

# Privacy Policy Pink & Adel GmbH | SEO for Jobs

#### Preamble

With the following privacy policy we would like to inform you about the types of personal data (hereinafter also referred to as "data") we process, for which purposes and to what extent in the context of providing our application.

The terms used are not gender-specific..

## Controller

Pink & Adel GmbH, Jungfernstieg 47, 20354 Hamburg, Germany. Authorised Representatives: Patrick Schmidt, Alexander Meirowski.

E-mail address: team@seo-for-jobs.com.

Legal Notice: https://www.seo-for-jobs.com/imprint.



# 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

• 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).

- Inventory data (e.g. names, addresses).
- 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).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Location data (Information on the geographical position of a device or person).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

## Special Categories of Data

• Data revealing racial or ethnic origin.

# Categories of Data Subjects

- Employees (e.g. Employees, job applicants).
- Job applicants.
- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Members.
- Users (e.g. website visitors, users of online services).
- Participants in sweepstakes and competitions.

# Purposes of Processing

- A/B Tests.
- Affiliate Tracking.
- Authentication processes.
- Provision of our online services and usability.
- Conversion tracking (Measurement of the effectiveness of marketing activities).
- Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- Office and organisational procedures.
- Clicktracking.



- Content Delivery Network (CDN).
- Cross-Device Tracking (Device-independent processing of user data for marketing purposes).
- Direct marketing (e.g. by e-mail or postal).
- Conducting sweepstakes and contests.
- Affiliate Tracking.
- Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.).
- Interest-based and behavioral marketing.
- Contact requests and communication.
- Profiling (Creating user profiles).
- Remarketing.
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Targeting (e.g. profiling based on interests and behaviour, use of cookies).
- Polls and Questionnaires (e.g. surveys with input options, multiple choice questions).
- Provision of contractual services and customer support.
- Managing and responding to inquiries.
- Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content).

# Legal Bases for the Processing

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

- Consent (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.
- Performance of a tasks carried out in the public interest (Article 6 (1) (e) GDPR) -Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.



- Legitimate Interests (Article 6 (1) (f) GDPR) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.
- Job application process as a pre-contractual or contractual relationship (Article 9 (2)(b) GDPR) If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, their processing shall be carried out in accordance with Article 9 (2)(b) GDPR, in the case of the protection of vital interests of applicants or other persons on the basis of Article 9 (2)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (2)(d) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (2)(a) GDPR.
- Performance of a contract and prior requests (EKD) (§ 6 No. 5 DSG-EKD) 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.

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

# **Security Precautions**

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



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

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

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.

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

#### Transmission and Disclosure of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, payment institutions within the context of payment transactions, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of your data.

# Data Processing in Third Countries

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

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as



a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection en).

## Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his visit within an online service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term "cookies" also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

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

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed his browser.
- Permanent cookies: Permanent cookies remain stored even after closing the browser. For
  example, the login status can be saved or preferred content can be displayed directly when the user
  visits a website again. The interests of users who are used for range measurement or marketing
  purposes can also be stored in such a cookie.
- First-Party-Cookies: First-Party-Cookies are set by ourselves.
- **Third party cookies**: Third party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential) cookies:** Cookies can be necessary for the operation of a website (e.g. to save logins or other user inputs or for security reasons).
- Statistics, marketing and personalisation cookies: Cookies are also generally used to measure a website's reach and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) are stored on individual websites in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This procedure is also referred to as "tracking", i.e. tracking the potential interests of users. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or in the context of obtaining consent.

**Information on legal basis:** The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this applies and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed



with the help of cookies will be processed on the basis of our legitimate interests (e.g. in a business operation of our online service and its improvement) or, if the use of cookies is necessary to fulfill our contractual obligations.

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

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

**Processing Cookie Data on the Basis of Consent**: We use a cookie management solution in which users' consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) in order to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device.

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

# Performing tasks in accordance with statutes or rules of procedure

We process the data of our members, supporters, prospects, business partners or other persons (collectively, "data subjects") when we have a membership or other business relationship with them and perform our



functions and are recipients of benefits and benefits. Otherwise, we process the data of data subjects on the basis of our legitimate interests, e.g. when it concerns administrative tasks or public relations.

The data processed, the type, scope and purpose and the necessity of their processing, are determined by the underlying membership or contractual relationship, from which the necessity of any data information arises (otherwise we refer to necessary data).

We delete data that is no longer required for the performance of our statutory and business purposes. This is determined according to the respective tasks and contractual relationships. We retain the data for as long as it may be relevant for the purpose of conducting business and with regard to any warranty or liability obligations on the basis of our legitimate interest in their regulation. The necessity of storing the data is checked regularly; otherwise the statutory storage obligations apply.

- Processed data types: Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contact data (e.g. e-mail, telephone numbers), Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Users (e.g. website visitors, users of online services), Members, Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### **Commercial Services**

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

We process this data in order to fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of data subjects concerned (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part of this privacy policy.



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

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

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

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

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

**Economic Analyses and Market Research**: For economic reasons and in order to be able to recognise market trends, wishes of contractual partners and users, we analyse the data available to us on business transactions, contracts, enquiries, etc., whereby the persons concerned may include contractual partners, interested parties, customers, visitors and users of our online service.

The analyses are carried out for the purpose of business evaluations, marketing and market research (for example, to determine customer groups with different characteristics). If available, we can take into account the profiles of registered users with information, e.g. on the services they have used. The analyses serve us alone and are not disclosed externally unless they are anonymous analyses with summarised, i.e. anonymised values. Furthermore, we respect the privacy of the users and process the data for analysis purposes as pseudonymously as possible and if possible anonymously (e.g. as summarized data).

**Online Shop and E-Commerce**: We process the data of our customers in order to enable them to select, purchase or order the selected products, goods and 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 aviable and invoicing as well as contact information in order to be able to hold any consultation.

**Agency Services**: We process the data of our customers within the scope of our contractual services, which may include e.g. conceptual and strategic consulting, campaign planning, software and design development / consulting or maintenance, implementation of campaigns and processes, handling, server administration, data analysis / consulting services and training services.

**Coaching**: We process the data of our clients and interested parties and other clients or contractual partners (uniformly referred to as "clients") in order to provide them with our services. The data processed, the type, scope and purpose of their processing and the necessity of their processing are determined by the underlying contractual and client relationship.

Within the scope of our services, we may also process special categories of data, here in particular information on the health of clients, possibly with reference to their sexual life or sexual orientation and data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs. To this end, we obtain the express consent of clients where necessary and process the special categories of data otherwise for the purposes of health care, if the data is public or wit an other legal persmission.

