

## Privacy Policy

### Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

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## Controller

TerraE GmbH  
Zeche Gustav 1  
63791 Karlstein  
Authorised Representatives: Sven Bauer  
E-mail address: [sales@terrae.com](mailto:sales@terrae.com)  
Phone: 06188 9956-0  
Legal Notice: <https://terrae.com/en/legals/imprint>

## Contact information of the Data Protection Officer

Kompass Datenschutz GmbH  
Jan Besold  
E-Mail: [besold \(at\) kompass-datenschutz.de](mailto:besold@kompass-datenschutz.de)

Telefon: 02233 / 6290596  
Mobil: 01575/ 2623224

## Overview of processing operations

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

### Categories of Processed Data

- Inventory data.
- Employee Data.
- Payment Data.
- Location data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.
- Job applicant details.
- Images and/ or video recordings.
- Audio recordings.
- Event Data (Facebook).
- Log data.
- Creditworthiness Data.

### Categories of Data Subjects

- Service recipients and clients.
- Employees.
- Prospective customers.
- Communication partner.
- Users.
- Job applicants.
- Business and contractual partners.
- Persons depicted.

- Third parties.
- Customers.

## Purposes of Processing

- Provision of contractual services and fulfillment of contractual obligations.
- Communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Targeting.
- Office and organisational procedures.
- Remarketing.
- Conversion tracking.
- Affiliate Tracking.
- Organisational and Administrative Procedures.
- Feedback.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Assessment of creditworthiness.
- Information technology infrastructure.
- Financial and Payment Management.
- Public relations.
- Sales promotion.
- Business processes and management procedures.

## Automated Individual Decision-Making

- Credit report.

## Relevant legal bases

**Relevant legal bases according to the GDPR:** In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in

In addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - the processing is necessary for the protection of the legitimate interests of the controller or a third party, provided that the interests, fundamental rights, and freedoms of the data subject, which require the protection of personal data, do not prevail.

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, data protection laws of the individual federal states may apply.

**Reference to the applicability of the GDPR and the Swiss DPA:** This privacy policy serves both to provide information pursuant to the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the broader spatial application and comprehensibility, the terms used in the GDPR are applied. In particular, instead of the terms used in the Swiss FADP such as "processing" of "personal data", "predominant interest", and "particularly sensitive personal data", the terms used in the GDPR, namely "processing" of "personal data", as well as "legitimate interest" and "special categories of data" are used. However, the legal meaning of these terms will continue to be determined according to the Swiss FADP within its scope of application.

## Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the

nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

**Masking of the IP address:** If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address is shortened (also referred to as "IP masking"). In this process, the last two digits or the last part of the IP address after a full stop are removed or replaced by wildcards. The masking of the IP address is intended to prevent the identification of a person by means of their IP address or to make such identification significantly more difficult.

**Securing online connections through TLS/SSL encryption technology (HTTPS):** To protect the data of users transmitted via our online services from unauthorized access, we employ TLS/SSL encryption technology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are the cornerstones of secure data transmission on the internet. These technologies encrypt the information that is transferred between the website or app and the user's browser (or between two servers), thereby safeguarding the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions conform to the highest security standards. When a website is secured with an SSL/TLS certificate, this is indicated by the display of HTTPS in the URL. This serves as an indicator to users that their data is being securely and encryptedly transmitted.

## Transmission of Personal Data

In the course of processing personal data, it may happen that this data is transmitted to or disclosed to other entities, companies, legally independent organizational units, or individuals. Recipients of this data may include service providers tasked with IT duties or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and particularly conclude relevant contracts or agreements that serve to protect your data with the recipients of your data.

**Data Transmission within the Group of Companies:** We may transfer personal data to other companies within our group of companies or otherwise grant them access to this data. Insofar as this disclosure is for administrative purposes, the disclosure of the data is based on our legitimate business and economic interests or otherwise, if it is necessary to fulfill our

contractual obligations or if the consent of the data subjects or otherwise a legal permission is present.

**Data Transfer within the Organization: Data Transfer within the Corporate Group:** We may transfer personal data to other companies within our corporate group or grant them access to it. If the data is shared for administrative purposes, it is based on our legitimate business and commercial interests or occurs if necessary to fulfil our contractual obligations, or when consent from the individuals concerned has been obtained or a legal permission exists.

## International data transfers

**Data Processing in Third Countries:** If we process data in a third country (i.e., outside the European Union (EU) or the European Economic Area (EEA)), or if the processing is done within the context of using third-party services or the disclosure or transfer of data to other individuals, entities, or companies, this is only done in accordance with legal requirements. If the data protection level in the third country has been recognized by an adequacy decision (Article 45 GDPR), this serves as the basis for data transfer. Otherwise, data transfers only occur if the data protection level is otherwise ensured, especially through standard contractual clauses (Article 46 (2)(c) GDPR), explicit consent, or in cases of contractual or legally required transfers (Article 49 (1) GDPR). Furthermore, we provide you with the basis of third-country transfers from individual third-country providers, with adequacy decisions primarily serving as the foundation. "Information regarding third-country transfers and existing adequacy decisions can be obtained from the information provided by the EU Commission:

[https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection_en).

**EU-US Trans-Atlantic Data Privacy Framework:** Within the context of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the data protection level for certain companies from the USA as secure within the adequacy decision of 10th July 2023. The list of certified companies as well as additional information about the DPF can be found on the website of the US Department of Commerce at <https://www.dataprivacyframework.gov/s/>. We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

## General Information on Data Retention and Deletion

We delete personal data that we process in accordance with legal regulations as soon as the underlying consents are revoked or no further legal bases for processing exist. This applies to cases where the original purpose of processing is no longer applicable or the data is no longer needed. Exceptions to this rule exist if statutory obligations or special interests require a longer retention or archiving of the data.

In particular, data that must be retained for commercial or tax law reasons, or whose storage is necessary for legal prosecution or protection of the rights of other natural or legal persons, must be archived accordingly.

Our privacy notices contain additional information on the retention and deletion of data specifically applicable to certain processing processes.

In cases where multiple retention periods or deletion deadlines for a date are specified, the longest period always prevails.

If a period does not expressly start on a specific date and lasts at least one year, it automatically begins at the end of the calendar year in which the event triggering the period occurred. In the case of ongoing contractual relationships in the context of which data is stored, the event triggering the deadline is the time at which the termination or other termination of the legal relationship takes effect.

Data that is no longer stored for its originally intended purpose but due to legal requirements or other reasons are processed exclusively for the reasons justifying their retention.

