

Privacy Policy

Preamble

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

The terms used are not gender-specific.

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Controller

Dr. Andreas Kanstein
Robert-Bosch-Str. 7
64293 Darmstadt

E-mail address:

kanstein@cesah.com

Phone:

+49 6151 392 156 12

Legal Notice:

<https://cesah.com/index.php/impressum>

Relevant legal bases according

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

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

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

Overview of processing operations

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

Categories of Processed Data

- Inventory data.

- Payment Data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.

Categories of Data Subjects

- Customers.
- Employees.
- Prospective customers.
- Communication partner.
- Users.
- Participants in sweepstakes and competitions.
- Business and contractual partners.
- Participants.

Purposes of Processing

- Provision of contractual services and customer support.
- Contact requests and communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Targeting.
- Office and organisational procedures.
- Conversion tracking.
- Affiliate Tracking.
- Managing and responding to inquiries.
- Conducting sweepstakes and contests.
- Feedback.

- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Information technology infrastructure.

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.

TLS encryption (https): To protect your data transmitted via our online services, we use TLS encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

Transmission of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such cases, 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.

Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose). If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person. In the context of our information on data processing, we may provide users with further information on the deletion and retention of data that is specific to the respective processing operation.

Rights of Data Subjects

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

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

incorrect data concerning you.

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

Use of Cookies

Cookies are small text files or other data records that store information on end devices and read information from the end devices. For example, to store the login status in a user account, the contents of a shopping cart in an e-shop, the contents accessed or the functions used. Cookies can also be used for various purposes, e.g. for purposes of functionality, security and convenience of online offers as well as the creation of analyses of visitor flows.

Information on consent: We use cookies in accordance with the statutory provisions. Therefore, we obtain prior consent from users, except when it is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is strictly necessary in order to provide an information society service explicitly requested by the subscriber or user. Essential cookies usually include cookies with functions related to the display and operability of the onlineservice, load balancing, security, storage of users' preferences and choices or similar purposes related to the provision of the main and secondary functions of the onlineservice requested by users. The revocable consent will be clearly communicated to the user and will contain the information on the respective cookie use.

Information on legal bases under data protection law: The legal basis under data protection law on which we process users' personal data with the use of cookies depends on whether we ask users for consent. If users consent, the legal basis for processing their data is their declared consent. Otherwise, the data

processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in a business operation of our online services and improvement of its usability) or, if this is done in the context of the fulfillment of our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. For which purposes the cookies are processed by us, we do clarify in the course of this privacy policy or in the context of our consent and processing procedures.

Retention period: With regard to the retention period, a distinction is drawn between the following types of cookies:

- **Temporary cookies (also known as "session cookies"):** Temporary cookies are deleted at the latest after a user has left an online service and closed his or her end device (i.e. browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the terminal device is closed. For example, the login status can be saved, or preferred content can be displayed directly when the user visits a website again. Likewise, user data collected with the help of cookies can be used for reach measurement. Unless we provide users with explicit information about the type and storage duration of cookies (e.g., as part of obtaining consent), users should assume that cookies are permanent and that the storage period can be up to two years.

General notes on revocation and objection (so-called "Opt-Out"): Users can revoke the consents they have given at any time and object to the processing in accordance with legal requirements. Users can restrict the use of cookies in their browser settings, among other options (although this may also limit the functionality of our online offering). A objection to the use of cookies for online marketing purposes can also be made through the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>.

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

Further information on processing methods, procedures and services used:

- **Processing Cookie Data on the Basis of Consent:** We 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; **Legal Basis:** Consent (Article 6(1)(a) GDPR).

Business services

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

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

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

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving. The statutory retention period for documents relevant under tax law as well as for commercial books, inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters

and reproductions of sent commercial and business letters six years. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent, or the accounting document was created, furthermore the record was made or the other documents were created.

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.

