# Privacy Policy Joridiro

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#### Introduction

With the following data protection declaration, we would like to inform you about what types of your personal data (hereinafter also referred to as "data") we process for which purposes and to what extent. The data protection declaration applies to all of us (Querkauf UG as the operator of Joridiro. com) processing of personal data, both in the context 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").

#### Responsible

Robert Bernhardt

Ellerbachweg 40

89079 Ulm

E-Mail-Address:admin@joridiro.com

### Overview of processing

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

inventory data

payment details

contact details

content data

contract data

usage data

The Meta/Communication Data

Categories of data subjects

customers

interested persons

communication partner

user

Sweepstakes and Contest Entrants

business and contractual partners

participant

purposes of processing

Provision of contractual services and customer service

Contact Requests and Communication

Safety measures

range measurement

Tracking

office and organizational procedures

conversion measurement

Management and response to inquiries

Conducting sweepstakes and competitions

Feedback

Marketing

Profiles with user-related information Registration procedure

Provision of our online offer and user-friendliness

information technology infrastructure

#### Relevant legal bases

Below you will find an overview of the legal bases 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 more specific legal bases are relevant in individual cases, we will inform you of them in the data protection declaration.

**consent** (Art. 6 (1) sentence 1 lit. a) GDPR) - The data subject has given their consent to the processing of their personal data for a specific purpose or multiple specific purposes. Performance of contract and pre-contractual

**Requests** (Art. 6 (1) sentence 1 lit. b) GDPR) - The processing is necessary for the performance of a contract to which the data subject is party, or for the implementation of pre-contractual measures that are taken at the request of the data subject.

**Legal Obligation** (*Article 6 paragraph 1 sentence 1 letter c) GDPR*) - Processing is necessary for compliance with a legal obligation to which the controller is subject.

**Legitimate Interests** (*Art. 6 (1) sentence 1 lit. f) GDPR*) - The processing is necessary to protect the legitimate interests of the person responsible or a third party, unless the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, prevail.

In addition to the data protection regulations of the GDPR, national data protection regulations apply in Germany. This includes in particular the law on the 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 the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, implementation or termination of employment relationships and the consent of employees. Furthermore, state data protection laws of the individual federal states may apply.

#### Safety 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 type, 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 to ensure a level of protection appropriate to the risk.

The measures include, in particular, securing the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access, input, disclosure, securing availability and their separation. Furthermore, we have set up procedures that ensure the exercise of data subject rights, the deletion of data and reactions to data threats. Furthermore, we already take the protection of personal data into account during 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.

**IP address truncation**: If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address will be shortened (also referred to as "IP masking"). The last two digits or the last part of the IP address after a point are removed or replaced by placeholders. The purpose of shortening the IP address is to prevent or make it much more difficult to identify a person based on their IP address.

**TLS encryption** (*https*): In order 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 line of your browser.

# Transmission of personal data

As part of our processing of personal data, it may happen that the data is transmitted to other bodies, companies, legally independent organizational units or persons or that it is disclosed to them. The recipients of this data can include, for example, service providers commissioned with IT tasks or providers of services

and content that are integrated into a website. In such a case, we observe the legal requirements and, in particular, conclude appropriate contracts or agreements with the recipients of your data that serve to protect your data.

### Data processing in third countries

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

Subject to express consent or contractually or legally required transmission, we only process or have the data processed in third countries with a recognized level of data protection, contractual obligation through so-called standard protection clauses of the EU Commission, if there are certifications or binding internal data protection regulations (Art. 44 to 49 DSGVO, Information page of the EU Commission.

#### Deletion of data

The data processed by us will be deleted in accordance with the legal requirements as soon as your consent to processing is revoked or other permissions are no longer applicable (e.g. if the purpose of processing this data no longer applies or it is not required for the purpose). If the data is not deleted because it is required for other, legally permissible purposes, its processing will be limited to these purposes. This means that the data will be blocked and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or whose storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

As part of our data protection information, we can provide users with further information on the deletion and storage of data that applies specifically to the respective processing.

#### Use of cookies

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

#### Notes on consent:

We use cookies in accordance with legal regulations. Therefore, we obtain prior consent from users, except where not required by law. In particular, consent is not necessary if the storage and reading of the information, including cookies, is absolutely necessary in order to provide the users with a telemedia service (i.e. our online offer) that they have expressly requested. The revocable consent is clearly communicated to the users and contains the information on the respective cookie use.

