests**). Nevertheless, we only use Wix if you have given your consent to it.

Wix uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR) as basis for data processing by recipients based in third countries (which are outside the European Union, Iceland, Liechtenstein and Norway) or for data transfer there. These clauses oblige Wix to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=en.

With this Privacy Policy we have made you familiar with the most important information on data processing by Wix.com. If you want to find out more about it, we recommend you to read the company's Privacy guidelines at <a href="https://www.wix.com/about/privacy">https://www.wix.com/about/privacy</a>.

# **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.
- To 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?

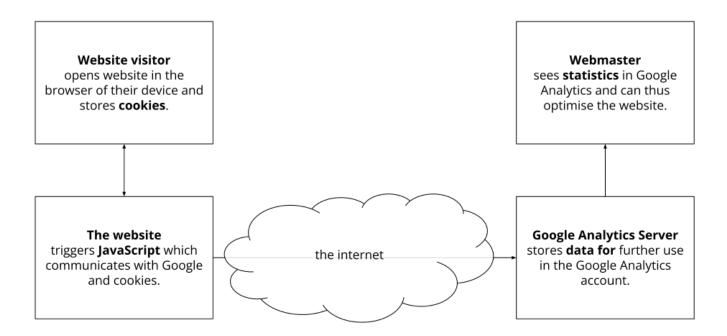
We have a clear goal in mind when it comes to our website: we want to offer our industry's best website on the market. Therefore, we want to give you both, the best and most interesting offer as well as comfort when you visit our website. With web analysis tools, we can observe the behaviour of our website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

# **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.
- The 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: 2.1326744211.152122145356-5

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: 2.1687193234.152122145356-1

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

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: <a href="https://tools.google.com/dlpage/gaoptout?hl=en">https://tools.google.com/dlpage/gaoptout?hl=en</a> 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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> 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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

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

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

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

## **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 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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

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

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

# **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.

- The 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-c2e2d7235c16122145356-

**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=AQF6KNnJ0G122145356...

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: kt0lrv3NF3x3t6xvDgGrZGDKkX

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

**Expiry date:** after 2 minutes

Name: |SESSIONID

**Value:** ajax:1221453562900777718326218137

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: AQHj7li23ZBcqAAAA...

**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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> 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.

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

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

# **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.

## **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. Provided we offer certain forms of content by cloud services on our website, cookies can also be set for web analysis and advertising purposes. Furthermore, such cookies retain your settings (e.g. the language used) so you will be provided with your usual web environment next time you visit our website.

#### Which data is processed by cloud services?

Much of the data we store in the cloud cannot be used to identify you as a person, but some data is personal data as defined by the GDPR. This is often customer data such as name, address, IP address or telephone number or technical device information. Videos, images and audio files may also be stored in the cloud. Exactly how the data is collected and stored depends on the respective service. We only try to use services that handle your data in a very reliable and professional manner. Generally, services such as Amazon Drive, have access to the stored files in order to be able to offer their own service accordingly. For this, however, the services require consent (such as for the right to copy files for security reasons). The data will be processed and handled as part of the provided services and in compliance with applicable laws. This also includes compliance with the GDPR for US providers (via the standard contractual clauses). In some cases, cloud services also cooperate with third parties who may process data under instructions and in accordance with privacy policies and other security measures. At this point we would like to emphasise again that all well-known cloud services (such as Amazon Drive, Google Drive or Microsoft OneDrive) obtain the right to access stored content in order to be able to offer and optimise their own services accordingly.

# **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. In general, cloud services store data until you or we revoke the data storage or erase the retained data. In general, personal data is only stored for as long as it is necessary for the provision of the respective services. However, it may take up to several months to erase your data from the cloud. This may occur because data is usually not only stored on one server but divided between different servers.

#### Right to object

You also have the right and the opportunity to revoke your consent to data storage in a cloud at any time. If cookies are used, you also have a right to withdraw your consent. 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. 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 policy of the respective cloud provider.

#### **Legal Basis**

We use cloud services mainly on the basis of our legitimate interests (Art. 6 Para. 1 lit. f GDPR) in good security and storage systems.

Certain types of processing, in particular the use of cookies and storage functions, require your consent. If you have consented to your data being processed and stored by cloud services, this consent is the legal basis for data processing (Article 6 (1) (a) GDPR). Most of the services we use place cookies in your browser to store data. Thus, we recommend you read our privacy policy on cookies carefully and study the privacy policy or cookie policy of the relevant service provider.

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

# **OneDrive Privacy Policy**

We use OneDrive for our business, which is a file hosting service from Microsoft. Service provider is the American company Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA.

Microsoft processes data from you, among other things, in the USA. Microsoft 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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> en.

Additionally, Microsoft 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, Microsoft 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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

For more information on Microsoft's Standard Contractual Clauses, see <a href="https://docs.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses">https://docs.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses</a>.

You can find out more about the data processed by using OneDrive in the privacy statement at

## **External Online Platforms Introduction**

#### **External Online Platforms Privacy Policy Overview**

- Affected parties: website visitors or visitors to the external online platforms
- Purpose: Presentation and optimisation of our service, as well as establishing contact with visitors & interested parties
- Data processed: data such as phone numbers, email addresses, contact details, user behaviour data, information about your device and your IP address.

More details can be found directly with the respective platform used.

- The Storage duration: depends on the platforms used
- Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

#### What are external online platforms?

In order to be able to offer our services or products outside of our website, we also use external platforms. These are mostly online marketplaces such as Amazon or eBay. In addition to our responsibility for data protection, the data privacy regulations of the external platforms used also apply. This especially applies when our products are purchased via such a platform, i. e. if there is a payment process. Furthermore, most platforms also use your data to optimise their own marketing measures. For example, the platform can use the collected data to tailor advertisements to the interests of customers and website visitors.

## Why do we use external online platforms?

In addition to our website, we also want to display our offer on other platforms in order to reach more customers. External online marketplaces such as Amazon, eBay or Digistore24 offer large sales websites that show our products to people who may not know our website. Moreover, built-in elements on our site may also lead to an external online platform. Any data that is processed and stored by the respective online platform is used by the business to log the payment process and also to conduct web analyses.

The aim of these analyses is to enable the development of more precise and personal marketing and advertising strategies. Depending on your interaction with a platform, the evaluated data may be used to draw appropriate conclusions about your interests and to create a so-called user profile on you. This also allows the platforms to show customised advertisements or products to you. For this purpose, cookies are usually set in your browser in order to store data on your usage behaviour.

