# **Legal Notice**

Information in accordance with the duty to inform pursuant to § 5 Telemediengesetz (TMG).

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# **EU Dispute Resolution**

We would like to inform you about the Online Dispute Resolution platform (ODR platform) in accordance with the regulation on Online Dispute Resolution in consumer matters (ODR Regulation).

Consumers have the option of submitting complaints to the European Commission's Online Dispute Resolution platform at

https://ec.europa.eu/consumers/odr/main/?event=main.home2.show. You will find the necessary contact details in our imprint above.

However, we would like to note, that we are not willing or obliged to participate in dispute settlement procedures before a consumer arbitration board.

# **Liability for the Contents of this Website**

We are constantly developing the content of this website and strive to provide correct and up-to-date information. Unfortunately, we cannot accept liability for the accuracy of any content on this website. This especially includes content provided by third parties. As a service provider, we are neither obliged to monitor any information you transmit or store, nor to investigate any circumstances that indicate illegal activity.

Due to court- or official orders under the general law, our obligations to remove information or to block the use of information remain unaffected, even if we are not responsible.

If you notice any problematic or illegal content, please contact us immediately so we can remove the illegal content. You will find our contact details in the imprint.

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# **Privacy Policy**

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# **Privacy Policy Introduction and Overview**

We have written this privacy policy (version 06.02.2024-322587715) in order to explain to you, in accordance with the provisions of the <u>General Data Protection Regulation (EU) 2016/679</u> and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered gender-neutral.

**In short:** We provide you with comprehensive information about any of your personal data we process.

Privacy policies usually sound very technical and use legal terminology. However, this privacy policy is intended to describe the most important things to you as simply and transparently as possible. So long as it aids transparency, technical **terms are explained in a reader-friendly manner, links** to further information are provided and **graphics** are used. We are thus informing in clear and simple language that we only process personal data in the context of our business activities if there is a legal basis for it. This is certainly not possible with brief, unclear and legal-technical statements, as is often standard on the internet when it comes to data protection. I hope you find the following explanations interesting and informative. Maybe you will also find some information that you have not been familiar with.

If you still have questions, we kindly ask you to contact the responsible body named below or in the imprint, follow the existing links and look at further information on third-party sites. You can of course also find our contact details in the imprint.

# Scope

This privacy policy applies to all personal data processed by our company and to all personal data processed by companies commissioned by us (processors). With the term personal data, we refer to information within the meaning of Article 4 No. 1 GDPR, such as the name, email address and postal address of a person. The processing of personal data ensures that we can offer and invoice our services and products, be it online or offline. The scope of this privacy policy includes:

- all online presences (websites, online shops) that we operate
- Social media presences and email communication
- mobile apps for smartphones and other devices

**In short:** This privacy policy applies to all areas in which personal data is processed in a structured manner by the company via the channels mentioned. Should we enter into legal relations with you outside of these channels, we will inform you separately if necessary.

# **Legal bases**

In the following privacy policy, we provide you with transparent information on the legal principles

and regulations, i.e. the legal bases of the General Data Protection Regulation, which enable us to process personal data.

Whenever EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016. You can of course access the General Data Protection Regulation of the EU online at EUR-Lex, the gateway to EU law, at <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679</a>.

We only process your data if at least one of the following conditions applies:

- 1. **Consent** (Article 6 Paragraph 1 lit. a GDPR): You have given us your consent to process data for a specific purpose. An example would be the storage of data you entered into a contact form.
- 2. **Contract** (Article 6 Paragraph 1 lit. b GDPR): We process your data in order to fulfill a contract or pre-contractual obligations with you. For example, if we conclude a sales contract with you, we need personal information in advance.
- 3. **Legal obligation** (Article 6 Paragraph 1 lit. c GDPR): If we are subject to a legal obligation, we will process your data. For example, we are legally required to keep invoices for our bookkeeping. These usually contain personal data.
- 4. **Legitimate interests** (Article 6 Paragraph 1 lit. f GDPR): In the case of legitimate interests that do not restrict your basic rights, we reserve the right to process personal data. For example, we have to process certain data in order to be able to operate our website securely and economically. Therefore, the processing is a legitimate interest.

Other conditions such as making recordings in the interest of the public, the exercise of official authority as well as the protection of vital interests do not usually occur with us. Should such a legal basis be relevant, it will be disclosed in the appropriate place.

In addition to the EU regulation, national laws also apply:

- In Austria this is the Austrian Data Protection Act (Datenschutzgesetz), in short DSG.
- In **Germany** this is the Federal Data Protection Act (**Bundesdatenschutzgesetz**), in short **BDSG**.

Should other regional or national laws apply, we will inform you about them in the following sections.

# **Storage Period**

It is a general criterion for us to store personal data only for as long as is absolutely necessary for the provision of our services and products. This means that we delete personal data as soon as any reason for the data processing no longer exists. In some cases, we are legally obliged to keep certain data stored even after the original purpose no longer exists, such as for accounting purposes.

If you want your data to be deleted or if you want to revoke your consent to data processing, the data will be deleted as soon as possible, provided there is no obligation to continue its storage.

We will inform you below about the specific duration of the respective data processing, provided we have further information.

# Rights in accordance with the General Data Protection Regulation

In accordance with Articles 13, 14 of the GDPR, we inform you about the following rights you have to ensure fair and transparent processing of data:

- According to Article 15 DSGVO, you have the right to information about whether we are processing data about you. If this is the case, you have the right to receive a copy of the data and to know the following information:
  - for what purpose we are processing;
  - the categories, i.e. the types of data that are processed;
  - who receives this data and if the data is transferred to third countries, how security can be guaranteed;
  - how long the data will be stored;
  - the existence of the right to rectification, erasure or restriction of processing and the right to object to processing;
  - that you can lodge a complaint with a supervisory authority (links to these authorities can be found below);
  - the origin of the data if we have not collected it from you;
  - Whether profiling is carried out, i.e. whether data is automatically evaluated to arrive at a personal profile of you.
- You have a right to rectification of data according to Article 16 GDPR, which means that we must correct data if you find errors.
- You have the right to erasure ("right to be forgotten") according to Article 17 GDPR, which specifically means that you may request the deletion of your data.
- According to Article 18 of the GDPR, you have the right to restriction of processing, which means that we may only store the data but not use it further.
- According to Article 20 of the GDPR, you have the right to data portability, which means that we will provide you with your data in a standard format upon request.
- According to Article 21 DSGVO, you have the right to object, which entails a change in processing after enforcement.
  - If the processing of your data is based on Article 6(1)(e) (public interest, exercise of
    official authority) or Article 6(1)(f) (legitimate interest), you may object to the processing.
    We will then check as soon as possible whether we can legally comply with this
    objection.
  - If data is used to conduct direct advertising, you may object to this type of data processing at any time. We may then no longer use your data for direct marketing.
  - If data is used to conduct profiling, you may object to this type of data processing at any time. We may no longer use your data for profiling thereafter.
- According to Article 22 of the GDPR, you may have the right not to be subject to a decision based solely on automated processing (for example, profiling).
- You have the right to lodge a complaint under Article 77 of the GDPR. This means that you

can complain to the data protection authority at any time if you believe that the data processing of personal data violates the GDPR.

In short: you have rights – do not hesitate to contact the responsible party listed above with us!

If you believe that the processing of your data violates data protection law or your data protection rights have been violated in any other way, you can complain to the supervisory authority. For Austria, this is the data protection authority, whose website can be found at <a href="https://www.dsb.gv.at/">https://www.dsb.gv.at/</a>. In Germany, there is a data protection officer for each federal state. For more information, you can contact the Federal Commissioner for <a href="Data Protection and Freedom of Information (BfDI)">Data Protection and Freedom of Information (BfDI)</a>. The following local data protection authority is responsible for our company:

# **Niedersachsen Data protection authority**

State Commissioner for Data Protection: Barbara Thiel

Address: Prinzenstraße 5, 30159 Hannover

**Phone number:** 05 11/120-45 00

**E-mail address:** poststelle@lfd.niedersachsen.de **Website:** https://lfd.niedersachsen.de/startseite/

# Security of data processing operations

In order to protect personal data, we have implemented both technical and organisational measures. We encrypt or pseudonymise personal data wherever this is possible. Thus, we make it as difficult as we can for third parties to extract personal information from our data.

Article 25 of the GDPR refers to "data protection by technical design and by data protection-friendly default" which means that both software (e.g. forms) and hardware (e.g. access to server rooms) appropriate safeguards and security measures shall always be placed. If applicable, we will outline the specific measures below.

# TLS encryption with https

The terms TLS, encryption and https sound very technical, which they are indeed. We use HTTPS (Hypertext Transfer Protocol Secure) to securely transfer data on the Internet.

This means that the entire transmission of all data from your browser to our web server is secured – nobody can "listen in".