**Further information on processing methods, procedures and services used:**

- **Data Retention and Deletion:** The following general deadlines apply for the retention and archiving according to German law:
  - 10 Years - Fiscal Code/Commercial Code - Retention period for books and records, annual financial statements, inventories, management reports, opening balance sheet as well as the necessary work instructions and other organisational documents, booking receipts and invoices (Section 147 Paragraph 3 in conjunction with Paragraph 1 No. 1, 4 and 4a of the German General Tax Code (AO), Section 14b Paragraph 1 of the German VAT Act (UStG), Section 257 Paragraph 1 Numbers 1 and 4, Paragraph 4 of the German Commercial Code (HGB)).
  - 6 Years - Other business documents: received commercial or business letters, copies of dispatched commercial or business letters, and other documents to the extent that they are significant for taxation purposes, for example, hourly wage slips, operating accounting sheets, calculation documents, price tags, as well as payroll accounting documents, provided they are not already accounting vouchers and cash register tapes Section (Section 147 Paragraph 3 in conjunction with Paragraph 1 No. 2, 3, 5 of the German General Tax Code (AO), Section 257 Paragraph 1 No. 2 and 3, Paragraph 4 of the German Commercial Code (HGB)).



- 3 Years - Data required to consider potential warranty and compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the regular statutory limitation period of three years. This period begins at the end of the year in which the relevant contractual transaction took place or the contractual relationship ended in the case of ongoing contracts (Sections 195, 199 of the German Civil Code).

## Rights of Data Subjects

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

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.

- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

## Data processing BMZ Group

TerraE GmbH is a part of the BMZ organization. For further information about data processing within the BMZ Group, visit the privacy notice under <https://www.bmz-group.com/>

## Business services

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

We process this data in order to fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope of this privacy policy.

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

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

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- **Data subjects:** Service recipients and clients; Prospective customers; Business and contractual partners. Job applicants.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Security measures; Communication; Office and organisational procedures; Organisational and Administrative Procedures; Business processes and management procedures. Conversion tracking (Measurement of the effectiveness of marketing activities).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".

- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Online shop, order forms, e-commerce and delivery.:** We process the data of our customers in order to enable them to select, purchase or order the selected products, goods and related services, as well as their payment and delivery, or performance of other services. If necessary for the execution of an order, we use service providers, in particular postal, freight and shipping companies, in order to carry out the delivery or execution to our customers. For the processing of payment transactions we use the services of banks and payment service providers. The required details are identified as such in the course of the ordering or comparable purchasing process and include the details required for delivery, or other way of making the product available and invoicing as well as contact information in order to be able to hold any consultation; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Automotive Industry and Vehicle Technology:** We process the data of our customers and clients to enable them to develop, produce, and provide vehicles and vehicle technologies and related services. The required information includes that needed for project implementation and billing, as well as contact information for necessary coordination. To the extent that we have access to information from end customers, employees, or other persons, we process this in accordance with legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Coaching:** We process the data of our clients as well as prospects and other contractors or business partners (collectively referred to as "clients") in order to provide them with our services. The processes carried out within the framework and for the purposes of coaching include: initiating contact and communication with clients, needs analysis to determine suitable coaching measures, planning and conducting coaching sessions, documenting coaching progress, capturing and managing client-specific information and data, scheduling and organising appointments, providing coaching materials and resources, invoicing and payment management, post-processing and

follow-up of coaching sessions, quality assurance and feedback processes.

The processed data, its nature, scope, purpose, and the necessity of its processing are determined by the underlying contractual relationship with the client.

Insofar as it is necessary for fulfilling our contract, protecting vital interests or legally required, or if there is consent from the clients, we disclose or transfer the clients' data in compliance with professional legal requirements to third parties or agents such as authorities, billing centers as well as in the field of IT, office or comparable services;

**Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **Data Analysis:** We process the data of our customers and clients to enable them to perform data analysis, evaluation, and consulting, as well as related services. The required information includes that needed for analysis, evaluation, and billing, as well as contact information for necessary coordination. To the extent that we have access to information from end customers, employees, or other persons, we process this in accordance with legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Craft Services:** We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works and related tasks, as well as their payment and delivery, or execution or provision.

The required details are identified as such within the framework of the conclusion of the order, order or comparable contract and include the details required for delivery and invoicing as well as contact information in order to be able to hold any consultations;

**Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **IT Services:** We process the data of our clients as well as contractors to enable them to plan, implement, and support IT solutions and associated services. The required information is marked as such during the contract, project, or similar agreement phase and includes details necessary for service provision and billing, as well as contact information to facilitate any necessary consultations. Insofar as we gain access to information from end customers, employees, or other individuals, we process this in accordance with legal and contractual requirements.

Processing processes include project management and documentation, which cover all phases from initial requirement analysis to project completion. This involves creating and managing project timelines, budgets, and resource allocations. Data processing also supports change management, where changes in the project flow are documented and tracked to ensure compliance and transparency.

Another process is customer relationship management (CRM), which involves recording and analyzing customer interactions and feedback to improve service quality and efficiently address individual customer needs. Additionally, the processing process encompasses technical support and trouble-shooting, which includes capturing and handling support requests, error resolutions, and regular maintenance.

Furthermore, reporting and performance analysis are conducted by capturing and evaluating performance metrics to assess the effectiveness of provided IT solutions continuously optimizing them. All these processes are aimed at ensuring high customer satisfaction and compliance with all relevant regulations; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

- **Recruiting Services:** As part of our services, which include in particular the search for, contacting and placement of potential job candidates, we process the data of the job candidates and the personal data of potential employers or their employees.

We process the information and contact data provided by the job candidates for the purposes of establishing, implementing and, if necessary, terminating a job placement contract. In addition, we can ask interested parties questions about the success of our recruiting services at a later date, in accordance with legal requirements.

We process the data of the job candidates, as well as of the employers, in order to fulfil our contractual obligations, in order to process the requests we receive for the placement of jobs to the satisfaction of the parties involved.

We can record the recruiting processes in order to be able to prove the existence of the contractual relationship and the consent of the interested parties in accordance with the statutory accountability obligations (Article 5 (2) GDPR). This information will be stored for a period of three to four years if we need to prove the original request (e.g. to prove

eligibility to contact the job candidates); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **Technical and Engineering services:** We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works as well as associated activities and to pay for and make available such services or works or to perform such services or works.

The required information is indicated as such within the framework of the conclusion of the agreement, order or equivalent contract and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations. Insofar as we gain access to the information of end customers, employees or other persons, we process it in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **Event Management:** We process the data of the participants of the events, events and similar activities offered or organized by us (hereinafter uniformly referred to as "participants" and "events") in order to enable them to participate in the events and to make use of the services or actions associated with their participation.

Insofar as we process health-related data, religious, political or other special categories of data in this context, this is done within the framework of disclosure (e.g. for thematically oriented events or serves health care, security or is done with the consent of the data subjects).

The necessary information is identified as such in the context of the conclusion of the agreement, booking or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any enquiries. Insofar as we gain access to information of end customers, employees or other persons, we process this in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

- **Commission-based matching and agency services:** We process the information provided by interested parties as part of the request for agency for the purposes of establishing, implementing and, if necessary, terminating a contract for the brokerage of offers from providers of the requested products or services .

We use the contact data of the interested parties to specify their request by means of the agreed or otherwise permitted communication channel (e.g., telephone or e-mail) and to suggest suitable suppliers or offers based on the specified request. In addition, we can ask interested parties questions about the success of our agency services at a later point in time, in accordance with legal requirements.

We process the data of the interested parties, as well as the suppliers, to fulfil our contractual obligations, in order to link the enquiry of the interested parties submitted to us with the offers of the suppliers matching it and to forward it to the corresponding suppliers, or to recommend the suppliers.

