

# Privacy Policy

## Introduction

With the following data protection declaration, we would like to inform you about the types of your personal data (hereinafter also referred to as "data") that we process, for what purposes and to what extent. The data protection declaration applies to all processing of personal data carried out by us, both as part of the provision of our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online offer").

The terms used are not gender-specific.

Status: December 8, 2022

## Responsible persons

PennyPlanner  
Erzbergerstraße, 121  
76133, Karlsruhe, Deutschland

E-Mail-Address:

[contact@penny-planner.eu](mailto:contact@penny-planner.eu)

Legal Notice:

<https://penny-planner.eu/>

## Processing overview

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

### Types of data processed

- Usage data.
- Meta/communication data.

### Categories of persons concerned

- Users.

### Processing purposes

- Security measures.
- Provision of our online offer and user friendliness.
- Information technology infrastructure.

### Relevant legal bases

The following is an overview of the legal basis of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. If, in addition, more specific legal bases are relevant in individual cases, we will inform you of these in the data protection declaration.

- **Legitimate interests (Art. 6 Abs. 1 S. 1 lit. f) DSGVO)** - The processing is necessary for the purposes of the legitimate interests of the controller or of a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

In addition to the data protection regulations of the General Data Protection Regulation, national regulations on data protection apply in Germany. These include, in particular, the Act on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special regulations on the right to information, the right to erasure, the right to object, the processing of special categories of personal data, processing for other purposes and transmission, as well as automated decision-making in individual cases, including profiling. Furthermore, it regulates data processing for employment purposes (Section 26 BDSG), in particular with regard to the establishment, implementation or termination of employment relationships as well as the consent of employees. Furthermore, state data protection laws of the individual federal states may apply.

## Security measures

We take appropriate technical and organizational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input of, disclosure of, assurance of availability of and segregation of the data. Furthermore, we have established procedures to ensure the exercise of data subjects' rights, the deletion of data, and responses to data compromise. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and processes in accordance with the principle of data protection, through technology design and through data protection-friendly default settings.

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

## Data processing in third countries

If we process data in a third country (i.e., outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third-party services or the disclosure or transfer of data to other persons, entities or companies, this will only be done in accordance with the legal requirements.

Subject to express consent or contractually or legally required transfer, we only process or have data processed in third countries with a recognized level of data protection, contractual obligation through so-called standard protection clauses of the EU Commission, in the presence of certifications or binding internal data protection regulations (Art. 44 to 49 DSGVO, information page of the EU Commission: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_de)).

## Removal of data

The data processed by us will be deleted in accordance with the legal requirements as soon as their consents permitted for processing are revoked or other permissions cease to apply (e.g. if the purpose of processing this data has ceased to apply or it is not required for the purpose). If the data are not deleted because they are required for other and legally permissible purposes, their processing will be limited to these purposes. I.e., the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for reasons of commercial or tax law or whose storage is necessary for the assertion, exercise or defense of legal claims or for the protection of the rights of another natural or legal person.

Our privacy notices may also contain further information on the retention and deletion of data, which will take precedence for the respective processing operations.

## Usage of cookies

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

**Notes on consent:** We use cookies in accordance with the law. Therefore, we obtain prior consent from users, except when it is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is absolutely necessary to provide the user with a telemedia service (i.e., our online offering) expressly requested by the user. The revocable consent is clearly communicated to the users and contains the information about the respective cookie use.

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

**Storage duration:** In terms of storage duration, the following types of cookies are distinguished:

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

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

## Further guidance on processing operations, procedures and services:

- **Processing of cookie data on the basis of consent:** We use a cookie consent management procedure in which the consent of users to the use of cookies, or the processing and providers named in the cookie consent management procedure, can be obtained and managed and revoked by users. Here, the declaration of consent is stored in order not to have to repeat its query and to be able to prove the consent in accordance with the legal obligation. The storage can take place on the server side and/or in a cookie (so-called opt-in cookie, or with the help of comparable technologies), in order to be able to assign the consent to a user or their device. Subject to individual information on the providers of cookie management services, the following information applies: The duration of the storage of consent can be up to two years. A pseudonymous user identifier is created and stored with the time of consent, information on the scope of consent (e.g., which categories of cookies and/or service providers), as well as the browser, system and end device used.

## Provision of the online offer and web hosting

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

- **Types of data processed:** Usage data (e.g. web pages visited, interest in content, access times); meta/communication data (e.g. device information, IP addresses).
- **Affected persons:** Users (e.g., website visitors, users of online services).
- **Purposes of processing:** Provision of our online offer and user-friendliness; information technology infrastructure (operation and provision of information systems and technical equipment (computers, servers, etc.)); security measures.
- **Legal basis:** Legitimate interests (Art. 6 Abs. 1 S. 1 lit. f) DSGVO).

## Further guidance on processing operations, procedures and services:

- **Provision of online offer on rented storage space:** For the provision of our online offer, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also called "web hoster"); **Legal basis:** Legitimate interests (Art. 6 Abs. 1 S. 1 lit. f) DSGVO).
- **Collection of access data and log files:** Access to our online offer is logged in the form of so-called "server log files". The server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. The server log files may be used, on the one hand, for security purposes, e.g., to prevent server overload (especially in the event of abusive attacks, so-called DDoS attacks) and, on the other hand, to ensure the utilization of the servers and their stability; Legal basis: Legitimate interests (Art. 6 para. 1 p. 1 lit. f)

DSGVO); Deletion of data: Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data whose further storage is required for evidentiary purposes is exempt from deletion until final clarification of the respective incident.#

## Modification and update of the privacy policy

We ask you to regularly inform yourself about the content of our privacy policy. We adapt the data protection declaration as soon as the changes in the data processing carried out by us make this necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy statement, please note that the addresses may change over time and please check the information before contacting us.

## Rights of the data subjects

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

- **Right to object:** You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(e) or (f) DSGVO; this also applies to profiling based on these provisions. If the personal data concerning you is processed for the purposes of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purposes of such marketing; this also applies to profiling, insofar as it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke any consent you have given at any time.
- **Right to Information:** You have the right to request confirmation as to whether data in question is being processed and to information about this data, as well as further information and a copy of the data in accordance with the legal requirements.
- **Right of rectification:** In accordance with the legal requirements, you have the right to request that the data concerning you be completed or that incorrect data concerning you be corrected.
- **Right to erasure and restriction of processing:** In accordance with the statutory provisions, you have the right to demand that data relating to you be deleted immediately or, alternatively, to demand restriction of the processing of the data in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you, which you have provided to us, in a structured, common and machine-

readable format in accordance with the legal requirements, or to request that it be transferred to another responsible party.

- **Complaint to supervisory authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the requirements of the GDPR.

## Definition of Terms

This section provides you with an overview of the terms used in this privacy policy. Many of the terms are taken from the law and defined primarily in Art. 4 of the GDPR. The legal definitions are binding. The following explanations, on the other hand, are primarily intended to aid understanding. The terms are sorted alphabetically.

- **Personal data:** "personal data" means any information relating to an identified or identifiable natural person (hereinafter "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 (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Responsible person:** 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.
- **Processing:** "Processing" means any operation or set of operations which is performed upon personal data, whether or not by automatic means. The term is broad and includes virtually any handling of data, be it collection, analysis, storage, transmission or deletion.