# Notes on data protection legal bases:

The data protection legal basis on which we process the personal data of users with the help of cookies depends on whether we ask users for their consent. If the users consent, the legal basis for the processing of your data is the declared consent. Otherwise, the data processed with the help of cookies will be processed on the basis of our legitimate interests (e.g. in the commercial operation of our online offer and improving its usability) or, if this is done in the context of fulfilling our contractual obligations, if the use of cookies is necessary to enable our to fulfill contractual obligations. We will explain the purposes for which we process cookies in the course of this data protection declaration or as part of our consent and processing processes.

### Storage duration

With regard to the storage period, the following types of cookies are distinguished:

#### Temporary Cookies (also: session or session cookies):

Temporary cookies are deleted at the latest after a user has left an online offer and closed his end device (e.q. browser or mobile application).

#### **Permanente Cookies:**

Permanent cookies remain stored even after the end 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, the user data collected with the help of cookies can be used to measure reach. Unless we provide users with explicit information on the type and storage period of cookies (e.g. when obtaining consent), users should assume that cookies are permanent and the storage period can be up to two years.

#### General information on revocation and objection (opt-out):

Users can revoke the consent they have given at any time and also object to the 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 (which can also limit the functionality of our online services).

### Further information on processing processes, procedures and services:

#### Processing of cookie data based on consent:

We use a procedure for cookie consent management, as part of which the consent of the user to the use of cookies or the processing and providers mentioned in the context of the cookie consent management procedure is obtained and managed and revoked by the user can become. The declaration of consent is stored here so that the query does not have to be repeated 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 his device. Subject to individual information about the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. A pseudonymous user identifier is created and stored with the time of the consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) and the browser, system and end device used.

#### **Business Achievements**

We process the data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the framework of contractual and comparable legal relationships and related measures and within the framework of communication with the contractual partners (or pre-contractual), e.g respond.

We process this data to fulfill our contractual obligations. This includes in particular the obligations to provide the agreed services, any updating obligations and remedy in the case of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of the administrative tasks associated with these obligations and the corporate organization. In addition, we process the data on the basis of our legitimate interests in proper and economical business management and security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. to involve telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of the applicable law, we only pass on the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. The contractual partners

will be informed about other forms of processing, e.g. for marketing purposes, within the scope of this data protection declaration.

We inform the contractual partners which data is required for the aforementioned purposes before or as part of the data collection, e.g. in online forms, by means of special markings (e.g. colours) or symbols (e.g. asterisks or similar), or personally.

We delete the data after the expiry of statutory warranty and comparable obligations, i.e., in principle after 4 years, unless the data is stored in a customer account, e.g. for as long as it must be kept for legal archiving reasons. The statutory retention period is ten years for documents relevant to tax law and for trading books, inventories, opening balance sheets, annual financial statements, the work instructions and other organizational documents and accounting documents required to understand these documents, and six years for received commercial and business letters and reproductions of the commercial and business letters sent. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report were drawn up, the commercial or business letter was received or sent or the accounting document was created, and the recording was also made has been made or the other documents have been created.

Insofar as we use third-party providers or platforms to provide our services, the terms and conditions and data protection notices of the respective third-party providers or platforms apply in the relationship between the users and the providers.

# Types of data processed:

inventory data (e.g. names, addresses);

payment details (e.g. bank details, invoices, payment history);

contact details (e.g. email, phone numbers);

contract data (e.g. subject matter of the contract, term, customer category);

**usage data** (e.g. websites visited, interest in content, access times);**The Meta/Communication Data** (e.g. device information, IP addresses).

# Affected people:

customers;

interested persons;

business and contractual partners.

# Purposes of processing:

Provision of contractual services and customer service;

Safety measures;

contact requests and communication;

office and organizational procedures;

Management and response to inquiries

# Legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR);

**Legal Obligation** (Article 6 paragraph 1 sentence 1 letter c) GDPR);

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR)

Further information on processing processes, procedures and services:

#### Customer account:

Contractual partners can create an account within our online offer (e.g. customer or user account, "customer account" for short). If it is necessary to register a customer account, contractual partners will be informed of this as well as of the information required for registration. Customer accounts are not public and cannot be indexed by search engines. As part of the registration and subsequent registrations and uses of the customer account, we store the IP addresses of the customers together with the access times in order to be able to prove the registration and to prevent any misuse of the customer account.