We can record the entries in the online form sent by interested parties in order to be able to prove the existence of the contractual relationship and the consent of the interested parties in accordance with the statutory accountability obligations (Article 5 (2) GDPR). These details will be stored for a period of three to four years if we have to prove the original request (e.g. to be able to prove that we are entitled to contact the interested party); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

## Business processes and operations

Personal data of service recipients and clients - including customers, clients, or in specific cases, mandates, patients, or business partners as well as other third parties - are processed within the framework of contractual and comparable legal relationships and pre-contractual measures such as the initiation of business relations. This data processing supports and facilitates business processes in areas such as customer management, sales, payment transactions, accounting, and project management.



The collected data is used to fulfil contractual obligations and make business processes efficient. This includes the execution of business transactions, the management of customer relationships, the optimisation of sales strategies, and ensuring internal invoicing and financial processes. Additionally, the data supports the protection of the rights of the controller and promotes administrative tasks as well as the organisation of the company.

Personal data may be transferred to third parties if necessary for fulfilling the mentioned purposes or legal obligations. After legal retention periods expire or when the purpose of processing no longer applies, the data will be deleted. This also includes data that must be stored for longer periods due to tax law and legal obligations to provide evidence.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Log data (e.g. log files concerning logins or data retrieval or access times.); Creditworthiness Data (e.g. received credit score, estimated default probability, risk classification based on this, historical payment behaviour). Employee Data (Information about employees and other individuals in an employment relationship).
- **Data subjects:** Service recipients and clients; Prospective customers; Communication partner (Recipients of e-mails, letters, etc.); Business and contractual partners; Third parties; Users (e.g. website visitors, users of online services); Employees (e.g. employees, job applicants, temporary workers, and other personnel.). Customers.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Office and organisational procedures; Business processes and management procedures; Communication; Marketing; Sales promotion; Public relations; Assessment of creditworthiness; Financial and Payment Management; Security measures. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".

- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Legitimate Interests (Article 6 (1) (f) GDPR). Compliance with a legal obligation (Article 6 (1) (c) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Customer Management and Customer Relationship Management (CRM):** Processes required in the context of customer management and Customer Relationship Management (CRM) include customer acquisition in compliance with data protection regulations, measures to promote customer retention and loyalty, effective customer communication, complaint management and customer service with consideration of data protection, data management and analysis to support the customer relationship, management of CRM systems, secure account management, customer segmentation and targeting; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Contact management and contact maintenance:** Processes required in the context of organizing, maintaining, and securing contact information (e.g., setting up and maintaining a central contact database, regular updates of contact information, monitoring data integrity, implementing data protection measures, ensuring access controls, conducting backups and restorations of contact data, training employees in effective use of contact management software, regular review of communication history and adjustment of contact strategies); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **General Payment Transactions:** Procedures required for carrying out payment transactions, monitoring bank accounts, and controlling payment flows (e.g., creation and verification of transfers, processing of direct debit transactions, checking of account statements, monitoring of incoming and outgoing payments, management of chargebacks, account reconciliation, cash management); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Accounting, accounts payable, accounts receivable:** Procedures required for the collection, processing, and control of business transactions in the area of accounts payable and receivable accounting (e.g., creation and verification of incoming and outgoing invoices, monitoring and management of outstanding items, execution of

payment transactions, handling of dunning processes, account reconciliation within the scope of receivables and payables, accounts payable accounting, and accounts receivable accounting); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

- **Financial Accounting and Taxes:** Procedures required for the collection, management, and control of finance-related business transactions as well as for the calculation, reporting, and payment of taxes (e.g., accounting and posting of business transactions, preparation of quarterly and annual financial statements, execution of payment transactions, handling of dunning processes, account reconciliation, tax consulting, preparation and submission of tax returns, management of tax affairs); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Purchasing:** Processes required in the procurement of goods, raw materials, or services (e.g., selection and evaluation of suppliers, price negotiations, placement and monitoring of orders, inspection and control of deliveries, invoice verification, management of orders, inventory management, creation and maintenance of purchasing policies); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Sales:** Procedures required for the planning, implementation, and control of measures for marketing and selling products or services (e.g., customer acquisition, preparation and tracking of offers, order processing, customer consultation and support, sales promotion, product training, sales controlling and analysis, management of distribution channels); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Marketing, advertising, and sales promotion:** Processes required in the context of marketing, advertising, and sales promotion (e.g., market analysis and audience targeting, development of marketing strategies, planning and execution of advertising campaigns, design and production of advertising materials, online marketing including SEO and social media campaigns, event marketing and trade show participation, customer loyalty programs, sales promotion measures, performance measurement and

optimisation of marketing activities, budget management and cost control); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

- **Economic Analyses and Market Research:** To fulfill business management purposes and to identify market trends, desires of contractual partners, and users, the present data regarding business transactions, contracts, inquiries, etc., are analyzed. The group of affected individuals may include contractual partners, interested parties, customers, visitors, and users of the online service managed by the responsible entity. The execution of these analyses serves the purposes of business economic evaluations, marketing, and market research (e.g., to determine customer groups with different characteristics). Where available, profiles of registered users along with their information on services utilized are considered. The analyses are exclusively for the use of the responsible entity and are not disclosed externally unless they pertain to anonymous analyses with aggregated, thus anonymized values. Moreover, user privacy is accounted for; data is processed for analysis purposes in as pseudonymized a manner as possible and anonymized when feasible (e.g., as aggregated data); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Public Relations:** Processes required in the context of public relations and public relations activities (e.g., development and implementation of communication strategies, planning and execution of PR campaigns, creation and distribution of press releases, maintenance of media contacts, monitoring and analysis of media response, organisation of press conferences and public events, crisis communication, creation of content for social media and corporate websites, management of corporate branding); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Guest Wi-Fi:** Procedures required for the setup, operation, maintenance, and monitoring of a wireless network for guests (e.g., installation and configuration of Wi-Fi access points, creation and management of guest access, monitoring of network connection, ensuring network security, resolving connection issues, updating network software, compliance with data protection regulations); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Payment Procedure

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

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

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

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Service recipients and clients. Business and contractual partners.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Business processes and management procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

## Credit Assessment

Insofar as we make advance payments or enter into comparable economic risks (e.g. when ordering on account), we reserve the right to obtain identity and credit information from specialised service providers (credit agencies) for the purpose of assessing the credit risk on the basis of mathematical-statistical procedures in order to safeguard legitimate interests. We process the information received from credit agencies on the statistical probability of non-payment as part of an appropriate discretionary decision on the establishment, execution and termination of the contractual relationship. In the event of a negative result of the credit assessment, we reserve the right to refuse payment on account or any other advance payment. In accordance with the law, the decision as to whether we will provide goods or services prior to payment is made solely on the basis of an automated decision in the individual case, which our software makes on the basis of the information provided by the credit agency. If we obtain the express consent of contractual partners, the legal basis for the credit information and the transmission of the customer's data to the credit agencies is consent. If no consent is obtained, the credit rating will be based on our legitimate interests in the security of our payment claims.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers); Contract data (e.g. contract object, duration, customer category). Creditworthiness Data (e.g. received credit score, estimated default probability, risk classification based on this, historical payment behaviour).
- **Data subjects:** Service recipients and clients; Prospective customers. Business and contractual partners.
- **Purposes of processing:** Assessment of creditworthiness.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).
- **Automated individual decision-making:** Credit report (Decision based on a credit report).