Insofar as it is necessary for the fulfilment of our contractual obligations, the protection of vital interests or by law, or with theclients's consent, we disclose or transfer the clients's data to third parties or agents, such as public authorities, accounting offices and in the field of IT, office or comparable services, in compliance with professional regulations.

**Consulting**: We process the data of our clients, clients as well as interested parties and other clients or contractual partners (uniformly referred to as "clients") in order to provide them with our consulting services. The data processed, the type, scope and purpose of the processing and the necessity of its processing are determined by the underlying contractual and client relationship.

Insofar as it is necessary for the fulfilment of our contract, for the protection of vital interests or by law, or with the consent of the client, we disclose or transfer the client's data to third parties or agents, such as authorities, courts, subcontractors or in the field of IT, office or comparable services, taking into account the professional requirements.

**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.

**Project and Development 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.

**Publishing Activities**: We process the data of our contact partners, interviewed persons and other persons who are the subject of our editorial, journalistic and related activities. Here we refer to the validity of protection regulations of freedom of opinion and freedom of the press according to Article 85 GDPR in connection with the respective national laws. The processing serves us the fulfilment of order activities and is otherwise based in particular on the interest of the general public in information and media products.

**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).

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

**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.

**Consulting**: Insofar as it is necessary for our contractual performance or required by law, or if the consent of the customer has been obtained, we disclose or transfer the customer's data to third parties or agents, such as authorities, courts or in the field of IT, office or comparable services, in compliance with the contractual and legal requirements.

**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).

**Further information on commercial 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 service provision and invoicing as well as contact information in order to be able to hold any consultations.

• Processed data types: Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contact data (e.g. e-mail, telephone numbers), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), 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).

- **Special categories of personal data:** Health Data (Article 9 (1) GDPR), Data related to sexual preferences, sex life, and/or sexual orientation (Article 9 (1) GDPR), Rreligious or philosophical beliefs (Article 9 (1) GDPR), Data revealing racial or ethnic origin.
- Data subjects: Prospective customers, Business and contractual partners, Customers, Job applicants.
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures, Managing and responding to inquiries, Security measures, Conversion tracking (Measurement of the effectiveness of marketing activities), Interest-based and behavioral marketing, Profiling (Creating user profiles).
- **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), Consent (Article 6 (1) (a) GDPR).

# Payment Service Provider

In addition to banks and credit institutions, we use other payment service providers on the basis of our interests in efficient and secure payment procedures, whose platforms users and we can use to perform payment transactions.

- Processed data types: Inventory data (e.g. names, addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos).
- Data subjects: Customers, Prospective customers, Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Targeting (e.g. profiling based on interests and behaviour, use of cookies), Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR), Consent (Article 6 (1) (a) GDPR).

#### **Services and service providers being used:**



- **Amazon Payments:** Payment service provider; Service provider: Amazon Payments Europe S.C.A. 38 avenue J.F. Kennedy, L-1855 Luxembourg; Website: https://pay.amazon.com; Privacy Policy: https://pay.amazon.com/us/help/201212490.
- American Express: Payment service provider; Service provider: American Express Europe S.A.,
  Theodor-Heuss-Allee 112, 60486 Frankfurt am Main, Germany; Website: https://
  www.mastercard.co.uk; Privacy Policy: https://www.americanexpress.com/de/legal/online-datenschutzerklarung.htmll.
- Apple Pay: Payment services provider; Service provider: Apple Inc., Infinite Loop, Cupertino, CA 95014, USA; Website: https://www.apple.com/apple-pay/; Privacy Policy: https://www.apple.com/privacy/privacy-policy/.
- **Discover:** Payment service provider; Service provider: Discover Financial Services, Attn: ECP Privacy Operations, P.O. Box 795, Deerfield IL 60015, USA; Website: https://www.discover.com/; Privacy Policy: https://www.discover.com/privacy-statement/?ICMPGN=PUB\_FTR\_QL\_PRIVACY.
- **EPS (Electronic Payment Standard):** Payment service provider; Service provider: Firma Studiengesellschaft für Zusammenarbeit im Zahlungsverkehr GmbH, Frankgasse 10/8, 1090 Wien, Austria; Website: https://www.eps-ueberweisung.at/; Privacy Policy: https://eservice.stuzza.at/de/datenschutzerklaerung.html.
- **Flattr:** Flattr Online payment and donation service; Service provider: Flattr AB, Box 4111, 203 12 Malmö, Sweden; Website: https://flattr.com/; Privacy Policy: https://flattr.com/privacy.
- **Giropay:** Payment service provider; Service provider: giropay GmbH, An der Welle 4, 60322 Frankfurt, Germany; Website: https://www.giropay.de; Privacy Policy: https://www.giropay.de/rechtliches/datenschutzerklaerung/.
- Google Pay: Payment services provider; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://pay.google.com/intl/en\_uk/about/; Privacy Policy: https://policies.google.com/privacy.
- Heidelpay: Payment service provider; Service provider: heidelpay GmbH, Vangerowstraße 18, 69115 Heidelberg, Germany; Website: https://www.heidelpay.com; Privacy Policy: https:// www.heidelpay.com/de/datenschutz.
- **iDEAL:** Payment service provider; Service provider: Currence Holding B.V., Beethovenstraat 300 Amsterdam, 1077, Netherlands; Website: https://www.ideal.nl/en; Privacy Policy: https://www.ideal.nl/en/disclaimer-privacy-statement/.
- Klarna / Sofortüberweisung: Payment service provider; Service provider: Klarna Bank AB (publ),
   Sveavägen 46, 111 34 Stockholm, Sweden; Website: https://www.klarna.com; Privacy Policy: https://www.klarna.com/de/datenschutz.



- **Mastercard:** Payment service provider; Service provider: Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium; Website: https://www.mastercard.co.uk; Privacy Policy: https://www.mastercard.co.uk/en-gb/about-mastercard/what-we-do/privacy.html.
- **PayPal:** Payment service provider (e.g. PayPal, PayPal Plus, Braintree, Braintree); Service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; Website: https://www.paypal.com; Privacy Policy: https://www.paypal.com/de/webapps/mpp/ua/privacy-full.
- **Shop Pay (Shopify):** Payment service provider; Service provider: Shopify International Limited, Victoria Buildings, 2. Etage,1-2 Haddington Road, Dublin 4, D04 XN32, Ireland; Website: https://www.shopify.com; Privacy Policy: https://www.shopify.com/legal/privacy.
- **Skrill:** Payment service provider; Service provider: Skrill Limited, 25 Canada Square, London E14 5LQ, UK; Website: https://www.skrill.com/en/; Privacy Policy: https://www.skrill.com/en/footer/privacypolicy/.
- **Stripe:** Payment service provider; Service provider: Stripe, Inc., 510 Townsend Street, San Francisco, CA 94103, USA; Website: https://stripe.com/en-de; Privacy Policy: https://stripe.com/en-de/privacy.
- **Visa:** Payment service provider; Service provider: Visa Europe Services Inc., Zweigniederlassung London, 1 Sheldon Square, London W2 6TT, UK; Website: https://www.visa.de; Privacy Policy: https://www.visa.de/datenschutz.