If customers have terminated their customer account, the data relating to the customer account will be deleted, subject to their retention being required for legal reasons. Customers are responsible for backing up their data upon termination of the customer account;

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

#### Shop and e-commerce:

We process the data of our customers in order to enable them to select, purchase or order the selected products, goods and associated services, as well as their payment and delivery or execution. If necessary for the execution of an order, we use service providers, in particular postal, forwarding and shipping companies, to carry out the delivery or execution for our customers. We use the services of banks and payment service

providers to process payment transactions. The required information is marked as such in the context of the ordering or comparable acquisition process and includes the information required for delivery or provision and billing as well as contact information in order to be able to hold any consultation;

legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR)

Offer of software and platform services:

We process the data of our users, registered users and any test users (hereinafter referred to as "users") in order to be able to provide them with our contractual services and on the basis of legitimate interests to ensure the security of our offer and to be able to develop it further. The required information is marked as such within the framework of the contract, order or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any consultations;

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR)

Events:

We process the data of the participants of the events, events and similar activities offered or organized by us (hereinafter referred to as "participants" and "events") in order to allow them to participate in the events and use the services or promotions associated with participation enable.

If we process health-related data, religious, political or other special categories of data in this context, then this is done within the scope of obviousness (e.g. in the case of thematically oriented events or is used for health care, security or with the consent of those affected).

The information required is marked as such within the framework of the conclusion of the contract, order or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any consultations. Insofar as we receive access to information from end customers, employees or other persons, we process this in accordance with the legal and contractual requirements;

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Payment procedure

As part of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our

legitimate interests, we offer the data subjects efficient and secure payment options and use other service

providers in addition to banks and credit institutions (collectively "payment service providers").

The data processed by the payment service provider includes inventory data, such as name and address, bank

data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as contract,

total and recipient-related information. The information is required to carry out the transactions. However, the

data entered will only be processed and stored by the payment service providers. This means that we do not

receive any account or credit card-related information, only information with confirmation or negative

information about the payment. Under certain circumstances, the payment service provider may transmit the

data to credit agencies. The purpose of this transmission is to check identity and creditworthiness. For this we

refer to the terms and conditions and the data protection information of the payment service provider.

The terms and conditions and data protection notices of the respective payment service providers apply to

the payment transactions, which can be accessed within the respective websites or transaction applications.

We also refer to this for the purpose of further information and the assertion of revocation, information and

other data subject rights.

Types of Data Processed:

inventory data (e.g. names, addresses);

payment details (e.g. bank details, invoices, payment history);

contract data (e.g. subject matter of the contract, term, customer category);

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

Customers;

Interested persons.

purposes of processing:

Provision of contractual services and customer service.

legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

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Further information on processing processes, procedures and services:

Stripe:

Payment services (technical connection of online payment methods);

Stripe, Inc.,

510 Townsend Street,

San Francisco,

CA 94103,

USA;

legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR;

https://stripe.com

https://stripe.com/de/privacy

# Provision of the online offer and web hosting

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

Types of Data Processed:

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses);

content data (e.g. entries in online forms).

Affected people:

user (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.).);

Safety measures.

legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Further information on processing processes, 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 from a corresponding server provider (also called "web hoster") or obtain from another source;

legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Collection of access data and log files:

Access to our online offer is logged in the form of so-called "server log files". The address and name of the retrieved websites and files, date and time of retrieval, amounts of data transferred, notification of successful retrieval, 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 belong.

The server log files can be used on the one hand for security purposes, e.g. to avoid overloading the server (especially in the case of abusive attacks, so-called DDoS attacks) and on the other hand to ensure server utilization and stability;

legal bases.

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR);

Deletion of data:

Log file information is stored for a maximum of 30 days and then deleted or made anonymous. Data whose further storage is required for evidence purposes are excluded from deletion until the respective incident has been finally clarified.