We have thus introduced an additional layer of security and meet privacy requirements through technology design <u>Article 25 Section 1 GDPR</u>). With the use of TLS (Transport Layer Security), which is an encryption protocol for safe data transfer on the internet, we can ensure the protection of confidential information.

You can recognise the use of this safeguarding tool by the little lock-symbol  $\widehat{\Box}$ , which is situated in your browser's top left corner in the left of the internet address (e.g. examplepage.uk), as well as by the display of the letters https (instead of http) as a part of our web address.

If you want to know more about encryption, we recommend you to do a Google search for

"Hypertext Transfer Protocol Secure wiki" to find good links to further information.

## **Communications**

#### **Communications Overview**

Affected parties: Anyone who communicates with us via phone, email or online form

Processed data: e. g. telephone number, name, email address or data entered in forms.

You can find more details on this under the respective form of contact

Purpose: handling communication with customers, business partners, etc.

To Storage duration: for the duration of the business case and the legal requirements

Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1) (f) GDPR (legitimate interests)

If you contact us and communicate with us via phone, email or online form, your personal data may be processed.

The data will be processed for handling and processing your request and for the related business transaction. The data is stored for this period of time or for as long as is legally required.

#### **Affected persons**

The above-mentioned processes affect all those who seek contact with us via the communication channels we provide.

## **Telephone**

When you call us, the call data is stored in a pseudonymised form on the respective terminal device, as well as by the telecommunications provider that is being used. In addition, data such as your name and telephone number may be sent via email and stored for answering your inquiries. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

#### **Email**

If you communicate with us via email, your data is stored on the respective terminal device (computer, laptop, smartphone, ...) as well as on the email server. The data will be deleted as soon as the business case has ended and the legal requirements allow for its erasure.

#### **Online forms**

If you communicate with us using an online form, your data is stored on our web server and, if necessary, forwarded to our email address. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

#### **Legal bases**

Data processing is based on the following legal bases:

- Art. 6 para. 1 lit. a GDPR (consent): You give us your consent to store your data and to continue to use it for the purposes of the business case;
- Art. 6 para. 1 lit. b GDPR (contract): For the performance of a contract with you or a processor such as a telephone provider, or if we have to process the data for pre-contractual activities, such as preparing an offer;
- Art. 6 para. 1 lit. f GDPR (legitimate interests): We want to conduct our customer inquiries and business communication in a professional manner. Thus, certain technical facilities such email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.

# **Data Processing Agreement (DPA)**

In this section, we would like to explain what a Data Processing Agreement is and why it is needed. As the term "Data Processing Agreement" is quite lengthy, we will often only use the acronym DPA here in this text. Like most companies, we do not work alone, but also use the services of other companies or individuals. By involving different companies or service providers, we may pass on personal data for processing. These partners then act as processors with whom we conclude a contract, the so-called Data Processing Agreement (DPA). Most importantly for you to know is that any processing of your personal data takes place exclusively according to our instructions and must be regulated by the DPA.

#### Who are the processors?

As a company and website owner, we are responsible for any of your data that is processed by us. In addition to the controller, there may also be so-called processors involved. This includes any company or person who processes your personal data. More precisely and according to the GDPR's definition, this means: Any natural or legal person, authority, institution or other entity that processes your personal data is considered a processor. Processors can therefore be service providers such as hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

To make the terminology easier to comprehend, here is an overview of the GDPR's three roles:

**Data subject** (you as a customer or interested party) 

Controller (we as a company and contracting entity)

Processors (service providers such as web hosts or cloud providers)

## **Contents of a Data Processing Agreement**

As mentioned above, we have concluded a DPA with our partners who act as processors. First and foremost, it states that the processor processes the data exclusively in accordance with the GDPR. The contract must be concluded in writing, although an electronic contract completion is also considered a "written contract". Any processing of personal data only takes place after this contract is concluded. The contract must contain the following:

- indication to us as the controller
- · obligations and rights of the controller

- categories of data subjects
- type of personal data
- type and purpose of data processing
- subject and duration of data processing
- location of data processing

Furthermore, the contract contains all obligations of the processor. The most important obligations are:

- ensuring data security measures
- taking possible technical and organisational measures to protect the rights of the data subject
- maintaining a data processing record
- cooperation with the data protection authority upon request
- performing a risk analysis for any received personal data
- subprocessors may only be appointed with the written consent of the controller

You can see an example of what a DPA looks like at <a href="https://gdpr.eu/data-processing-agreement/">https://gdpr.eu/data-processing-agreement/</a>. This link shows a sample contract.

#### **Cookies**

#### **Cookies Overview**

- Affected parties: visitors to the website
- Purpose: depending on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.
- Processed data: depends on the cookie used. More details can be found below or from the manufacturer of the software that sets the cookie.
- The Storage duration: can vary from hours to years, depending on the respective cookies
- 4 Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What are cookies?

Our website uses HTTP-cookies to store user-specific data.

In the following we explain what cookies are and why they are used, so that you can better understand the following privacy policy.

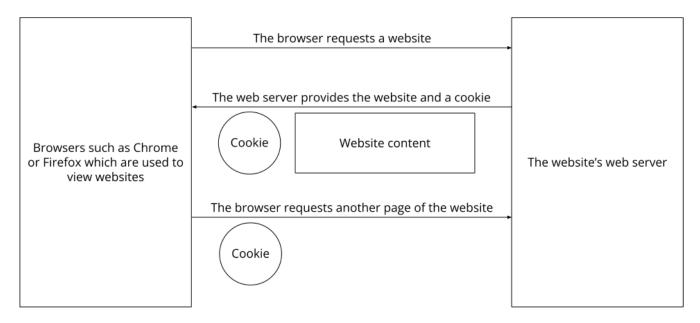
Whenever you surf the Internet, you are using a browser. Common browsers are for example, Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

It is important to note that cookies are very useful little helpers. Almost every website uses cookies. More precisely, these are HTTP cookies, as there are also other cookies for other uses. HTTP cookies are small files that our website stores on your computer. These cookie files are automatically placed into the cookie-folder, which is the "brain" of your browser. A cookie consists of a name and a value. Moreover, to define a cookie, one or multiple attributes must be specified.

Cookies store certain user data about you, such as language or personal page settings. When you

re-open our website to visit again, your browser submits these "user-related" information back to our site. Thanks to cookies, our website knows who you are and offers you the settings you are familiar to. In some browsers, each cookie has its own file, while in others, such as Firefox, all cookies are stored in one single file.

The following graphic shows a possible interaction between a web browser such as Chrome and the web server. The web browser requests a website and receives a cookie back from the server. The browser then uses this again as soon as another page is requested.



There are both first-party cookies and third-party cookies. First-party cookies are created directly by our site, while third-party cookies are created by partner-websites (e.g. Google Analytics). Each cookie must be evaluated individually, as each cookie stores different data. The expiry time of a cookie also varies from a few minutes to a few years. Cookies are not software programs and do not contain viruses, trojans or other malware. Cookies also cannot access your PC's information.

This is an example of how cookie-files can look:

Name: \_ga

Value: GA1.2.1326744211.152322587715-9

Purpose: Differentiation between website visitors

Expiry date: after 2 years

A browser should support these minimum sizes:

- At least 4096 bytes per cookie
- At least 50 cookies per domain
- At least 3000 cookies in total

### Which types of cookies are there?

The exact cookies that we use, depend on the used services, which will be outlined in the following sections of this privacy policy. Firstly, we will briefly focus on the different types of HTTP-cookies.

There are 4 different types of cookies:

#### **Essential cookies**

These cookies are necessary to ensure the basic functions of a website. They are needed when a user for example puts a product into their shopping cart, then continues surfing on different websites and comes back later in order to proceed to the checkout. These cookies ensure the shopping cart does not get deleted, even if the user closes their browser window.

#### **Purposive cookies**

These cookies collect information about user behaviour and whether the user receives any error messages. Furthermore, these cookies record the website's loading time as well as its behaviour in different browsers.

#### **Target-orientated cookies**

These cookies ensure better user-friendliness. Thus, information such as previously entered locations, fonts sizes or data in forms stay stored.

#### **Advertising cookies**

These cookies are also known as targeting cookies. They serve the purpose of delivering customised advertisements to the user. This can be very practical, but also rather annoying.

Upon your first visit to a website you are usually asked which of these cookie-types you want to accept. Furthermore, this decision will of course also be stored in a cookie.

If you want to learn more about cookies and do not mind technical documentation, we recommend <a href="https://tools.ietf.org/html/rfc6265">https://tools.ietf.org/html/rfc6265</a>, the Request for Comments of the Internet Engineering Task Force (IETF) called "HTTP State Management Mechanism".

