

# Privacy Policy

## Introduction

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

The terms used are not gender-specific.

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# 1. Responsible

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## 2. Overview of the processing operations

The following table summarises the types of data processed and the purposes of their processing, and refers to the data subjects.

### Types of data processed

- inventory data (e.g. names, addresses).
- Content data (e.g. text entries, photographs, videos).
- Contact details (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Location data (data indicating the location of an end user's device).
- Contract data (e.g. object of the contract, duration, customer category).
- Payment data (e.g. bank details, invoices, payment history).
- Location history and movement profiles (collection of location data and position changes over a period of time).

### Categories of data subjects

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

### Purpose of processing

- Registration procedure.
- Provision of our online offer and user-friendliness.
- Visit action evaluation.
- Office and organizational procedures.
- Direct marketing (e.g. by e-mail or by post).
- Interest-based and behavioral marketing.

- Contact requests and communication.
- Conversion measurement (measuring the effectiveness of marketing measures).
- Profiling (creation of user profiles).
- Remarketing.
- Reach measurement (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Tracking (e.g. interest/behavioral profiling, use of cookies).
- Server monitoring and error detection.
- Contractual obligations and service performance.
- Management and response to requests.

### 3. Relevant legal bases

In the following, we provide the legal basis of the basic data protection regulation (DSGVO), on the basis of which we process personal data. Please note that in addition to the regulations of the DSGVO, national data protection regulations may apply in your or our country of residence and domicile. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Art. 6 para. 1 sentence 1 letter a FADP)** - The data subject has given his or her consent to the processing of personal data relating to him or her for one or more specific purposes.
- **Fulfillment of a contract and pre-contractual requests (Art. 6 para. 1 sentence 1 lit. b. FADP)** - The processing is necessary for the performance of a contract to which the data subject is a party, or for carrying out pre-contractual measures taken at the request of the data subject.
- **Legal obligation (Art. 6 para. 1 sentence 1 lit. c. FADP)** - The processing is necessary to fulfill a legal obligation to which the controller is subject.
- **Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. FADP)** - The processing is necessary to protect the legitimate interests of the controller or of a third party unless the interests or fundamental rights and freedoms of the data subject which require the protection of personal data outweigh the processing.

**National data protection regulations in Germany:** In addition to the data protection regulations of the basic data protection regulation, national regulations on data protection apply in Germany. These include in particular the law 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 deletion, the right of objection, 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 (Section 26, BDSG), in particular with regard to the establishment, implementation, or termination of employment relationships and the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

## **4. Security measures**

We take appropriate technical and organizational measures in accordance with the legal requirements, taking into account the state of technological development, 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 commensurate with the risk.

These measures shall include in particular, the safeguarding of confidentiality, integrity, and availability of data by controlling physical and electronic access to data as well as access, input, disclosure, safeguarding of availability, and segregation of data relating thereto. Furthermore, we have established procedures to ensure that data subjects' rights are exercised, data is deleted and responses to data breaches are established. 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, by designing our technology in accordance, and by using data protection-friendly default settings.

## **5. Transmission and disclosure of personal data**

In the course of our processing of personal data, it may happen that the data is transferred to or disclosed to other bodies, companies, legally independent organizational units or persons. The recipients of this data may include, for example, payment institutions in the context of payment transactions, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and in particular, conclude appropriate contracts or agreements with the recipients of your data which serve to protect your data.

## **6. 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 if the processing takes place in the context of the use of services of third parties or the disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transmission required by contract or by law, we process or allow the data to be processed only in third countries with a recognized level of data protection, contractual obligation through so-called standard protection clauses of the EU Commission, in the case 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) ).

## **7. Use of cookies**

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his visit

within an online offer. The stored information can include, for example, the language settings on a website, the login status, a shopping cart or the location where a video was viewed. The term "cookies" also includes other technologies that perform the same functions as cookies (e.g., when user information is stored using pseudonymous online identifiers, also referred to as "user IDs")

**The following cookie types and functions 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 browser.
- **Permanent cookies:** Permanent cookies remain stored even after closing the browser. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. The interests of users used for reach measurement or marketing purposes can also be stored in such a cookie.
- **First-party cookies:** First-party cookies are set by ourselves.
- **Third-party cookies:** Third-party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential or absolutely necessary) cookies:** Cookies can
  - be absolutely necessary for the operation of a website (e.g. to store logins or other user entries or for security reasons).
- **Statistical, marketing, and personalization cookies:** Furthermore, cookies are generally also used in the context of reach measurement and when the interests of a user or his behavior (e.g. viewing certain content, using functions, etc.) are stored in a user profile on individual web/app pages. Such profiles are used to show users e.g. content that corresponds to their potential interests. This procedure is also known as "tracking", i.e. following the potential interests of users. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or when you give your consent.