Please note that when using the platforms or our built-in elements, your data may also be processed outside the European Union, since online platforms such as Amazon or eBay 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 stored and processed depends on the respective external platform. But usually, it is data such as phone numbers, email addresses, data you enter in a contact form, along with user data (e. g. which buttons you click and which pages you view during your visit), as well as information about your device and IP address. In most cases, the majority of this data is stored in cookies. If you have a profile on an external platform and are logged in there, your data can be linked to any such profile. The collected data is stored on the servers of the platforms used, where it is processed. You can find out exactly how an external platform stores, manages and processes data in the respective privacy policy. If you have any questions about data storage and data processing, or if you want to assert corresponding rights, we recommend that you contact the platform directly.

### **Duration of data processing**

We will inform you below about the duration of data processing, provided we have further information on this. For example, Amazon stores data until it is no longer needed for its own purposes. Generally, we only process your personal data as long as is absolutely necessary for the provision of our services and products.

### Right to object

You also have the right and the opportunity to revoke your consent to the use of cookies at any time. This can be done either via our cookie management tool or via opt-out functions on the respective external platform. You can also prevent data collection through cookies by managing, deactivating or erasing the cookies in your browser.

As cookies may be used, we also recommend 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 external platforms.

### **Legal Basis**

If you have consented to your data being processed and stored by external platforms, this **consent** is the legal basis for data processing (**Art. 6 Para. 1 lit. a GDPR**). In general, if you have consented, your data will also be stored and processed on the basis of our **legitimate interest** (**Art. 6 Para. 1 lit. f GDPR**) in fast and good communication with you as well as other customers and business partners. If there are integrated elements of external platforms on our website, we only use them if you have given your consent.

Information on specific external platforms – if available – can be found in the following sections.

# **Bing AI Privacy Policy**

#### **Bing AI Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: Optimization of the website offering.
- Processed data: Depending on the inputs and previous settings. More details can be found below in this privacy policy.
- Storage period: Data is generally stored as long as it is necessary for the purpose of the service.
- 4 Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

We use the AI-based search engine Bing for our website. The service provider is the American company Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For the European region, the company Microsoft Ireland Operations Limited (South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland) is responsible for all Microsoft services.

### What is Bing AI?

Bing AI refers to the artificial intelligence technology used by the Microsoft search engine Bing. This technology uses machine learning and other algorithms to improve search results and other Bing functions. Bing AI is not only used in the search engine but also in other Microsoft products such as Microsoft Office or Azure.

You have probably heard of or used ChatGPT yourself. This tool is a language model developed by OpenAI specifically designed to engage in natural language interactions with people. Microsoft specifically uses the OpenAI-developed GPT-4 language model for some of their own products.

### Why do we use Bing AI on our website?

We use Bing AI features on our website to provide you with a better and more interactive user experience. With the help of the tool, you can interact directly with our website and ask questions. If Bing satisfactorily answers your questions, you can quickly get help without having to wait for an email response from us. The tool is available for you at all times, thus improving our customer service.

## What data is stored by Bing AI?

The data that is stored depends on your inputs. All text messages or inputs you make in the tool are stored.

Various types of data can be processed, including your search queries, as well as the IP addresses and locations of the devices used to access Bing. Bing can also store information about which search results were clicked on and which ads were displayed and clicked on. Additionally, Bing may use cookies and similar technologies to track your behavior on the website and personalize your experience. However, Microsoft is committed to protecting your privacy to the fullest extent possible and collecting and using only data that is necessary to improve search results and the user experience.

Here is an overview of the most common data collected by the Al-based search engine Bing:

- Information about the content of search gueries
- Information about the type of questions asked
- Information about the type of device, browser, and operating system
- Information about the user's IP address

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

In general, data entered in Al-based tools is stored because the tools use the data to train themselves. If you choose to enter personal data such as your email address or name, this information can also be stored in a database for a longer period of time. However, your consent to data processing must be obtained before this happens.

The exact storage periods and locations of the data collected by Bing AI depend heavily on the type of data. Bing AI is a Microsoft product, and the company's privacy policies set general principles for storing personal data. Microsoft is required to limit the storage of data to a period necessary for the purpose of data storage. Microsoft typically stores data on servers in the United States and other countries where it has branches.

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

Under European Union data protection law, you have the right to access, update, delete, or restrict your data. However, you can only prevent complete data storage by not using Bing Al.

## Legal basis for the processing of personal data

If personal data is collected, the use of Bing AI requires consent. According to Art. 6 para. 1 lit. a GDPR (Consent), this consent represents the legal basis for the processing of personal data, as may occur when collected by Bing AI.

In addition to consent, we have a legitimate interest in optimizing our service and improving our offering technically and economically. With the help of Bing AI, we enhance your user experience on our website and expand our support services. The legal basis for this is Art. 6 para. 1 lit. f GDPR (Legitimate interests).

Bing AI or Microsoft processes data from you, among other things, in the USA. Microsoft 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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> en.

Additionally, Microsoft 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, Microsoft 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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

We hope we have provided you with the most important information about the data processing by Bing AI. You can learn more about the data processing by Bing AI in the privacy statement at <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>.

### **Audio & Video**

#### **Audio & Video Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: service optimisation
- Processed data: Data such as contact details, user behaviour, device information and IP addresses can be stored.

You can find more details in the Privacy Policy below.

- To Storage period: data are retained for as long as necessary 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 are audio and video elements?

We have integrated audio and video elements to our website. Therefore, you can watch videos or listen to music/podcasts directly via our website. This content is delivered by service providers and is obtained from the respective providers' servers.

Audio and video elements are integrated functional elements of platforms such as YouTube, Vimeo or Spotify. It is usually free of charge to use these portals, but they can also contain paid content. With the integrated elements, you can listen to or view any of their content on our website.

If you use audio or video elements on our website, your personal data may get transmitted to as well as processed and retained by service providers.

## Why do we use audio & video elements on our website?

We of course want to provide you with the best offer on our website. And we are aware that content is no longer just conveyed in text and static images. Instead of just giving you a link to a video, we offer you audio and video formats directly on our website. These are entertaining or informative, but ideally they are both. Our service therefore gets expanded and it gets easier for you to access interesting content. In addition to our texts and images, we thus also offer video and/or audio content.

## Which data are retained by audio & video elements?

When you visit a page on our website with e.g. an embedded video, your server connects to the service provider's server. Thus, your data will also be transferred to the third-party provider, where it will be stored. Certain data is collected and stored regardless of whether you have an account

with the third party provider or not. This usually includes your IP address, browser type, operating system and other general information about your device. Most providers also collect information on your web activity. This e.g. includes the session duration, bounce rate, the buttons you clicked or information about the website you are using the service on. This data is mostly stored via cookies or pixel tags (also known as web beacons). Any data that is pseudonymised usually gets stored in your browser via cookies. In the respective provider's Privacy Policy, you can always find more information on the data that is stored and processed.