## Provision of online services and web hosting

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

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

**E-mail Sending and Hosting**: The web hosting services we use also include sending, receiving and storing e-mails. For these purposes, the addresses of the recipients and senders, as well as other information relating to the sending of e-mails (e.g. the providers involved) and the contents of the respective e-mails are processed. The above data may also be processed for SPAM detection purposes. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received (unless a so-called end-to-end encryption method



is used). We can therefore accept no responsibility for the transmission path of e-mails between the sender and reception on our server.

**Collection of Access Data and Log Files**: We, ourselves or our web hosting provider, collect data on the basis of each access to the server (so-called server log files). Server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a general rule, IP addresses and the requesting provider.

The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal load balancing of the servers .

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

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

## Services and service providers being used:

- Amazon Web Services (AWS): Web hosting and infrastructural services; Service provider: Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA; Website: https://aws.amazon.com/; Privacy Policy: https://aws.amazon.com/de/privacy/?nc1=f\_pr.
- Cloudflare: Content-Delivery-Network (CDN); Service provider: Cloudflare, Inc., 101 Townsend St, San Francisco, CA 94107, USA; Website: https://www.cloudflare.com; Privacy Policy: https://www.cloudflare.com/privacypolicy/.
- **Raygun:** Technical fault, crash and performance monitoring; Service provider: Raygun Limited, L7, 59 Courtenay Place, Te Aro, Wellington, 6011, New Zealand; Website: https://raygun.com; Privacy Policy: https://raygun.com/privacy; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): As part of the contract.
- **Sentry:** Monitoring system stability and identifying code errors Information about the device or error time are collected pseudonymously and are deleted afterwards; Service provider: Functional Software Inc., Sentry, 132 Hawthorne Street, San Francisco, California 94107, USA; Website: https://



sentry.io; Security measures: IP Masking (Pseudonymization of the IP address); Privacy Policy: https://sentry.io/privacy.

# Special Notes on Applications (Apps)

We process the data of the users of our application to the extent necessary to provide the users with the application and its functionalities, to monitor its security and to develop it further. Furthermore, we may contact users in compliance with the statutory provisions if communication is necessary for the purposes of administration or use of the application. In addition, we refer to the data protection information in this privacy policy with regard to the processing of user data.

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

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

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

**Processing of stored contacts**: When using our application, the contact information of persons (e.g. name, e-mail address and telephone number) stored in the contact directory of the device is processed. The use of the contact information requires user authorization, which can be withdrawn at any time. The use of the contact information serves only to provide the respective functionality of our application, according to its description to the users, or its typical and expectable functionality. Users are advised that permission to



process the contact information must be granted and, especially in the case of natural persons, their consent or a legal permission is required.

**Use of contact data for contact matching purposes**: The data of contacts stored in the contact directory of the device can be used to check whether these contacts also use our application. For this purpose, the contact data of the respective contacts (which includes the telephone number and e-mail address) are uploaded to our server and used only for the purpose of matching.

- Processed data types: Inventory data (e.g. names, addresses), Meta/communication data (e.g. device information, IP addresses), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- Purposes of Processing: Provision of contractual services and customer support.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

# Registration, Login and User Account

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

Users may be informed by e-mail of information relevant to their user account, such as technical changes. If users have terminated their user account, their data will be deleted with regard to the user account, subject to a statutory retention obligation. It is the responsibility of the users to secure their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract.

Within the scope of using our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the user's protection against misuse and other unauthorized use. This data will not be passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Meta/communication data (e.g. device information, IP addresses).
- Data subjects: Users (e.g. website visitors, users of online services).



- Purposes of Processing: Provision of contractual services and customer support, Security measures, Managing and responding to inquiries.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

# Single Sign-on Authentication

Single Sign-On" or "Single Sign-On Authentication or Logon" are procedures that allow users to log in to our online services using a user account with a provider of Single Sign-On services (e.g. a social network). The prerequisite for Single Sign-On Authentication is that users are registered with the respective Single Sign-On provider and enter the required access data in the online form provided for this purpose, or are already logged in with the Single Sign-On provider and confirm the Single Sign-On login via the button.

Authentication takes place directly with the respective single sign-on provider. Within the scope of such authentication, we receive a user ID with the information that the user is logged in with the respective single sign-on provider under this user ID and an ID that cannot be used for other purposes (so-called "user handle"). Whether we receive further data depends solely on the single sign-on procedure used, the data releases selected as part of authentication and also which data users have released in the privacy or other settings of the user account with the single sign-on provider. Depending on the single sign-on provider and the user's choice, there can be different data, usually the e-mail address and the user name. The password entered by the single sign-on provider as part of the single sign-on procedure is neither visible to us nor is it stored by us.

Users are requested to note that their data stored with us can be automatically compared with their user account with the single sign-on provider, but this is not always possible or actual. If, for example, the e-mail addresses of users change, users must change these manually in their user account with us.

We can use single sign-on authentication, provided that it has been agreed with users in the context of prefulfillment or fulfillment of the contract, in the context of consent processing and otherwise use it on the basis of our legitimate interests and the interests of users in an effective and secure authentication system. Should users decide to no longer want to use the link of their user account with the Single Sign-On provider for the Single Sign-On procedure, they must remove this link within their user account with the Single Sign-On provider. If users wish to delete their data from us, they must cancel their registration with us.

**Facebook Single-Sign-On**: We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or receipt as part of a transmission (but not the further processing) of Event Data that Facebook collects or receives as part of a transmission for the following purposes using the Facebook single sign-on registration procedures that are implemented on our online services: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and



transactional messages (e.g., b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", https://www.facebook.com/legal/ controller\_addendum), which specifically addresses the security measures that Facebook must take (https:// www.facebook.com/legal/terms/data security terms) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", https://www.facebook.com/legal/terms/dataprocessing), the "Data Security Conditions" (https://www.facebook.com/legal/terms/data security terms) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum, https:// www.facebook.com/legal/EU\_data\_transfer\_addendum). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook.