**Information on legal bases:** The legal basis on which we process your personal data using cookies depends on whether we ask you for your consent. If this is the case and you consent to the use of cookies, the legal basis for processing your data is the declared consent. Otherwise, the data processed with the aid of cookies will be processed on the basis of our legitimate interests (e.g. in the business operation of our online offer and its improvement) or, if the use of cookies is necessary to fulfill our contractual obligations.

**Storage duration:** Unless we provide you with explicit information on the storage duration of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the storage duration can be up to two years.

**General information on revocation and objection (Opt-Out):** Depending on whether the processing is based on consent or legal permission, you have the possibility at any time to revoke any consent given or to object to the processing of your data by cookie technologies (collectively referred to as "Opt-Out"). You can initially declare your objection by means of the settings of your browser, e.g. by deactivating the use of cookies (although this may also restrict the functionality of our online service). An objection to the use

of cookies for online marketing purposes can also be declared by means of a variety of services, especially in the case of tracking, via the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>.

**Processing of cookie data based on consent:** Before we process or have processed data in the context of the use of cookies, we ask users for their consent, which can be revoked at any time. Before consent has not been given, cookies are used if necessary, which are absolutely necessary for the operation of our online service.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, device location, IP addresses).
- **Applicable Persons:** Users (e.g. website visitors, users of online services (app)).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

## 8. Commercial and Business Services

We process data of our contractual and business partners, e.g. customers and prospective customers (collectively referred to as "contractual partners") within the scope of contractual and comparable legal relationships, as well as associated measures and within the scope of communication with the contractual partners (or pre-contractual), e.g. to answer inquiries.

We process these data in order to fulfill our contractual obligations, to safeguard our rights and for the purposes of the administrative tasks associated with these data and for the purposes of the business organization. Within the framework of the applicable law, we only pass on the data of the contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations or with the consent of the persons concerned (e.g. to participating telecommunication, transport, and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). 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 our contractual partners which data are required for the above-mentioned purposes before or within the scope of data collection, e.g. in online forms, by means of special identification (e.g. colors) or symbols (e.g. asterisks or similar), or personally.

We delete the data after the expiry of legal warranty and comparable obligations, i.e., in principle after 4 years, unless the data is stored in a customer account, e.g., as long as it must be kept for legal archiving reasons (e.g., for tax purposes usually 10 years). We will delete data that has been disclosed to us by the contractual partner within the scope of an order in accordance with the specifications of the order, generally after the end of the order.

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

**The offer of software and platform services:** We process the data of our users, registered and unregistered users (hereinafter uniformly referred to as "users") in order to be able to provide them with our contractual services and on the basis of legitimate interests, in order to guarantee the security of our offer and to be able to further develop it. The required information is identified as such within the scope of the order, contract or comparable contract conclusion and includes the information required for the provision of services and invoicing as well as contact information in order to be able to make any necessary arrangements.

- **Data types processed:** inventory data (e.g. names, addresses), location data, payment data (e.g. bank details, invoices, payment history), contact data (e.g. e-mail, telephone numbers), contract data (e.g. subject matter of contract, duration, customer category).
- **Applicable Persons:** Interested parties, app users, businesses, and contractual partners.
- **Purposes of processing:** contractual services and assistance, contact requests and communication, office and organisational procedures, management and reply to requests.
- **Legal bases:** Fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), Legal obligation (Art. 6 para. 1 sentence 1 lit. c. DSGVO), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO)

## 9. Payment service provider

Within the scope of contractual and other legal relationships, due to legal obligations or otherwise based on our legitimate interests, we offer the relevant persons, efficient and secure payment options, and use other payment service providers in addition to banks and credit institutions (collectively "payment service providers").

The data processed by the payment service providers include inventory data, such as name and address, bank data, such as account or credit card numbers, passwords, TANs, and checksums, as well as contract, sum, and recipient related information. These details are required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored by them. This means that we do not receive any account or credit card-related information, but only information with confirmation or declination about the payment. Under certain circumstances, the payment service providers may transfer the data to credit agencies. The purpose of this transmission is to check identity and creditworthiness. In this regard, we refer to the General Terms and Conditions (AGBs) and the data protection information (Privacy Policy) of the payment service providers.

Payment transactions are subject to the terms and conditions and the data protection information of the respective payment service providers, which are available within the respective websites or transaction applications. We also refer to these for further information and the assertion of rights of revocation, information and other affected parties.