# Purpose of processing via cookies

The purpose ultimately depends on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

# Which data are processed?

Cookies are little helpers for a wide variety of tasks. Unfortunately, it is not possible to tell which data is generally stored in cookies, but in the privacy policy below we will inform you on what data is processed or stored.

# **Storage period of cookies**

The storage period depends on the respective cookie and is further specified below. Some cookies are erased after less than an hour, while others can remain on a computer for several years.

You can also influence the storage duration yourself. You can manually erase all cookies at any time in your browser (also see "Right of objection" below). Furthermore, the latest instance cookies based on consent will be erased is after you withdraw your consent. The legality of storage will

remain unaffected until then.

#### Right of objection - how can I erase cookies?

You can decide for yourself how and whether you want to use cookies. Regardless of which service or website the cookies originate from, you always have the option of erasing, deactivating or only partially accepting cookies. You can for example block third-party cookies but allow all other cookies.

If you want to find out which cookies have been stored in your browser, or if you want to change or erase cookie settings, you can find this option in your browser settings:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want cookies, you can set up your browser in a way to notify you whenever a cookie is about to be set. This gives you the opportunity to manually decide to either permit or deny the placement of every single cookie. This procedure varies depending on the browser. Therefore, it might be best for you to search for the instructions in Google. If you are using Chrome, you could for example put the search term "delete cookies Chrome" or "deactivate cookies Chrome" into Google.

#### **Legal basis**

The so-called "cookie directive" has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section 165 (3) of the Telecommunications Act (2021). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in Section 15 (3) of the Telemedia Act (TMG).

For absolutely necessary cookies, even if no consent has been given, there are legitimate interests (Article 6 (1) (f) GDPR), which in most cases are of an economic nature. We want to offer our visitors a pleasant user experience on our website. For this, certain cookies often are absolutely necessary.

This is exclusively done with your consent, unless absolutely necessary cookies are used. The legal basis for this is Article 6 (1) (a) of the GDPR.

In the following sections you will find more detail on the use of cookies, provided the used software does use cookies.

#### **Customer Data**

#### **Customer Data Overview**

- Affected parties: Customers or business and contractual partners
- Purpose: Performance of a contract for the provision of agreed services or prior to entering into such a contract, including associated communications.
- Data processed: name, address, contact details, email address, telephone number, payment information (such as invoices and bank details), contract data (such as duration and subject matter of the contract), IP address, order data
- Storage period: the data will be erased as soon as they are no longer required for our business purposes and there is no legal obligation to process them.
- Legal bases: Legitimate interests (Art. 6 Para. 1 lit. f GDPR), Contract (Art. 6 Para. 1 lit. b GDPR)

#### What is customer data?

In order to be able to offer our services and contractual services, we also process data from our customers and business partners. This data always includes personal data. Customer data is all information that is processed on the basis of contractual or pre-contractual agreements so that the offered services can be provided. Customer data is therefore all the information we collect and process about our customers.

#### Why do we process customer data?

There are many reasons why we collect and process customer data. The main reason is that we simply need specific data to provide our services. Sometimes for example your email address may be enough. But if you purchase a product or service, we may e. g. also need data such as your name, address, bank details or other contract data. This data will subsequently be used for marketing and sales optimisation so that we can improve our overall service for our customers and clients. Another important reason for data processing is our customer service, which is very important to us. We want you to have the opportunity to contact us at any time with questions about our offers. Thus, we may need certain data such as your email address at the very least.

# What data is processed?

Exactly which data is stored can only be shown by putting them in categories. All in all, it always depends on which of our services you receive. In some cases, you may only give us your email address so that we can e. g. contact you or answer your questions. In other instances, you may purchase one of our products or services. Then we may need significantly more information, such as your contact details, payment details and contract details.

Here is a list of potential data we may receive and process:

- Name
- Contact address
- Email address
- Phone number

- Your birthday
- Payment data (invoices, bank details, payment history, etc.)
- Contract data (duration, contents)
- Usage data (websites visited, access data, etc.)
- Metadata (IP address, device information)

#### How long is the data stored?

We erase corresponding customer data as soon as we no longer need it to fulfill our contractual obligations and purposes, and as soon as the data is also no longer necessary for possible warranty and liability obligations. This can for example be the case when a business contract ends. Thereafter, the limitation period is usually 3 years, although longer periods may be possible in individual cases. Of course, we also comply with the statutory retention requirements. Your customer data will certainly not be passed on to third parties unless you have given your explicit consent.

#### **Legal Basis**

The legal basis for the processing of your data is Article 6 Paragraph 1 Letter a GDPR (consent), Article 6 Paragraph 1 Letter b GDPR (contract or pre-contractual measures), Article 6 Paragraph 1 Letter f GDPR (legitimate interests) and in special cases (e. g. medical services) Art. 9 (2) lit. GDPR (processing of special categories).

In the case of protecting vital interests, data processing is carried out in accordance with Article 9 Paragraph 2 Letter c. GDPR. For the purposes of health care, occupational medicine, medical diagnostics, care or treatment in the health or social sectors or for the administration of systems and services in health or social sectors, the processing of personal data takes place in accordance with Art. 9 Para. 2 lit. h. GDPR. If you voluntarily provide data of these special categories, the processing takes place on the basis of Article 9 Paragraph 2 lit. a GDPR.

# Registration

#### **Registration Overview**

- Affected parties: Anyone who registers to create an account with us, and logs in to use the account.
- Processed data: Personal data such as email address, name, password and other data that is collected during registration, login and account use.
- Purpose: For the provision of our services, as well as to communicate with clients or customers in the scope of our services.
- Storage period: As long as the company account associated with the texts exists, plus a period of usually 3 years.
- Legal bases: Article 6 paragraph 1 letter b GDPR (contract), Article 6 paragraph 1 letter a GDPR (consent), Article 6 paragraph 1 letter f GDPR (legitimate interests)

If you register with us and provide any personal data, this data may be processed, possibly along with your IP address. Below you can explore what we mean by the rather broad term "personal data".

Please only enter the data we need for the registration. In case you are registering on behalf of a third party, please only enter data for which you have the approval of the party you are registering for. If possible, use a secure password that you don't use anywhere else and an email address that you check regularly.

In the following, we will inform you about the exact type of data processing we do. After all, we want you to feel at ease with the services we provide!

#### What is a registration?

When you register, we retain certain of your data in order to make it easy for you to log in with us online and use your account. An account with us has the advantage that you don't have to re-enter everything every time. It saves time and effort and ultimately prevents any issues with the provision of our services.

## Why do we process personal data?

In short, we process personal data to make account registration and usage possible for you. If we didn't do this, you would have to enter all your data each time, wait for our approval and then enter everything again. This strenuous process would probably not only irritate us a little, but also many of our dear clients and customers.

#### Which data is processed?

Any data that you provided during registration or login and any data that you may enter as part of managing your account data.

During registration, we process the following types of data:

- First name
- Last name
- · Email address
- Company name
- Street + house number
- Residence
- Postcode
- Country

During your registration, we process any data you enter, such as your username and password, along with data that is collected in the background such as your device information and IP addresses.

When using your account, we process any data you enter while using the account, as well as any data that is created while you use our services.

#### Storage time

We store the entered data for at least as long as the account associated with the data exists with us and is in use – and as long as there are contractual obligations between you and us. In case the contract ends, we retain the data until the respective claims get time-barred. Moreover, we store your data as long as we are subject to legal storage obligations, if applicable. Following that, we keep any accounting records (invoices, contract documents, account statements, etc.) of the contract for 10 years (§ 147 AO) and other relevant business documents for 6 years (§ 247 HGB) after accrual.

## Right to object

You have registered, entered data and want to revoke the data processing? Not a problem. As you can see above, you retain this right under the General Data Protection Regulation also at and after registration, login or account creation with us. Contact the Data Protection Officer above to exercise your rights. If you already have an account with us, you can easily view and manage your data and texts in your account.

#### **Legal Basis**

By completing the registration process, you enter into a pre-contractual agreement with us, with the intention to conclude a contract of use for our platform (although there is no automatic payment obligation). You invest time to enter data and register and in return, we offer you our services after you log on to our system and view your customer account. We also meet our contractual obligations. Finally, we need to be able to email registered users about important changes. Article 6(1)(b) GDPR (implementation of pre-contractual measures, fulfilment of a contract) applies.

Where applicable, we will ask for your consent, e.g. in case you voluntarily provide more data than is absolutely necessary, or in case we may ask you if we may send you advertising. Article 6 paragraph 1 lit. a GDPR (consent) applies in this matter.

We also have a legitimate interest in knowing who who our clients or customers are, in order to get in touch if required. We also need to know who is using our services and whether they are being used in accordance with our terms of use, i.e. Article 6(1)(f) GDPR (legitimate interests) applies in this matter.