Email delivery and hosting:

The web hosting services we use also include sending, receiving and storing emails. For these purposes, the addresses of the recipients and senders as well as other information regarding the e-mail dispatch (e.g. the providers involved) and the content of the respective e-mails are processed. The aforementioned data can also be processed for SPAM detection purposes. We ask you to note that e-mails are generally not sent in

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encrypted form on the Internet. As a rule, e-mails are encrypted during transport, but (unless a so-called end-to-end encryption method is used) not on the servers from which they are sent and received. We can therefore assume no responsibility for the transmission path of the e-mails between the sender and receipt on our server:

legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Content-Delivery-Network:

We use a "Content Delivery Network" (CDN). A CDN is a service with the help of which the content of an online offer, in particular large media files such as graphics or program scripts, can be delivered faster and more securely with the help of regionally distributed servers connected via the Internet;

legal bases.

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Registration, login and user account

Users can create a user account. As part of the registration, the users are informed of the required mandatory information and processed for the purpose of providing the user account on the basis of contractual fulfillment of obligations. The processed data includes in particular the login information (user name, password and an e-mail address).

When using our registration and login functions and when using the user account, we store the IP address and the time of the respective user action. The storage takes place on the basis of our legitimate interests as well as those of the users in protection against misuse and other unauthorized use. In principle, this data will not be passed on to third parties, unless it is necessary to pursue our claims or there is a legal obligation to do so.

Users can be informed by email about processes that are relevant to their user account, such as technical changes.

Types of Data Processed:

inventory data (e.g. names, addresses);

contact details (e.g. email, phone numbers);

content data (e.g. entries in online forms);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

user (e.g. website visitors, users of online services).

purposes of processing.

Provision of contractual services and customer service;

Safety measures;

managing and responding to inquiries;

Provision of our online offer and user-friendliness.

legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR);

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Further information on processing processes, procedures and services:

Registration with clear names:

Due to the nature of our community, we ask users to only use our offer using real names. I.e. the use of pseudonyms is not permitted;

legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Setting the visibility of profiles:

Users can use settings to determine the extent to which their profiles are visible or accessible to the public or only to certain groups of people;

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Community features

The community functions we provide allow users to engage in conversations or other exchanges with one another. We ask you to note that the use of the community functions is only permitted in compliance with the applicable legal situation, our conditions and quidelines as well as the rights of other users and third parties.

Types of Data Processed:

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

user (e.g. website visitors, users of online services).

purposes of processing:

Provision of contractual services and customer service;

Safety measures.

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Further information on processing processes, procedures and services:

User posts are public:

The posts and content created by users are publicly visible and accessible;

legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Storage of data for security purposes:

The contributions and other inputs of the users are processed for the purposes of the community and conversation functions and, subject to legal obligations or legal permission, are not made available to third parties. A duty to surrender may arise in particular in the case of illegal contributions for the purposes of legal prosecution. We would like to point out that in addition to the content of the posts, their time and the IP address of the user are also stored. This is done in order to be able to take appropriate measures to protect other users and the community;

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Restricted deletion of conversations:

Out of consideration for other users, the user's conversations remain stored even after termination and account deletion, so that conversations, comments, advice or similar communication between and among users do not lose their meaning or are reversed. User names are deleted or pseudonymised, provided they are

not already pseudonyms. Users can request the complete deletion of the conversation contributions from us at any time;

legal bases.

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Single sign-on login

"Single sign-on" or "single sign-on registration or "authentication" refers to procedures that allow users to use a user account to log in to a provider of single sign-on procedures (e.g. a social network), also with our online offer. The prerequisite for single sign-on authentication is that the user is registered with the respective single sign-on provider and enters the required access data in the online form provided for this purpose, or .are already registered with the single sign-on provider and confirm the single sign-on registration via the button.

The authentication takes place directly with the respective single sign-on provider. As part of such authentication, we receive a user ID with the information that the user is logged in to the respective single sign-on provider under this user ID and an ID that we can no longer use for other purposes (so-called "user handle"). Whether additional data is transmitted to us depends solely on the single sign-on procedure used, on the selected data releases as part of the authentication and also on what data users have in the privacy or other settings of the user account with the single sign-on provider. Depending on the single sign-on provider and the choice of the user, it can be different data, usually it is the e-mail address and the user name. The password entered during the sign-on procedure with the single sign-on provider is neither visible to us nor is it stored by us.

