

## Privacy Policy and Consents

### Table of contents

1. Objectives and responsible body
2. Basic information on data processing
3. Processing of personal data
4. Collection of access data
5. Cookies & range measurement
6. Google analytics
7. Google ring/marketing services
8. Facebook social plugins
9. Facebook remarketing
10. Newsletter
11. Integration of third party services and content
12. User rights and deletion
13. Changes to the privacy policy

#### 1. Objectives and responsible body

This data protection declaration clarifies the type, scope and purpose of the processing (including collection, processing and use as well as obtaining consent) of personal data within our online offer and the websites, functions and contents connected with it (hereinafter jointly referred to as "online offer" or "website"). This privacy policy applies regardless of the domains, systems, platforms and devices (e.g. desktop or mobile) on which the online offer is executed.

The provider of the online offer and the body responsible for data protection is [company\_name], owner: [company\_owner], [adress\_street], [adress\_zip\_location] (hereinafter referred to as "provider", "we" or "us"). For contact details please refer to our imprint

The term "user" includes all customers and visitors of our online offer. The terms used, e.g. "user", are to be understood in a gender-neutral way.

#### 2. Basic information on data processing

We process personal data of users only in compliance with the relevant data protection regulations in accordance with the dictates of data economy and data avoidance. This means that user data will only be processed if a legal permission has been granted, especially if the data is required for the provision of our contractual services and online services, or if it is legally required or if permission has been granted.

We take organizational, contractual and technical security measures in accordance with the state of the art to ensure that the provisions of the data protection laws are complied with and thus to protect the data processed by us against accidental or intentional manipulation, loss, destruction or access by unauthorized persons.

If, within the scope of this data protection declaration, content, tools or other means are used by other providers (hereinafter jointly referred to as "third-party providers") and their registered office is abroad, it must be assumed that data is transferred to the countries in which the third-party providers are based. The transfer of data to third countries is either based on a legal permission, a consent of the users or special contractual clauses which guarantee the legally required security of the data.

### 3. Processing of personal data

Personal data will be processed for the following purposes, in addition to the uses expressly mentioned in this privacy policy, on the basis of legal permissions or consents given by users:

- The provision, execution, maintenance, optimization and safeguarding of our services, services and user benefits;
- The provision of effective customer service and technical support.

We only transfer the users' data to third parties if this is necessary for billing purposes (e.g. to a payment service provider) or for other purposes if this is necessary to fulfil our contractual obligations to the users (e.g. address notification to suppliers).

When contacting us (via contact form or email), the user's details are stored for the purpose of processing the enquiry and in the event that follow-up questions arise.

Personal data will be deleted, provided that they have fulfilled their intended purpose and there are no storage obligations to prevent deletion.

### 4. Collection of access data

We collect data about every access to the server on which this service is located (so-called server log files). The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited site), IP address and the requesting provider.

We use the protocol data without allocation to the person of the user or other profile creation according to the legal regulations only for statistical evaluations for the purpose of operation, security and optimization of our online offer. However, we reserve the right to check the log data subsequently if, on the basis of concrete evidence, there is a justified suspicion of illegal use of the data.

### 5. Cookies & range measurement

Cookies are information that is transferred from our web server or web servers of third parties to the web browsers of users and stored there for later retrieval. Users are informed about the use of cookies in the context of pseudonymous range measurement within the scope of this data protection declaration.

The viewing of this online offer is also possible under exclusion of cookies. If the users do not want cookies to be stored on their computer, they are asked to deactivate the corresponding option in the system settings of their browser. Stored cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional limitations of this online offer.

It is possible to manage many online ad cookies from companies via the US site <http://www.aboutads.info/choices> or the EU site <http://www.youronlinechoices.com/uk/your-ad-choices/>.

## 6. Google analytics

We use Google Analytics, a web analytics service provided by Google Ireland Ltd. ("Google"). Google uses cookies. The information generated by the cookie about the use of the website by the user is usually transferred to a Google server in the USA and stored there.

Google will use this information on our behalf to evaluate the use of our website by users, to compile reports on the activities within this website and to provide us with further services associated with the use of this website and the Internet. The processed data can be used to create pseudonymous user profiles of the users.