## Provision of online services and web hosting

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

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Log data (e.g. log files concerning logins or data retrieval or access times.).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.). Security measures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Collection of Access Data and Log Files:** Access to our online service is logged in the form of so-called "server log files". Server log files may include the address and name of the accessed web pages and files, date and time of access, transferred data volumes, notification of successful retrieval, browser type along with version, the user's operating system, referrer URL (the previously visited page), and typically IP addresses and the requesting provider. The server log files can be used for security purposes, e.g., to prevent server overload (especially in the case of abusive attacks, known as DDoS attacks), and to ensure server load management and stability; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage

of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.

- **ALL-INKL:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** ALL-INKL.COM - Neue Medien Münnich, Inhaber: René Münnich, Hauptstraße 68, 02742 Friedersdorf, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://all-inkl.com/>; **Privacy Policy:** <https://all-inkl.com/datenschutzinformationen/>. **Data Processing Agreement:** Provided by the service provider.

## Use of Cookies

Cookies are small text files or other types of storage markers that store information on end devices and read information from them. For example, to save the login status in a user account, the contents of a shopping cart in an e-shop, the content accessed, or the functions used of an online offer. Furthermore, cookies can be used for various concerns, such as for the functionality, security, and comfort of online offers as well as the creation of analyses of visitor flows.

**Notes on Consent:** We use cookies in accordance with legal regulations. Therefore, we obtain prior consent from users, unless it is not required by law. Permission is particularly not necessary if the storage and reading of information, including cookies, are absolutely necessary to provide a telemedia service (i.e., our online offer) expressly requested by the users. The revocable consent is clearly communicated to them and contains information on the respective cookie usage.

**Notes on the legal basis for data protection:** The legal basis on which we process users' personal data with the help of cookies depends on whether we ask them for consent. If users accept, the legal basis for processing their data is the declared consent. Otherwise, the data processed with the help of cookies are based on our legitimate interests (e.g., in a commercial operation of our online offer and its usability improvement) or, if this occurs within the fulfillment of our contractual obligations, when the use of cookies is necessary to fulfill our contractual obligations. We clarify the purposes for which the cookies are used by us in the course of this data protection declaration or within the scope of our consent and processing processes.

**Storage Duration:** Regarding the storage duration, the following types of cookies are distinguished:

- **Temporary cookies (also: session or session cookies):** Temporary cookies are deleted at the latest after a user has left an online offer and closed his end device (e.g., browser or mobile application).



- **Permanent cookies:** Permanent cookies remain stored even after closing the end device. For example, the login status can be saved and preferred content can be displayed directly when the user revisits a site. Similarly, user data collected via cookies can be used for reach measurement. Unless we provide users with explicit information about the nature and storage duration of cookies (e.g., when obtaining consent), they should assume that they are permanent and the storage duration can be up to two years.

**General notes on revocation and objection (Opt-out):** Users can revoke the consents they have given at any time and also declare an objection to the processing according to legal requirements, also via the privacy settings of their browser.

#### **Cookie Settings/ Opt-Out:**

Footer Symbol.

- **Processed data types:** Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Consent (Article 6 (1) (a) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Processing Cookie Data on the Basis of Consent:** We implement a consent management solution that obtains users' consent for the use of cookies or for the processes and providers mentioned within the consent management framework. This procedure is designed to solicit, log, manage, and revoke consents, particularly regarding the use of cookies and similar technologies employed to store, read from, and process information on users' devices. As part of this procedure, user consents are obtained for the use of cookies and the associated processing of information, including specific processing and providers named in the consent management process. Users also have the option to manage and withdraw their consents. Consent declarations are stored to avoid repeated queries and to provide proof of consent according to legal requirements. The storage is carried out server-side and/or in a cookie (so-called opt-in cookie) or by means of comparable technologies in order to associate the consent with a specific user or their device. If no specific details about the providers of consent management services are provided, the following general notes apply: The duration of

consent storage is up to two years. A pseudonymous user identifier is created, which is stored along with the time of consent, details on the scope of consent (e.g., relevant categories of cookies and/or service providers), as well as information about the browser, system, and device used; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

- **Cookiebot:** Cookie Consent Management: Procedures for obtaining, recording, managing, and revoking consents, particularly for the use of cookies and similar technologies for storing, accessing, and processing information on users' devices as well as their processing; **Service provider:** Usercentrics A/S, Havnegade 39, 1058 Kopenhagen, Dänemark; **Website:** <https://www.cookiebot.com>; **Privacy Policy:** <https://www.cookiebot.com/en/privacy-policy/>; **Data Processing Agreement:** Provided by the service provider; **Further Information:** Stored data (on the server of the service provider): The IP number of the user in anonymous form (the last three digits are set to 0), date and time of the consent, user agent of the user's browser, the URL from which the consent was sent, An anonymous, random and encrypted key value. the consent status of the user.

## Contact and Inquiry Management

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

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).

- **Purposes of processing:** Communication; Organisational and Administrative Procedures; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Contact form:** Upon contacting us via our contact form, email, or other means of communication, we process the personal data transmitted to us for the purpose of responding to and handling the respective matter. This typically includes details such as name, contact information, and possibly additional information provided to us that is necessary for appropriate processing. We use this data exclusively for the stated purpose of contact and communication; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Video Conferences, Online Meetings, Webinars and Screen-Sharing

We use platforms and applications of other providers (hereinafter referred to as "Conference Platforms") for the purpose of conducting video and audio conferences, webinars and other types of video and audio meetings (hereinafter collectively referred to as "Conference"). When using the Conference Platforms and their services, we comply with the legal requirements.

**Data processed by Conference Platforms:** In the course of participation in a Conference, the Data of the participants listed below are processed. The scope of the processing depends, on the one hand, on which data is requested in the context of a specific Conference (e.g., provision of access data or clear names) and which optional information is provided by the participants. In addition to processing for the purpose of conducting the conference, participants' Data may also be processed by the Conference Platforms for security purposes or service optimization. The processed Data includes personal information (first name, last name), contact information (e-mail address, telephone number), access data (access codes or passwords), profile pictures, information on professional position/function, the IP address of the internet access, information on the participants' end devices, their operating system, the browser and its technical and linguistic settings, information on the content-related communication processes, i.e. entries in chats and audio and video data, as well as the use of other available functions (e.g. surveys). The content of communications is encrypted to the extent technically provided by the conference providers. If participants are registered as users with the Conference Platforms,

then further data may be processed in accordance with the agreement with the respective Conference Provider.

**Logging and recording:** If text entries, participation results (e.g. from surveys) as well as video or audio recordings are recorded, this will be transparently communicated to the participants in advance and they will be asked - if necessary - for their consent.