Instagram Single-Sign-On: We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or receipt as part of a transmission (but not the further processing) of Event Data that Facebook collects or receives as part of a transmission for the following purposes using the Facebook single sign-on registration procedures that are implemented on our online services: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", https://www.facebook.com/legal/ controller addendum), which specifically addresses the security measures that Facebook must take (https:// www.facebook.com/legal/terms/data\_security\_terms) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", https://www.facebook.com/legal/terms/dataprocessing), the "Data Security Conditions" (https://www.facebook.com/legal/terms/data\_security\_terms) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum, https:// www.facebook.com/legal/EU\_data\_transfer\_addendum). The rights of users (in particular to access to



information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook.

- Processed data types: Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), 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).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- Purposes of Processing: Provision of contractual services and customer support, Authentication processes.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Apple Single-Sign-On:** Authentication service; Service provider: Apple Inc., Infinite Loop, Cupertino, CA 95014, USA; Website: https://www.apple.com; Privacy Policy: https://www.apple.com/legal/privacy/en-ww/.
- Facebook Single-Sign-On: Authentication service; Service provider: https://www.facebook.com, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: https://www.facebook.com; Privacy Policy: https://www.facebook.com/about/privacy; Opt-Out: https://www.facebook.com/settings?tab=ads.
- Google Single-Sign-On: Authentication service; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://www.google.com; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- **Instagram Single-Sign-On:** Authentication service; Service provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; Website: https://www.instagram.com; Privacy Policy: https://instagram.com/about/legal/privacy.
- **Microsoft Single-Sign-On:** Authentication service; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: https://www.microsoft.com; Privacy Policy:



https://privacy.microsoft.com/de-de/privacystatement, Security information: https://www.microsoft.com/de-de/trustcenter.

- **OpenID Single-Sign-On:** Authentication service; Service provider: OpenID Foundation, 2400 Camino Ramon, Suite 375, San Ramon, CA 94583, USA; Website: https://openid.net; Privacy Policy: https://openid.net/foundation/policies/.
- Twitter Single-Sign-On: Authentication service; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: https://twitter.com; Privacy Policy: https://twitter.com/de/privacy; Opt-Out: https://twitter.com/personalization.
- Yahoo! Single-Sign-On: Authentication service; Service provider: Oath (EMEA) Limited, 5-7 Point Square, North Wall Quay, Dublin 1, Ireland; Website: https://www.yahoo.com/; Privacy Policy: https://policies.oath.com/ie/de/oath/privacy/index.html.

# Blogs and publication media

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

- Processed data types: Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Contacting us

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



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

- Processed data types: Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Payment Data (e.g. bank details, invoices, payment history), Contract data (e.g. contract object, duration, customer category), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Customers, Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication, Managing and responding to inquiries, Feedback (e.g. collecting feedback via online form), Polls and Questionnaires (e.g. surveys with input options, multiple choice questions).
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR), Performance of a tasks carried out in the public interest (Article 6 (1) (e) GDPR).

## **Services and service providers being used:**

HubSpot: Customer relations and service software (management of customer inquiries from various channels), ticketing system, feedback, satisfaction and other surveys; Service provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; Website: https://www.hubspot.de; Privacy Policy: https://legal.hubspot.com/privacy-policy.

### Chatbots and chat functions

We provide online chats and chatbot functions as a means of communication (together referred to as "Chat Services"). A chat is an online conversation that is conducted with a certain degree of immediacy. A chatbot is software that answers users' questions or informs them about messages. If you use our chat functions, we may process your personal data.

If you use our Chat Services within an online platform, your identification number is also stored within the respective platform. We may also collect information about which users interact with our Chat Services and when. Furthermore, we store the content of your conversations via the Chat Services and log registration and consent processes in order to be able to prove these in accordance with legal requirements. We would like to inform users that the respective platform provider can find out that and when users communicate with our Chat Services and can collect technical information about the user's device used and, depending on the settings of their device, also location information (so-called metadata) for the purpose of optimising the respective services and for security purposes. Likewise, the metadata of communication via



Chat Services (i.e., information about who has communicated with whom) could be used by the respective platform providers for marketing purposes or to display advertising tailored to users in accordance with their regulations, to which we refer for further information.

If users agree to activate information with regular messages to a chatbot, they have the possibility to unsubscribe from the information for the future at any time. The chatbot points out to users how and with which terms they can unsubscribe the messages. By unsubscribing from the chatbot messages, Users' data is deleted from the directory of message recipients.

We use the aforementioned information to operate our Chat Services, e.g. to address users personally, to answer their inquiries, to transmit any requested content and also to improve our Chat Services (e.g. to "teach" chatbots answers to frequently asked questions or to identify unanswered inquiries).

**Information on Legal basis:** We use the Chat Services on the basis of a consent if we first obtain the permission of the users to process their data by the Chat Services (this applies in cases where users are asked for consent, e.g. so that a chatbot regularly sends them messages). If we use Chat Services to answer user queries about our services or our company, this is done for contractual and pre-contractual communication. In addition, we use Chat Services based on our legitimate interests in optimizing the Chat Services, its operating efficiency and enhancing the positive user experience.

**Withdrawal, objection and deletion:** You can revoke a given consent at any time or contradict the processing of your data in the context of our hatbot use.

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

#### **Services and service providers being used:**

• **HubSpot:** Chatbot and assistance software and related services; Service provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; Website: https://www.hubspot.com; Privacy Policy: https://legal.hubspot.com/privacy-policy.

# Push notifications

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



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

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

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

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

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

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

#### Contents:

"Information about us, our services, promotions and offers."

"Technical notes and changes to our application and its features.".

 Processed data types: Location data (Information on the geographical position of a device or person), Usage data (e.g. websites visited, interest in content, access times).

<sup>&</sup>quot;Notes on recent posts and comments."



- **Purposes of Processing:** Provision of contractual services and customer support, Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

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

We use third-party platforms and applications (hereinafter referred to as "third party providers") for the purposes of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we observe the legal requirements.

In this context, data of the communication participants will be processed and stored on the servers of third parties, as far as these are part of communication processes with us. This data may include, but is not limited to, registration and contact details, visual and voice contributions, chat entries and shared screen content.