### **Duration of data processing**

You can find out exactly how long the data is stored on the third-party provider's servers either in a lower point of the respective tool's Privacy Policy or in the provider's Privacy Policy. Generally, personal data is only processed for as long as is absolutely necessary for the provision of our services or products. This usually also applies to third-party providers. In most cases, you can assume that certain data will be stored on third-party providers' servers for several years. Data can be retained for different amounts of time, especially when stored in cookies. Some cookies are deleted after you leave a website, while others may be stored in your browser for a few years.

### Right to object

You also retain 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. You can e.g. also prevent data retention via cookies by managing, deactivating or erasing cookies in your browser. The legality of the processing up to the point of revocation remains unaffected.

Since the integrated audio and video functions on our site usually also use cookies, we recommend you to also read our general Privacy Policy on cookies. You can find out more about the handling and storage of your data in the Privacy Policies of the respective third party providers.

## **Legal basis**

If you have consented to the processing and storage of your data by integrated audio and video elements, your consent is considered 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) in maintaining fast and good communication with you or other customers and business partners. We only use the integrated audio and video elements if you have consented to it.

# YouTube Privacy Policy

#### **YouTube Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: optimising our service
- Processed data: Data such as contact details, data on user behaviour, information about your device and IP address may be stored.

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

- The Storage period: data are generally stored for as long as is necessary for the purpose of the service
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What is YouTube?

We have integrated YouTube videos to our website. Therefore, we can show you interesting videos directly on our site. YouTube is a video portal, which has been a subsidiary company of Google LLC since 2006. The video portal is operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. When you visit a page on our website that contains an embedded YouTube video, your browser automatically connects to the servers of YouTube or Google. Thereby, certain data are transferred (depending on the settings). Google is responsible for YouTube's data processing and therefore Google's data protection applies.

In the following we will explain in more detail which data is processed, why we have integrated YouTube videos and how you can manage or clear your data.

On YouTube, users can watch, rate, comment or upload videos for free. Over the past few years, YouTube has become one of the most important social media channels worldwide. For us to be able to display videos on our website, YouTube provides a code snippet that we have integrated to our website.

## Why do we use YouTube videos on our website?

YouTube is the video platform with the most visitors and best content. We strive to offer you the best possible user experience on our website, which of course includes interesting videos. With the help of our embedded videos, we can provide you other helpful content in addition to our texts and images. Additionally, embedded videos make it easier for our website to be found on the Google search engine. Moreover, if we place ads via Google Ads, Google only shows these ads to people who are interested in our offers, thanks to the collected data.

# What data is stored by YouTube?

As soon as you visit one of our pages with an integrated YouTube, YouTube places at least one cookie that stores your IP address and our URL. If you are logged into your YouTube account, by using cookies YouTube can usually associate your interactions on our website with your profile. This includes data such as session duration, bounce rate, approximate location, technical information such as browser type, screen resolution or your Internet provider. Additional data can include contact details, potential ratings, shared content via social media or YouTube videos you added to your favourites.

If you are not logged in to a Google or YouTube account, Google stores data with a unique identifier linked to your device, browser or app. Thereby, e.g. your preferred language setting is maintained. However, many interaction data cannot be saved since less cookies are set.

In the following list we show you cookies that were placed in the browser during a test. On the one hand, we show cookies that were set without being logged into a YouTube account. On the other hand, we show you what cookies were placed while being logged in. We do not claim for this list to be exhaustive, as user data always depend on how you interact with YouTube.

Name: YSC

Value: b9-CV6ojI5Y122145356-1

**Purpose:** This cookie registers a unique ID to store statistics of the video that was viewed.

Expiry date: after end of session

Name: PREF

**Value:** f1=50000000

**Purpose:** This cookie also registers your unique ID. Google receives statistics via PREF on how you

use YouTube videos on our website.

Expiry date: after 8 months

Name: GPS Value: 1

**Purpose:** This cookie registers your unique ID on mobile devices to track GPS locations.

Expiry date: after 30 minutes

Name: VISITOR\_INFO1\_LIVE

Value: 95Chz8bagyU

Purpose: This cookie tries to estimate the user's internet bandwith on our sites (that have built-in

YouTube videos).

Expiry date: after 8 months

Further cookies that are placed when you are logged into your YouTube account:

Name: APISID

Value: zILlvClZSkqGsSwI/AU1aZl6HY7122145356-

**Purpose:** This cookie is used to create a profile on your interests. This data is then used for

personalised advertisements.

Expiry date: after 2 years

Name: CONSENT

**Value:** YES+AT.de+20150628-20-0

**Purpose:** The cookie stores the status of a user's consent to the use of various Google services.

CONSENT also provides safety measures to protect users from unauthorised attacks.

Expiry date: after 19 years

Name: HSID

Value: AcRwpgUik9Dveht0I

**Purpose:** This cookie is used to create a profile on your interests. This data helps to display

customised ads.

Expiry date: after 2 years

Name: LOGIN\_INFO

Value: AFmmF2swRQIhALl6aL...

**Purpose:** This cookie stores information on your login data.

Expiry date: after 2 years

Name: SAPISID

Value: 7oaPxoG-pZsJuuF5/AnUdDUIsJ9iJz2vdM

Purpose: This cookie identifies your browser and device. It is used to create a profile on your

interests.

Expiry date: after 2 years

Name: SID

Value: oQfNKjAsI122145356-

Purpose: This cookie stores your Google Account ID and your last login time, in a digitally signed

and encrypted form.

Expiry date: after 2 years

Name: SIDCC

Value: AN0-TYuqub2JOcDTyL

Purpose: This cookie stores information on how you use the website and on what advertisements

you may have seen before visiting our website.

Expiry date: after 3 months

## How long and where is the data stored?

The data YouTube receive and process on you are stored on Google's servers. Most of these servers are in America. At <a href="https://www.google.com/about/datacenters/locations/?hl=en">https://www.google.com/about/datacenters/locations/?hl=en</a> you can see where Google's data centres are located. Your data is distributed across the servers. Therefore, the data can be retrieved quicker and is better protected against manipulation.

Google stores collected data for different periods of time. You can delete some data anytime, while other data are automatically deleted after a certain time, and still other data are stored by Google for a long time. Some data (such as elements on "My activity", photos, documents or products) that are saved in your Google account are stored until you delete them. Moreover, you can delete some data associated with your device, browser, or app, even if you are not signed into a Google Account.

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

Generally, you can delete data manually in your Google account. Furthermore, in 2019 an automatic deletion of location and activity data was introduced. Depending on what you decide on, it deletes stored information either after 3 or 18 months.