**Data protection measures of the participants:** Please refer to the data privacy information of the Conference Platforms for details on the processing of your data and select the optimum security and data privacy settings for you within the framework of the settings of the conference platforms. Furthermore, please ensure data and privacy protection in the background of your recording for the duration of a Conference (e.g., by notifying roommates, locking doors, and using the background masking function, if technically possible). Links to the conference rooms as well as access data, should not be passed on to unauthorized third parties.

**Notes on legal bases:** Insofar as, in addition to the Conference Platforms, we also process users' data and ask users for their consent to use contents from the Conferences or certain functions (e.g. consent to a recording of Conferences), the legal basis of the processing is this consent. Furthermore, our processing may be necessary for the fulfillment of our contractual obligations (e.g. in participant lists, in the case of reprocessing of Conference results, etc.). Otherwise, user data is processed on the basis of our legitimate interests in efficient and secure communication with our communication partners.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Images and/ or video recordings (e.g. photographs or video recordings of a person); Audio recordings. Log data (e.g. log files concerning logins or data retrieval or access times.).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.); Users (e.g. website visitors, users of online services). Persons depicted.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Communication. Office and organisational procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Microsoft Teams:** Audio and video conferencing, chat, file sharing, integration with Office 365 applications, real-time collaboration on documents, calendar functions, task management, screen sharing, optional recording; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.microsoft.com/microsoft-teams/>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>. **Basis for third-country transfers:** Data Privacy Framework (DPF).

## Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the storage and management of content (e.g. document storage and management, exchange of documents, content and information with certain recipients or publication of content and information). Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

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

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Prospective customers; Communication partner (Recipients of e-mails, letters, etc.). Business and contractual partners.

- **Purposes of processing:** Office and organisational procedures. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

- **Google Cloud Storage:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://cloud.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://cloud.google.com/terms/data-processing-addendum>; **Basis for third-country transfers:** Data Privacy Framework (DPF). **Further Information:** <https://cloud.google.com/privacy>.
- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>. **Basis for third-country transfers:** Data Privacy Framework (DPF).

## Newsletter and Electronic Communications

We send newsletters, emails, and other electronic notifications (hereinafter "newsletters") exclusively with the consent of the recipients or based on a legal basis. If the contents of the newsletter are specified during registration for the newsletter, these contents are decisive for the users' consent. Normally, providing your email address is sufficient to sign up for our newsletter. However, to offer you a personalised service, we may ask for your name for

personal salutation in the newsletter or for additional information if necessary for the purpose of the newsletter.

**Deletion and restriction of processing:** We may store unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to be able to demonstrate previously given consent. The processing of these data is limited to the purpose of potentially defending against claims. An individual request for deletion is possible at any time, provided that at the same time the former existence of consent is confirmed. In case of obligations to permanently observe objections, we reserve the right to store the email address solely for this purpose in a blocklist.

The logging of the registration process is based on our legitimate interests for the purpose of proving its proper execution. If we commission a service provider to send emails, this is done based on our legitimate interests in an efficient and secure mailing system.

## **Contents:**

Information about us, our services, promotions and offers.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by e-mail or postal). Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Retention and deletion:** 3 years - Contractual claims (AT) (Data required to consider potential warranty and compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the regular statutory limitation period of three years (Sections 1478, 1480 of the Austrian Civil Code).). 10 years - Contractual claims (CH) (Data required to consider potential compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the statutory limitation period of ten years, unless a shorter period of 5 years is applicable, which is relevant in certain cases. This period begins at the end of

the calendar year in which the claim arose (Articles 127 and 128 Swiss Code of Obligations (CO))).

- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

#### **Further information on processing methods, procedures and services used:**

- **Measurement of opening rates and click rates:** The newsletters contain a so-called "web beacons", which is a pixel-sized file that is retrieved from our server, or the server of the dispatch service provider if one is used, when the newsletter is opened. In the course of this retrieval, technical information such as details about the browser and your system, as well as your IP address and the time of access are collected. This information is used to technically improve our newsletter based on technical data or target audiences and their reading behavior, which can be determined by their access locations (identifiable by IP address) or access times. This analysis also includes determining whether and when newsletters are opened and which links are clicked. The information is assigned to individual newsletter recipients and stored in their profiles until deletion. The evaluations serve to recognize the reading habits of our users and adjust our content to them or send different content according to the interests of our users. The measurement of opening and click rates, as well as the storage of the measurement results in user profiles and their further processing, are based on user consent. Unfortunately, it is not possible to revoke success measurement separately; in this case, the entire newsletter subscription must be cancelled or objected to. In that case, stored profile information will be deleted; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).
- **Brevo:** E-mail dispatch and automation services; **Service provider:** Sendinblue GmbH, Köpenicker Str. 126, 10179 Berlin, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.brevo.com/>; **Privacy Policy:** <https://www.brevo.com/de/legal/privacypolicy/>. **Data Processing Agreement:** Provided by the service provider.



## Commercial communication by E-Mail, Postal Mail, Fax or Telephone

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After revocation or objection, we store the data required to prove the past authorization to contact or send up to three years from the end of the year of revocation or objection on the basis of our legitimate interests. The processing of this data is limited to the purpose of a possible defense against claims. Based on the legitimate interest to permanently observe the revocation, respectively objection of the users, we further store the data necessary to avoid a renewed contact (e.g. depending on the communication channel, the e-mail address, telephone number, name).

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by e-mail or postal); Marketing. Sales promotion.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

## Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require optimization.

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

Unless otherwise stated below, profiles, i.e. data aggregated for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed. Unless otherwise stated below, profiles, that is data summarized for a usage process or user, may be created for these purposes and stored in a browser or terminal device (so-called "cookies") or similar processes may be used for the same purpose. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data or profiles to us or to the providers of the services we use, these may also be processed, depending on the provider.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

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

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Remarketing; Affiliate Tracking; Web Analytics (e.g. access statistics, recognition of returning visitors); Profiles with user-related information (Creating user profiles). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).

- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Google Analytics:** We use Google Analytics to perform measurement and analysis of the use of our online services by users based on a pseudonymous user identification number. This identification number does not contain any unique data, such as names or email addresses. It is used to assign analysis information to an end device in order to recognize which content users have accessed within one or various usage processes, which search terms they have used, have accessed again or have interacted with our online services. Likewise, the time of use and its duration are stored, as well as the sources of users referring to our online services and technical aspects of their end devices and browsers.