- **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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Customers; Prospective customers; Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and customer support; Security measures; Contact requests and communication; Office and organisational procedures; Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR); Compliance with a legal obligation (Article 6(1)(1)(c) GDPR); Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Customer Account:** Customers can create an account within our online offer (e.g. customer or user account, "customer account" for short). If the registration of a customer account is required, customers will 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 the customer account has been terminated, the customer account data will be deleted after the termination date, unless it is retained for purposes other than provision in the customer account or must be retained for legal reasons (e.g. internal storage of customer data, order transactions or invoices). It is the customers' responsibility to back up their data when terminating the customer Account; **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR).

- **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; **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR).
- **Events:** We process the data of the participants of the events, events and similar activities offered or organized by us (hereinafter uniformly referred to as "participants" and "events") in order to enable them to participate in the events and to make use of the services or actions associated with their participation. Insofar as we process health-related data, religious, political or other special categories of data in this context, this is done within the framework of disclosure (e.g. for thematically oriented events or serves health care, security or is done with the consent of the data subjects). The necessary information is identified as such in the context of the conclusion of the agreement, booking or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any enquiries. Insofar as we gain access to information of end customers, employees or other persons, we process this in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR).

Provision of online services and web hosting

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

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.); Security measures.
- **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).
- **Collection of Access Data and Log Files:** The access to our online services is logged in the form of 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; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.
- **ALL-INKL:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** ALL-INKL.COM - Neue Medien Münnich, Inhaber: René Münnich, Hauptstraße 68, 02742 Friedersdorf, Germany; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://all-inkl.com/>; **Privacy Policy:** <https://all-inkl.com/datenschutzzinformationen/>; **Data Processing Agreement:** Provided by the service provider.

Registration, Login and User Account

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

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

Users may be informed by e-mail of information relevant to their user account, such as technical changes.

- **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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **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; Provision of our online services and usability.
- **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR); Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Registration with pseudonyms:** Users may use pseudonyms as user names instead of real names; **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR).
- **Users' profiles are public:** The users' profiles are not publicly visible or accessible.

Contact and Inquiry Management

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

- **Processed data types:** 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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication; Managing and responding to inquiries; Feedback (e.g. collecting feedback via online form); Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); Performance of a

contract and prior requests (Article 6(1)(1)(b) GDPR).

Further information on processing methods, procedures and services used:

- **Contact form:** When users contact us via our contact form, e-mail or other communication channels, we process the data provided to us in this context to process the communicated request; **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR), Legitimate Interests (Article 6(1)(1)(f) GDPR).
- **HubSpot:** Customer management and process and sales support with personalized customer care with multi-channel communication, i.e. management of customer inquiries from different channels, and analysis and feedback functions; **Service provider:** HubSpot, Inc., 25 First St., 2nd floor, Cambridge, Massachusetts 02141, USA; **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR), Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.hubspot.de>; **Privacy Policy:** <https://legal.hubspot.com/privacy-policy>; **Data Processing Agreement:** <https://legal.hubspot.com/dpa>; **Data Privacy Framework (DPF); Standard Contractual Clauses:** <https://legal.hubspot.com/dpa>.

Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the storage and management of content (e.g. document storage and management, exchange of documents, content and information with certain recipients or publication of content and information).

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

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

- **Processed data types:** Inventory data (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 and process data (e.g. IP addresses, time information, identification numbers, consent status).

- **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; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).
- **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>; **Data Privacy Framework (DPF); Standard Contractual Clauses:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.
- **Nextcloud (hosting on own server):** Cloud storage service, with operation and storage of processed data on a server managed by us; **Service provider:** Nextcloud GmbH, Hauptmannsreute 44a, 70192 Stuttgart, Germany; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://nextcloud.com/>; **Privacy Policy:** <https://nextcloud.com/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 e-mail address solely for this purpose in a blacklist.

The logging of the registration process takes place on the basis of our legitimate interests for the purpose of proving its proper course. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests in an efficient and secure sending system.

Contents:

Information about us, our services, promotions and offers.

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status); 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); Provision of contractual services and customer support.
- **Legal Basis:** Consent (Article 6(1)(a) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one

of the contact options listed above, preferably e-mail.