- **Processed data types:** inventory data (e.g. names, addresses), payment data (e.g. bank details, invoices, payment history), contract data (e.g. subject matter of the contract, duration, customer

category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses), contact data (e.g. e-mail, telephone numbers).

- **Relevant Persons:** Customers, interested parties.
- **Purposes of the processing:** contractual and service.
- **Legal bases:** Fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO)

#### Services and service providers used:

- **Apple Pay:** payment services; service provider: Apple Inc, Infinite Loop, Cupertino, CA 95014, USA; Web site: <https://www.apple.com/de/apple-pay/>; Privacy Policy: <https://www.apple.com/legal/privacy/de-ww/>.
- **Google Pay:** payment services; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: [https://pay.google.com/intl/de\\_de/about/](https://pay.google.com/intl/de_de/about/); privacy policy: <https://policies.google.com/privacy>.
- **Klarna / Sofortüberweisung:** payment services; service provider: Klarna Bank AB (publ), Sveavägen 46, 111 34 Stockholm, Sweden; website: <https://www.klarna.com/de/>; privacy policy: <https://www.klarna.com/de/datenschutz>.
- **Mastercard:** payment services; service provider: Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium; website: <https://www.mastercard.de/de-de.html>; privacy policy: <https://www.mastercard.de/de-de/datenschutz.html>.
- **PayPal:** payment services and solutions (e.g. PayPal, PayPal Plus, Braintree); service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; website: <https://www.paypal.com/de/>; privacy policy: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

## 10. Provision of the online offer and web hosting

In order to provide our online services securely and efficiently, we use the services of one or more web-hosting providers from whose servers (or servers managed by them) the online services can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services, and security and technical maintenance services.

The data processed within the framework of the provision of the hosting offer may include all data relating to the users of our online offer, which are generated within the framework of use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online offers to browsers, and all entries made within our online offer or from websites.



**Collection of access data and log files:** We ourselves (or our web hosting provider) collect data on every access to the server (so-called server log files). Server log files may include the address and name of the web pages and files accessed, date and time of access, data volume 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 can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the capacity utilisation of the servers and their stability.

- **Processed data types:** Content data (e.g. text entries, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Persons concerned:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** reach measurement (e.g. access statistics, recognition of returning visitors), tracking (e.g. interest/behaviour-related profiling, use of cookies), visitor action evaluation, server monitoring and error recognition.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

**Used services and service providers:**

- **Squarespace:** Squarespace offers software as a service for the creation and hosting of websites. service provider: Squarespace, Inc. 8 Clarkson St, New York, NY 10014, USA; website: <https://www.squarespace.com>; privacy policy: <https://www.squarespace.com/privacy>.

## **11. Special notes on the application (Nectar)**

We process the data of the users of our application to the extent necessary to provide the users with the application and its functionalities, to monitor its security and to develop it further. We may also contact users in compliance with legal requirements if the communication is necessary for the purposes of the administration or use of the application. For further information on the processing of user data, please refer to the data protection information in this privacy policy.

**Legal basis:** The processing of data required for the provision of the functionalities of the application serves the fulfillment of contractual obligations. This also applies if the provision of the functions requires user authorization (e.g. release of device functions). If the processing of data is not necessary for the provision of the functionalities of the application but serves the security of the application or our business interests (e.g. collection of data for the purpose of optimizing the application or security purposes), it is carried out on the basis of our legitimate interests. If users are expressly asked to give their consent to the processing of their data, the data covered by the consent is processed on the basis of the consent.

**Commercial use:** We process the data of the users of our application, registered, unregistered and possible test users (hereinafter uniformly referred to as "users") in order to be able to provide them with our contractual services and on the basis of legitimate interests, in order to guarantee the security of our application and to be able to further develop it. The required information is identified as such within the scope of the conclusion of the use, order, contract, or comparable contract and may include the information required for the provision of services and for possible invoicing as well as contact information in order to be able to hold possible consultations.

**Storage of a Universal Unique Identifier (UUID):** The application stores a so-called Universally Unique Identifier (UUID) for the purpose of analyzing the use and functionality of the application and storing the user's settings. This identifier is generated when this application is installed (but is not connected to the device, so it is not a device identifier in this sense), remains stored between the start of the application and its updates, and is deleted when users remove the application from their device.

**Device permissions for access to functions and data:** The use of our application or its functionalities may require user authorizations for access to certain functions of the devices used or to the data stored on or accessible through the devices. By default, these authorizations must be granted by the users and can be revoked at any time in the settings of the respective devices. The exact procedure for controlling app authorizations may vary depending on the device and software used by the users. Users can contact us if they require further explanation. We would like to point out that the refusal or revocation of the respective authorizations can affect the functionality of our application.