In the process, pseudonymous profiles of users are created with information from the use of various devices, and cookies may be used. Google Analytics does not log or store individual IP addresses. Analytics does provide coarse geo-location data by deriving the following metadata from IP addresses: City (and the derived latitude, and longitude of the city), Continent, Country, Region, Subcontinent (and ID-based counterparts). For EU-based traffic, IP-address data is used solely for geo-location data derivation before being immediately discarded. It is not logged, accessible, or used for any additional use cases. When Analytics collects measurement data, all IP lookups are performed on EU-based servers before forwarding traffic to Analytics servers for processing;

**Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland;

**Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:**

<https://marketingplatform.google.com/intl/en/about/analytics/>; **Security measures:** IP

Masking (Pseudonymization of the IP address); **Privacy Policy:**

<https://policies.google.com/privacy>; **Data Processing Agreement:**

<https://business.safety.google/adsprocessorterms/>; **Basis for third-country transfers:**

Data Privacy Framework (DPF); **Opt-Out:** Opt-Out-Plugin:

<https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of

Advertisements: <https://myadcenter.google.com/personalizationoff>. **Further**

**Information:** <https://business.safety.google/adsservices/> (Types of processing and data processed).

- **Google as a recipient of consent:** The consent given by users in the context of a consent dialogue (also known as "Cookie Opt-In/Consent", "Cookie Banner", etc.) serves multiple purposes. Firstly, it helps us to fulfil our obligation to obtain consent for the storage and reading of information on and from the end-user's device (in accordance with ePrivacy Directives). Secondly, it covers the processing of users' personal data in accordance with data protection requirements. Additionally, this consent is also applicable to Google, as the company is required by the Digital Markets Act to obtain consent for personalised services. Therefore, we share the status of consents given by users with Google. Our consent management software informs Google about whether consents have been given or not. The aim is to ensure that user consents—or their absence—are taken into account when using Google Analytics and integrating features and external services. Thus, user consents and their revocation can be dynamically adjusted within our online offerings through Google Analytics and other Google services, depending on user selection; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://support.google.com/analytics/answer/9976101?hl=en>. **Privacy Policy:** <https://policies.google.com/privacy>.
- **Google Signals (Google Analytics function):** Google signals are session data from sites and apps that Google associates with users who have signed in to their Google accounts, and who have turned on Ads Personalization. This association of data with these signed-in users is used to enable cross-device reporting, cross-device remarketing, and cross-device conversion export to Ads. These are the areas where more information is gathered when Google Signals is activated (but only for users with Ads Personalization enabled): Cross Platform reporting - Connection of data about devices and activities from different sessions using your User-ID or Google-signals data providing an understanding of user behavior at each step of the conversion process, from initial contact to conversion and beyond; Remarketing with Google Analytics - Creation of remarketing audiences from Google Analytics data, and sharing of those audiences with linked advertising accounts; Demographics & Interests: Google Analytics collects additional information about demographics and interests from users who are signed in to their Google accounts and who have turned on Ads Personalization; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4,

Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:**

<https://support.google.com/analytics/answer/7532985?hl=en>; **Privacy Policy:**

<https://policies.google.com/privacy>; **Data Processing Agreement:**

<https://business.safety.google/adsprocessorterms>; **Basis for third-country transfers:**

Data Privacy Framework (DPF). **Further Information:**

<https://business.safety.google/adsservices/> (Types of processing and data processed).

- **Google Analytics Audiences:** We use Google Analytics to specifically present ads, placed through Google's advertising services and those of its partners, to users who have already shown interest in our online offering or exhibit certain characteristics (e.g., interests in specific topics or products determined based on the websites they have visited). We transmit this data to Google as part of what is known as "Remarketing" or "Google Analytics Audiences". The purpose of using Remarketing Audiences is to ensure that our ads align as closely as possible with the potential interests of the users; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com/>; **Legal Basis:** <https://business.safety.google/adsprocessorterms/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessorterms/>; **Basis for third-country transfers:** Data Privacy Framework (DPF); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Data Processing Conditions for Google Advertising Products and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adsprocessorterms> .
- **Google Tag Manager:** We use Google Tag Manager, a software provided by Google, which enables us to manage so-called website tags centrally via a user interface. Tags are small code elements on our website that serve to record and analyse visitor activities. This technology assists us in improving our website and the content offered on it. Google Tag Manager itself does not create user profiles, store cookies with user profiles, or perform any independent analyses. Its function is limited to simplifying and making the integration and management of tools and services we use on our website more efficient. Nevertheless, when using Google Tag Manager, users' IP addresses are transmitted to Google, which is technically necessary to implement the services we use.

Cookies may also be set in this process. However, this data processing only occurs if services are integrated via the Tag Manager. For more detailed information about these services and their data processing, please refer to the further sections of this privacy policy; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessorterms>. **Basis for third-country transfers:** Data Privacy Framework (DPF).

## Online Marketing

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

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

The IP addresses of the users are also stored. However, we use provided IP masking procedures (i.e. pseudonymisation by shortening the IP address) to ensure the protection of the user's by using a pseudonym. In general, within the framework of the online marketing process, no clear user data (such as e-mail addresses or names) is secured, but pseudonyms. This means that we, as well as the providers of online marketing procedures, do not know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or similar memorizing procedures. These cookies can later, generally also on other websites that use the same online marketing technology, be read and analyzed for purposes of content display, as well as supplemented with other data and stored on the server of the online marketing technology provider.

Exceptionally, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may

enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

As a matter of principle, we only gain access to summarised information about the performance of our advertisements. However, within the framework of so-called conversion measurement, we can check which of our online marketing processes have led to a so-called conversion, i.e. to the conclusion of a contract with us. The conversion measurement is used alone for the performance analysis of our marketing activities.

Unless otherwise stated, we kindly ask you to consider that cookies used will be stored for a period of two years.

#### **Notes on revocation and objection:**

We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called "opt-out"). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area:

a) Europe: <https://www.youronlinechoices.eu>.

b) Canada: <https://www.youradchoices.ca/choices>.

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

d) Cross-regional: <https://optout.aboutads.info>.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Event Data (Facebook ("Event Data" is data that can be transmitted from us to Facebook, e.g. via Facebook pixels (via apps or other means) and relates to persons or their actions; the data includes, for example, information about visits to websites, interactions with content, functions, installations of apps, purchases of products, etc.; Event data is processed for the purpose of creating target groups for content and advertising information (Custom Audiences); Event Data does not include the actual content (such as written comments), login information, and Contact Information (such as names, email addresses, and phone numbers). Event Data is deleted by Facebook after a maximum of two years, the Custom Audiences created from them with the deletion of our Facebook account). Location data (Information on the geographical position of a device or person).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behaviour, use of cookies);

Affiliate Tracking; Marketing; Profiles with user-related information (Creating user profiles); Conversion tracking (Measurement of the effectiveness of marketing activities); Provision of our online services and usability. Remarketing.

- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

- **Google Ad Manager:** We use the service "Google Ad Manager" to place ads in the Google advertising network (e.g. in search results, videos, websites, etc.). The Google Ad Manager stands out because ads are displayed in real time based on users' presumed interests. This allows us to display ads for our online offering to users who may have a potential interest in our offering or who have previously shown interest, and measure the success of the ads; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>; Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>. where Google acts as processor, Data Processing Conditions for Google Advertising Products and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adsprocessorterms> apply.
- **AdMob:** Platform for displaying advertising content within mobile apps; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://admob.google.com/home/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF). **Further**



**Information:** Processing by Google as controller:

<https://business.safety.google/adscontrollerterms/>.