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 observe the data protection information of the respective third party providers.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers or certain functions (e.g. permission to record conversations), the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interest in efficient and secure communication with our communication partners. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

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



# Services and service providers being used:

- **GoToMeeting:** Konferenz-Software; Service provider: LogMeIn Ireland Limited, Bloodstone Building Block C 70, Sir John Rogerson's Quay Dublin 2, Ireland, parent company: LogMeIn, Inc., 320 Summer Street, Boston, MA 02210 320 Summer Street Boston, Massachusetts 02210, USA; Website: https://www.gotomeeting.com/; Privacy Policy: https://www.logmeininc.com/legal/privacy.
- **TeamViewer:** Conference Software; Service provider: TeamViewer GmbH, Jahnstr. 30, 73037 Göppingen, Germany; Website: https://www.teamviewer.com/en/; Privacy Policy: https://www.teamviewer.com/en/privacy-policy/.

# **Job Application Process**

The application process requires applicants to provide us with the data necessary for their assessment and selection. The information required can be found in the job description or, in the case of online forms, in the information contained therein.

In principle, the required information includes personal information such as name, address, a contact option and proof of the qualifications required for a particular employment. Upon request, we will be happy to provide you with additional information.

If made available, applicants can submit their applications via an online form. The data will be transmitted to us encrypted according to the state of the art. Applicants can also send us their applications by e-mail. Please note, however, that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received. We can therefore accept no responsibility for the transmission path of the application between the sender and the reception on our server. For the purposes of searching for applicants, submitting applications and selecting applicants, we may make use of the applicant management and recruitment software, platforms and services of third-party providers in compliance with legal requirements. Applicants are welcome to contact us about how to submit their application or send it to us by regular mail.

**Processing of special categories of data:** If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can exercise his/her rights arising from labour law and social security and social protection law and fulfil his/her duties in this regard, their processing shall be carried out in accordance with Article 9 (1)(b) GDPR, in the case of the protection of vital interests of applicants or other persons pursuant to Article 9 (1)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (1)(h)



GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (1)(a) GDPR.

**Ereasure of data:** In the event of a successful application, the data provided by the applicants may be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicants' data will also be deleted if an application is withdrawn, to which applicants are entitled at any time. Subject to a justified revocation by the applicant, the deletion will take place at the latest after the expiry of a period of six months, so that we can answer any follow-up questions regarding the application and comply with our duty of proof under the regulations on equal treatment of applicants. Invoices for any reimbursement of travel expenses are archived in accordance with tax regulations.

**Admission to a talent pool -** Admission to an talent pool, if offered, is based on consent. Applicants are informed that their consent to be included in the talent pool is voluntary, has no influence on the current application process and that they can revoke their consent at any time for the future.

- **Processed data types:** 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:** Job applicants.
- **Purposes of Processing:** Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- **Legal Basis:** Job application process as a pre-contractual or contractual relationship (Article 9 (2) (b) GDPR).

## **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 following purposes: document storage and administration, calendar management, e-mail delivery, spreadsheets and presentations, exchange of documents, content and information with specific recipients or publication of websites, forms or other content and information, as well as chats and participation in audio and video conferences.

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).

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

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

#### Services and service providers being used:

• **Google Cloud Services:** Cloud storage services; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://cloud.google.com/; Privacy Policy: https://www.google.com/policies/privacy, Security information: https://cloud.google.com/security/privacy.

## **Newsletter and Electronic Communications**

We send newsletters, e-mails and other electronic communications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

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

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



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

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

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

**Measurement of opening rates and click rates**: The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file, which is retrieved from our server when the newsletter is opened or, if we use a mailing service provider, from its server. Within the scope of this retrieval, technical information such as information about the browser and your system, as well as your IP address and time of retrieval are first collected. This information is used for the technical improvement of our newsletter on the basis of technical data or target groups and their reading behaviour on the basis of their retrieval points (which can be determined with the help of the IP address) or access times. This analysis also includes determining whether newsletters are opened, when they are opened and which links are clicked. This information is assigned to the individual newsletter recipients and stored in their profiles until the profiles are deleted. The evaluations serve us much more to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The measurement of opening rates and click rates as well as the storage of the measurement results in the profiles of the users and their further processing are based on the consent of the users.

A separate objection to the performance measurement is unfortunately not possible, in this case the entire newsletter subscription must be cancelled or objected to. In this case, the stored profile information will be deleted.

- Processed data types: Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Meta/communication data (e.g. device information, IP addresses), Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).



- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion tracking (Measurement of the effectiveness of marketing activities), Profiling (Creating user profiles).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

## Services and service providers being used:

- Google Analytics: Measuring the success of email campaigns and building user profiles with a storage period of up to two years; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://marketingplatform.google.com/intl/en/about/analytics/; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- **HubSpot:** Email marketing platform; Service provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; Website: https://www.hubspot.com; Privacy Policy: https://legal.hubspot.com/privacy-policy.
- Mailchimp: Email marketing platform; Service provider: "Mailchimp" Rocket Science Group, LLC,
   675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA; Website: https://mailchimp.com;
   Privacy Policy: https://mailchimp.com/legal/privacy/.
- Mailgun: Email marketing platform; Service provider: Mailgun Technologies, Inc., 535 Mission St.,
   San Francisco, CA 94105, USA; Website: https://www.mailgun.com; Privacy Policy: https://www.mailgun.com/privacy-policy.
- **Salesforce:** Email marketing platform; Service provider: salesforce.com Germany GmbH, Erika-Mann-Str. 31, 80636 München, Germany, parent company: Salesforce.com, inc. Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA; Website: https://www.salesforce.com; Privacy Policy: https://www.salesforce.com/company/privacy/.

## 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 withdrawal or objection, we may store the data required to prove consent for up to three years on the basis of our legitimate interests before we delete them. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is affirmed.

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

  Inhalte der Vorschau werden geladen, bitte noch ein bisschen Gelduld...

Inhalte der Vorschau werden geladen, bitte

noch ein bisschen Gelduld...

## 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.

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

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **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), Conversion tracking (Measurement of the effectiveness of marketing activities), Profiling (Creating user profiles), Interest-based and behavioral marketing, Clicktracking, A/B Tests, Feedback (e.g. collecting feedback via online form), Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.), Polls and Questionnaires (e.g. surveys with input options, multiple choice questions), Remarketing.
- Security measures: IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Google Analytics:** web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://marketingplatform.google.com/intl/en/about/analytics/; Privacy Policy: https://policies.google.com/privacy.
- Google Optimize: Use of Google Analytics data for the purpose of improving areas of our online services and improving the targeting of our marketing activities on potential user interests; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://optimize.google.com; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- Google Tag Manager: Google Tag Manager is a solution with which we can manage so-called website tags via an interface and thus integrate other services into our online services (please refer to further details in this privacy policy). With the Tag Manager itself (which implements the tags), for example, no user profiles are created or cookies are stored. Google only receives the IP address of



the user, which is necessary to run the Google Tag Manager. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy.