**Access to the camera and stored images:** In the course of using our application, image and/or video recordings (including audio recordings) of the users (and of other persons covered by the recordings) are processed by accessing the camera functions or stored recordings. Access to the camera functions or stored recordings requires an authorization by the user that can be revoked at any time. The processing of the image and/or video recordings serves only to provide the respective functionality of our application, according to its description to the users or its typical and expectable functionality.

**Processing of stored contacts:** Within the scope of using our application, the contact information of persons (name, e-mail address, telephone number) stored in the contact directory of the device is processed. The use of the contact information requires an authorization of the user, which can be revoked at any time. The use of the contact information serves only to provide the respective functionality of our application, according to its description to the users, or its typical and expectable functionality. Users are advised that permission to process the contact information must be granted and, especially in the case of natural persons, their consent or legal permission is required.

**Processing of location data:** Within the scope of the use of our application, location data collected by the device used or otherwise entered by the users are processed. The use of location data requires the authorization of the users, which can be revoked at any time. The use of the location data only serves to provide the respective functionality of our application, according to its description to the users, or its typical and expectable functionality.

**Location and movement profiles:** Based on the location data collected during the use of our application, a location history is generated which shows the geographical movements of the devices used over a period of time (and can allow conclusions to be drawn about the movement profile of the users). The location history only serves to provide the respective functionality of our application, according to its description to the users, or its typical and expectable functionality.

- **Types of data processed:** inventory data (e.g. names, addresses), meta/communication data (e.g. device information, IP addresses), image and/or video footage (e.g. photographs or video footage of a person), location data (data indicating the location of a user's mobile device), location history and movement profiles (collection of location data and changes of position over time).
- **Purposes of the processing:** contractual and service.
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), Performance of the contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

## 12. Obtaining of applications via App stores

Our application can be obtained via special online platforms operated by other service providers (so-called "app stores"). In this context, the data protection information (Privacy Policy) of the respective App stores applies in addition to our data protection information. This applies in particular with regard to the methods used on the platforms for the measurement of reach and for interest-related marketing as well as possible cost obligations.

- **Processed data types:** inventory data (e.g. names, addresses), payment data (e.g. bank details, invoices, payment history), contact data (e.g. e-mail, telephone numbers), contract data (e.g. subject matter of the contract, duration, customer category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Relevant Persons:** customers.
- **Purposes of the processing:** contractual and service.
- **Legal bases:** Fulfilment of contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO)

### Used services and service providers:

- **Apple App Store:** app and software sales platform; service provider: Apple Inc, Infinite Loop, Cupertino, CA 95014, USA; Web site: <https://www.apple.com/de/ios/app-store/>; Privacy policy: <https://www.apple.com/legal/privacy/de-ww/>.
- **Google Play:** app and software sales platform; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: <https://play.google.com/store/apps?hl=de>; privacy policy: <https://policies.google.com/privacy>.

## 13. Registration, login and user account

Users can create a user account. Within the scope of registration, users are provided with the required mandatory data and processed for the purpose of providing the user account on the basis of contractual obligation fulfilment. The processed data includes in particular the login information (name, password and an e-mail address). The data entered during registration is used for the purpose of using the user account and its purpose.

Users can be informed by e-mail about processes relevant to their user account, such as technical changes. If users have canceled their user account, their data with regard to the user account will be deleted, subject to a legal obligation to keep records. It is the responsibility of users to save their data before the end of the contract if they have terminated their user account. We are entitled to irretrievably delete all user data stored during the contract period.

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

- **Processed data types:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos), meta/communication data (e.g. device information, IP addresses).
- **Relevant persons:** Users (e.g. website visitors, users of online services).
- **Purposes of the processing:** contractual and other services, security measures, management and reply to requests.
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), Performance of the contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

## 14. Single sign-on registration

Single sign-on" or "single sign-on registration or authentication" refers to procedures that allow users to register with a provider of single sign-on procedures (e.g. a social network), including our online service, using a user account. The prerequisite for single sign-on authentication is that users are registered with the respective single sign-on provider and enter 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 a button.

Authentication is carried out directly with the respective Single Sign-On provider. Within the scope of such authentication, we receive a user ID with the information that the user is logged in under this user ID at

the respective single sign-on provider and an ID (so- called "user handle") that cannot be used by us for other purposes. Whether additional data is transmitted to us depends solely on the Single Sign-On procedure used, on the selected data releases within the scope of authentication and also on the data that users have released 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 users, different data can be used, usually the e-mail address and the user name. The password entered with the single sign-on provider as part of the single sign-on procedure is neither visible to us nor is it stored by us.

