# **Privacy Policy**

#### **Preamble**

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing 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 services").

The terms used are not gender-specific.

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### Controller

Nils Knieling Klabundeweg 14 22359 Hamburg Germany

Authorised Representatives: Nils Knieling.

E-mail address: nils@nkn-it.de.

Phone: + 49 (0) 40 2282 1390.

Legal Notice: <a href="https://www.nkn-it.de/imprint.html">https://www.nkn-it.de/imprint.html</a>.

Nils Knieling operates the websites and owns the brands:

- www.nkn-it.de
- www.velohero.com
- trainingstagebuch.org

# Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

#### **Categories of Processed Data**

• Inventory data (e.g. names, addresses).

- Content data (e.g. text input, photographs, videos).
- 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).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

#### **Categories of Data Subjects**

- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).

#### **Purposes of Processing**

- Affiliate Tracking.
- Provision of our online services and usability.
- Office and organisational procedures.
- Content Delivery Network (CDN).
- Direct marketing (e.g. by e-mail or postal).
- Feedback (e.g. collecting feedback via online form).
- Contact requests and communication.
- Security measures.
- Provision of contractual services and customer support.
- Managing and responding to inquiries.

#### **Legal Bases for the Processing**

In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection

declaration.

- Consent (Article 6 (1) (a) GDPR) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Performance of a contract and prior requests (Article 6 (1) (b) GDPR) Performance of a contract to which the data subject is party or in order to
  take steps at the request of the data subject prior to entering into a contract.
- Compliance with a legal obligation (Article 6 (1) (c) GDPR) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Legitimate Interests (Article 6 (1) (f) GDPR) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

National data protection regulations in Germany: In addition to the data protection regulations of the General Data Protection Regulation, national regulations apply to data protection in Germany. This includes 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 provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

# **Security Precautions**

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly.

Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

**SSL encryption (https)**: In order to protect your data transmitted via our online services in the best possible way, we use SSL encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

#### Transmission of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of 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 takes place in the context of the use of third party services or 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 transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission: <a href="https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\_en">https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\_en</a>).

# **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 service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term

"cookies" also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

#### The following types and functions of cookies are distinguished:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service 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 who are used for range 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) cookies:** Cookies can be necessary for the operation of a website (e.g. to save logins or other user inputs or for security reasons).
- Statistics, marketing and personalisation cookies: Cookies are also generally used to measure a website's reach and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) are stored on individual websites in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This procedure is also referred to as "tracking", i.e. tracking the potential interests of users. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or in the context of obtaining consent.

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

**Retention period:** Unless we provide you with explicit information on the retention period of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the retention period can be as long as two years.

General information on Withdrawal of consent and objection (Opt-Out): Respective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as "opt-out"). You can initially explain your objection using the settings of your browser, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online services). An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via the websites <a href="https://www.aboutads.info/choices/">https://www.aboutads.info/choices/</a> and <a href="https://www.youronlinechoices.com">https://www.youronlinechoices.com</a>. In addition, you can receive further information on objections in the context of the information on the used service providers and cookies.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- Data subjects: Users (e.g. website visitors, users of online services).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Business services**

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

We process this data in order to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of data subjects concerned (e.g. telecommunications, 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 further processing, e.g. for marketing purposes, as part of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations,

i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving (e.g., as a rule 10 years for tax purposes). In the case of data disclosed to us by the contractual partner within the context of an assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

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

**Customer Account**: Contractual partners can create a customer or user account. If the registration of a customer account is required, contractual partnerswill be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account.

If customers have terminated their customer account, their data will be deleted with regard to the customer account, subject to their retention is required for legal reasons. It is the responsibility of the customer to secure their data upon termination of the customer account.

**Software and Platform Services**: We process the data of our users, registered and any test users (hereinafter uniformly referred to as "users") in order to provide them with our contractual services and on the basis of legitimate interests to ensure the security of our offer and to develop it further. The required details are identified as such within the context of the conclusion of the agreement, order or comparable contract and include the details required for the provision of services and invoicing as well as contact information in order to be able to hold any further consultations.