Regardless of whether you have a Google account or not, you can set your browser to delete or deactivate cookies placed by Google. These settings vary depending on the browser you use. The following instructions will 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, you can set your browser to always notify you when a cookie is about to be set. This will enable you to decide to either allow or permit each individual cookie.

### **Legal basis**

If you have consented processing and storage of your data by integrated YouTube 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. Nevertheless, we only use integrated YouTube elements if you have given your consent. YouTube also sets cookies in 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 the cookie policy of the respective service provider.

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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

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

Since YouTube is a subsidiary company of Google, Google's privacy statement applies to both. If

you want to learn more about how your data is handled, we recommend the privacy policy at <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>.

# YouTube Subscribe Button Privacy Policy

We have integrated the YouTube subscribe button to our website, which you can recognise by the classic YouTube logo. The logo shows the words "Subscribe" or "YouTube" in white letters against a red background, with a white "Play" symbol on the left. The button may also be displayed in a different design.

Our YouTube channel consistently offers you funny, interesting or exciting videos. With the built-in "Subscribe" button you can subscribe to our channel directly via our website and do not need to go to YouTube's website for it. With this feature, we want to make it as easy as possible for you to access our comprehensive content. Please note that YouTube may save and process your data.

If you see a built-in subscription button on our page, YouTube sets at least one cookie, according to Google. This cookie stores your IP address and our URL. It also allows YouTube to receive information about your browser, your approximate location and your default language. In our test the following four cookies were placed, without us being logged into YouTube:

Name: YSC

Value: b9-CV6ojI5122145356Y

**Purpose:** This cookie registers a unique ID, which stores statistics of the viewed video.

Expiry date: after end of session

Name: PREF

**Value:** f1=50000000

Purpose: This cookie also registers your unique ID. Google uses PREF to get statistics on how you

interact with YouTube videos on our website.

Expiry date: after 8 months

Name: GPS Value: 1

**Purpose:**This cookie registers your unique ID on mobile devices to track your GPS location.

**Expiry date:** after 30 minutes

Name: VISITOR\_INFO1\_LIVE
Value: 12214535695Chz8bagyU

Purpose: This cookie tries to estimate the user's internet bandwith on our website (that contain

built-in YouTube video). **Expiry date:** after 8 months

Note: These cookies were set after a test, thus we do not claim for the list to be exhaustive.

If you are logged into your YouTube account, YouTube may store many of the actions and interactions you make on our website via cookies, to then assign them to your YouTube account.

This gives YouTube information on e.g. how long you have been browsing our website, which browser type you use, which screen resolution you prefer or what actions you take.

On the one hand, YouTube uses this data to improve its own services and offers, and on the other hand to provide analyses and statistics for advertisers (who use Google Ads).

# **Video Conferencing & Streaming**

### **Video Conferencing & Streaming Privacy Policy Overview**

- Affected parties: users of our video conferencing or streaming tools
- Purpose: communication and presentation of content
- Processed data: Access statistics such as your name, address, contact details, email address, telephone number or IP address. You can find more details on this directly at the video conference or streaming tool that is being used.
- The Storage duration: depending on the video conferencing or streaming tool
- Legal bases: Article 6 (1) (a) GDPR (consent), Article 6 (1) (f) GDPR (legitimate interests), Article 6 (1) (b) GDPR (contract)

### What are video conferences & streamings?

We use software programs that enable us to hold video conferences, online meetings, webinars and to utilise display sharing and/or streaming. In a video conference or a streaming, information is transmitted simultaneously via sound and moving images. With such video conference or streaming tools, we can communicate quickly and easily with customers, business partners, clients and employees via the Internet. Of course, when selecting the service provider, we consider the given legal framework.

Generally, third-party providers can process data as soon as you interact with the software program. Third-party video conference providers or streaming solutions use your data and metadata for different purposes. The data helps to e.g. make the tool more secure and to improve the service. Most of the time, the data may also be used for the respective third-party provider's own marketing purposes.

## Why do we use video conferencing & streaming on our website?

We want to communicate digitally, quickly, easily and securely with you, our customers and our business partners. This works best with video conferencing solutions that are very easy to use. Most tools also work directly in your browser and with just a few clicks you can get right to your video meeting. The tools also offer helpful additional features such as chat and screen sharing functions or the possibility of sharing content between meeting participants.

## Which data are processed?

If you join our video conference or streaming, your data will also be processed and stored on the servers of the respective service provider.

The exact data that gets stored depends on the respective software. Each provider stores and

processes data differently. Generally, however, most providers store your name, address, contact details such as your email address or telephone number and your IP address. Information about the device you are using may also get stored, along with usage data, such as which websites you visit, when you visit a website or which buttons you click. Data that is shared within the video conference (photos, videos, texts) may also be retained.

### **Duration of data processing**

Below we will inform you about the duration of the data processing of the service that is being used, provided we have further information on this. In general, we only process personal data for as long as is absolutely necessary to provide our services and products. Moreover, it is possible that the provider may store your data according to their own requirements, which we have no influence on.

### Right to object

You always have the right to information, rectification and erasure of your personal data. If you have any questions, you can always contact the person responsible for the respective video conferencing or streaming tool. You can find contact details either in our specific privacy policy or on the website of the relevant provider.

In your browser you can erase, deactivate or manage cookies that providers use for their functions. This works slightly different, depending on which browser you are using. Please note, however, that functions may not keep working as usual after doing so.

### **Legal basis**

If you have consented to the processing and storage of your data by the respective video or streaming solution, this consent is the legal basis for data processing (Art. 6 para. 1 lit. a GDPR). We may also offer a video conference as part of our services, if there has been a contractual agreement with you in advance (Art. 6 para. 1 lit. b 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, provided you have priorly given consent. Most video or streaming solutions 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.

Provided it is available, you can find information on special video conference and streaming solutions in the following sections.

# **Microsoft Teams Privacy Policy**

On our website we use Microsoft Teams, which is an online meeting and video conferencing service. The provider of this service is the American company Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA.

Microsoft processes data from you, among other things, in the USA. Microsoft 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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> en.

Additionally, Microsoft 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, Microsoft 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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

You can find more information on the standard contractual clauses at Microsoft at <a href="https://docs.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses">https://docs.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses</a>.

You can find out more about the data that is processed by Microsoft in their Privacy Policy at <a href="https://privacy.microsoft.com/en-GB/privacystatement">https://privacy.microsoft.com/en-GB/privacystatement</a>.