- **Google Ads and Conversion Tracking:** Online marketing process for purposes of placing content and advertisements within the provider's advertising network (e.g., in search results, in videos, on web pages, etc.) so that they are displayed to users who have a presumed interest in the ads. Furthermore, we measure the conversion of the ads, i.e. whether the users took them as a reason to interact with the ads and make use of the advertised offers (so-called conversion). However, we only receive anonymous information and no personal information about individual users; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://marketingplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>.
- **Google Ads Remarketing:** Google Remarketing, also known as retargeting, is a technology that adds users who use an online service to a pseudonymous remarketing list so that users can be shown ads on other online services based on their visit to the online service  
; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>.
- **Enhanced Conversions for Google Ads:** When users click on our Google ads and subsequently use the advertised service (so-called "conversion"), the data entered by the user, such as email address, name, residential address or telephone number, may

be transmitted to Google. The hash values are then matched with existing Google accounts of the users to better evaluate and improve their interaction with the ads (e.g., clicks or views) and thus their performance; **Legal Basis:** Consent (Article 6 (1) (a) GDPR). **Website:** <https://support.google.com/google-ads/answer/9888656>.

- **Google AdSense with personalized ads:** We integrate the service Google AdSense, which enables the placement of personalized advertisements within our online offering. Google AdSense analyzes user behavior and uses this data to deliver targeted advertising that is aligned with the interests of our visitors. We receive financial compensation for each advertisement placement or other types of usage of these ads; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>.
- **Google AdSense with non-personalized ads:** We use the service Google AdSense to display non-personalised advertisements in our online offering. These advertisements are not based on individual user behaviour but are selected based on general characteristics such as the content of the page or your approximate geographical location. We receive a fee for the display or other use of these advertisements; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF); **Further Information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: <https://business.safety.google/adscontrollerterms>.
- **Instagram Ads:** Placement of ads within the Instagram platform and analysis of ad results; **Service provider:** Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04

X2K5, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:**

<https://www.instagram.com>; **Privacy Policy:** <https://privacycenter.instagram.com/policy/>;

**Basis for third-country transfers:** Data Privacy Framework (DPF); **Opt-Out:** We refer to the data protection and advertising settings in the user's profile on the Instagram platform as well as Instagram's consent procedure and Instagram's contact options for exercising information and other data subject rights in Instagram's privacy policy.

**Further Information:** User event data, i.e. behavioral and interest data, is processed for the purposes of targeted advertising and audience building on the basis of the joint controllership agreement ("Controller Addendum",

[https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)). The joint controllership is limited to the collection and transfer of the data to Meta Platforms Ireland Limited, a company located in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which concerns in particular the transfer of the data to the parent company Meta Platforms, Inc. in the USA (on the basis of standard contractual clauses concluded between Meta Platforms Ireland Limited and Meta Platforms, Inc.).

- **LinkedIn Insight Tag:** Code that is loaded when a user visits our online offering and tracks the user's behavior and conversions, as well as stores it in a profile (possible use cases: measuring campaign performance, optimizing ad delivery, building custom and similar target groups); **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>, cookie policy: [https://www.linkedin.com/legal/cookie\\_policy](https://www.linkedin.com/legal/cookie_policy); **Data Processing Agreement:** <https://www.linkedin.com/legal/dpa>; **Basis for third-country transfers:** Data Privacy Framework (DPF). **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **Google Search Ads 360:** Search management platform that enables agencies and advertisers to manage and target search marketing campaigns across multiple search engines and media channels; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com/intl/en/about/search-ads-360/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessor/terms/>; **Basis for third-country transfers:**

Data Privacy Framework (DPF). **Further Information:**

<https://business.safety.google/adsservices/> (Types of processing and data processed).

## Profiles in Social Networks (Social Media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights.

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created on the basis of user behaviour and the associated interests of users. The user profiles can then be used, for example, to place advertisements within and outside the networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

For a detailed description of the respective processing operations and the opt-out options, please refer to the respective data protection declarations and information provided by the providers of the respective networks.

Also in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

- **Processed data types:** Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Communication; Feedback (e.g. collecting feedback via online form). Public relations.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Further information on processing methods, procedures and services used:

- **LinkedIn:** Social network - We are jointly responsible with LinkedIn Ireland Unlimited Company for the collection (but not the further processing) of data from visitors for the purposes of creating „Page-Insights" (statistics) for our LinkedIn profiles. This data includes information about the types of content that users view or interact with, or the actions they take, as well as information about the devices used by the users (e.g., IP addresses, operating system, browser type, language settings, cookie data) and details from the users' profiles, such as job function, country, industry, seniority, company size, and employment status. Privacy information regarding the processing of user data by LinkedIn can be found in LinkedIn's privacy notices:

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

We have concluded a special agreement with LinkedIn Ireland, the 'Page Insights Joint Controller Addendum (the 'Addendum')' (<https://legal.linkedin.com/pages-joint-controller-addendum>), which specifically regulates the security measures that LinkedIn must observe and wherein LinkedIn has agreed to fulfill the rights of the affected parties (i.e., users can, for example, direct requests for information or deletion directly to LinkedIn). The rights of the users (in particular to access to information, erasure, objection, and complaint to the competent supervisory authority) are not restricted by the agreements with LinkedIn. The joint responsibility is limited to the collection of data by and transmission to Ireland Unlimited Company, a company based in the EU. The further processing of the data is the sole responsibility of Ireland Unlimited Company, particularly regarding the transmission of data to the parent company LinkedIn Corporation in the USA; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>; **Basis for third-country transfers:** Data Privacy Framework (DPF). **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

## Plugins and embedded functions and content

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

The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability. Provision of contractual services and fulfillment of contractual obligations.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

- **Google Fonts (from Google Server):** Obtaining fonts (and symbols) for the purpose of a technically secure, maintenance-free and efficient use of fonts and symbols with regard to timeliness and loading times, their uniform presentation and consideration of possible restrictions under licensing law. The provider of the fonts is informed of the

user's IP address so that the fonts can be made available in the user's browser. In addition, technical data (language settings, screen resolution, operating system, hardware used) are transmitted which are necessary for the provision of the fonts depending on the devices used and the technical environment. This data may be processed on a server of the provider of the fonts in the USA - When visiting our online services, users' browsers send their browser HTTP requests to the Google Fonts Web API. The Google Fonts Web API provides users with Google Fonts' cascading style sheets (CSS) and then with the fonts specified in the CCS. These HTTP requests include (1) the IP address used by each user to access the Internet, (2) the requested URL on the Google server, and (3) the HTTP headers, including the user agent describing the browser and operating system versions of the website visitors, as well as the referral URL (i.e., the web page where the Google font is to be displayed). IP addresses are not logged or stored on Google servers and they are not analyzed. The Google Fonts Web API logs details of HTTP requests (requested URL, user agent, and referring URL). Access to this data is restricted and strictly controlled. The requested URL identifies the font families for which the user wants to load fonts. This data is logged so that Google can determine how often a particular font family is requested. With the Google Fonts Web API, the user agent must match the font that is generated for the particular browser type. The user agent is logged primarily for debugging purposes and is used to generate aggregate usage statistics that measure the popularity of font families. These aggregate usage statistics are published on Google Fonts' Analytics page. Finally, the referral URL is logged so that the data can be used for production maintenance and to generate an aggregate report on top integrations based on the number of font requests. Google says it does not use any of the information collected by Google Fonts to profile end users or serve targeted ads; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://fonts.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF). **Further Information:** <https://developers.google.com/fonts/faq/privacy?hl=en>.