- **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. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Prospective customers, Business and contractual partners, Customers.
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures, Managing and responding to inquiries, Security measures.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR),

# **Payment Procedure**

Within the framework of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our legitimate interests, we offer data subjects efficient and secure payment options and use other service providers for this purpose in addition to banks and credit institutions (collectively referred to as "payment service providers").

The data processed by the payment service providers includes inventory data, such as the name and address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as the contract, total and recipient-related information. The information is required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored with them. I.e. we do not receive any account or credit card related information, but only information with confirmation or negative information of the payment. Under certain circumstances, the data may be transmitted by the payment service providers to credit agencies. The purpose of this transmission is to check identity and creditworthiness. Please refer to the terms and conditions and data protection information of the payment service providers.

The terms and conditions and data protection information of the respective payment service providers apply to the payment transactions and can be accessed within the respective websites or transaction applications. We also refer to these for further information and the assertion of revocation, information and other data subject rights.

If you use paid services, the payment service provider Digital River GmbH collects and uses your payment data such as credit card or bank details for the purpose of payment processing and billing according to the selected payment method.

The payment service provider has its own privacy policy, which can be found at the following link: <a href="https://secure.shareit.com/shareit/privacypolicy.html">https://secure.shareit.com/shareit/privacypolicy.html</a>

- **Processed data types:** Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Prospective customers.
- **Purposes of Processing:** Contact requests and communication, Affiliate Tracking.

• **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

# Provision of online services 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 they manage) the online services can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services, as well as security and technical maintenance services.

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

Collection of Access Data and Log Files: We, ourselves or our web hosting provider, collect data on the basis of each 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, the date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a general 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 stability and optimal load balancing of the servers .

**Content-Delivery-Network**: We use a so-called "Content Delivery Network" (CDN). A CDN is a service with whose help contents of our online services, in particular large media files, such as graphics or scripts, can be delivered faster and more securely with the help of regionally distributed servers connected via the Internet.

- Processed data types: Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- Data subjects: Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability, Content Delivery Network (CDN).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- Cloudflare: Content-Delivery-Network (CDN); Service provider: Cloudflare, Inc., 101 Townsend St, San Francisco, CA 94107, USA; Website: <a href="https://www.cloudflare.com">https://www.cloudflare.com</a>; Privacy Policy: <a href="https://www.cloudflare.com/privacypolicy/">https://www.cloudflare.com/privacypolicy/</a>.
- Hetzner: Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); Service provider: Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany; Website: <a href="https://www.hetzner.com">https://www.hetzner.com</a>; Privacy Policy: <a href="https://www.hetzner.com/de/rechtliches/datenschutz">https://www.hetzner.com/de/rechtliches/datenschutz</a>.

# Registration, Login and User Account

Users can create a user account. Within the scope of registration, the required mandatory information is communicated to the users and processed for the purposes of providing the user account on the basis of contractual fulfilment of obligations. The processed data includes in particular the login information (name, password and an e-mail address).

Within the scope of using 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 the user's protection against misuse and other unauthorized use. 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 may be informed by e-mail of information relevant to their user account, such as technical changes.

**Registration with pseudonyms**: Users may use pseudonyms as user names instead of real names.

**Setting the visibility of profiles**: By setting preferences, users can determine the extent to which their profiles are visible or accessible to the public or only to certain groups of people.

**Deletion of data after termination**: If users have terminated their user account, their data relating to the user account will be deleted, subject to any legal permission, obligation or consent of the users.

It is the responsibility of the users to secure their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Meta/communication data (e.g. device information, IP addresses).
- Data subjects: Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Security measures, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

# **Community Functions**

The community functions provided by us allow users to engage in conversations and other forms of interaction with each other. Please note that the use of the community functions is only permitted in compliance with the applicable legal situation, our terms and guidelines and the rights of other users and third parties.

**Setting the visibility of posts**: By using their settings, users can determine the extent to which the posts and content they create are visible or accessible to the public or only to certain persons or groups.

**Right of deletion**: The deletion of posts, content or information provided by users is permissible to the extent necessary after proper consideration if there are concrete indications that they could represent a violation of legal regulations, our provisions or the rights of third parties.