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

We can use the Single Sign-On registration if agreed with the users, within the scope of, or prior to the fulfillment of the contract. If the users have been asked to do so, we can process the Single Sign-On registration within the scope of the consent, and otherwise, we use it on the basis of the legitimate interests on our part and the interests of the users in an effective and secure registration system.

If users should ever decide that they no longer want to use the link of their user account with the single sign-on provider for the single sign-on procedure, they must cancel this link within their user account with the single sign-on provider. If users wish to delete their data from our system, they must cancel their registration with us.

- **Data types processed:** stock data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers).
- **Persons concerned:** Users (e.g. website visitors, users of online services).
- **Purposes of the processing:** contractual and other services, registration procedure.
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), Performance of the contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

#### **Used services and service providers:**

- **Facebook Single-Sign-On:** Authentication Service; Service Provider: <https://www.facebook.com>, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; website: <https://www.facebook.com>; privacy policy: <https://www.facebook.com/about/privacy>; opt-out: <https://www.facebook.com/settings?tab=ads>.

## **15. Contact**

When contacting us (e.g. via contact form, e-mail, telephone or via social media), the data of the inquiring persons will be processed to the extent necessary to answer the contact inquiries and any requested measures.

The answering of contact inquiries within the framework of contractual or pre-contractual relations is made in order to fulfill our contractual obligations or to answer (pre)contractual inquiries and otherwise on the basis of the legitimate interest in answering the inquiries.

- **Processed data types:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos).
- **Relevant Persons:** Communication partner.
- **Purposes of the processing:** contact requests and communication.
- **Legal bases:** Fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO)

## 16. Push Notifications

With the consent of the users, we can send the users so-called "push notifications". These are messages that are displayed on users' screens, terminals, or browsers, even if our online service is not being actively used.

In order to register for the push messages, users must confirm that they have received the push messages by querying their browser or mobile device. This approval process is documented and stored. The storage is necessary to recognize whether users have consented to receive the push messages and to be able to prove their consent. For these purposes, a pseudonymous identifier of the browser (so-called "push token") or the device ID of a terminal device is stored.

The push messages may be necessary for the fulfillment of contractual obligations (e.g. technical and organizational information relevant for the use of our online offer) and are otherwise, unless specifically mentioned below, sent on the basis of the users' consent. Users can change the receipt of push messages at any time using the notification settings of their respective browsers or mobile devices.

**Push messages with promotional content:** The push notifications we send may contain promotional information. The promotional push messages are processed on the basis of user consent. If the content of the push messages is described in detail in the context of the consent to receive the advertising push messages, the descriptions are decisive for the consent of the users. In addition, our newsletters contain information about our services and us.

**Location-dependent sending of push messages:** The push notifications sent by us can be displayed depending on the location of the users based on the location data transmitted by the terminal device used.

**Analysis and performance measurement:** We statistically evaluate push messages and can thus identify if and when push messages were displayed and clicked on. This information is used to technically improve our push messages based on technical data or target groups and their retrieval behavior or retrieval times. This analysis also includes determining whether push messages are opened, when they are opened, and whether users interact with their content or buttons. For technical reasons, this information can be assigned to individual push message recipients. However, it is neither our intention nor, if used, that of the push message service provider to monitor individual users. Rather, the evaluations

serve to identify the usage habits of our users and to adapt our push messages to them or to send different push messages according to the interests of our users.

The evaluation of the push messages and the measurement of success are based on the explicit consent of the users, which is given with their consent to receive the push messages. Users may object to the analysis and performance measurement by unsubscribing from the Push Messages. Unfortunately, it is not possible to cancel the analysis and performance measurement separately.

- **Types of data processed:** location data (data indicating the location of an end user's device), usage data (e.g. websites visited, interest in content, access times).
- **Purposes of the processing:** contractual services and service, direct marketing, reach measurement (e.g. access statistics, recognition of returning visitors).
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), performance of the contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO).

#### **Used services and service providers:**

- **Firebase:** service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: <https://firebase.google.com>; privacy policy: <https://policies.google.com/privacy>.

## **17. Cloud services**

We use software services accessible via the Internet and running on the servers of their providers (so-called "cloud services", also referred to as "software as a service") for the following purposes: document storage and management, calendar management, e- mailing, spreadsheets and presentations, exchanging documents, content and information with specific recipients or publishing web pages, forms or other content and information, as well as chatting and participating in audio and video conferences.