Users are asked to note that their information stored by us can be automatically compared with their user account with the single sign-on provider, but this is not always possible or actually takes place. If, for example, the e-mail addresses of the users change, they must change them manually in their user account with us.

If agreed with the users, we can use the single sign-on registration as part of or before the fulfillment of the contract, insofar as the users have been asked to do so, process it within the framework of consent and otherwise use it on the basis of our legitimate interests and those of the interests of the users in an effective and secure registration system.

If users decide that they no longer want to use the connection to their user account with the single sign-on provider for the single sign-on process, they must cancel this connection within their user account with the single sign-on provider. If users want to delete their data from us, they must cancel their registration with us.

#### Types of Data Processed:

inventory data (e.g. names, addresses);

contact details (e.g. email, phone numbers);

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

#### Affected people:

**user** (e.g. website visitors, users of online services).

#### purposes of processing.

Provision of contractual services and customer service;

Safety measures;

registration procedure.

#### legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Further information on processing processes, procedures and services:

#### Google Single-Sign-On:

authentication service;

Google Ireland Limited,

Gordon House,

Barrow Street,

Dublin 4,

Ireland;

#### legal bases:

**Legitimate Interests** (Art. 6 paragraph 1 sentence 1 lit. f) GDPR);

https://www.google.de

https://policies.google.com/privacy

#### Contact and request management

When contacting us (e.g. via contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the details of the inquiring persons are processed to the extent necessary to answer the contact inquiries and any requested measures.

#### Types of Data Processed:

contact details (e.g. email, phone numbers);

content data (e.g. entries in online forms);

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

#### Affected people:

communication partner.

#### purposes of processing.

**Contact Requests and Communication**;

Management and response to inquiries;

Feedback (e.g. collecting feedback via online form);

Provision of our online offer and user-friendliness.

#### legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR);

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Further information on processing processes, procedures and services:

#### Contact form:

If users contact us via our contact form, e-mail or other communication channels, we process the data communicated to us in this context to process the communicated request;

#### legal bases:

Performance of Contracts and Pre-Contractual Inquiries (*Art. 6 (1) sentence 1 lit. b) GDPR*), Legitimate Interests (*Art. 6 (1) sentence 1 lit. f) GDPR*).

#### Sweepstakes and Contests

We process the personal data of participants in sweepstakes and competitions only in compliance with the relevant data protection regulations, insofar as the processing is contractually required for the provision, implementation and processing of the sweepstakes, the participants have consented to the processing or the processing serves our legitimate interests (e.g. in the security of the competition or the protection of our interests from misuse by possible collection of IP addresses when submitting competition entries).

If entries by the participants are published as part of the competition (e.g. as part of a voting or presentation of the competition entries or the winners or reporting on the competition), we would like to point out that the names of the participants may also be published in this context. The participants can object to this at any time.

If the competition takes place within an online platform or a social network (e.g. Facebook or Instagram, hereinafter referred to as "online platform"), the usage and data protection provisions of the respective platforms also apply. In these cases, we would like to point out that we are responsible for the information provided by the participants in the context of the competition and inquiries regarding the competition are to be addressed to us.

The participants' data will be deleted as soon as the sweepstakes or competition has ended and the data is no longer required to inform the winners or because queries about the sweepstakes are to be expected. In principle, the data of the participants will be deleted no later than 6 months after the end of the competition. Winners' data may be retained for a longer period of time, e.g. to be able to answer questions about the prizes or to be able to fulfill the prizes; in this case, the retention period depends on the type of prize and is, for example, up to three years for items or services in order to be able to process warranty cases, for example. Furthermore, the data of the participants can be stored longer, e.g. in the form of reporting on the competition in online and offline media.

If data was also collected for other purposes as part of the competition, its processing and storage period are based on the data protection notices for this use (e.g. in the case of registration for the newsletter as part of a competition).

Types of Data Processed:

inventory data (e.g. names, addresses);

content data (e.g. entries in online forms);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

Sweepstakes and Contest Entrants.

purposes of processing.

Conducting sweepstakes and competitions.

Legal bases:

Performance of Contracts and Pre-Contractual Inquiries (Art. 6 (1) sentence 1 lit. b) GDPR).