- Hotjar: Testing and Optimization; Service provider: Hotjar Ltd., 3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta; Website: https://www.hotjar.com; Security measures: IP Masking (Pseudonymization of the IP address); Privacy Policy: https://www.hotjar.com/legal/policies/privacy. Cookie Policy: https://www.hotjar.com/legal/policies/cookie-information; Retention period: The cookies that Hotjar uses have a different "lifetime"; some last up to 365 days, some only last during the current visit; Opt-Out: https://www.hotjar.com/legal/compliance/opt-out.
- **Optimizely:** Web analysis, testing, optimization; Service provider: Optimizely Inc, 631 Howard Street, Suite 100, San Francisco, CA 94105, USA; Website: https://www.optimizely.com/de; Privacy Policy: https://www.optimizely.com/privacy.

# Onlinemarketing

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 in 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. 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.

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

Facebook Pixel and Custom Audiences (Custom Audiences): With the help of the Facebook pixel (or equivalent functions, to transfer Event-Data or Contact Information via interfaces or other software in apps), Facebook is on the one hand able to determine the visitors of our online services as a target group for the presentation of ads (so-called "Facebook ads"). Accordingly, we use Facebook pixels to display Facebook ads placed by us only to Facebook users and within the services of partners cooperating with Facebook (socalled "audience network" https://www.facebook.com/audiencenetwork/) who have shown an interest in our online services or who have certain characteristics (e.g. interests in certain topics or products that are determined on the basis of the websites visited) that we transmit to Facebook (so-called "custom audiences"). With the help of Facebook pixels, we also want to ensure that our Facebook ads correspond to the potential interest of users and do not appear annoying. The Facebook pixel also enables us to track the effectiveness of Facebook ads for statistical and market research purposes by showing whether users were referred to our website after clicking on a Facebook ad (known as "conversion tracking"). We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or transmission (but not the further processing) of "event data" that Facebook collects or receives as part of a transmission for the following purposes using the Facebook pixel and comparable functions (e.g. APIs) that are implemented in our online services: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", https://www.facebook.com/legal/controller\_addendum), which specifically addresses the



security measures that Facebook must take (https://www.facebook.com/legal/terms/data security terms) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", https://www.facebook.com/legal/terms/ dataprocessing), the "Data Security Conditions" (https://www.facebook.com/legal/terms/ data\_security\_terms) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum, https://www.facebook.com/legal/ EU\_data\_transfer\_addendum). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Facebook Conversions API: We use the "Conversions API" provided by Facebook. The Conversions API is an interface with which event data is sent directly from our servers to Facebook. The functionality and processing of data within the framework of the Conversions API corresponds to the functionality and processing within the framework of the use of the Facebook Pixel, and therefore we refer to the data protection information on the Facebook Pixel and Custom Audiences in this respect.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Location data (Information on the geographical position of a device or person), 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).
- Data subjects: Users (e.g. website visitors, users of online services), Prospective customers.
- Purposes of Processing: Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion tracking (Measurement of the effectiveness of marketing activities), Interest-based and behavioral marketing, Profiling (Creating user profiles), Web Analytics (e.g. access statistics, recognition of returning visitors), Cross-Device Tracking (Device-independent processing of user data for marketing purposes), Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- Legal Basis: Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).



• **Opt-Out:** 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.

# Services and service providers being used:

- Google Analytics: Online marketing and web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://marketingplatform.google.com/intl/en/about/analytics/; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- Google Ads and Conversion Tracking: We use the Google "Ads" online marketing method to place ads on the Google advertising network (e.g., in search results, videos, websites, etc.) so that they are displayed to users who have an alleged interest in the ads. We also measure the conversion of the ads. However, we only know the anonymous total number of users who clicked on our ad and were redirected to a page tagged with a conversion tracking tag. However, we ourselves do not receive any information that can be used to identify users. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy.
- Google Signals: Additional marketing options that apply only to users who have enabled personalized ads on Google (https://support.google.com/ads/answer/2662856) and include device-based and cross-device data processing; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://support.google.com/analytics/answer/7532985? hl=en; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- **Google Adsense with personalized ads:** We use the Google Adsense service with personalized ads, which helps us to display ads within our online services and we receive a remuneration for their display or other use.; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA



- 94043, USA; Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy.
- Facebook Pixel and Custom Audiences (Custom Audiences): Service provider: https:// www.facebook.com, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: https:// www.facebook.com; Privacy Policy: https://www.facebook.com/about/privacy; Opt-Out: https:// www.facebook.com/settings?tab=ads.

# Affiliate-Programms und Affiliate-Links

Within our online services, we include so-called affiliate links or other references (which for example may include search forms, widgets or discount codes) to the offers and services of third parties (collectively referred to as "affiliate links"). When users follow affiliate links or subsequently take advantage of offers, we may receive commission or other benefits (collectively referred to as "commission") from these third parties. In order to be able to track whether the users have followed the offers of an affiliate link used by us, it is necessary for the respective third party to know that the users have followed an affiliate link used within our online services. The assignment of affiliate links to the respective business transactions or other actions (e.g., purchases) serves the sole purpose of commission settlement and is removed as soon as it is no longer required for this purpose.

For the purposes of the aforementioned affiliate link assignment, the affiliate links may be supplemented by certain values that may be a component of the link or otherwise stored, for example, in a cookie. The values may include in particular the source website (referrer), time, an online identifier of the operator of the website on which the affiliate link was located, an online identifier of the respective offer, the type of link used, the type of offer and an online identifier of the user.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- Processed data types: Contract data (e.g. contract object, duration, customer category), Usage
  data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device
  information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- Purposes of Processing: Affiliate Tracking.



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

## **Services and service providers being used:**

• Amazon Affiliate Program: Amazon Affiliate Program - Amazon and the Amazon logo are trademarks of Amazon.com, Inc. or one of its affiliates. Service provider: Amazon Europe Core S.à.r.l., Amazon EU S.à.r.l., Amazon Services Europe S.à.r.l. and Amazon Media EU S.à.r.l., all four located at 38, avenue John F. Kennedy, L-1855 Luxembourg, and Amazon Instant Video Germany GmbH, Domagkstr. 28, 80807 Munich (together "Amazon Europe"), parent company: Amazon.com, Inc., 2021 Seventh Ave, Seattle, Washington 98121, USA.; Website: https://www.amazon.com; Privacy Policy: https://www.amazon.com/gp/help/customer/display.html?nodeId=201909010.