In this context, personal data may be processed and stored on the servers of the providers, as far as they are part of communication processes with us or otherwise processed by us as described in this privacy policy. This data may include, in particular, master data and contact details of users, data on procedures, contracts, other processes, and their contents. The providers of cloud services also process usage data and metadata that they use for security purposes and service optimization.

If we use cloud services to provide other users or publicly accessible websites with forms or other documents and content, the providers may store cookies on the users' devices for web analysis purposes or to remember user settings (e.g. in the case of media control).

**Notes on legal bases:** If we ask for consent to use the cloud services, the legal basis for processing is consent. Furthermore, their use can be a component of our (pre)contractual services, provided that the use of the cloud services has been agreed in this context. Otherwise, user data is processed on the basis of our legitimate interests (i.e., interest in efficient and secure administration and collaboration processes).

- **Processed data types:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Persons concerned:** Customers, employees (e.g. employees, applicants, former employees), interested parties, communication partners.
- **Purpose of the processing:** office and organisational procedures.
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), Performance of the contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

#### **Used services and service providers:**

- **Google Cloud Services:** Cloud storage services; service providers: GoogleIreland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://cloud.google.com/>; Privacy Policy: <https://www.google.com/policies/privacy>, Security Notices: <https://cloud.google.com/security/privacy>; Standard Contractual Clauses (Ensuring Level of Data Protection for Processing in Third Countries): <https://cloud.google.com/terms/data-processing-terms>; Additional Privacy Notices: <https://cloud.google.com/terms/data-processing-terms>.

## **18. Newsletter and electronic notifications**

We send newsletters, e-mails, and other electronic notifications (hereinafter referred to as "newsletters") only with the consent of the recipients or legal permission. If 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. Furthermore, our newsletters contain information about our services and us.

To subscribe to our newsletters, it is generally sufficient to provide your e-mail address. However, we may ask you to provide a name for the purpose of personal contact in the newsletter, or other information if this is necessary for the purposes of the newsletter.

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

**Deletion and restriction of processing:** We may store the deleted e-mail addresses for up to three years on the basis of our legitimate interests before deleting them in order to be able to prove that we



have previously been given our consent. The processing of this data is limited to the purpose of a possible defense against claims. An individual request for deletion is possible at any time, provided that the former existence of a consent is confirmed at the same time. In case of obligations to permanently observe contradictions, we reserve the right to store the e-mail address in a blacklist for this purpose alone.

The logging of the registration procedure is based on our legitimate interests for the purpose of proving that it has been carried out properly. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests in an efficient and secure sending system.

**Information on legal bases:** The dispatch of the newsletters is based on the consent of the recipients or if consent is not required, on our legitimate interests in direct marketing, if and to the extent that this is permitted by law, e.g. in the case of advertising to existing customers. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests. The registration process is recorded on the basis of our legitimate interests in order to prove that it was carried out in accordance with the law.

**Contents:** Information about us, our services, actions, and offers.

**Analysis and success measurement:** The newsletters contain a so-called "web beacon", i.e. a pixel-sized file that is retrieved from our server when the newsletter is opened, or, if we use a mailing service provider, from their server. Within the scope of this retrieval, technical information such as information on the browser and your system, as well as your IP address and the time of the retrieval, is initially collected.

This information is used for the technical improvement of our newsletter based on the technical data or the target groups and their reading behavior on the basis of their retrieval locations (which can be determined by means of the IP address) or the access times. This analysis also includes 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 intention nor, if used, that of the mailing service provider to observe individual users. Rather, the evaluations serve us to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The evaluation of the newsletter and the measurement of success are carried out, subject to the express consent of the users, on the basis of our legitimate interests for the purpose of using a user-friendly and secure newsletter system that serves our business interests and meets the expectations of the users. A separate revocation of the performance measurement is unfortunately not possible, in this case, the entire newsletter subscription must be canceled.

- **Processed data types:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), meta/communication data (e.g. device information, IP addresses), usage data (e.g. websites visited, interest in content, access times).
- **Relevant persons:** Communication partners.
- **Purposes of processing:** direct marketing (e.g. by e-mail or push notification),

reach measurement (e.g. access statistics, recognition of returning visitors), tracking (e.g. interest/behavioral profiling, use of cookies), profiling (creation of user profiles).

- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).
- **Opt-out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can use one of the contact options listed above, preferably e-mail.

#### **Used services and service providers:**

- **Mailgun:** email marketing platform; service provider: Mailgun Technologies, Inc., 535 Mission St., San Francisco, CA 94105, USA; Website: <https://www.mailgun.com>; Privacy Policy: <https://www.mailgun.com/privacy-policy>.