Polls and surveys

We conduct surveys and surveys to collect information for the specific survey or survey purpose communicated. The polls and surveys we conduct (hereinafter "surveys") are evaluated anonymously. Personal data is only processed to the extent that this is necessary for the provision and technical implementation of the surveys (e.g. processing the IP address to display the survey in the user's browser or to enable the survey to be resumed using a cookie).

Types of Data Processed:

contact details (e.g. email, phone numbers);

content data (e.g. entries in online forms);

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

communication partner;

Participant.

purposes of processing:

Feedback (e.g. collecting feedback via online form).

legal bases:

Legitimate Interests(Art. 6 (1) sentence 1 lit. f) GDPR).

Web analysis, monitoring and optimization

The web analysis (also referred to as "reach measurement") serves to evaluate the flow of visitors to our online offer and can include behavior, interests or demographic information about the visitors, such as age or gender, as pseudonymous values. With the help of the range analysis, we can, for example, recognize at what

time our online offer or its functions or content are used most frequently or invite you to reuse them. We can also understand which areas need optimization.

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

Unless otherwise stated below, profiles, i.e. data summarized for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read out from it. The information collected includes, in particular, websites visited and elements used there, as well as technical information such as the browser used, the computer system used and information on usage times. If users have given their consent to us or the providers of the services we use to collect their location data, location data can also be processed.

The IP addresses of the users are also saved. However, we use an IP masking process (i.e. pseudonymization by shortening the IP address) to protect users. In general, no clear user data (e.g. e-mail addresses or names) are stored in the context of web analysis, A/B testing and optimization, but pseudonyms. This means that we and the providers of the software used do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective process.

Types of Data Processed:

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

user (e.g. website visitors, users of online services).

purposes of processing.

range measurement (e.g. access statistics, recognition of returning visitors);

**Profiles with user-related information** (creating user profiles);

Tracking (e.g. interest/behavioral profiling, use of cookies);

Provision of our online offer and user-friendliness.

Safety measures:

IP-Masking (Pseudonymization of the IP address)

legal bases.

consent (Art. 6 (1) sentence 1 lit. a) GDPR).

Further information on processing processes, procedures and services:

Google Analytics:

Web analysis, range measurement and measurement of user flows;

Google Ireland Limited,

Gordon House,

Barrow Street.

Dublin 4,

Ireland;

legal bases.

consent(Art. 6 (1) sentence 1 lit. a) GDPR);

https://marketingplatform.google.com/intl/de/about/analytics/ https://policies.google.com/privacy

# Online marketing

We process personal data for online marketing purposes, which may include the marketing of advertising space or the presentation of advertising and other content (collectively referred to as "content") based on the potential interests of users and the measurement of their effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar processes are used, by means of which the information about the user relevant to the presentation of the aforementioned content is stored. This information can include, for example, content viewed, websites visited, online networks used, but also communication partners and technical information such as the browser used, the computer system used and information on usage times and functions used. If users have consented to the collection of their location data, this can also be processed.

The IP addresses of the users are also saved. However, we use available IP masking procedures (i.e. pseudonymization by shortening the IP address) to protect users. In general, no clear user data (e.g. e-mail

addresses or names) are stored as part of the online marketing process, but pseudonyms. This means that we and the providers of the online marketing process do not know the actual identity of the users, only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or by means of similar processes. These cookies can later generally also be read on other websites that use the same online marketing process and analyzed for the purpose of displaying content, as well as supplemented with further data and stored on the server of the online marketing process provider.

As an exception, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing process we use and the network connects the user's profile with the aforementioned information. We ask you to note that users can make additional agreements with the providers, e.g. by giving their consent during registration.

In principle, we only receive access to summarized information about the success of our advertisements. However, we can use so-called conversion measurements to check which of our online marketing processes have led to a so-called conversion, i.e. e.g. to the conclusion of a contract with us. The conversion measurement is only used to analyze the success of our marketing measures.

Unless otherwise stated, please assume that cookies used will be stored for a period of two years.

Types of Data Processed:

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses).

Affected people:

user (e.g. website visitors, users of online services).

purposes of processing.

range measurement (e.g. access statistics, recognition of returning visitors);

**Tracking** (e.g. interest/behavioral profiling, use of cookies);

Marketing;

Profiles with user-related information (creating user profiles);

conversion measurement (Measuring the effectiveness of marketing measures).

Safety measures.