Note: the following sections are to be ticked by users (as required):

#### Registration with real names

Since business operations require us to know who our clients or customers are, registration is only possible with your real name (full name) and not with a pseudonym.

#### Registration with pseudonyms

You can use a pseudonym for the registration, which means you don't have to register with your

real name. This ensures that your real name cannot be processed by us.

#### Storage of the IP address

During registration, login and account use, we store your IP address for security reasons in order to be able to determine legitimate use.

#### **Public Profile**

User profiles are publicly visible, i.e. parts of the profiles can also be viewed on the Internet without the need to enter a username and password.

#### Two Factor Authentication (2FA)

Two Factor Authentication (2FA) offers additional security when logging in, as it prevents you from logging in without a smartphone, for example. This technical measure to secure your account protects you against the loss of data or unauthorised access, even if your username and password were leaked. During your registration process, login or within the account itself you can find out which 2FA is used.

# Web hosting

#### **Web hosting Overview**

- Affected parties: visitors to the website
- Purpose: professional hosting of the website and security of operations
- Processed data: IP address, time of website visit, browser used and other data. You can find more details on this below or at the respective web hosting provider.
- 🃅 Storage period: dependent on the respective provider, but usually 2 weeks
- Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests)

# What is web hosting?

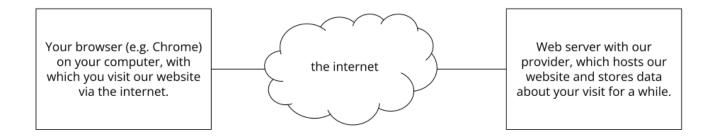
Every time you visit a website nowadays, certain information – including personal data – is automatically created and stored, including on this website. This data should be processed as sparingly as possible, and only with good reason. By website, we mean the entirety of all websites on your domain, i.e. everything from the homepage to the very last subpage (like this one here). By domain we mean example.uk or examplepage.com.

When you want to view a website on a screen, you use a program called a web browser. You probably know the names of some web browsers: Google Chrome, Microsoft Edge, Mozilla Firefox, and Apple Safari.

The web browser has to connect to another computer which stores the website's code: the web server. Operating a web server is complicated and time-consuming, which is why this is usually done by professional providers. They offer web hosting and thus ensure the reliable and flawless storage of website data.

Whenever the browser on your computer establishes a connection (desktop, laptop, smartphone) and whenever data is being transferred to and from the web server, personal data may be processed. After all, your computer stores data, and the web server also has to retain the data for a period of time in order to ensure it can operate properly.

Illustration:



#### Why do we process personal data?

The purposes of data processing are:

- 1. Professional hosting of the website and operational security
- 2. To maintain the operational as well as IT security
- 3. Anonymous evaluation of access patterns to improve our offer, and if necessary, for prosecution or the pursuit of claims.li>

## Which data are processed?

Even while you are visiting our website, our web server, that is the computer on which this website is saved, usually automatically saves data such as

- the full address (URL) of the accessed website (e. g. https://www.examplepage.uk/examplesubpage.html?tid=322587715)
- browser and browser version (e.g. Chrome 87)
- the operating system used (e.g. Windows 10)
- the address (URL) of the previously visited page (referrer URL) (e. g. https://www.examplepage.uk/icamefromhere.html/)
- the host name and the IP address of the device from the website is being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- date and time
- in so-called web server log files

## How long is the data stored?

Generally, the data mentioned above are stored for two weeks and are then automatically deleted. We do not pass these data on to others, but we cannot rule out the possibility that this data may be viewed by the authorities in the event of illegal conduct.

**In short:** Your visit is logged by our provider (company that runs our website on special computers

(servers)), but we do not pass on your data without your consent!

#### **Legal basis**

The lawfulness of processing personal data in the context of web hosting is justified in Art. 6 para. 1 lit. f GDPR (safeguarding of legitimate interests), as the use of professional hosting with a provider is necessary to present the company in a safe and user-friendly manner on the internet, as well as to have the ability to track any attacks and claims, if necessary.

# **STRATO Privacy Policy**

We use STRATO for our website, which is a web hosting provider, among other things. The provider of this service is the German company STRATO AG, Pascalstraße 10, 10587 Berlin, Germany. You can find out more about the data that is processed through the use of STRATO in their Privacy Policy at <a href="https://www.strato.de/datenschutz">https://www.strato.de/datenschutz</a>.

# **Data Processing Agreement (DPA) STRATO**

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with STRATO. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".

This contract is required by law because STRATO processes personal data on our behalf. It clarifies that STRATO may only process data they receive from us according to our instructions and must comply with the GDPR.

# **Website Builders Introduction**

#### **Website Builders Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: service optimisation
- Data processed: The data that is being processed includes but is not limited to technical usage information, browser activity, clickstream activity, session heat maps, contact details, IP addresses or geographic locations. You can find more details in the Privacy Policy below as well as in the providers' Privacy Policies.
- 5 Storage duration: depends on the provider
- 🙅 Legal bases: Art. 6 (1) lit. f GDPR (legitimate interests), Art. 6 (1) lit. a GDPR (consent)

#### What are website builders?

We use a modular website builder for our website. This is a special form of Content Management System (CMS). Website builders enable website operators to create websites very easily and without any programming knowledge. In many cases, web hosts also offer website builders. Your personal data may be collected, stored and processed if a website builder is being used. In this Privacy Policy, you will find general information about data that is processed by such modular website builder systems. You can find more information in the respective provider's Privacy Policy.

## Why do we use website builders for our website?

The greatest advantage of modular website builders is their ease of use. We want to offer you a clear, simple and nicely designed website that we can easily operate and maintain by ourselves – without needing any external support. Nowadays website builders offer many helpful functions that we can use even without having any programming knowledge. This enables us to design our website according to our wishes and therefore, to give you an informative and pleasant experience on our website.

#### Which data are stored by website builders?

First of all, the exact data that is stored depends on the website builder that is being used. Each provider processes and collects different data from website visitors. However, technical usage information such as users' operating system, browser, screen resolution, language and keyboard settings, hosting provider as well as the date of the website visit are usually collected. Moreover, tracking data (e. g. browser activity, clickstream activities, session heat maps, etc.) may also be processed. The same goes for personal data, since data such as contact information e. g. email address, telephone number (if you have provided it), IP address and geographic location data may also be processed and stored. In the respective provider's Privacy Policy you can find out exactly which of your data is getting stored.

#### How long and where are the data stored?

Provided that we have any further information on this, we will inform you below about the duration of the data processing associated with the website builder we use. You can find detailed information on this in the provider's Privacy Policy. Generally, we only process personal data for as long as is absolutely necessary to provide our services and products. The provider may store your data according to their own specifications, over which we have no influence.

# Right to object

You always retain the right to information, rectification and erasure of your personal data. If you have any questions, you can also contact the responsible parties at the respective website builder system at any time. You can find the corresponding contact details either in our Privacy Policy or on the website of the respective provider.

What is more, in your browser you can clear, disable or manage cookies that providers use for their functions. Depending on the browser you use, this can be done in different ways. Please note, that this may lead to not all functions working as usual anymore.

### **Legal Bases**

We have a legitimate interest in using a website builder system to optimise our online service and present it in an efficient and user-friendly way. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use the website builder system if you have consented to it.

If the processing of data is not absolutely necessary for the operation of the website, your data will only be processed on the basis of your consent. This particularly applies to tracking activities. The legal basis for this is Article 6 (1) (a) GDPR.

With this Privacy Policy, we have made you more familiar with the most important general information on data processing. If you want to find out more about this, you will find further information – if available – in the following section or in the Privacy Policy of the provider.

# **WordPress.com Privacy Policy**

#### **WordPress.com Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: service optimisation
- Processed data: data such as technical usage information like browser activity, clickstream activities, session heat maps and contact details, IP addresses or geographic locations. You can find more details on this in the Privacy Policy below.
- 📅 Storage period: It depends primarily on the type of stored data and the specific settings.
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What is WordPress?

We use the well-known Content Management System WordPress.com for our website. The service provider is the American company Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA.

Founded in 2003, the company quickly became one of the most renowned Content Management Systems (CMS) worldwide. A CMS is software that helps us design our website and present content in an organized manner. Content can include text, audio, and video.

By using WordPress, personal data may be collected, stored, and processed. Typically, technical data such as operating system, browser, screen resolution, or hosting provider is stored. However, personal data such as IP address, geographical data, or contact information may also be processed.

## Why do we use WordPress on our website?

We have many strengths, but real programming is not exactly our core competence.

Nevertheless, we want to have a powerful and attractive website that we can manage and maintain ourselves. With a website builder or Content Management System like WordPress, that's exactly possible. With WordPress, we don't have to be programming experts to offer you a beautiful website. Thanks to WordPress, we can operate our website quickly and easily without technical expertise. If technical problems arise or we have special requests for our website, we still have our experts who feel at home in HTML, PHP, CSS, and the like.