## **19. Web analysis, monitoring, and optimization**

Web analysis (also known as "reach measurement") is used to evaluate the streams of visitors to our online offering and may include behavior, interests, or demographic information about visitors, such as age or gender, as pseudonymous values. With the help of the range analysis we can, for example, identify at what time our online offer or its functions or contents are most frequently used or invite reuse. We can also understand which areas require 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.

For these purposes, so-called user profiles can be created and stored in a file (so-called "cookie") or similar procedures with the same purpose can be used. This information may include, for example, content viewed, web pages visited and elements used there, and technical details such as the browser used, the computer system used, and information on usage times. If users have consented to the collection of their location data, this data may also be processed.

The IP addresses of users are also stored. However, we use an IP masking procedure (i.e., pseudonymization by shortening the IP address) to protect the users. In general, the data stored in the context of web analysis, A/B testing and optimization are not clear user data (such as e-mail addresses or names), but pseudonyms. This means that we as well as 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 procedures.

**Notes on legal bases:** If we ask users for their consent to use the third party providers, the legal basis for processing data is consent. Otherwise, the users' data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Relevant persons:** Users (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/behaviour-related profiling, use of cookies), visitor action evaluation, profiling (creation of user profiles), server monitoring and error recognition.
- **Security measures:** IP masking (pseudonymization of the IP address).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

#### **Used services and service providers:**

- **Firebase:** Google Firebase is a platform for developers of applications (in short "apps") for mobile devices and websites. Google Firebase offers a variety of functions for testing apps, monitoring their functionality and optimizing them (which are presented on the following overview page: <https://firebase.google.com/products>). These functions include, but are not limited to, the storage of Apps, including personal data of application users, such as content created by them or information regarding their interaction with the Apps (so-called "cloud computing"). Google Firebase also provides interfaces that allow for interaction between users of the App and other services, such as authentication via services such as Facebook, Twitter or via an email password combination. ; Service Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: <https://firebase.google.com>; privacy policy: <https://policies.google.com/privacy>.

## **20. Online marketing**

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

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

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

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

The information in the profiles is usually stored in the cookies or by similar methods. These cookies can later generally also be read out on other websites that use the same online marketing procedure, analyzed for the purpose of presenting content, and supplemented with additional data and stored on the server of the online marketing procedure 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 methods we use and the network links the users' profiles with the aforementioned data. Please note that users can make additional agreements with the providers, e.g. by giving their consent during registration.

As a matter of principle, we only have access to summarized information about the success of our advertisements. However, in the context of so-called conversion measurements, we can check which of our online marketing procedures have led to a so-called conversion, i.e., for example, to the conclusion of a contract with us. The conversion measurement is used solely to analyze the success of our marketing measures.

Unless otherwise stated, we ask you to assume that cookies used are stored for a period of two years.

**Notes on legal bases:** If we ask users for their consent to use the third party providers, the legal basis for processing data is consent. Otherwise, the users' data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Relevant Persons:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Tracking (e.g. interest/behavioral profiling, use of cookies), remarketing, visitor action evaluation, interest-based, and behavior-based marketing, profiling (creation of user profiles), conversion measurement (measurement of the effectiveness of marketing measures), reach measurement (e.g. access statistics, recognition of returning visitors).
- **Security measures:** IP masking (pseudonymization of the IP address).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).
- **Possibility of objection (Opt-Out):** We refer to the data protection information of the respective providers and the possibilities of objection (so-called "Opt-Out") indicated for the providers. If no explicit opt-out option has been specified, it is possible to switch off cookies in the settings of your browser. However, this may restrict the functions of our online offer. We, therefore, recommend the following additional opt-out options, which are offered in

summary form for the respective areas: a) Europe: <https://www.youronlinechoices.eu>. b) Canada: <https://www.youradchoices.ca/choices>. c) USA: <https://www.aboutads.info/choices>. d) Cross-regional: <https://optout.aboutads.info>.

#### Used services and service providers:

- **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 web pages, etc.) so that they are displayed to users who have a presumed interest in the ads. We also measure the conversion of the ads. However, we only learn the anonymous total number of users who clicked on our ad and were redirected to a page with a so-called "conversion tracking tag". However, we do not receive any information that can identify users ourselves. Service Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: <https://marketingplatform.google.com>; privacy policy: <https://policies.google.com/privacy>.
- **Google AdSense with non-personalized ads:** We use the Google AdSense Non-Personalized Ads service, which allows ads to appear within our online offerings and we receive compensation for their display or other use; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; website: <https://marketingplatform.google.com>; privacy policy: <https://policies.google.com/privacy>.