**Protection of own data**: Users decide for themselves what data they disclose about themselves within our online services. For example, when users provide personal information or participate in conversations. We ask users to protect their data and to publish personal data only with caution and only to the extent necessary. In particular, we ask users to note that they must protect their login credentials in particular and use secure passwords (preferably long and random combinations of characters).

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Security measures.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b)

# Blogs and publication media

We use blogs or comparable means of online communication and publication (hereinafter "publication medium"). Readers' data will only be processed for the purposes of the publication medium to the extent necessary for its presentation and communication between authors and readers or for security reasons. For the rest, we refer to the information on the processing of visitors to our publication medium within the scope of this privacy policy.

**Gravatar Profile Pictures**: We use the service Gravatar within our on-line offer and in particular in the Blog.

Gravatar is a service where users can register and store profile pictures and their e-mail addresses. If users leave contributions or comments with the respective e-mail address on other online presences (especially in blogs), their profile pictures can be displayed next to the contributions or comments. For this purpose, the e-mail address provided by the users is transmitted to Gravatar in encrypted form for the purpose of checking whether a profile is stored for it. This is the only purpose of transmitting the email address and it will not be used for other purposes, but deleted thereafter.

The use of Gravatar is based on our legitimate interests, as we use Gravatar to offer authors of contributions and comments the opportunity to personalize their contributions with a profile picture.

By displaying the images, Gravatar knows the IP address of the user, as this is necessary for communication between a browser and an online service.

If users do not want a user image linked to their e-mail address to appear in the comments at Gravatar, they should use an e-mail address which is not stored at Gravatar for commenting. We would also like to point out that it is also possible to use an anonymous e-mail address or no e-mail address at all if users do not wish their own e-mail address to be sent to Gravatar. Users can completely prevent the transmission of data by not using our comment system.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- Purposes of Processing: Provision of contractual services and customer

support, Feedback (e.g. collecting feedback via online form), Provision of our online services and usability.

• **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

• **Gravatar Profile Pictures:** Profile Pictures; Service provider: Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA; Website: <a href="https://automattic.com">https://automattic.com</a>; Privacy Policy: <a href="https://automattic.com/privacy">https://automattic.com/privacy</a>.

# Contacting us

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested activities.

The response to contact enquiries within the framework of contractual or precontractual relationships is made in order to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise on the basis of the legitimate interests in responding to the enquiries.

If you contact us, your e-mail will be processed by mailbox.org.

The mail service provider has its own privacy policy, which can be found at the following link: <a href="https://mailbox.org/en/data-protection-privacy-policy">https://mailbox.org/en/data-protection-privacy-policy</a>

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- Purposes of Processing: Contact requests and communication.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### **Newsletter and Electronic Communications**

We send newsletters, e-mails and other electronic communications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal

permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

In order to subscribe to our newsletters, it is generally sufficient to enter your email address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

**Double opt-in procedure:** The registration to our newsletter takes place in general in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external e-mail addresses.

The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

**Deletion and restriction of processing:** We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the e-mail address solely for this purpose in a blocklist.

**Information on legal bases:** The sending of the newsletter is based on the consent of the recipients or, if consent is not required, on the basis of our legitimate interests in direct marketing. Insofar as we engage a service provider for sending emails, this is done on the basis of our legitimate interests. The registration procedure is recorded on the basis of our legitimate interests for the purpose of demonstrating that it has been conducted in accordance with the law.

Contents: Information about us, our services, promotions and offers.

- **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).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

• **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 otherwise use one of the contact options listed above, preferably e-mail.

#### Services and service providers being used:

 Mailgun: Email marketing platform; Service provider: Mailgun Technologies, Inc., 535 Mission St., San Francisco, CA 94105, USA; Website: <a href="https://www.mailgun.com">https://www.mailgun.com</a>; Privacy Policy: <a href="https://www.mailgun.com/privacy-policy">https://www.mailgun.com/privacy-policy</a>.

# Plugins and embedded functions and content

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be 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 they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties 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 include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

**Information on legal basis:** If we ask users for their consent (e.g. in the context of a so-called "cookie banner consent"), the legal basis for processing is this consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. We refer you to the note on the use of cookies in this privacy policy.