### **Review Platforms Overview**

#### **Review Platforms Overview**

- Affected parties: Website or rating platform visitors
- Purpose: Feedback on our products and/or services
- Processed data: IP address, email address and name, among other things. You can find more details below or directly on the respective review platforms.
- The Storage duration: depends on the respective platform
- Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests),

### What are review platforms?

You can rate our products or services on various review platforms. We are registered on some of these platforms so we can get feedback from you, which can help us to optimise our offer. If you rate us via a review platform, the Privacy Policy and the General Terms and Conditions of the respective review service apply. In many instances, you also have to register in order to submit a review. We may also have rating technologies (widgets) integrated into our website. By using such tools, data is transmitted to the relevant provider, where it is processed and stored.

Many of these integrated programs work on a similar principle. After you have ordered one of our products or used one of our services, you will be asked to submit a review via email or on the website. You will usually be redirected to a review page via a link, where you can quickly and easily create a review. Some review systems also offer an interface to various social media channels in order to make the feedback accessible to more people.

### Why do we use review platforms?

Review platforms collect feedback and ratings about our offer. Your ratings help us to quickly receive appropriate feedback. We can use this valuable input to improve our products and/or services much more efficiently. Therefore, on the one hand, ratings help us to optimise our offers. On the other hand, they give you and all our future customers a good overview of the quality of our products and services.

### Which data is processed?

If we have your consent, we transmit information about you and the services you have used to the relevant review platform. We do this to ensure that you have genuinely used one of our services. Only then can you give real feedback. The transmitted data is only used to identify the user. The exact data that is stored and processed of course depends on the providers used. Personal data such as IP address, email address or your name are usually also made available to the rating platforms. Specific order information such as the order number of a purchased item will also be forwarded to the appropriate platform after you have submitted your review. If your email address is transmitted, this is done in a form that allows the review platform to send you an email after purchasing a product. In order to integrate your review to our website as well, we also inform the providers that you have accessed our site. The respective review platform that is used is responsible for any personal data collected.

## How long and where is the data stored?

You can find out more about the duration of data processing in the relevant Privacy Policy of the provider below, provided we have further information on this. Generally, we only process personal data for as long as is absolutely necessary for the provision of our services and products. Personal data that is mentioned in a review is usually anonymised by the respective platform's employees and is therefore only visible to company administrators. The collected data is stored on the providers' servers, while most providers erase it after the end of the order.

## Right to object

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

### **Legal Basis**

If you have agreed that an evaluation platform may be used, the legal basis for the corresponding data processing is this consent. According to Article 6 Paragraph 1 lit. a of the GDPR (consent) represents the legal basis for the processing of personal data, as may occur when it is collected by a review portal.

We also have a legitimate interest in using a review platform to optimise our online service. The

corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use any given review platform if you have consented to it.

We hope we could give you the most important general information about data processing at review platforms. You can find further information in the Privacy Policy texts below or in the linked Privacy Policies of the respective companies.

# **Google Reviews Privacy Policy**

We also use the rating platform Google Reviews for our website. The provider of this service is the American company Google Inc. The responsible entity for all Google services in the European area is Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland).

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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

The Google Ads Data Processing Terms, which reference the standard contractual clauses, can be found at <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>.

You can find out more about the data that is processed by Google in their Privacy Policy at <a href="https://policies.google.com/?hl=en">https://policies.google.com/?hl=en</a>.

# Web Design Introduction

#### **Web Design Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: improvement of user experience
- Processed data: depends heavily on the services used. Usually, data such as IP address, technical data, language settings, browser version, screen resolution and browser name are processed. You can find more details directly with the respective web design tools.
- Torage duration: depends on the tools used
- Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

### What is web design?

We use various tools on our website for the purpose of our web design. Contrary to common belief, web design is not just about making our website look nice, but rather also about functionality and performance. But of course, a good-looking website is also a major goal of professional web design. Web design is a part of media design and deals with the visual as well as the structural and functional design of a website. Our aim with our web design is to improve your experience on our site. In web design jargon, this is called User Experience (UX) and usability. User Experience entails all impressions and experiences that website visitors come across on a website. What is more, usability is part of the User Experience, as it determines how user-friendly a website is. This includes the clear structuring of content, subpages or products, along with how quickly and easily the website enables you to find what you are looking for. In order to offer you the best possible experience on our website, we also use so-called third-party web design tools. Therefore, all tools and services that help improve our website's design are classified under the category "web design". This may, for example, include fonts, various plugins or other integrated web design functions.

## Why do we use web design tools?

The way you absorb information on a website depends very much on its structure, functionality and visual perception. Therefore, good and professional web design has become increasingly important for us. We are constantly working on improving our site as a way of further extending our services for you as a website visitor. Furthermore, a beautiful and functioning website also has economic advantages for us. Needless to say, you will only visit it and take advantage of our offers if you feel completely at ease.

## What data is stored by web design tools?

When you visit our website, any web design elements integrated into our pages may process your data. The exact data that is processed depends on the tools used. Below you can see exactly which tools we use for our website. For more information about data processing, we recommend you also read the respective privacy policy of the respective tools. There you can usually find out which data is processed, whether cookies are used and how long the data is stored. Moreover, fonts such as Google Fonts, for example, also automatically transmit information such as your language settings, IP address, browser version, browser screen resolution and browser name to Google's servers.

## **Duration of data processing**

Data processing times are very individual and depend on the web design elements used. For example, when cookies are used, the retention period can be as little as a minute, but it may also be a few years. Please make yourself familiar with this topic. You may for example read our general section on cookies as well as the Privacy Policies of the tools used. There you can likely find out exactly which cookies are used and what information is stored there. For example, Google Font files are stored for one year, in order to improve the loading speed of a website. In principle, data is only kept for as long as is necessary to provide the service. But legal requirements may require data to be stored for longer.

### Right to object

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers at any time. You can do this either via our cookie management tool or via other opt-out functions. You can also prevent cookies from collecting your data by managing, deactivating or deleting the cookies in your browser. However, among web design elements (typically fonts) there is also data that cannot be erased easily. This is the case whenever data is automatically collected as soon as a page is accessed and then directly transmitted to a third party (e.g. Google). In these cases, please contact the support of the respective provider. In the case of Google, you can reach support at <a href="https://support.google.com/?hl=de">https://support.google.com/?hl=de</a>.

### **Legal Basis**

If you have consented to the use of web design tools, this consent serves as the legal basis for the relevant data processing. According to Article 6 (1) (a) GDPR (consent), your consent represents the legal basis for the processing of personal data, as it may occur when it is collected by web design tools. We also have a legitimate interest in web design to improve on our website. After all, only then can we provide you with a beautiful and professional web offer. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we strongly want to emphasise once more that we only use web design tools if you have given your consent.

You can find information on different web design tools – if available – in the following sections.

# **Google Fonts Privacy Policy**

#### **Google Fonts Privacy Policy Overview**

Affected parties: website visitors

Purpose: service optimisation

Processed data: data such as IP address, CSS and font requests

You can find more details on this in the Privacy Policy below.