## 21. Presence in social networks (social media)

We maintain an online presence 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 point out that user data may be processed outside the European Union. This may result in risks for the users because the enforcement of the users' rights could be more difficult.

Furthermore, user data within social networks is usually processed for market research and advertising purposes. Thus, for example, user profiles can be created based on user behavior and the resulting interests of the users. The user profiles can in turn be used, for example, to place advertisements within 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 user behavior and interests of the users are stored. Furthermore, data may also be stored in the user profiles regardless 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 presentation of the respective forms of processing and the possibilities 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 most effectively be asserted with the providers. Only the providers have access to the data of the users and can take appropriate measures and provide information directly. Should you nevertheless require assistance, you can contact us.

- **Processed data types:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Relevant Persons:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** contact requests and communication, tracking (e.g. interest/behavioural profiling, use of cookies), remarketing, reach measurement (e.g. access statistics, recognition of returning visitors).
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

#### **Used services and service providers:**

- **Facebook:** Social network; service provider: Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Opt-Out: Advertising Settings: <https://www.facebook.com/settings?tab=ads>; Additional Privacy Notice: Agreement on Joint Processing of Personal Information on Facebook Pages: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum), Privacy Notice for Facebook Pages: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).

## **22. Plugins and embedded functions and content**

We include in our online offer functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third party providers"). These may be, for example, graphics, videos or social media buttons and contributions (hereinafter referred to uniformly as "content").

The integration always assumes that the third-party providers of this content process the IP address of the users, as without the IP address they would not be able to send the content to their browsers. The IP address is therefore required to display these contents or functions. We make every effort to use only such content whose respective providers use the IP address only to deliver the content. Third-party providers may 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 may also be stored in cookies on the user's device and may contain technical information about the browser and operating system, the websites to be linked, the time of visit and other details about the use of our online offer, as well as being linked to such information from other sources.

**Notes on legal bases:** If we ask users for their consent to use the third party providers, the legal basis for processing data is consent. Otherwise, the users' data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text entries, photographs, videos).
- **Relevant Persons:** Users (e.g. website visitors, users of online services), communication partners.
- **Purposes of processing:** Provision of our online offer and user-friendliness, contact requests and communication, direct marketing (e.g. by e-mail or post), tracking (e.g. interest/behavioral profiling, use of cookies), interest-based and behavioral marketing, profiling (creation of user profiles).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

#### **Used services and service providers:**

- **Instagram plugins and content:** Instagram Plugins and Content - This may include content such as images, videos or text and buttons that allow users to share content from this online offering within Instagram. Service Provider: <https://www.instagram.com>, Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; Website: <https://www.instagram.com>; Privacy Policy: <https://instagram.com/about/legal/privacy>.

## **23. Deletion of data**

The data processed by us will be deleted in accordance with the legal requirements as soon as their consent permitted for processing is revoked or other permissions cease to apply (e.g. if the purpose for which the data were processed ceases to apply or if they are not necessary for the purpose).

Unless the data are deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that 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 that must be stored for the purpose of asserting, exercising or defending legal claims or protecting the rights of another natural or legal person.

Further information on the deletion of personal data can also be found in the individual data protection notes of this privacy policy.

## **24. Amendment 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 changes in the data processing carried out by us make this necessary. We will inform you as soon as the changes make it necessary for you to take action to cooperate (e.g. to give your consent) or to receive other individual notification.

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

## 25. Rights of data subjects

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

- **Right of objection:** You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you which is carried out pursuant to Article 6 paragraph 1 letter e or f FADP; this also applies to profiling based on these provisions. If the personal data concerning you are processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing, including profiling, insofar as it is linked to such direct marketing.
- **Right of revocation for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to obtain confirmation as to whether or not data in question are being processed and to obtain information on such data, as well as further information and a copy of the data in accordance with legal requirements.
- **Right of rectification:** You have the right to ask for the completion of the data concerning you or the rectification of incorrect data concerning you, in accordance with the law.
- **Right to erasure and restriction of processing:** You have the right to request that data concerning you be erased immediately in accordance with the law or, alternatively, to request the restriction of processing of the data in accordance with the law.
- **Right to data transferability:** You have the right to receive data concerning you that you have provided to us in a structured, common and machine-readable format in accordance with the law, or to request that it be transferred to another responsible party.
- **Complaints to the supervisory authority:** You also have the right, in accordance with the law, to lodge a complaint with a supervisory authority, in particular in the Member State in which you are habitually resident, your place of work or the place where the alleged infringement is committed, if you consider that the processing of personal data relating to you is in breach of the DPA.