Due to the easy usability and comprehensive features of WordPress, we can design our web presence according to our wishes and provide you with good user-friendliness.

## What data does WordPress process?

Non-personal data includes technical usage information such as browser activity, clickstream activities, session heatmaps, and data about your computer, operating system, browser, screen resolution, language and keyboard settings, internet provider, and the date of the page visit.

Personal data is also collected. Primarily, this includes contact details (email address or phone number if you provide them), IP address, or your geographical location.

WordPress may also use cookies to collect data. These often include data about your behavior on our website. For example, it can be recorded which subpages you particularly like to view, how long you stay on individual pages, when you leave a page again (bounce rate), or which preferences (e.g., language selection) you have made. Based on this data, WordPress can better tailor its own marketing measures to your interests and user behavior. The next time you visit our website, WordPress will display our website according to the settings you made beforehand.

WordPress can also use technologies such as pixel tags (web beacons) to clearly identify you as a user and possibly offer interest-based advertising.

#### How long and where are the data stored?

The storage duration of the data depends on various factors. It mainly depends on the type of data stored and the specific settings of the website. In general, data is deleted by WordPress when it is no longer needed for its own purposes. There are exceptions, especially if legal obligations prescribe a longer retention of data. Web server logs containing your IP address and technical data are deleted by WordPress or Automattic after 30 days. During this time, Automattic uses the data to analyze traffic on its own websites (for example, all WordPress sites) and to address possible issues. Deleted content on WordPress websites is also kept in the trash for 30 days to enable recovery; afterward, they can remain in backups and caches until deleted. The data is stored on American servers by Automattic.

# How can I delete my data or prevent data storage?

You have the right and the opportunity to access your personal data at any time and to object to its use and processing. You can also submit a complaint to a state supervisory authority at any time.

In your browser, you also have the option to individually manage, delete, or deactivate cookies. Please note, however, that deactivated or deleted cookies may have possible negative effects on the functions of our WordPress site. Depending on which browser you use, managing cookies works slightly differently. You can find the respective links to the instructions of the most well-known browsers under the "Cookies" section.

## **Legal basis**

If you have given your consent for WordPress to be used, the legal basis for the corresponding data processing is this consent. According to Art. 6 para. 1 lit. a DSGVO (consent), this consent is the legal basis for the processing of personal data, as may occur when collected by WordPress.

From our side, there is also a legitimate interest in using WordPress to optimize our online service and present it beautifully for you. The corresponding legal basis for this is Art. 6 para. 1 lit. f DSGVO (legitimate interests). However, we only use WordPress to the extent that you have given your consent.

WordPress or Automattic also processes data from you in the USA. Automattic is an active participant in the EU-US Data Privacy Framework, regulating the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

In addition, Automattic uses so-called Standard Contractual Clauses (Art. 46 para. 2 and 3 DSGVO). Standard Contractual Clauses (SCC) are model templates provided by the European Commission and are intended to ensure that your data complies with European data protection standards, even when transmitted and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and through the Standard Contractual Clauses, Automattic undertakes to comply with the European level of data protection when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the European Commission. You can find the decision and the corresponding Standard Contractual Clauses, among other places, here:

https://eur-lex.europa.eu/eli/dec\_impl/2021/914/oj?locale=de.

More details about the privacy policy and what data is processed in what way by WordPress can be found at <a href="https://automattic.com/privacy/">https://automattic.com/privacy/</a>.

# Data Processing Agreement (DPA) WordPress.com

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with WordPress.com. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".

This contract is required by law because WordPress.com processes personal data on our behalf. It clarifies that WordPress.com may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Agreement (DPA) under <a href="https://wordpress.com/support/data-processing-agreements/">https://wordpress.com/support/data-processing-agreements/</a>.

# **Web Analytics**

#### **Web Analytics Privacy Policy Overview**

- Affected parties: visitors to the website
- Purpose: Evaluation of visitor information to optimise the website.
- Processed data: Access statistics that contain data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this from the respective web analytics tool directly.
- The Storage period: depending on the respective web analytics tool used
- 🙅 Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What is Web Analytics?

We use software on our website, which is known as web analytics, in order to evaluate website visitor behaviour. Thus, data is collected, which the analytic tool provider (also called tracking tool) stores, manages and processes. Analyses of user behaviour on our website are created with this data, which we as the website operator receive. Most tools also offer various testing options. These enable us, to for example test which offers or content our visitors prefer. For this, we may show you two different offers for a limited period of time. After the test (a so-called A/B test) we know which product or content our website visitors find more interesting. For such testing as well as for various other analyses, user profiles are created and the respective data is stored in cookies.

#### Why do we run Web Analytics?

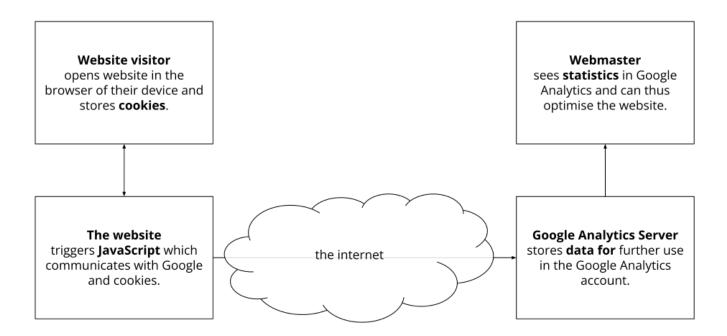
We have a clear goal in mind when it comes to our website: we want to offer our industry's best website on the market. Therefore, we want to give you both, the best and most interesting offer as well as comfort when you visit our website. With web analysis tools, we can observe the behaviour of our website visitors, and then improve our website accordingly for you and for us. For example, we can see the average age of our visitors, where they come from, the times our website gets visited the most, and which content or products are particularly popular. All this information helps us to optimise our website and adapt it to your needs, interests and wishes.

## Which data are processed?

The exact data that is stored depends on the analysis tools that are being used. But generally, data such as the content you view on our website are stored, as well as e. g. which buttons or links you click, when you open a page, which browser you use, which device (PC, tablet, smartphone, etc.) you visit the website with, or which computer system you use. If you have agreed that location data may also be collected, this data may also be processed by the provider of the web analysis tool.

Moreover, your IP address is also stored. According to the General Data Protection Regulation (GDPR), IP addresses are personal data. However, your IP address is usually stored in a pseudonymised form (i.e. in an unrecognisable and abbreviated form). No directly linkable data such as your name, age, address or email address are stored for testing purposes, web analyses and web optimisations. If this data is collected, it is retained in a pseudonymised form. Therefore, it cannot be used to identify you as a person.

The following example shows Google Analytics' functionality as an example for client-based web tracking with JavaScript code.



The storage period of the respective data always depends on the provider. Some cookies only retain data for a few minutes or until you leave the website, while other cookies can store data for several years.

#### **Duration of data processing**

If we have any further information on the duration of data processing, you will find it below. We generally only process personal data for as long as is absolutely necessary to provide products and services. The storage period may be extended if it is required by law, such as for accounting purposes for example for accounting.

## Right to object

You also have the option and the right to revoke your consent to the use of cookies or third-party providers at any time. This works either via our cookie management tool or via other opt-out functions. For example, you can also prevent data processing by cookies by managing, deactivating or erasing cookies in your browser.

## **Legal basis**

The use of Web Analytics requires your consent, which we obtained with our cookie popup. According to **Art. 6 para. 1 lit. a of the GDPR (consent)**, this consent represents the legal basis for the processing of personal data, such as by collection through Web Analytics tools.

In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors, which enables us to technically and economically improve our offer. With Web Analytics, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f of the GDPR (legitimate interests)**. Nevertheless, we only use these tools if you have given your consent.

Since Web Analytics tools use cookies, we recommend you to read our privacy policy on cookies. If you want to find out which of your data are stored and processed, you should read the privacy policies of the respective tools.

If available, information on special Web Analytics tools can be found in the following sections.

# **Google Analytics Privacy Policy**

#### **Google Analytics Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: Evaluation of visitor information to optimise the website.
- Processed data: Access statistics that contain data such as the location of access, device data, access duration and time, navigation behaviour and click behaviour. You can find more details on this in the privacy policy below.
- The Storage period: Customizable, GA4 stores data for 14 months by default.
- Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What is Google Analytics?

On our website, we use the analytics tracking tool Google Analytics in the Google Analytics 4 (GA4) version provided by the American company Google Inc. For the European region, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. Google Analytics collects data about your actions on our website. By combining various technologies such as cookies, device IDs, and login information, you can be identified as a user across different devices. This allows your actions to be analyzed across platforms as well.