Further information on processing methods, procedures and services used:

- **Measurement of opening rates and click rates:** The newsletters contain a so-called "web-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; **Legal Basis:** Consent (Article 6(1)(a) GDPR).
- **Prerequisite for the use of free services:** Consent to the sending of mailings can be made dependent on the use of free services (e.g. access to certain content or participation in certain campaigns) as a prerequisite. If the users would like to take advantage of the free service without registering for the newsletter, we offer them to contact us.

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

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

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

After revocation or objection, we store the data required to prove the past

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

- **Processed data types:** Inventory data (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)(1)(f) GDPR).

Sweepstakes and Contests

We process the personal data of participants in We process personal data of participants in competitions, contents, raffles, prize-draws or sweepstakes (hereinafter referred to as "competitions") only in compliance with the relevant data protection regulations and if the processing is contractually necessary for the provision, execution and handling of the competition, the participants have consented to the processing or the processing serves our legitimate interests (e.g. in the security of the competition or the protection of our interests against misuse by possible recording of IP addresses when submitting entries to the competition.

In the event that entries are published as part of the competitions (e.g. as part of a vote or presentation of the competition entries, or the winner or reporting on the competition), we would like to point out that the names of participants may also be published in this context. The participants can object to this at any time.

If the competitions take place within an online platform or a social network (e.g. Facebook or Instagram, hereinafter referred to as "online platform"), the usage and data protection provisions of the respective online platforms also apply. In such cases, we would like to point out that we are responsible for the information provided by the participants as part of the competition and that we must be contacted with regard to the competitions.

The data of the participants will be deleted as soon as the competition has ended and the data is no longer required to inform the winners or because questions about the competition can be expected. In general, the data of the participants will be deleted at the latest 6 months after the end of the competition. Winners' data can

be retained for a longer period of time, e.g. in order to answer questions about the prizes or to fulfil the prizes; in this case, the retention period depends on the type of prize and is up to three years for items or services, e.g. in order to be able to process warranty claims. Furthermore, the participants' data may be stored for longer, e.g. in the form of coverage of the competition in online and offline media.

Insofar as data was collected for other purposes as part of the competition, its processing and storage period shall be governed by the privacy information for this use (e.g. in the case of registration for a newsletter as part of a competition).

- **Processed data types:** Inventory data (e.g. names, addresses); Content data (e.g. text input, photographs, videos); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Participants in sweepstakes and competitions.
- **Purposes of Processing:** Conducting sweepstakes and contests.
- **Legal Basis:** Performance of a contract and prior requests (Article 6(1)(1)(b) GDPR).

Surveys and Questionnaires

We conduct surveys and interviews to gather information for the survey purpose communicated in each case. The surveys and questionnaires ("surveys") carried out by us are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical execution of the survey (e.g. processing the IP address to display the survey in the user's browser or to enable a resumption of the survey with the aid of a cookie).

- **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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.); Participants.
- **Purposes of Processing:** Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Microsoft Cloud Services:** Cloud storage, cloud infrastructure services and cloud-based application software; **Service provider:** Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, parent company: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://microsoft.com>; **Privacy Policy:** <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>; **Data Processing Agreement:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>; **Data Privacy Framework (DPF); Standard Contractual Clauses:** <https://www.microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>.

Web Analysis, Monitoring and Optimization

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

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

Unless otherwise stated below, profiles, i.e. data aggregated for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

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

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

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Profiles with user-related information (Creating user profiles).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6(1)(a) GDPR).

Further information on processing methods, procedures and services used:

- **Matomo:** Matomo is software that is used for the purposes of web analysis and reach measurement. As part of the use of Matomo, cookies are generated and stored on the user's terminal device. User data collected through the use of Matomo is processed only by us and is not shared with third parties. The cookies are stored for a maximum period of 13 months:
https://matomo.org/faq/general/faq_146/; **Legal Basis:** Consent (Article 6(1)(a) GDPR); **Retention period:** The cookies have a maximum storage period of 13 months.

Online Marketing

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

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar procedure 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 and used functions. If users have consented to the collection of their sideline data, these can also be processed.

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

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

Exceptionally, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

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

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

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **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); Marketing; Profiles with user-related information (Creating user profiles); Conversion tracking (Measurement of the effectiveness of marketing activities); Affiliate Tracking; Provision of our online services and usability.

- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Legitimate Interests (Article 6(1)(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>.

Further information on processing methods, procedures and services used:

- **Facebook Ads:** Placement of ads within the Facebook platform and analysis of ad results; **Service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.facebook.com>; **Privacy Policy:** <https://www.facebook.com/about/privacy>; **Data Privacy Framework (DPF); Opt-Out:** Wir verweisen auf die Datenschutz- und Werbeeinstellungen im Profil des Nutzers auf der Facebook-Plattform sowie auf das Einwilligungsverfahren von Facebook und die Kontaktmöglichkeiten von Facebook zur Ausübung von Informations- und sonstigen Betroffenenrechten in der Datenschutzerklärung von Facebook; **Further Information:** User event data, i.e. behavioral and interest data, is processed for the purposes of targeted advertising and audience building on the basis of the joint controllership agreement ("Controller Addendum", https://www.facebook.com/legal/controller_addendum). The joint controllership is limited to the collection and transfer of the data to Meta Platforms Ireland Limited, a company located in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which concerns in particular the transfer of the data to the parent company Meta Platforms, Inc. in the USA (on the basis of standard contractual clauses concluded between Meta Platforms Ireland Limited and Meta Platforms, Inc.).

Profiles in Social Networks (Social Media)

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

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

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

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

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

- **Processed data types:** Contact data (e.g. 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 and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication; Feedback (e.g. collecting feedback via online form); Marketing.
- **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Instagram:** Social network; **Service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.instagram.com>; **Privacy Policy:** <https://instagram.com/about/legal/privacy>.
- **Facebook-Seiten:** Profiles within the social network Facebook - We are jointly responsible (so called "joint controller") with Meta Platforms Ireland

Limited 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); **Service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.facebook.com>; **Privacy Policy:** <https://www.facebook.com/about/privacy>; **Data Privacy Framework (DPF); Standard Contractual Clauses:**

https://www.facebook.com/legal/EU_data_transfer_addendum; **Further Information:** Joint Controllershship Agreement:

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

- **LinkedIn:** Social network; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Plaza Wilton Place, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>; **Data Processing Agreement:** <https://legal.linkedin.com/dpa>; **Standard Contractual Clauses:** <https://legal.linkedin.com/dpa>; **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

- **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; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Privacy Policy:** <https://twitter.com/privacy>, (Settings: <https://twitter.com/personalization>); **Data Privacy Framework (DPF).**
- **YouTube:** Social network and video platform; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Privacy Policy:** <https://policies.google.com/privacy>; **Data Privacy Framework (DPF); Opt-Out:** <https://adssettings.google.com/authenticated>.

Plugins and embedded functions and content

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

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

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status); 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).
- **Purposes of Processing:** Provision of our online services and usability; Provision of contractual services and customer support.
- **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).

Further information on processing methods, procedures and services used:

- **Google Fonts (Provision on own server):** Provision of font files for the purpose of a user-friendly presentation of our online services; **Service provider:** The Google Fonts are hosted on our server, no data is transmitted to Google; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).
- **Font Awesome (Provision on own server):** Display of fonts and symbols; **Service provider:** The Font Awesome icons are hosted on our server, no data is transmitted to the provider of Font Awesome; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR).
- **OpenStreetMap:** We integrate the maps of the service "OpenStreetMap", which are offered based on the Open Data Commons Open Database License (ODbL) by the OpenStreetMap Foundation (OSMF). OpenStreetMap uses user data exclusively for the purpose of displaying map functions and temporarily storing the selected settings. This data may include, in particular, IP addresses and location data of users, which are not collected without their consent (usually within the context of the settings of their mobile devices); **Service provider:** OpenStreetMap Foundation (OSMF); **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.openstreetmap.de>; **Terms & Conditions:** https://wiki.osmfoundation.org/wiki/Privacy_Policy; **Privacy Policy:** https://wiki.osmfoundation.org/wiki/Privacy_Policy.
- **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; **Legal Basis:** Legitimate Interests (Article 6(1)(1)(f) GDPR); **Website:** <https://www.youtube.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Privacy Framework (DPF); Opt-Out:** Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

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.