# Affiliate Program

We offer an affiliate program, i.e. we offer commissions or other benefits (collectively referred to as "Commission") to users (collectively referred to as "Affiliates") who refer to our offers and services. The reference is made through a link associated with the Affiliate or other methods (e.g., discount codes) that allow us to recognize that the use of our services was based on the reference (collectively referred to as "Affiliate Links").

In order to track whether users have perceived our services based on affiliate links used by affiliates, it is necessary for us to know that users have followed an affiliate link. The assignment of affiliate links to the respective business transactions or other use of our services serves solely the purpose of Commission billing and will be cancelled as soon as it is no longer necessary for the purpose.

For the purposes of the aforementioned affiliate link assignment, the affiliate links may be supplemented by certain values that may be a component of the link or otherwise stored, for example, in a cookie. The values may include in particular the source website (referrer), time, an online identifier of the operator of the website on which the affiliate link was located, an online identifier of the respective service, the type of link used, the type of service and an online identifier of the user.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

 Processed data types: Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times).



- **Data subjects:** Users (e.g. website visitors, users of online services), Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and customer support, Affiliate Tracking.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

# Rating Platforms

We participate in rating procedures to evaluate, optimise and advertise our performance. If users rate us via the participating rating platforms or methods or otherwise provide feedback, the General Terms and Conditions of Business or Use and the data protection information of the providers also apply. As a rule, the rating also requires registration with the respective provider.

In order to ensure that the evaluators have actually made use of our services, we transmit, with the consent of the customer, the necessary data relating to the customer and the service or products used to the respective rating platform (this includes the name, e-mail address, order number or article number). This data is used solely to verify the authenticity of the user.

- **Processed data types:** Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Users (e.g. website visitors, users of online services).
- Purposes of Processing: Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

# 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 networs 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.

Facebook: We are jointly responsible (so called "joint controller") with Facebook Ireland Ltd. for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: https://www.facebook.com/policy), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: https:// www.facebook.com/policy). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site operators to help them understand how people interact with their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", https:// www.facebook.com/legal/terms/page\_controller\_addendum), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfill the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information about Page Insights" (https://www.facebook.com/legal/terms/ information\_about\_page\_insights\_data).

- Processed data types: Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of Processing: Contact requests and communication, Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Web Analytics (e.g. access statistics, recognition of returning visitors), Affiliate Tracking, Profiling (Creating user profiles).
- Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:



- **Instagram:** Social network; Service provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA, , Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: https://www.instagram.com; Privacy Policy: https://instagram.com/about/legal/privacy.
- **Facebook:** Social network; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: https://www.facebook.com; Privacy Policy: https://www.facebook.com/about/privacy; Opt-Out: Settings for advertisements: https://www.facebook.com/settings?tab=ads.
- LinkedIn: Social network; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place,
  Dublin 2, Ireland; Website: https://www.linkedin.com; Privacy Policy: https://www.linkedin.com/
  legal/privacy-policy; Opt-Out: https://www.linkedin.com/psettings/guest-controls/retargeting-optout.
- **Pinterest:** Social network; Service provider: Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA,; Website: https://www.pinterest.com; Privacy Policy: https://about.pinterest.com/de/privacy-policy; Opt-Out: https://about.pinterest.com/de/privacy-policy.
- SlideShare: Platform for presentations; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: https://www.linkedin.com; Privacy Policy: https://www.linkedin.com/legal/privacy-policy.
- **Snapchat:** Social network; Service provider: Snap Inc., 3000 31st Street, Santa Monica, California 90405, USA; Website: https://www.snapchat.com/; Privacy Policy: https://www.snap.com/en-US/privacy/privacy-policy, Cookie-Richtlinie: Cookie-Policy: https://www.snap.com/en-US/cookie-policy; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): https://www.snap.com/en-US/terms/standard-contractual-clauses.
- Twitter: Social network; Service provider: Twitter International Company, One Cumberland Place,
  Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite
  900, San Francisco, CA 94103, USA; Privacy Policy: https://twitter.com/de/privacy, (Settings) https://twitter.com/personalization.
- **Vimeo:** Social network and video platform; Service provider: Vimeo Inc., Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA; Website: https://vimeo.com; Privacy Policy: https://vimeo.com/privacy.
- YouTube: Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Policy: https://policies.google.com/privacy; Opt-Out: https://adssettings.google.com/authenticated.
- **Xing:** Social network; Service provider: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany; Website: https://www.xing.com; Privacy Policy: https://privacy.xing.com/en.



# 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 social media buttons as well as contributions (hereinafter uniformly referred to as "Content").

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

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

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

Facebook plugins and contents: We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or transmission (but not further processing) of "Event Data" that Facebook collects or receives as part of a transmission using the Facebook Social Plugins that run on our website for the following purposes: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", https://www.facebook.com/legal/controller\_addendum), which specifically addresses the security measures that Facebook must take (https://www.facebook.com/legal/terms/data\_security\_terms) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with



measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", https://www.facebook.com/legal/terms/dataprocessing/update), the "Data Security Conditions" (https://www.facebook.com/legal/terms/data\_security\_terms) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum, https://www.facebook.com/legal/EU\_data\_transfer\_addendum). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), 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), Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services), Communication partner (Recipients of e-mails, letters, etc.).
- Purposes of Processing: Provision of our online services and usability, Provision of contractual
  services and customer support, Security measures, Managing and responding to inquiries, Contact
  requests and communication, Direct marketing (e.g. by e-mail or postal), Targeting (e.g. profiling
  based on interests and behaviour, use of cookies), Interest-based and behavioral marketing, Profiling
  (Creating user profiles).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR), Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

#### Services and service providers being used:

• Facebook plugins and contents: Facebook Social Plugins and contents - This can include content such as images, videos or text and buttons with which users can share content from this online service within Facebook. The list and appearance of the Facebook Social Plugins can be viewed here: https://developers.facebook.com/docs/plugins/; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: https://www.facebook.com; Privacy Policy: https://



- www.facebook.com/about/privacy; Opt-Out: Settings for advertisements: https://www.facebook.com/settings?tab=ads.
- Google Fonts: We integrate the fonts ("Google Fonts") of the provider Google, whereby the data of the users are used solely for purposes of the representation of the fonts in the browser of the users. The integration takes place on the basis of our legitimate interests in a technically secure, maintenance-free and efficient use of fonts, their uniform presentation and consideration of possible licensing restrictions for their integration. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://fonts.google.com/; Privacy Policy: https://policies.google.com/privacy.
- Google Maps: We integrate the maps of the service "Google Maps" from the provider Google. The data processed may include, in particular, IP addresses and location data of users, which are not collected without their consent (usually within the framework of the settings of their mobile devices); Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://cloud.google.com/maps-platform; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- Google Maps APIs and SDKs: Interfaces to the map and location services provided by Google, which, for example, allow the addition of address entries, location determinations, distance calculations or the provision of supplementary information on locations and other places; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://cloud.google.com/maps-platform; Privacy Policy: https://policies.google.com/privacy.
- YouTube videos: Video contents; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: https://www.youtube.com; Privacy Policy: https://policies.google.com/privacy; Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout? hl=en, Settings for the Display of Advertisements: https://adssettings.google.com/authenticated.
- **Xing plugins and buttons:** Xing plugins and buttons This can include content such as images, videos or text and buttons with which users can share content from this online service within Xing. Service provider: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany; Website: https://www.xing.com; Privacy Policy: https://privacy.xing.com/en.