For example, when you click on a link, this event is stored in a cookie and sent to Google Analytics. With the reports we receive from Google Analytics, we can better tailor our website and service to your needs. In the following, we will provide more information about the tracking tool and specifically inform you about the data processed and how you can prevent it.

Google Analytics is a tracking tool used for website traffic analysis. The basis for these measurements and analyses is a pseudonymous user identification number. This number does not include personally identifiable information such as name or address but is used to assign events to a device. GA4 utilizes an event-based model that captures detailed information about user interactions such as page views, clicks, scrolling, and conversion events. Additionally, GA4 incorporates various machine learning features to better understand user behavior and certain trends. GA4 employs modeling through machine learning capabilities, meaning that based on the collected data, missing data can be extrapolated to optimize the analysis and provide forecasts.

In order for Google Analytics to function properly, a tracking code is embedded in the code of our website. When you visit our website, this code records various events that you perform on our website. With GA4's event-based data model, we, as website operators, can define and track specific events to obtain analyses of user interactions. This allows us to track not only general information such as clicks or page views but also specific events that are important for our business, such as submitting a contact form or making a purchase.

Once you leave our website, this data is sent to and stored on Google Analytics servers.

Google processes the data, and we receive reports on your user behavior. These reports can include, among others, the following:

- Audience reports: Audience reports help us get to know our users better and gain a more precise understanding of who is interested in our service.
- Advertising reports: Advertising reports make it easier for us to analyze and improve our online advertising.
- Acquisition reports: Acquisition reports provide helpful information on how we can attract more people to our service.
- Behavior reports: Here, we learn about how you interact with our website. We can track the path you take on our site and which links you click on.
- Conversion reports: Conversion refers to an action you take as a result of a marketing message, such as going from being a website visitor to becoming a buyer or newsletter subscriber. Through these reports, we gain insights into how our marketing efforts resonate with you, with the aim of improving our conversion rate.
- Real-time reports: With real-time reports, we can see what is currently happening on our website. For example, we can see how many users are currently reading this text.

In addition to the above-mentioned analysis reports, Google Analytics 4 also offers the following functions:

- Event-based data model: This model captures specific events that can occur on our website, such as playing a video, making a purchase, or subscribing to our newsletter.
- Advanced analytics features: With these features, we can gain a better understanding of your behavior on our website or certain general trends. For example, we can segment user groups, conduct comparative analyses of target audiences, or track your path on our website.
- Predictive modeling: Based on the collected data, missing data can be extrapolated through machine learning to predict future events and trends. This can help us develop better marketing strategies.
- Cross-platform analysis: Data collection and analysis are possible from both websites and apps. This enables us to analyze user behavior across platforms, provided you have consented to data processing.

## Why do we use Google Analytics on our website?

Our goal with this website is clear: we want to provide you with the best possible service. The statistics and data from Google Analytics help us achieve this goal.

The statistically evaluated data gives us a clear picture of the strengths and weaknesses of our website. On one hand, we can optimize our site to make it more easily found by interested people on Google. On the other hand, the data helps us better understand you as a visitor. We know exactly what we need to improve on our website in order to provide you with the best possible service. The data also helps us conduct our advertising and marketing activities in a more personalized and cost-effective manner. After all, it only makes sense to show our products and services to people who are interested in them.

## What data is stored by Google Analytics?

With the help of a tracking code, Google Analytics creates a random, unique ID associated with your browser cookie. This way, Google Analytics recognizes you as a new user, and a user ID is assigned to you. When you visit our site again, you are recognized as a "returning" user. All collected data is stored together with this user ID, making it possible to evaluate pseudonymous user profiles.

To analyze our website with Google Analytics, a property ID must be inserted into the tracking code. The data is then stored in the corresponding property. For each newly created property, the default is Google Analytics 4 Property. The data storage duration varies depending on the property used.

Through identifiers such as cookies, app instance IDs, user IDs, or custom event parameters, your interactions, if you have consented, are measured across platforms. Interactions encompass all types of actions you perform on our website. If you also use other Google systems (such as a Google account), data generated through Google Analytics can be linked to third-party cookies. Google does not disclose Google Analytics data unless we, as website operators, authorize it, except when required by law.

According to Google, IP addresses are not logged or stored in Google Analytics 4. However, IP address data is used by Google for deriving location data and is immediately deleted thereafter. All IP addresses collected from users in the EU are deleted before the data is stored in a data center or on a server.

Since GA4 focuses on event-based data, the tool uses significantly fewer cookies compared to previous versions such as Google Universal Analytics. However, there are still some specific cookies used by GA4. These can include:

Name: \_ga

Value: 2.1326744211.152322587715-5

Purpose: By default, analytics.js uses the \_ga cookie to store the user ID. It is used to distinguish

website visitors.

Expiration: After 2 years

Name: \_gid

Value: 2.1687193234.152322587715-1

**Purpose:** This cookie is also used to distinguish website visitors.

**Expiration:** After 24 hours

Name: gat\_gtag\_UA Value: 1

Purpose: Used to reduce the request rate. If Google Analytics is deployed via Google Tag Manager,

this cookie will be named dc\_gtm.

**Expiration:** After 1 minute

**Note:** This list cannot claim to be exhaustive, as Google may change their choice of cookies from time to time. GA4 aims to improve data privacy and offers several options for controlling data collection. For example, we can determine the storage duration ourselves and control data.

Here we provide an overview of the main types of data collected by Google Analytics:

**Heatmaps:** Google creates heatmaps to show the exact areas you click on. This provides us with information about your interactions on our site.

**Session Duration:** Google refers to session duration as the time you spend on our site without leaving. If you are inactive for 20 minutes, the session automatically ends.

**Bounce Rate:** Bounce rate refers to when you view only one page on our website and then leave.

**Account Creation:** If you create an account or place an order on our website, Google Analytics collects this data.

**Location:** IP addresses are not logged or stored in Google Analytics. However, location data is derived shortly before the IP address is deleted.

**Technical Information:** Technical information includes your browser type, internet service provider, and screen resolution, among others.

**Source of Origin:** Google Analytics is interested in the website or advertisement that brought you to our site.

Additional data may include contact information, reviews, media playback (e.g., if you play a video on our site), sharing of content via social media, or adding to favorites. This list is not exhaustive and serves only as a general guide to the data storage by Google Analytics.

## Where and how long are the data stored?

Google has servers distributed worldwide. You can find precise information about the locations of Google data centers at: <a href="https://www.google.com/about/datacenters/locations/?hl=en">https://www.google.com/about/datacenters/locations/?hl=en</a>

Your data is distributed across multiple physical storage devices. This ensures faster access to data and better protection against manipulation. Each Google data center has emergency programs in place for your data. In the event of hardware failure or natural disasters, the risk of service interruption at Google remains low.

The retention period of data depends on the properties used. The storage duration is always set separately for each individual property. Google Analytics offers us four options for controlling the storage duration:

- 2 months: This is the shortest storage period.
- 14 months: By default, data is stored in GA4 for 14 months.
- 26 months: Data can also be stored for 26 months.
- Data is only deleted manually.

In addition, there is also the option for data to be deleted only if you do not visit our website within the selected time period. In this case, the retention period is reset every time you revisit our website within the defined time frame.

Once the defined period has expired, the data is deleted once a month. This retention period applies to data linked to cookies, user identification, and advertising IDs (e.g., cookies from the DoubleClick domain). Report results are based on aggregated data and are stored independently of user data. Aggregated data is a combination of individual data into larger units.

#### How can I delete my data or prevent data storage?

Under the data protection laws of the European Union, you have the right to access, update, delete, or restrict your data. By using the browser add-on to deactivate Google Analytics JavaScript (analytics.js, gtag.js), you can prevent Google Analytics 4 from using your data. You can download and install the browser add-on at: <a href="https://tools.google.com/dlpage/gaoptout?hl=en">https://tools.google.com/dlpage/gaoptout?hl=en</a> Please note that this add-on only disables data collection by Google Analytics.

If you want to disable, delete, or manage cookies in general, you can find the respective instructions for the most common browsers in the "Cookies" section.

#### **Legal basis**

The use of Google Analytics requires your consent, which we obtained through our cookie popup. According to **Art. 6(1)(a) of the GDPR**, this consent constitutes the legal basis for the processing of personal data that may occur during the collection by web analytics tools.

In addition to consent, we also have a legitimate interest in analyzing the behavior of website visitors to improve our offering technically and economically. By using Google Analytics, we can identify website errors, detect attacks, and improve efficiency. The legal basis for this is **Art. 6(1)(f) of the GDPR** (legitimate interests). However, we only use Google Analytics if you have given your consent.

Google processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> en.

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

You can find the Google Ads Data Processing Terms, which refer to the Standard Contractual Clauses, at: <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>

We hope we have provided you with the most important information regarding the data processing

by Google Analytics. If you want to learn more about the tracking service, we recommend the following links: <a href="https://marketingplatform.google.com/about/analytics/terms/en/">https://marketingplatform.google.com/about/analytics/terms/en/</a> and <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>

If you want to learn more about data processing, you can refer to the Google Privacy Policy at: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>.