Torage period: Google stores font files for one year

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

interests)

## What are Google Fonts?

On our website we use Google Fonts, by the company Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA).

To use Google Fonts, you must log in and set up a password. Furthermore, no cookies will be saved in your browser. The data (CSS, Fonts) will be requested via the Google domains fonts.googleapis.com and fonts.gstatic.com. According to Google, all requests for CSS and fonts are fully separated from any other Google services. If you have a Google account, you do not need to worry that your Google account details are transmitted to Google while you use Google Fonts. Google records the use of CSS (Cascading Style Sheets) as well as the utilised fonts and stores these data securely. We will have a detailed look at how exactly the data storage works.

Google Fonts (previously Google Web Fonts) is a directory with over 800 fonts that <u>Google</u> provides its users free of charge.

Many of these fonts have been published under the SIL Open Font License license, while others have been published under the Apache license. Both are free software licenses.

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

With Google Fonts we can use different fonts on our website and do not have to upload them to our own server. Google Fonts is an important element which helps to keep the quality of our website high. All Google fonts are automatically optimised for the web, which saves data volume and is an advantage especially for the use of mobile terminal devices. When you use our website, the low data size provides fast loading times. Moreover, Google Fonts are secure Web Fonts. Various image synthesis systems (rendering) can lead to errors in different browsers, operating systems and mobile terminal devices. These errors could optically distort parts of texts or entire websites. Due to the fast Content Delivery Network (CDN) there are no cross-platform issues with Google Fonts. All common browsers (Google Chrome, Mozilla Firefox, Apple Safari, Opera) are supported by Google Fonts, and it reliably operates on most modern mobile operating systems, including Android 2.2+ and iOS 4.2+ (iPhone, iPad, iPod). We also use Google Fonts for presenting our entire online service as pleasantly and as uniformly as possible.

### Which data is stored by Google?

Whenever you visit our website, the fonts are reloaded by a Google server. Through this external cue, data gets transferred to Google's servers. Therefore, this makes Google recognise that you (or your IP-address) is visiting our website. The Google Fonts API was developed to reduce the usage, storage and gathering of end user data to the minimum needed for the proper depiction of fonts. What is more, API stands for "Application Programming Interface" and works as a software data intermediary.

Google Fonts stores CSS and font requests safely with Google, and therefore it is protected. Using its collected usage figures, Google can determine how popular the individual fonts are. Google publishes the results on internal analysis pages, such as Google Analytics. Moreover, Google also utilises data of ist own web crawler, in order to determine which websites are using Google fonts. This data is published in Google Fonts' BigQuery database. Enterpreneurs and developers use Google's webservice BigQuery to be able to inspect and move big volumes of data.

One more thing that should be considered, is that every request for Google Fonts automatically transmits information such as language preferences, IP address, browser version, as well as the browser's screen resolution and name to Google's servers. It cannot be clearly identified if this data is saved, as Google has not directly declared it.

## How long and where is the data stored?

Google saves requests for CSS assets for one day in a tag on their servers, which are primarily located outside of the EU. This makes it possible for us to use the fonts by means of a Google stylesheet. With the help of a stylesheet, e.g. designs or fonts of a website can get changed swiftly

and easily.

Any font related data is stored with Google for one year. This is because Google's aim is to fundamentally boost websites' loading times. With millions of websites referring to the same fonts, they are buffered after the first visit and instantly reappear on any other websites that are visited thereafter. Sometimes Google updates font files to either reduce the data sizes, increase the language coverage or to improve the design.

### How can I erase my data or prevent it being stored?

The data Google stores for either a day or a year cannot be deleted easily. Upon opening the page this data is automatically transmitted to Google. In order to clear the data ahead of time, you have to contact Google's support at <a href="https://support.google.com/?hl=en-GB&tid=122145356">https://support.google.com/?hl=en-GB&tid=122145356</a>. The only way for you to prevent the retention of your data is by not visiting our website.

Unlike other web fonts, Google offers us unrestricted access to all its fonts. Thus, we have a vast sea of font types at our disposal, which helps us to get the most out of our website. You can find out more answers and information on Google Fonts at

https://developers.google.com/fonts/faq?tid=122145356. While Google does address relevant elements on data protection at this link, it does not contain any detailed information on data retention.

It proofs rather difficult to receive any precise information on stored data by Google.

## **Legal basis**

If you have consented to the use of Google Fonts, your consent is the legal basis for the corresponding data processing. According to **Art. 6 Paragraph 1 lit. a GDPR (Consent)** your consent is the legal basis for the processing of personal data, as can occur when it is processed by Google Fonts.

We also have a legitimate interest in using Google Font to optimise our online service. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use Google Font if you have given your consent to it.

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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> 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.

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

You can find more information on which data is generally retained by Google and what this data is used at <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>.

# **Google Fonts Local Privacy Policy**

On our website we use Google Fonts, by the company Google Inc. The responsible entity for the European area is Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland). We have integrated Google fonts locally, i.e. on our web server and not on Google's servers. This means that no connection to Google's servers and therefore no data transfer or retention take place.

### What are Google Fonts?

Google Fonts was previously called Google Web Fonts. It is an interactive list with over 800 fonts which <u>Google</u> offer for free use. With the use of Google Fonts, it is possible to utilise fonts without uploading them to your own server. In order to prevent any transfer of information to Google's servers, we downloaded the fonts to our own server. This way we can comply with data privacy and do not transmit any data to Google Fonts.

# **Online Map Services Introduction**

### **Online Map Services Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: Improvement of user experience
- Processed data: the data that is processed depends heavily on the services used. Usually, it is your IP address, location data, search queries and/or technical data. You can find more details on this under the respective tools used.
- The Storage duration: depends on the tools used
- Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

### What are Online Map Services?

We also use online map services for our website as an extended service. Google Maps is probably the service you are most familiar with. But there are also other providers out there that specialise in creating digital maps. These services allow the display of locations, route maps or other geographical information directly via our website. Thanks to an integrated map service, you no longer have to leave our website to e. g. view the route to a location. In order to ensure that the online map can run on our website, we have integrated map sections within our HTML code. This way the services can display street maps, the earth's surface, or aerial or satellite imagery. If you use the built-in map service, your data will be transferred to the tool used, where it will be retained. This may also include your personal data.

### Why do we use Online Map Services on our website?

Generally speaking, it is imperative for us to offer you a pleasant time on our website. Of course, we know that you will most likely only enjoy your time here if you can easily find your way around and find all the information you need quickly and easily. Therefore, we decided that an online map system may be a significant optimisation of our website's service. After all, you can use the map system to easily view route descriptions, locations or any other points of interest – without leaving our site. Needless to say, it is certainly also very practical that you can easily see where our company headquarters are so that you can find us quickly and safely. As you can see, there are just a lot of advantages – and we clearly consider online map services on our website to be part of our customer service.