We only use Google Analytics with activated IP anonymization. This means that the IP address of the user is shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there.

The IP address transmitted by the user's browser is not merged with other Google data. Users can prevent the storage of cookies by adjusting their browser software accordingly; users can also prevent the collection of data generated by the cookie and related to their use of the online offer to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>.

Further information on Google's use of data for advertising purposes, setting and objection options can be found on Google's websites: <https://www.google.com/intl/de/policies/privacy/partners> ("Data use by Google when you use websites or apps of our partners"), <http://www.google.com/policies/technologies/ads> ("Data use for advertising purposes"), <http://www.google.de/settings/ads> ("Manage information that Google uses to show you advertising") and <http://www.google.com/ads/preferences> ("Determine which advertising Google shows you").

## 7. Google ring/marketing services

We use the marketing and remarketing services ("Google Marketing Services") of Google Ireland Ltd, Gordon House, 4 Barrow St. Dublin, D04 E5W5, Ireland, ("Google").

The Google Marketing Services allow us to better target advertisements for and on our website in order to show users only ads that potentially match their interests. For example, if users are shown ads for products that they are interested in on other websites, this is called "remarketing". For these purposes, when users access our and other websites on which Google marketing services are active, a code from Google is executed directly by Google and so-called (re)marketing tags (invisible graphics or code, also known as "web beacons") are incorporated into the website. With their help, an individual cookie, i.e. a small file is stored on the user's device (instead of cookies, comparable technologies can also be used). The cookies can be set by various domains, including [google.com](http://google.com), [doubleclick.net](http://doubleclick.net), [invitemedia.com](http://invitemedia.com), [admeld.com](http://admeld.com), [googlesyndication.com](http://googlesyndication.com) or [googleadservices.com](http://googleadservices.com). This file records which websites the user has visited, what content he is interested in and which offers he has clicked on, as well as technical information on the browser and operating system, referring websites, visiting time and other information on the use of the online offer. The IP address of the user is also recorded, whereby we inform within the framework of Google Analytics that the IP address is shortened within member states of the European Union or in other contracting states of

the Agreement on the European Economic Area and only in exceptional cases is it transferred in full to a Google server in the USA and shortened there. The IP address will not be merged with data of the user within other offers of Google. The above-mentioned information may also be combined with such information from other sources. If the user subsequently visits other websites, advertisements tailored to the user's interests may be displayed.

User data is processed pseudonymously as part of Google's marketing services. This means, for example, that Google does not store and process the name or e-mail address of the user, but processes the relevant data in a cookie-based manner within pseudonymous user profiles. This means that from Google's point of view, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who that cookie holder is. This does not apply if a user has expressly permitted Google to process the data without this pseudonymisation. The information collected by "DoubleClick" about users is transmitted to Google and stored on Google's servers in the USA.

The Google marketing services we use include the online advertising program "Google AdWords". In the case of Google AdWords, each AdWords customer receives a different "conversion cookie". Cookies can therefore not be tracked on the websites of AdWords customers. The information collected using the cookie is used to compile conversion statistics for AdWords customers who have opted-in to conversion tracking. AdWords customers are told the total number of users who have clicked on their ad and been redirected to a page with a conversion tracking tag. However, they do not receive any information that can be used to personally identify users.

We include third-party ads based on Google's "DoubleClick" marketing service. DoubleClick uses cookies to enable Google and its partner sites to serve ads based on users' visits to this site or other sites on the Internet.

We also include third-party ads based on Google's "AdSense" marketing service. AdSense uses cookies to enable Google and its partner websites to serve ads based on user visits to this website and other websites on the internet.

Another Google marketing service used by us is the "Google Tag Manager", with whose help further Google analysis and marketing services can be integrated into our website (e.g. "AdWords", "DoubleClick" or "Google Analytics").

Further information on the use of data for marketing purposes by Google can be found on the overview page: <https://www.google.com/policies/technologies/ads>, Google's privacy policy is available at <https://www.google.com/policies/privacy>.

If you wish to opt out of collection by Google marketing services, you can use the setting and opt-out options provided by Google: <http://www.google.com/ads/preferences>.