- **reCAPTCHA:** We integrate the "reCAPTCHA" function to be able to recognise whether entries (e.g. in online forms) are made by humans and not by automatically operating

machines (so-called "bots"). The data processed may include IP addresses, information on operating systems, devices or browsers used, language settings, location, mouse movements, keystrokes, time spent on websites, previously visited websites, interactions with ReCaptcha on other websites, possibly cookies and results of manual recognition processes (e.g. answering questions asked or selecting objects in images). The data processing is based on our legitimate interest to protect our online services from abusive automated crawling and spam; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.google.com/recaptcha/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third-country transfers:** Data Privacy Framework (DPF). **Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://myadcenter.google.com/personalizationoff>.

- **Google Hosted Libraries:** Google Hosted Libraries is a globally available Content Delivery Network (CDN) for the most commonly used open-source JavaScript libraries. These are provided to supply web libraries that optimise website loading times, reduce bandwidth usage, and enhance performance through the use of shared, public resources; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://developers.google.com/speed/libraries/>. **Privacy Policy:** <https://policies.google.com/privacy>.

## Management, Organization and Utilities

We use services, platforms and software from other providers (hereinafter referred to as "third-party providers") for the purposes of organizing, administering, planning and providing our services. When selecting third-party providers and their services, we comply with the legal requirements.

Within this context, personal data may be processed and stored on the servers of third-party providers. This may include various data that we process in accordance with this privacy policy. This data may include in particular master data and contact data of users, data on processes, contracts, other processes and their contents.



If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third party providers.

- **Processed data types:** Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.). Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Office and organisational procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Changes and Updates

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

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

## Terminology and Definitions

In this section, you will find an overview of the terminology used in this privacy policy. Where the terminology is legally defined, their legal definitions apply. The following explanations, however, are primarily intended to aid understanding.

- **Affiliate Tracking:** Custom Audiences refers to the process of determining target groups for advertising purposes, e.g. the display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to conclude that the user is interested in advertisements for similar products or the online store in which the user viewed the products. "Lookalike Audiences" is the term used to describe content that is viewed as suitable by users whose profiles or interests presumably correspond to the users for whom the profiles were created. For the purposes of creating custom audiences and lookalike audiences, cookies and web beacons are typically used.
- **Contact data:** Contact details are essential information that enables communication with individuals or organizations. They include, among others, phone numbers, postal addresses, and email addresses, as well as means of communication like social media handles and instant messaging identifiers.
- **Content data:** Content data comprise information generated in the process of creating, editing, and publishing content of all types. This category of data may include texts, images, videos, audio files, and other multimedia content published across various platforms and media. Content data are not limited to the content itself but also include metadata providing information about the content, such as tags, descriptions, authorship details, and publication dates.
- **Contract data:** Contract data are specific details pertaining to the formalisation of an agreement between two or more parties. They document the terms under which services or products are provided, exchanged, or sold. This category of data is essential for managing and fulfilling contractual obligations and includes both the identification of the contracting parties and the specific terms and conditions of the agreement. Contract data may encompass the start and end dates of the contract, the nature of the agreed-upon services or products, pricing arrangements, payment terms, termination rights, extension options, and special conditions or clauses. They serve as the legal foundation for the relationship between the parties and are crucial for clarifying rights and duties, enforcing claims, and resolving disputes.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- **Credit report:** Automated decisions are based on automatic data processing without human intervention (e.g. in the case of an automatic rejection of a purchase on account, an online credit application or an online application procedure without any human intervention). Such automated decisions are only allowed under Article 22 GDPR if data subjects consent, if they are necessary for the performance of a contract or if national laws allow such decisions.
- **Employees:** As employees, individuals are those who are engaged in an employment relationship, whether as staff, employees, or in similar positions. Employment refers to a legal relationship between an employer and an employee, established through an employment contract or agreement. It entails the obligation of the employer to pay the employee remuneration while the employee performs their work. The employment relationship encompasses various stages, including establishment, where the employment contract is concluded, execution, where the employee carries out their work activities, and termination, when the employment relationship ends, whether through termination, mutual agreement, or otherwise. Employee data encompasses all information pertaining to these individuals within the context of their employment. This includes aspects such as personal identification details, identification numbers, salary and banking information, working hours, holiday entitlements, health data, and performance assessments.
- **Inventory data:** Inventory data encompass essential information required for the identification and management of contractual partners, user accounts, profiles, and similar assignments. These data may include, among others, personal and demographic details such as names, contact information (addresses, phone numbers, email addresses), birth dates, and specific identifiers (user IDs). Inventory data form the foundation for any formal interaction between individuals and services, facilities, or systems, by enabling unique assignment and communication.

- **Location data:** Location data is created when a mobile device (or another device with the technical requirements for a location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data serve to indicate the geographically determinable position of the earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- **Log data:** Protocol data, or log data, refer to information regarding events or activities that have been logged within a system or network. These data typically include details such as timestamps, IP addresses, user actions, error messages, and other specifics about the usage or operation of a system. Protocol data is often used for analyzing system issues, monitoring security, or generating performance reports.
- **Meta, communication and process data:** Meta-, communication, and procedural data are categories that contain information about how data is processed, transmitted, and managed. Meta-data, also known as data about data, include information that describes the context, origin, and structure of other data. They can include details about file size, creation date, the author of a document, and modification histories. Communication data capture the exchange of information between users across various channels, such as email traffic, call logs, messages in social networks, and chat histories, including the involved parties, timestamps, and transmission paths. Procedural data describe the processes and operations within systems or organisations, including workflow documentations, logs of transactions and activities, and audit logs used for tracking and verifying procedures.
- **Payment Data:** Payment data comprise all information necessary for processing payment transactions between buyers and sellers. This data is crucial for e-commerce, online banking, and any other form of financial transaction. It includes details such as credit card numbers, bank account information, payment amounts, transaction dates, verification numbers, and billing information. Payment data may also contain information on payment status, chargebacks, authorizations, and fees.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more

factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Remarketing:** Remarketing" or "retargeting" is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website in order to remind the user of these products on other websites, e.g. in advertisements.
- **Targeting:** "Tracking" is the term used when the behaviour of users can be traced across several websites. As a rule, behavior and interest information with regard to the websites used is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users presumably corresponding to their interests.
- **Usage data:** Usage data refer to information that captures how users interact with digital products, services, or platforms. These data encompass a wide range of information that demonstrates how users utilise applications, which features they prefer, how long they spend on specific pages, and through what paths they navigate an application. Usage data can also include the frequency of use, timestamps of activities, IP addresses, device information, and location data. They are particularly valuable for analysing user behaviour, optimising user experiences, personalising content, and improving products or services. Furthermore, usage data play a crucial role in identifying trends, preferences, and potential problem areas within digital offerings
- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at

what time visitors visit their website and what content they are interested in. This enables them, for example, to better adapt the content of their websites to the needs of their visitors. For the purposes of web analytics , pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online service.