**IP-Masking** (Pseudonymisation of the IP address).

legal bases:

consent (Art. 6 (1) sentence 1 lit. a) GDPR).

Possibility of objection (opt-out):

We refer to the data protection notices of the respective providers and the options for objection specified for

the providers (so-called "opt-out"). If no explicit opt-out option has been specified, you can turn off cookies in

your browser settings. However, this can limit the functions of our online offer. We therefore also recommend

the following opt-out options, which are offered in summary for the respective areas:

a) Europa: <a href="https://www.youronlinechoices.eu">https://www.youronlinechoices.eu</a>

(b) Canada:https://www.youradchoices.ca/choices

c) USA: https://www.aboutads.info/choices

d) Inter-territorial: https://optout.aboutads.info

Further information on processing processes, procedures and services:

Google Ads and conversion measurement:

We use the online marketing process "Google Ads" to place ads in the Google advertising network (e.g., in search results, in videos, on websites, etc.) so that they are displayed to users who have a presumed interest in the ads (so-called "conversion"). We also measure the conversion of the ads. However, we only find out the anonymous total number of users who clicked on our ad and were forwarded to a page with a so-called "conversion tracking tag". However, we do not receive any information that could be used to identify users;

Google Ireland Limited,

Gordon House,

Barrow Street,

Dublin 4.

Ireland:

legal bases:

consent (Art. 6 (1) sentence 1 lit. a) GDPR)

https://marketingplatform.google.com

https://policies.google.com/privacy

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Presence in social networks (Social Media)

We maintain online presences within social networks and process user data in this context in order to

communicate with the users active there or to offer information about us.

We would like to point out that user data can be processed outside of the European Union. This can result in

risks for users, for example because it could make it more difficult to enforce user rights.

Furthermore, user data is usually processed within social networks for market research and advertising

purposes. For example, user profiles can be created based on usage behavior and the resulting interests of

users. The usage profiles can in turn be used, for example, to place advertisements inside and outside the

networks that presumably correspond to the interests of the users. For these purposes, cookies are usually

stored on the users' computers, in which the usage behavior and the interests of the users are stored.

Furthermore, data can also be stored in the usage profiles independently of the devices used by the users

(especially if the users are members of the respective platforms and are logged in to them).

For a detailed description of the respective forms of processing and the possibility of objection (opt-out), we

refer to the data protection declarations and information provided by the operators of the respective

networks.

Also in the case of requests for information and the assertion of data subject rights, we would like to point out

that these can be asserted most effectively with the providers. Only the providers have access to the data of

the users and can take appropriate measures and provide information directly. If you still need help, you can

contact us.

Types of Data Processed:

contact details (e.g. email, phone numbers);

content data (e.g. entries in online forms);

**usage data** (e.g. websites visited, interest in content, access times);

**The Meta/Communication Data** (e.g. device information, IP addresses).

Affected people:

user(e.g. website visitors, users of online services).

Purposes of processing:

**Contact Requests and Communication**;

Feedback (e.g. collecting feedback via online form);

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#### Marketing.

legal bases.

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Further information on processing processes, procedures and services:

#### LinkedIn

LinkedIn Irland Unlimited Company,

Wilton Plaza Wilton Place,

Dublin 2,

Ireland:

legal bases.

Legitimate Interests (Art. 6 Para. 1 S. 1 lit. f) GDPR);

https://www.linkedin.com

https://www.linkedin.com/legal/privacy-policy

#### **Twitter**

Twitter International Company,

One Cumberland Place,

Fenian Street,

Dublin 2 Do2 AXo7,

Ireland.

https://twitter.com/privacy

# Plugins and embedded functions and content

We integrate functional and content elements into our online offer that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These can be, for example, graphics, videos or city maps (hereinafter uniformly referred to as "content").

The integration always presupposes that the third-party providers of this content process the IP address of the user, since without the IP address they could not send the content to their browser. The IP address is

therefore required for the display of this content or functions. We endeavor to only use content whose respective providers only use the IP address to deliver the content. Third-party providers can also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information can also be stored in cookies on the user's device and contain, among other things, technical information about the browser and the operating system, websites to be referred to, the time of the visit and other information on the use of our online offer and can also be linked to such information from other sources.