## 8. Facebook social plugins

Our online offer uses social plugins ("Plugins") of the social network facebook.com, which is operated by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). The Plugins can be recognized by one of the Facebook logos (white "f" on blue tile, the words "Like", "Like" or a "thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of the Facebook Social Plugins can be viewed here: <https://developers.facebook.com/docs/plugins/>.

If a user calls up a function of this online offer that contains such a plugin, his device establishes a direct connection with the Facebook servers. The content of the plugin is transmitted by Facebook directly to the user's device and integrated into the online offer by the user. User profiles can be created from the processed data. We therefore have no influence on the extent of the data that Facebook collects with the help of this plugin and therefore inform the users according to our state of knowledge.

By integrating the plugins, Facebook receives the information that a user has called up the corresponding page of the online offer. If the user is logged in to Facebook, Facebook can assign the visit to his or her Facebook account. If users interact with the plugins, for example, by pressing the Like button or posting a comment, the corresponding information is transmitted directly from your device to Facebook and stored there. If a user is not a member of Facebook, it is still possible for Facebook to find out his or her IP address and store it. According to Facebook, only an anonymized IP address is stored in Germany.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as the relevant rights and settings to protect the privacy of users, can be found in the Facebook data protection information: <https://www.facebook.com/about/privacy/>.

If a user is a Facebook member and does not want Facebook to collect data about him/her via this online offer and link it with his/her membership data stored on Facebook, he/she must log out of Facebook before using our online offer and delete his/her cookies. Further settings and objections to the use of data for advertising purposes are possible within the Facebook profile settings: <https://www.facebook.com/settings?tab=ads> or via the US site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>. The settings are platform-independent, i.e. they are adopted for all devices, such as desktop computers or mobile devices.

## 9. Facebook remarketing

Within our online offer, so-called "Facebook pixels" of the social network Facebook, which is operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are resident in the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"), are used. With the help of the Facebook pixel, Facebook is able to determine the visitors of our offer as a target group for the presentation of ads, so-called "Facebook ads". Accordingly, we use the Facebook Pixel in order to display the Facebook ads placed by us only to those Facebook users who have also shown an interest in our Internet offering. This means that with the help of the Facebook pixel, we want to ensure that our Facebook ads correspond to the potential interest of the users and do not appear annoying. The Facebook pixel also allows us to track the effectiveness of Facebook ads for statistical and market research purposes by seeing whether users are redirected to our website after clicking on a Facebook ad.

The Facebook pixel is integrated directly by Facebook when you call up our websites and can save a so-called cookie, i.e. a small file, on your device. If you then log in to Facebook or visit Facebook while logged in, the visit to our offer will be noted in your profile. The data collected about you is anonymous to us, so we cannot draw any conclusions about the identity of the user. However, the data is stored and processed by Facebook so that a connection to the respective user profile is possible. The processing of the data by Facebook takes place within the framework of Facebook's data usage guidelines. Accordingly, you can find more information on how the remarketing pixel works and generally on the display of Facebook ads in the Facebook Data Usage Policy: <https://www.facebook.com/policy.php>.

You may object to the collection by the Facebook Pixel and use of your information to display Facebook Ads. To do so, you can go to the Facebook page set up by Facebook and follow the instructions on the settings for usage-based advertising:

<https://www.facebook.com/settings?tab=ads> or declare your objection via the US page

<http://www.aboutads.info/choices/> or the EU page <http://www.youronlinechoices.com/>. The

settings are platform-independent, i.e. they are adopted for all devices, such as desktop computers or mobile devices.

## 10. Newsletter

With the following information, we will inform you about the contents of our newsletter as well as the registration, dispatch and statistical evaluation procedure and your rights of objection. By subscribing to our newsletter, you agree to receive it and to the described procedures.

Content of the newsletter: We send newsletters, e-mails and other electronic notifications containing advertising information (hereinafter "newsletter") only with the consent of the recipients or a legal permission. Insofar as the contents of the newsletter are specifically described in the context of a registration for the newsletter, they are decisive for the consent of the users. In addition, our newsletters contain the following information: our products, offers, promotions and our company.

Double-Opt-In and logging: The registration for our newsletter takes place in a so-called Double-Opt-In procedure. This means that after registration you will receive an e-mail asking you to confirm your registration. This confirmation is necessary so that nobody can register with foreign e-mail addresses. The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes the storage of the time of registration and confirmation as well as the IP address. Changes to your data stored by the shipping service provider are also logged.