### What data is stored by Online Map Services?

If you open a page on our website with an online map function installed, your personal data may be transmitted to the relevant service, where it may be stored. This usually includes your IP address, which may also be used to determine your approximate location. In addition to your IP address, data such as the search terms you entered, as well as your longitude and latitude coordinates will be stored. If you e. g. enter an address for route planning, this data will also be stored. This data is not stored by us but instead on the servers of the integrated tools. You can think of it like this: You may be on our website, but when you interact with a mapping service, that interaction is actually happening on their website. Moreover, in order for the service to function properly, at least one cookie is usually set in your browser. As an example, Google Maps also uses cookies to record user behaviour, with which it can optimise its own service and offer personalised advertising. You can find out more about cookies in our "Cookies" section.

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

Every online map service processes different user data. Provided we have further information, we will inform you about the duration of data processing in the corresponding sections on the individual tools below. Generally, personal data is only retained for as long as is necessary to provide the service. Google Maps e. g. stores certain data for a specified period of time, but you must erase other data yourself. At Mapbox, for example, your IP address is stored for 30 days after which it is deleted. As you can see, each tool stores data for different lengths of time. We thus recommend you take a closer look at the privacy policies of the tools used.

The providers may use cookies to store data on your user behaviour in relation to their map services. You can find more information about cookies in our "Cookies" section, but in the individual providers' privacy policies you can most probably also find out which cookies may be used. In most cases, however, this is only an indicative list and is not exhaustive.

## Right to object

You always have the possibility and the right to access your personal data and to object to its use and processing. You can also revoke the consent you gave to us at any time. This is usually easiest through the cookie consent tool. However, there are other opt-out tools that you can use. You can

also manage, erase or deactivate any cookies set by the used providers yourself with just a few mouse clicks. However, this may lead to some service functions stopping to work as usual. It also depends on your browser how you can manage cookies there. In our "Cookies" section you will find links to instructions of the most popular browsers.

### **Legal Basis**

If you have agreed to the use of an online map service, the legal basis for the corresponding data processing is this consent. According to Article 6 Paragraph 1 lit. (consent) this consent is the legal basis for the processing of personal data as may occur when collected by an online map service.

We also have a legitimate interest in using an online map service to optimise our service on our website. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use an online map service if you have given your consent. We definitely wanted to stress this point once again.

You can find information on specific online map services – if available – in the following sections.

# **Bing Maps Privacy Policy**

We also use the online map service Bing Maps. The provider of this service is the American company Microsoft Corporation, one Microsoft Way, Redmond, WA 98052-6399, USA.

Microsoft processes data from you, among other things, in the USA. Microsoft 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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

Additionally, Microsoft 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, Microsoft 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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

You can find more information about the standard contractual clauses at Microsoft at <a href="https://learn.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses">https://learn.microsoft.com/en-us/compliance/regulatory/offering-eu-model-clauses</a>

We hope we could give you an overview on data processing by Microsoft. Of course, it is always possible for Microsoft's privacy guidelines to change. For finding more information and always staying up-to-date, we recommend you to read Microsoft's privacy policy at <a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>.

# **Google Maps Privacy Policy**

#### **Google Maps Privacy Policy Overview**

Affected parties: website visitors

Purpose: service optimisation

Processed data: data such as entered search terms, IP address as well as latitude and longitude coordinates.

You can find more details on this in the Privacy Policy below.

The Storage duration: depending on the retained data

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

### What is Google Maps?

On our website we use Google Maps of the company Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). With the use of Google Maps, we can show you locations in a better way and can therefore adjust our service to your needs. Due to the utilisation of Google Maps, data gets transferred to Google and is saved on Google's servers. In the following, we want to explain in detail what Google Maps is, why we use this Google service, what data is stored and how you can prevent this.

Google Maps is an internet maps service of the company Google Inc. With Google Maps you can search for exact locations of cities, sights, accommodations or businesses online via a PC, a tablet or an app. If businesses are represented on Google My Business, the respective location as well as other information about the company are shown there. In order to show route directions, a location's map sections can be integrated in a website through a HTML-code. Google Maps depicts the earth's surface as either a road map or as air and satellite images. Due to the street view and high-quality satellite images, it is possible for exact representations to be made.

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

The efforts we make on this page have the goal of giving you a useful and meaningful experience on our website. Through the integration of Google Maps, we can offer you essential information on various locations. Therefore, you can spot our office address with one glance. Furthermore, the route directions always show you the best and fastest way to us. You can retrieve the route directions for traveling either by car, by public transport, on foot or by bike. The integration of Google Maps is a part of our customer service.

## What data is stored by Google Maps?

For Google Maps to offer its full services, the company must collect and store your data. This includes your entered search terms, your IP-address as well as your longitude and latitude coordinates. When you use the route-planner function, the entered start address is stored also. However, this data retention happens on Google Maps' websites. We can only inform you about it but cannot influence it in any way. Since we have included Google Maps on our website, Google will set at least one cookie (Name: NID) into your browser. This cookie saves data on your user

behaviour. Google primarily uses this data to optimise ist own services and to provide you with individual, personalised advertisements.

The following cookies are set in your browser due to the integration of Google Maps:

Name: NID

Value: 188=h26c1Ktha7fCQTx8rXgLyATyITJ122145356-5

**Purpose:** Google uses NID in order to adjust advertisments to your Google searches. With the cookie's help Google "remembers" your most frequently entered search queries or your previous interaction with ads. That way you always receive customised adertisments. The cookie contains a unique ID, wich Google uses to collect your personal settings for advertising porposes.

**Expiration date:** after 6 months

**Note:** We cannot guarantee completeness of the information on saved data. This is, because especially concerning the use of cookies, changes can happen anytime. To identify the cookie NID, a test page was created, to which Google Maps was included.

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

There are Google servers in data centres across the entire planet. However, most servers are in America. For this reason, your data is widely stored in the USA. Here you can read in detail about where the Google servers are located: <a href="https://www.google.com/about/datacenters/locations/?hl=en">https://www.google.com/about/datacenters/locations/?hl=en</a>

Google distributes data to various data carriers. This makes it possible to retrieve the data faster and to better protect it from possible attempted manipulations. Every server has emergency programs. Thus, should for example a problem with Google's hardware occur or should a natural disaster impact the servers, any data will quite certainly stay protected.