# **Data Processing Agreement (DPA) Google Analytics**

In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with Google Analytics. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".

This contract is required by law because Google Analytics processes personal data on our behalf. It clarifies that Google Analytics may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the Data Processing Terms under <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>.

# Google Analytics Reports on demographic characteristics and interests

You can terminate the use of your Google Account's activities and information in "Ads Settings" at <a href="https://adssettings.google.com/authenticated">https://adssettings.google.com/authenticated</a> via a checkbox.

# **Google Tag Manager Privacy Policy**

#### **Google Tag Manager Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: Organisation of individual tracking tools
- Processed data: Google Tag Manager itself does not store any data. The data record tags of the web analytics tools used.
- To Storage period: depending on the web analytics tool used
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

# What is Google Tag Manager?

We use Google Tag Manager by the company Google Inc. (1600 Amphitheatre Parkway Mountain

View, CA 94043, USA) for our website.

This Tag Manager is one of Google's many helpful marketing products. With it, we can centrally integrate and manage code sections of various tracking tools, that we use on our website.

In this privacy statement we will explain in more detail, what Google Tag Manager does, why we use it and to what extent your data is processed.

Google Tag Manager is an organising tool with which we can integrate and manage website tags centrally and via a user interface. Tags are little code sections which e.g. track your activities on our website. For this, segments of JavaScript code are integrated to our site's source text. The tags often come from Google's intern products, such as Google Ads or Google Analytics, but tags from other companies can also be integrated and managed via the manager. Since the tags have different tasks, they can collect browser data, feed marketing tools with data, embed buttons, set cookies and track users across several websites.

### Why do we use Google Tag Manager for our website?

Everybody knows: Being organised is important! Of course, this also applies to maintenance of our website. In order to organise and design our website as well as possible for you and anyone who is interested in our products and services, we rely on various tracking tools, such as Google Analytics. The collected data shows us what interests you most, which of our services we should improve, and which other persons we should also display our services to. Furthermore, for this tracking to work, we must implement relevant JavaScript Codes to our website. While we could theoretically integrate every code section of every tracking tool separately into our source text, this would take too much time and we would lose overview. This is the reason why we use Google Tag Manager. We can easily integrate the necessary scripts and manage them from one place. Additionally, Google Tag Manager's user interface is easy to operate, and requires no programming skills. Therefore, we can easily keep order in our jungle of tags.

## What data is stored by Google Tag Manager?

Tag Manager itself is a domain that neither uses cookies nor stores data. It merely functions as an "administrator" of implemented tags. Data is collected by the individual tags of the different web analysis tools. Therefore, in Google Tag Manager the data is sent to the individual tracking tools and does not get saved.

However, with the integrated tags of different web analysis tools such as Google Analytics, this is quite different. Depending on the analysis tool used, various data on your internet behaviour is collected, stored and processed with the help of cookies. Please read our texts on data protection for more information on the articular analysis and tracking tools we use on our website.

We allowed Google via the account settings for the Tag Manager to receive anonymised data from us. However, this exclusively refers to the use of our Tag Manager and not to your data, which are saved via code sections. We allow Google and others, to receive selected data in anonymous form. Therefore, we agree to the anonymised transfer of our website data. However, even after extensive research we could not find out what summarised and anonymous data it is exactly that gets transmitted. What we do know is that Google deleted any info that could identify our website.

Google combines the data with hundreds of other anonymous website data and creates user trends as part of benchmarking measures. Benchmarking is a process of comparing a company's results with the ones of competitors. As a result, processes can be optimised based on the collected information.

#### How long and where is the data stored?

When Google stores data, this is done on Google's own servers. These servers are located all over the world, with most of them being in America. At <a href="https://www.google.com/about/datacenters/inside/locations/?hl=en">https://www.google.com/about/datacenters/inside/locations/?hl=en</a> you can read in detail where Google's servers are.

In our individual data protection texts on the different tools you can find out how long the respective tracking tools store your data.

#### How can I delete my data or prevent data retention?

Google Tag Manager itself does not set any cookies but manages different tracking websites' tags. In our data protection texts on the different tracking tools you can find detailed information on how you can delete or manage your data.

Please note that when using this tool, your data may also be stored and processed outside the EU. Most third countries (including the USA) are not considered secure under current European data protection law. Data must not be transferred, stored and processed to insecure third countries, unless there are suitable guarantees (such as EU standard contractual clauses) between us and the non-European service provider.

#### **Legal basis**

The use of the Google Tag Manager requires your consent, which we obtained via our cookie popup. According to **Art. 6 para. 1 lit. a GDPR (consent)**, this consent is the legal basis for personal data processing, such as when it is collected by web analytics tools.

In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors and thus technically and economically improving our offer. With the help of Google Tag Managers we can also improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. We only use Google Tag Manager if you have given us your consent.

Google processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy

Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

You can find the Google Ads Data Processing Terms, which refer to the Standard Contractual Clauses, at: <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>

If you want to learn more about Google Tag Manager, we recommend their FAQs at <a href="https://support.google.com/tagmanager/?hl=en#topic=3441530">https://support.google.com/tagmanager/?hl=en#topic=3441530</a>.

# YouTube Analytics and Reporting API Privacy Policy

We use the web analysis tool YouTube Analytics and Reporting API on our website. The provider of this service is the American company Google Inc. The responsible entity for the European region is the Irish company Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Irland).

Google processes data from you, among other things, in the USA. Google is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf</a> en.

Additionally, Google uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Google commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

You can find more information about the standard contractual clauses at Google at <a href="https://business.safety.google/intl/en/adsprocessorterms/">https://business.safety.google/intl/en/adsprocessorterms/</a>.

Since YouTube is a subsidiary of Google, they share the same privacy policy. If you want to find out more about how your data is handled, we recommend you read the privacy policy at <a href="https://policies.google.com/privacy?hl=en.">https://policies.google.com/privacy?hl=en.</a>

# **Content Delivery Networks**

#### **Content Delivery Networks Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: Service performance optimisation (to increase website loading speeds)
- Processed data: data such as your IP address

You can find more details on this below as well as in the individual Privacy Policies.

- Storage period: most data is stored until it is no longer needed for the provision of the service.
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What is a Content Delivery Network?

On our website we use a so-called content delivery network or CDN. This helps to load our website quickly and easily, regardless of your location. Moreover, your personal data will also be stored, managed and processed on the respective CDN provider's servers. In the following, we will go into more general detail on this service and the data processing associated with it. You can find detailed information on how your data is handled in the provider's Privacy Policy.

Each content delivery network (CDN) is a network of regionally distributed servers that are connected to each other via the internet. Through this network, website content (especially very large files) can be delivered quickly and smoothly, even when large loading peaks occur. To make this possible, CDNs create a copy of our website on their servers. The website can be delivered quickly because these servers are distributed all around the world. Any data transfer to your browser is therefore significantly shortened by the CDN.

### Why do we use a Content Delivery Network for our website?

A fast loading website is part of our service. Of course, we know how annoying it is when a website loads at a snail's pace. Most of the time, you lose your patience and click away before the website is fully loaded. But of course we want to avoid that. Therefore, to us a fast loading website is an obligatory part of our website offer. With the use of a content delivery network, our website loads significantly faster in your browser. Furthermore, CDNs are particularly helpful when you are abroad, as the website is always delivered from a server in your area.

## Which data are processed?

If you access a website or its content and it gets cached in a CDN, the CDN forwards the request to the server closest to you which then delivers the content. Content delivery networks are built in a way that JavaScript libraries can be downloaded and hosted on npm and Github servers.

Alternatively, WordPress plugins can also be loaded on most CDNs, provided they are hosted on WordPress.org. Moreover, your browser can send personal data to the content delivery network we use. This includes data such as IP addresses, browser type, browser version, the accessed website or the time and date of the page visit. This data is collected and stored by the CDN. Whether cookies are used for data storage depends on the network that is being used. For more information on this, please read the Privacy Policy of the respective service.

#### Right to object

If you want to prevent this data transfer altogether, you can use a JavaScript blocker (see for example <a href="https://noscript.net/">https://noscript.net/</a>) on your computer. However, our website can then of course no longer offer its usual service (such as a fast loading speeds).

#### **Legal basis**

If you have consented to the use of a content delivery network, your consent represents the the legal basis for the corresponding data processing. According to **Art. 6 paragraph 1 lit. a (consent)** your consent represents the legal basis for the processing of personal data, as it can occur when collected by a content delivery network.

We also have a legitimate interest in using a content delivery network to optimise our online service and make it more secure. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR** (**legitimate interests**). Nevertheless, we only use the tool if you have consented to it.