**Integration of third-party software, scripts or frameworks**: We incorporate into our online services software which we retrieve from servers of other providers (e.g. function libraries which we use for the purpose of displaying or user-friendliness of our online services). The respective providers collect the user's IP address and can process it for the purposes of transferring the software to the user's browser as well as for security purposes and for the evaluation and

optimisation of their services.

#### »»» Thunderforest.

We embed the maps of the service "Thunderforest" (<a href="https://www.thunderforest.com/">https://www.thunderforest.com/</a>), which are offered on the basis of the Open Data Commons Open Database License (ODbL) by the OpenStreetMap Foundation (OSMF).

To our knowledge, user data is used by Gravitystorm Limited solely for the purposes of displaying the map functions and caching the selected settings. This data may include, in particular, the user's IP address.

The data may be processed in the USA. For more information, please refer to Gravitystorm Limited's Privacy Policy: <a href="https://www.thunderforest.com/privacy/">https://www.thunderforest.com/privacy/</a>.

#### »»» OpenStreetMap

We embed the maps of the "OpenStreetMap" service (<a href="https://www.openstreetmap.org/">https://www.openstreetmap.org/</a>), which are offered on the basis of the Open Data Commons Open Database License (ODbL) by the OpenStreetMap Foundation (OSMF). Privacy Policy: <a href="https://wiki.openstreetmap.org/wiki/Privacy\_Policy">https://wiki.openstreetmap.org/wiki/Privacy\_Policy</a>

To our knowledge, user data is used by OpenStreetMap solely for the purposes of displaying the map functions and temporarily storing the selected settings. This data may include, in particular, the user's IP address.

The data may be processed in the USA. Further information can be found in the OpenStreetMap privacy policy: <a href="https://wiki.openstreetmap.org/wiki/Privacy\_Policy">https://wiki.openstreetmap.org/wiki/Privacy\_Policy</a>

#### »»» Wikimedia Toolforge

We embed maps from the "Wikimedia Toolforge" service (<a href="https://tools.wmflabs.org/">https://tools.wmflabs.org/</a>), which are offered on the basis of the Open Data Commons Open Database License (ODbL) by the OpenStreetMap Foundation (OSMF).

To our knowledge, user data is used by Wikimedia exclusively for purposes of displaying the map functions and caching the selected settings. This data may include, in particular, the user's IP address.

The data may be processed in the USA. Further information can be found in Wikimedia's privacy policy: <a href="https://wikimediafoundation.org/wiki/Privacy">https://wikimediafoundation.org/wiki/Privacy</a> policy

Processed data types: Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

- Data subjects: Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability.

#### Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose).

If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

In the context of our information on data processing, we may provide users with further information on the deletion and retention of data that is specific to the respective processing operation.

# **Changes and Updates to the Privacy Policy**

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

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

# **Rights of Data Subjects**

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

 Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.

- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- Right to Erasure and Right to Restriction of Processing: In accordance
  with the statutory provisions, you have the right to demand that the relevant
  data be erased immediately or, alternatively, to demand that the processing
  of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- Complaint to the supervisory authority: In accordance with the law 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 where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

# **Terminology and Definitions**

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- Affiliate Tracking: Affiliate tracking logs links that the linking websites use to refer users to websites with products or other offers. The owners of the respective linked websites can receive a commission if users follow these so-called "affiliate links" and subsequently take advantage of the offers (e.g. buy goods or use services). To this end, it is necessary for providers to be able to track whether users who are interested in certain offers subsequently follow the affiliate links. It is therefore necessary for the functionality of affiliate links that they are supplemented by certain values that become part of the link or are otherwise stored, e.g. in a cookie. The values include in particular the source website (referrer), time, an online identification of the owner of the website on which the affiliate link was located, an online identification of the respective offer, an online identifier of the user, as well as tracking specific values such as advertising media ID, partner ID and categorizations
- Content Delivery Network (CDN): A "Content Delivery Network" (CDN) is
  a service with whose help contents of our online services, in particular large
  media files, such as graphics or scripts, can be delivered faster and more
  securely with the help of regionally distributed servers connected via the
  Internet.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.