Dispatch service provider: Newsletters are sent by "[newsletter\_service]" (hereinafter referred to as "dispatch service provider"). You can view the data protection regulations of the dispatch service provider here: [newsletter\_service\_privacy\_policy].

The e-mail addresses of our newsletter recipients, as well as their other data described within the scope of this information, are stored on the servers of the shipping service provider. The dispatch service provider uses this information for the dispatch and evaluation of the newsletter on our behalf. In addition, the shipping service provider may use this data, according to its own information, to optimize or improve its own services, e.g. for technical optimization of the dispatch and presentation of the newsletters or for economic purposes to determine the countries from which the recipients come. However, the shipping service provider does not use the data of our newsletter recipients to write to them itself or pass them on to third parties.

Registration data: To subscribe to the newsletter, it is sufficient to enter your e-mail address.

Statistical survey and analyses - The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file which is retrieved from the server of the dispatch service provider when the newsletter is opened. Within the scope of this retrieval, technical information such as information on the browser and your system, as well as your IP address and time of retrieval are initially collected. This information is used for the technical improvement of the services based on the technical data or the target groups and their reading behavior based on their retrieval locations (which can be determined by means of the IP address) or the access times. Statistical surveys also include determining whether the newsletters are opened, when they are opened and which links are clicked. For technical reasons, this information can be assigned to individual newsletter recipients. However, it is neither our nor

the dispatch service provider's intention to observe individual users. The evaluations serve us much more to recognize the reading habits of our users and to adapt our contents to them or to send different contents according to the interests of our users.

Cancellation/revocation - You can cancel the receipt of our newsletter at any time, i.e. revoke your consent. Your consent to its dispatch by the dispatch service provider and the statistical analyses will then expire at the same time. A separate cancellation of the dispatch by the dispatch service provider or the statistical analysis is unfortunately not possible. You will find a link to cancel the newsletter at the end of each newsletter.

#### 11. Integration of third party services and content

It may happen that within our online offer contents or services of third party providers, such as city maps or fonts from other websites are integrated. The integration of content from third party providers always requires that the third party providers are aware of the IP address of the user, as without the IP address they would not be able to send the content to the user's browser. The IP address is therefore necessary for the display of this content. Furthermore, the providers of the third-party content may set their own cookies and process the users' data for their own purposes. User profiles can be created from the processed data. We will use this content as sparingly and as far as possible to avoid data loss and will select reliable third-party providers with regard to data security.

The following presentation offers an overview of third-party providers and their contents, together with links to their data protection declarations, which contain further information on the processing of data and, in some cases already mentioned here, the possibility of objection (so-called opt-out):

- External fonts from Google, Inc. <https://www.google.com/fonts> ("Google Fonts"). The integration of Google Fonts is done by a server call at Google (usually in the USA). Privacy policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://www.google.com/settings/ads/>.

- Maps of the "Google Maps" service provided by the third-party provider Google Ireland Ltd, Gordon House, 4 Barrow St. Dublin, D04 E5W5, Ireland. Privacy policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://www.google.com/settings/ads/>.

- Videos from the "YouTube" platform of the third-party provider Google Ireland Ltd, Gordon House, 4 Barrow St. Dublin, D04 E5W5, Ireland. Privacy policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://www.google.com/settings/ads/>.

#### 12. User rights and deletion of data

Users have the right to request information free of charge about the personal data we have stored about them.

In addition, users have the right to correct incorrect data, withdraw consent, block and delete their personal data and, in the event of the assumption of unlawful data processing, have the right to lodge a complaint with the competent supervisory authority.

The data stored with us will be deleted as soon as they are no longer required for their intended purpose and no legal storage obligations stand in the way of deletion.

#### 13. Amendments to the data protection declaration

We reserve the right to amend the privacy policy in order to adapt it to changed legal situations or in the event of changes to the service and data processing. However, this only applies with regard to declarations on data processing. If the consent of the users is required or components of the data protection declaration contain regulations of the contractual relationship with the users, the changes will only be made with the consent of the users.

Users are asked to inform themselves regularly about the content of the data protection declaration.

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