Provided this information is available, you can find out more about the particular content delivery networks in the following sections.

### **Miscellaneous Overview**

#### **Miscellaneous Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: Improvement of user experience
- Processed data: The processed data depends heavily on the services used. Usually, it is an IP address and/or technical data. You can find more details on this in the sections of the respective tools.
- The storage duration: depends on the tools used
- Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

#### What is included in "Miscellaneous"?

The "Miscellaneous" category includes any services that do not fit into any of the above categories. Usually, they are various plugins and integrated elements that are meant to improve our website. Generally, these functions are obtained from third parties and integrated into our website. They may e.g. be web search services such as Algolia Place, Giphy, Programmable Search Engine or online services for weather data such as OpenWeather.

## Why do we use these third parties?

With our website, we want to provide you with the best web offer in our industry. Websites have long been so much more than just a business card for companies. Instead, they are a place designed to help you find what you're looking for. And in order to make our website even more interesting and helpful for you, we use various third-party services.

#### Which data is processed?

Whenever elements are integrated into our website, your IP address will be transmitted to the respective provider, where it will be stored and processed. This is necessary to send the content to your browser which will then display it for you. Moreover, service providers may also use pixel tags or web beacons. These are small graphics on websites that can record a log file and create analyses of it. Providers can improve their own marketing measures with the information they receive this way. In addition to pixel tags, this information (e.g. which button you click or when you access which page) can also be stored in cookies. In addition to data analyses on your web behaviour, technical information such as your browser type or operating system may also be stored there. Some providers can also link the data they obtain to other internal services or to third-party providers. Each provider handles your data differently. Therefore, we recommend you carefully read the privacy policies of the respective services. We make every effort to only use services that operate very carefully in regards to data protection and privacy.

#### **Duration of data processing**

Below we will inform you about the duration of data processing, provided we have further information on this. In general, we only process personal data for as long as is absolutely necessary for the provision of our services and products.

#### **Legal Basis**

If we ask for your consent and you agree to us using a service, this consent serves as the legal basis for the processing of your data (Article 6 (1) (a) GDPR). In addition to your consent, we have a legitimate interest in analysing the behaviour of our website visitors and thus technically and economically improving our offer. The legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use any tools if you have given your consent.

Information on the special tools – if available – can be found in the following sections.

# **WooCommerce Privacy Policy**

#### **WooCommerce Privacy Policy Overview**

- Affected parties: website visitors
- Purpose: service optimisation
- Processed data: data such as IP address, browser information, preset language settings as well as date and time of web access
- You can find more details on this in the Privacy Policy below.
- Storage period: Server log files, technical data and IP addresses will be erased after about 30 days
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

#### What is WooCommerce?

We have integrated the open-source shop system WooCommerce to our website as a plugin. This WooCommerce plugin is based on the content management system WordPress, which is a subsidiary company of Automattic Inc. (60 29th Street #343, San Francisco, CA 94110, USA). Through the implemented functions, data are stored and sent to Automattic Inc where they are processed. In this privacy policy we want to inform you on what data this is, how the network uses this data and how you can manage or prevent data retention.

WooCommerce is an online shop system that has been part of the WordPress directory since 2011 and was specially developed for WordPress websites. It is a customisable, open source eCommerce platform that is based on WordPress. It has been integrated into our website as a WordPress plugin.

### Why do we use WooCommerce on our website?

We use this practical online shop system, to be able to offer you our physical or digital products or services in the best possible way on our website. The aim is to give you easy and easy access to our offer, so that you can quickly and easily navigate to the products you want. With WooCommerce we have found a good plugin that meets our requirements for an online shop.

### What data is stored by WooCommerce?

Information that you actively enter to a text field in our online shop can be collected and stored by WooCommerce or Automattic. Hence, if you register with us or order a product, Automattic may collect, process and save this data. In addition to email address, name or address, this can also be your credit card or billing information. Subsequently, Automattic can also use this information for their own marketing campaigns.

There is also evidence that Automattic automatically collects information on you in so-called server log files:

- IP-address
- Browser information
- Pre-set language settings
- Date and time of the web access

Moreover, WooCommerce sets cookies in your browser and uses technologies such as pixel tags (web beacons), to for example clearly identify you as a user and to be able to offer interest-based advertising. WooCommerce uses several different cookies, which are placed depending on the user action. This means that if you for example add a product to the shopping cart, a cookie is set so that the product remains in the shopping cart when you leave our website and come back later.

Below we want to show you an example list of possible cookies that may be set by WooCommerce:

Name: woocommerce\_items\_in\_cart

Value: 1

Purpose: This cookie helps WooCommerce to determine when the contents of the shopping cart

change.

Expiry date: after end of session

Name: woocommerce\_cart\_hash

Value: 447c84f810834056ab37cfe5ed27f204322587715-7

**Purpose:** This cookie is also used to recognise and save the changes in your shopping cart.

Expiry date: after end of session

Name: wp\_woocommerce\_session\_d9e29d251cf8a108a6482d9fe2ef34b6

**Value:** 1146%7C%7C1589034207%7C%7C95f8053ce0cea135bbce671043e740322587715-4aa **Purpose:** This cookie contains a unique identifier for you to allow the shopping cart data to be

found in the database. **Expiry date:** after 2 days

## How long and where is the data stored?

Unless there is a legal obligation to keep data for a longer period, WooCommerce will delete your data if it is no longer needed for the purposes it was saved for. Server log files for example, the technical data for your browser and your IP address will be deleted after about 30 days. This is how long Automattic use the data to analyse the traffic on their own websites (for example all WordPress websites) and to fix possible problems. The data is stored on Automattic's American servers.

## How can I erase my data and prevent data retention?

You have the right to access your personal data anytime, as well as to object to it being used and processed. You can also lodge a complaint with a state supervisory authority anytime.

You can also manage, delete or deactivate cookies individually in your browser. However, please note that deactivated or deleted cookies may have a negative impact on the functions of our WooCommerce online shop. Depending on the browser you use, managing cookies differs slightly. Below you will find links to the instructions for the most common browsers:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

#### **Legal basis**

If you have agreed to the use of WooCommerce, then your consent the legal basis for the corresponding data processing. According to **Art. 6 paragraph 1 lit. a (Consent)** your consent is

the legal basis for the processing of personal data, as can occur when it is collected by WooCommerce.

We also have a legitimate interest in using WooCommerce to optimise our online service and to present our service nicely for you. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR** (**legitimate interests**). Nevertheless, we only use WooCommerce if you have given your consent to it.

Automattic processes data from you, among other things, in the USA. Automattic is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at <a href="https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en">https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\_en</a>.

Additionally, Automattic uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, Automattic commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: <a href="https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847">https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_2847</a>.

You can find more details on WooCommerce's Privacy Policy and on which data is retained as well as how at <a href="https://automattic.com/privacy/">https://automattic.com/privacy/</a> and you can find more general information about WooCommerce at <a href="https://woocommerce.com/">https://woocommerce.com/</a>.

# **Explanation of the terminology used**

We always strive to make our privacy policy as clear and comprehensible as possible. However, this is not always easy, especially when it comes to technical and legal matters. It is often sensible to use legal terms (such as 'personal data)' or certain technical terms (such as 'cookies' or 'IP address'). But we don't want to use such terms without any explanation. This is why you will find an alphabetical list of important terms used below. These are terms we may not yet have sufficiently explained in the privacy policy. In case we have adopted any of these terms from the GDPR which are definitions, we will also list the GDPR texts here and add our own further explanations if necessary.

#### **Processor**

#### **Definition according to Article 4 of the GDPR**

For the purposes of this Regulation, the term means:

"processor" means a natural or legal person, public authority, agency or other body which

processes personal data on behalf of the controller;

**Explanation:** As a company and a website owner, we are responsible for all your data we process (i. e. the 'controller'). In addition to the controller, there may also be so-called processors. This includes any company or person who processes personal data on our behalf. In addition to service providers such as tax consultants, processors can also be hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

# **Closing Remarks**

Congratulations! If you are reading these lines, you have most likely familiarised yourself with our entire Privacy Policy – or at least scrolled down here. As you can see from the scope of our Privacy Policy, we do not take the protection of your personal data lightly.

We find it important to inform you about the processing of your personal data to the best of our abilities. In doing so, we not only want to tell you which data is processed but also explain to you why we use various software programs. In general, Privacy Policies have very technical and legal jargon. However, since most of you are not web developers or solicitors, we wanted to take a different approach and explain the facts in simple and clear language. Of course, this is not always possible due to the subject matter. Therefore, you can also find a more detailed explanation of the most important terms at the end of the Privacy Policy.

If you have any questions about data protection on our website, please do not hesitate to contact us or the responsible body. We wish you all the best and hope to soon welcome you to our website again.

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