# 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.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- Processed data types: Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services), Customers, Prospective customers.
- Purposes of Processing: Contact requests and communication, Web Analytics (e.g. access statistics, recognition of returning visitors), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Conversion tracking (Measurement of the effectiveness of marketing activities), Affiliate Tracking, Managing and responding to inquiries, Feedback (e.g. collecting feedback via online form), Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content), Remarketing, Interest-based and behavioral marketing, Profiling (Creating user profiles).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR), Performance of a contract and prior requests (EKD) (§ 6 No. 5 DSG-EKD).



### Services and service providers being used:

- **HubSpot:** Social media publishing, reporting (e.g. traffic sources, access figures, web analysis), contact management (e.g. contact forms, direct communication and user segmentation), landing pages; Service provider: HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; Website: https://www.hubspot.de; Privacy Policy: https://legal.hubspot.com/de/privacy-policy.
- **Jira:** Web application for error management, troubleshooting and operational project management; Service provider: Atlassian Inc. (San Francisco, Harrison Street Location), 1098 Harrison Street, San Francisco, California 94103, USA; Website: https://www.atlassian.com/de/software/jira; Privacy Policy: https://www.atlassian.com/legal/privacy-policy.
- Salesforce Marketing Cloud: Salesforce Marketing Cloud bietet Marketingautomatisierungs- und Analysesoftware für E-Mail-, Mobil-, Sozial- und Online-Marketing; Service provider: salesforce.com Germany GmbH, Erika-Mann-Str. 31, 80636 München, Germany, parent company: Salesforce.com, inc. Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, USA; Website: https://www.salesforce.com; Privacy Policy: https://www.salesforce.com/company/privacy/.
- Trello: Project management tool; Service provider: Trello Inc., 55 Broadway New York, NY 10006,
  USA, parent company: Atlassian Inc. (San Francisco, Harrison Street Location), 1098 Harrison Street,
  San Francisco, California 94103, USA; Website: https://trello.com/; Privacy Policy: https://trello.com/
  privacy.

### Erasure of data

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

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

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



# Changes and Updates to the Privacy Policy

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification. If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

# Rights of Data Subjects

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

- Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- Right to Erasure and Right to Restriction of Processing: In accordance with the statutory
  provisions, you have the right to demand that the relevant data be erased immediately or,
  alternatively, to demand that the processing of the data be restricted in accordance with the
  statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** You also have the right, under the conditions laid down by law, to lodge a complaint with a supervisory authority, in particular in the Member State of your



habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

# Terminology and Definitions

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

- A/B Tests: A/B tests are designed to improve the usability and performance of online services. For example, users are presented with different versions of a website or its elements, such as input forms, on which the placement of the contents or labels of the navigation elements can differ. The behaviour of users, e.g. prolonged visits to the site or more frequent interaction with the elements, can then be used to determine which of these sites or elements are more responsive to users' needs.
- 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.
- Clicktracking: Clicktracking allows users to keep track of their movements within an entire website.
   Since the results of these tests are more accurate if the interaction of the users can be followed over a certain period of time (e.g. if a user likes to return), cookies are usually stored on the computers of the users for these test purposes.
- Content Delivery Network (CDN): A "Content Delivery Network" (CDN) is a service with whose
  help contents of our online services, in particular large media files, such as graphics or scripts, can
  be delivered faster and more securely with the help of regionally distributed servers connected via
  the Internet.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.



- 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).
- Cross-Device Tracking: Cross-Device Tracking is a form of tracking in which behavior and interest
  information of the user is recorded across all devices in so-called profiles by assigning an online
  identifier to the user. This means that user information can usually be analysed for marketing
  purposes, regardless of the browser or device used (e.g. mobile phone or desktop computer). With
  most Cross-Device Tracking providers, the online identifier is not linked to plain data such as names,
  postal addresses or e-mail addresses.
- Custom Audiences: Target group formation (or "custom audiences") is the term used when target groups are determined for advertising purposes, e.g. display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to infer that that user is interested in advertisements for similar products or the online store in which they viewed the products. Lookalike Audiences" (or similar target groups) 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. Cookies are generally used for the purposes of creating custom audiences and lookalike audiences. Target groups can be created by processing visitors of an online service or can be uploaded to the provider of an online marketing technology by means of uploading (which is usually done pseudonymised).
- **Heatmaps:** "Heatmaps" are mouse movements of the users, which are combined to an overall picture, with the help of which it can be recognized, for example, which web page elements are preferred and which web page elements users prefer less.
- IP Masking: IP masking is a method by which the last octet, i.e. the last two numbers of an IP
  address, are deleted so that the IP address alone can no longer be used to uniquely identify a
  person. IP masking is therefore a means of pseudonymising processing methods, particularly in
  online marketing.
- Interest-based and behavioral marketing: Interest-related and/or behaviour-related marketing is the term used when potential user interest in advertisements and other content is predicted if possible. This is done on the basis of information on the previous behaviour of users (e.g. visiting and staying on certain websites, purchasing behaviour or interaction with other users), which is stored in a so-called profile. For these purposes cookies are usually used.
- **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.
- 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.
- **Profiling:** "Profiling" means any automated processing of personal data consisting in the use of such personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this includes information regarding age, gender, location and movement data, interaction with websites and their contents, shopping behaviour, social interactions with other people) (e.g. interests in certain contents or products, click behaviour on a website or the 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.
- 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 allows them, for example, to optimize the content of the website to better meet the needs of their visitors. For purposes of web analytics, pseudonymous cookies and web beacons are frequently used in order to recognise returning visitors and thus obtain more precise analyses of the use of an online service.