Types of Data Processed:

usage data (e.g. websites visited, interest in content, access times);

The Meta/Communication Data (e.g. device information, IP addresses);

**inventory data** (e.g. names, addresses); Contact information (e.g. email, phone numbers);

content data (e.g. entries in online forms).

Affected people:

user (e.g. website visitors, users of online services).

purposes of processing:

Provision of our online offer and user-friendliness.

legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR).

Further information on processing processes, procedures and services:

Google Fonts (obtained from Google Server):

Obtaining fonts (and symbols) for the purpose of technically safe, maintenance-free and efficient use of fonts and symbols with regard to topicality and loading times, their uniform representation and consideration of possible license restrictions. The provider of the fonts is informed of the IP address of the user so that the fonts can be made available in the user's browser. In addition, technical data (language settings, screen resolution, operating system, hardware used) are transmitted that are necessary for the provision of the fonts depending on the devices used and the technical environment. This data can be processed on a server of the font provider in the USA - When visiting our online offer, the user's browser sends their browser HTTP requests to the Google Fonts Web API (i.e. a software interface for retrieving the fonts). The Google Fonts Web API provides users with the Google Fonts Cascading Style Sheets (CSS) and then the fonts specified in the

CCS. These HTTP requests include (1) the IP address used by the respective user to access the Internet, (2) the requested URL on the Google server and (3) the HTTP headers, including the user agent, which describes the browser and operating system versions of the website visitors, as well as the referrer URL (i.e. the web page on which the Google font is to be displayed). IP addresses are not logged or stored on Google servers and they are not analyzed. The Google Fonts Web API logs details of HTTP requests (requested URL, user agent, and referrer URL). Access to this data is restricted and strictly controlled. The requested URL identifies the font families for which the user wants to download fonts. This data is logged so that Google can determine how often a particular font family is requested. The Google Fonts Web API requires the user agent to customize the font that is generated for each browser type. The user-agent is logged primarily for debugging and is used to generate aggregate usage statistics that measure font family popularity. These aggregate usage statistics are published on the Google Fonts Analytics page. Finally, the referrer URL is logged so the data can be used for production maintenance and an aggregated report can be generated on the top integrations based on the number of font requests. According to its own information, Google does not use any of the information collected by Google Fonts to create profiles of end users or to place targeted ads;

Google Ireland Limited, Gordon House, Barrow Street,

Dublin 4, Ireland;

legal basis.

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR)

https://fonts.google.com/ https://policies.google.com/privacy

YouTube-Videos

Google Ireland Limited,

Gordon House,

Barrow Street,

Dublin 4,

Ireland:

legal bases:

Legitimate Interests (Art. 6 (1) sentence 1 lit. f) GDPR);

## Change and update of the privacy policy

We ask you to inform yourself regularly about the content of our data protection declaration. We will adapt the data protection declaration as soon as the changes in the data processing we carry out make this necessary. We will inform you as soon as the changes require your participation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this data protection declaration, please note that the addresses can change over time and ask you to check the information before contacting us.

# Rights of data subjects

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

### Right to object

You have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data, which is based on Article 6 Paragraph 1 lit. e or f GDPR; this also applies to profiling based on these provisions. If the personal data concerning you is processed in order to operate direct advertising, you have the right to object at any time to the processing of your personal data for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct advertising.

### Right of withdrawal for consents

You have the right to revoke your consent at any time.

# right of providing information

You have the right to request confirmation as to whether the data in question is being processed and to request information about this data as well as further information and a copy of the data in accordance with legal requirements.

Right to Rectification

In accordance with the legal requirements, you have the right to request the completion of the data

concerning you or the correction of incorrect data concerning you.

Right to erasure and restriction of processing

In accordance with the legal requirements, you have the right to request that data concerning you be deleted

immediately, or alternatively to request a restriction of the processing of the data in accordance with the legal

requirements.

Right to data portability

You have the right to receive the data that you have provided to us in accordance with the legal requirements

in a structured, common and machine-readable format or to request its transmission to another person

responsible.

Complaint to supervisory authority

In accordance with the legal requirements and without prejudice to any other administrative or judicial

remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular

a supervisory authority in the Member State in which you usually reside, the supervisory authority of your

workplace or the place of the alleged infringement, if you believe that the processing of your personal data

violates the GDPR.

Status: 31 January 2023

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