Moreover, Google saves some data for a specified period. With some other data on the other hand, Google only offers the opportunity for deleting it manually. Furthermore, the company anonymises information (e.g. advertising data) in server logs, by deleting a part of the IP-address and cookie information after 9 to 18 months.

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

Due to the automatic delete function for location and activity data, which was introduced in 2019, information that is used for determining your location and web or app activity is saved for either 3 or 18 months, depending on your preferred decision, and is deleted thereafter. Furthermore, it is possible to delete this data manually from your browser history via your Google account anytime. If you want to prevent the determination of your location altogether, you must pause the category "Web and app activity" in your Google account. Click on "Data and personalisation" and then choose the option "Activity controls". Here you can switch the activities on or off.

Moreover, in your browser you can deactivate, delete or manage individual cookies. This function can differ a little, depending on what browser you are using. The following instructions will show you 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 permit any cookies, you can set up your browser in a way that ensures you get informed whenever a cookie is about to be placed. That way you can decide to either permit or refuse every single cookie.

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 to insecure third countries must not simply be transferred to, stored and processed there unless there are suitable guarantees (such as EU Standard Contractual Clauses) between us and the non-European service provider.

### **Legal basis**

If you have consented to the use of Google Maps, your consent is the legal basis for the corresponding data processing. According to **Art. 6 paragraph 1 lit. a GDPR (consent)** this consent is the legal basis for the processing of personal data, as can occur when processed by Google Maps.

We also have a legitimate interest in using Google Maps to optimise our online service. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use Google Maps if you have given your consent to it.

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 <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

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: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

The Google Ads Data Processing Terms, which reference the standard contractual clauses, can be found at <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>.

If you want to find out more about Google's data processing, we recommend you to read the company's own Privacy Policy at <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>.

# **Explanation of the terminology used**

We always strive to make our privacy policy as clear and comprehensible as possible. However, this is not always easy, especially when it comes to technical and legal matters. It is often sensible to use legal terms (such as 'personal data)' or certain technical terms (such as 'cookies' or 'IP address'). But we don't want to use such terms without any explanation. This is why you will find an alphabetical list of important terms used below. These are terms we may not yet have sufficiently explained in the privacy policy. In case we have adopted any of these terms from the GDPR which are definitions, we will also list the GDPR texts here and add our own further explanations if necessary.

### **Processor**

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

**Explanation:** As a company and a website owner, we are responsible for all your data we process (i. e. the 'controller'). In addition to the controller, there may also be so-called processors. This includes any company or person who processes personal data on our behalf. In addition to service providers such as tax consultants, processors can also be hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

# Filing system

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"filing system" means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis;

**Explanation:** Any organised storage of data on a computer's disk is referred to as a "filing system". For example, if we store your name and email address on a server for our newsletter, this data would be located in a so-called "filing system". One of the most important tasks of a "filing system" is to quickly be able to search and find specific data and, of course, to store the data securely.

# **Third party**

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"third party" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**Explanation:** The GDPR basically only explains what a "third party" is not. In practice, any "third party" who also has an interest in personal data, but not the persons mentioned above, are authorities or institutions. For example, a parent company can act as a "third party". In this case, the subsidiary company is the controller and the parent company is the "third party". However, this does not mean that the parent company may automatically view, collect or store personal data of the subsidiary.

### Consent

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**Explanation:** With websites, such consent is usually given via a cookie consent tool. You've most certainly come across these. Whenever you visit a website for the first time, you will usually be asked via a banner whether you agree or consent to the data processing. You can usually also make individual settings and thus decide for yourself which level of data processing you want to allow. If you do not give your consent, no personal data may be processed. Consent can of course also be given in writing, i.e. not via a tool.

# Recipient

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"recipient" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public

authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

**Explanation:** Any person or establishment that receives personal data is considered a recipient. We and our processors are therefore also so-called recipients. Only authorities that have an investigation mandate are not considered recipients.

# **Cross-border processing**

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

#### "Cross-border processing" either

a)

processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or

b)

processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

**Explanation:** If a company or other organisation e. g. has branches in Spain and Croatia where personal data is processed in connection with the branches' activities, this constitutes "cross-border processing" of personal data. Even if the data is only processed in one country (as in this example in Spain) but the effects for the data subject are also recognisable in another country, it is also considered "cross-border processing".

## **Personal Data**

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"personenal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification

number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**Explanation:** Personal data is all data that can identify you as a person. This is usually data such as:

- name
- address
- email address
- postal address
- phone number
- birthday
- identification numbers such as social security number, tax identification number, ID card number or matriculation number
- banking data such as account number, credit information, account balances and more.

According to the European Court of Justice (ECJ), your **IP address is also personal data**. IT experts can use your IP address to determine at least the approximate location of your device and subsequently your location as the connection owner. Therefore, storing an IP address also requires a legal basis within the scope of the GDPR. There are also so-called **"special categories"** of personal data, which are particularly worthy of protection. These include:

- racial and ethnic origin
- political opinions
- religious or ideological beliefs
- Union membership
- genetic data such as data obtained from blood or saliva samples
- biometric data (this is information about psychological, physical or behavioural characteristics that can identify an individual).
  - health Data
- Data relating to sexual orientation or sex life

# **Profiling**

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"Profiling" means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

**Explanation:** Profiling collects various personal data about an individual in order to learn more

about that individual. On the internet, profiling is often used for advertising purposes or for credit checks. Web and advertising analysis programs e. g. collect data about your behaviour and interests on a website. This results in a special user profile that can be used to target advertising to specific target groups.

## Controller

### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**Explanation:** In our example, we are responsible for the processing of your personal data and are therefore the "controller". If we pass on collected data to other service providers for processing, they are considered "contract processors". For this, a "Data Processing Agreement (DPA)" must be concluded.

# **Processing**

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**Note:** When we talk about processing in our Privacy Policy, we talk about any type of data processing. As mentioned above in the original GDPR declaration, this includes not only the collection but also the storage and processing of data.

# **Closing Remarks**

Congratulations! If you are reading these lines, you have most likely familiarised yourself with our entire Privacy Policy – or at least scrolled down here. As you can see from the scope of our Privacy Policy, we do not take the protection of your personal data lightly.

We find it important to inform you about the processing of your personal data to the best of our abilities. In doing so, we not only want to tell you which data is processed but also explain to you why we use various software programs. In general, Privacy Policies have very technical and legal jargon. However, since most of you are not web developers or solicitors, we wanted to take a different approach and explain the facts in simple and clear language. Of course, this is not always possible due to the subject matter. Therefore, you can also find a more detailed explanation of the most important terms at the end of the Privacy Policy.

If you have any questions about data protection on our website, please do not hesitate to contact us or the responsible body. We wish you all the best and hope to soon welcome you to our website again.

All texts are copyrighted.