

# Privacy Notice

## 1. Introduction

We would like to use the information below to provide you "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the "WEEEllogic GmbH". The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data on alternative ways, such as by phone or by post to us.

## 2. Data controller

The data controller, as defined by the GDPR, is:

### **WEEEllogic GmbH**

Max-Eyth-Str. 35, 71088 Holzgerlingen, Deutschland

Phone: +49 7031 410958-0

E-mail: [contact@weeellogic.com](mailto:contact@weeellogic.com)

Data controller's representative: Romain Letenneur

## 3. Data protection officer

You can reach the data protection officer as follows:

Michael Weinmann

Phone: +49 173 7632962

E-mail: michael.weinmann@dsb-office.de

You may contact our data protection officer directly at any time if you have any questions or suggestions regarding data protection.

## **4. Definitions**

This Privacy Notice is based on the terminology used by the European legislature and legislature in the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand, both for the public and for our customers and business partners. To ensure this, we would like to explain in advance the terminology used. Among other things, we use the following terms in this privacy policy.

We use the following terms in this Privacy Notice, among others:

### **1. Personal data**

Personal data means any information relating to an identified or identifiable natural person. 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.

### **2. Data subject**

A Data subject is any identified or identifiable natural person whose personal data is processed by the controller (our company).

### **3. Processing**

Processing is any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### **4. Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their future processing.

#### **5. Profiling**

Profiling is any form of automated processing of personal data which consists in using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location.

#### **6. Pseudonymisation**

Pseudonymisation is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures which ensure that the personal data cannot be attributed to an identified or identifiable natural person.

#### **7. Data processor**

Data processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

#### **8. Recipient**

A recipient is a natural or legal person, public authority, agency, or other body to whom personal data are disclosed, whether a third party or not. However, public authorities that may receive personal data in the context of a specific investigative task under Union or Member State law shall not be considered as recipients.

#### **9. Third party**

Third party means any natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons who, under the direct responsibility of the controller or the processor, are authorised to process the personal data.

#### **10. Consent**

Consent means any freely given specific and informed indication of the data subject's wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

### **5. Legal basis for processing**

Art. 6 (1) lit. a) GDPR (icw § 25 (1) Telecommunications Digital Services Data Protection Act (TDDDG) (formerly TTDSG)) serves our company as the legal basis for processing operations where we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the

delivery of goods or the provision of another service or consideration, the processing is based on Art. 6 (1) lit. b) GDPR. The same applies to processing operations that are necessary for the implementation of pre-contractual measures, for example in the case of enquiries about our products or services.

If our company is subject to a legal obligation by which the processing of personal data becomes necessary, such as for the fulfilment of tax obligations, the processing is based on Art. 6 (1) lit. c) GDPR.

In rare cases, the processing of personal data might become necessary to protect vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were to be injured on our premises and as a result their name, age, health insurance data or other vital information had to be passed on to a doctor, hospital or other third party. In this case, the processing would be based on Art. 6 (1) lit. d) GDPR.

Finally, processing operations could be based on Art. 6 (1) lit. f) GDPR. Processing operations which are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary for the protection of a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not outweigh. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European law. In this respect, the legislature took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47, Sentence 2 GDPR)..

Our offer is inherently aimed at adults. Persons under 16 years of age may not transmit any personal data to us without the consent of their parents or legal guardians. We do not request personal data from children and adolescents, do not collect it and do not pass it on to third parties.

## **6. Disclosure of data to third parties**

Your personal data will not be conveyed to third parties for purposes other than those listed below.

We will only share/convey your personal data with third parties if:

1. you have given us your express consent to do so in accordance with Art. 6 (1) lit. a) GDPR,
2. the disclosure is permissible in accordance with Art. 6 (1) lit. f) GDPR to protect our legitimate interests and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data,

3. in the event that a legal obligation exists for the disclosure pursuant to Art. 6 (1) lit. c) GDPR, as well as

In the context of the processing operations described in this privacy statement, personal data may be transferred to the USA. Companies in the USA only have an adequate level of data protection if they have certified themselves under the EU-US Data Privacy Framework and thus the adequacy decision of the EU Commission pursuant to Art. 45 GDPR applies. We have explicitly mentioned this in the privacy policy for the service providers concerned. In order to protect your data in all other cases, we have concluded commissioned processing agreements based on the standard contractual clauses of the European Commission. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent can serve as the legal basis for the transfer to third countries in accordance with Article 49 (1) a) of the GDPR. This sometimes does not apply in the case of a data transfer to third countries for which the European Commission has issued an adequacy decision pursuant to Art. 45 of the GDPR.

Your personal data will not be conveyed to third parties for purposes other than those listed below.

We will only share/convey your personal data with third parties if:

1. you have given us your express consent to do so in accordance with Art. 6 (1) lit. a) GDPR,
2. the disclosure is permissible in accordance with Art. 6 (1) lit. f) GDPR to protect our legitimate interests and there is no reason to assume that you have an overriding interest worthy of protection in the non-disclosure of your data,
3. in the event that a legal obligation exists for the disclosure pursuant to Art. 6 (1) lit. c) GDPR, as well as
4. this is legally permissible and necessary according to Art. 6 (1) lit. b) GDPR for the processing of contractual relationships with you.

In the context of the processing operations described in this privacy statement, personal data may be transferred to the USA. Companies in the USA only have an adequate level of data protection if they have certified themselves under the EU-US Data Privacy Framework and thus the adequacy decision of the EU Commission pursuant to Art. 45 GDPR applies. We have explicitly mentioned this in the privacy policy for the service providers concerned. In order to protect your data in all other cases, we have concluded commissioned processing agreements based on the standard contractual clauses of the European Commission. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent pursuant to Article 49 (1) a) of the GDPR may serve as the legal basis for the transfer to third countries. This sometimes does not apply in the case of a data transfer to third countries for which the European Commission has issued an adequacy decision pursuant to Article 45 of the GDPR.

## 7. Technology

### 7.1 SSL/TLS-encryption

This site uses SSL or TLS encryption to **guarantee** the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact enquiries that you send to us as the operator. You can recognise an encrypted connection by the fact that the address bar of the browser contains a "https://" instead of a "http://" and by the lock symbol in your browser bar.

We use this technology to protect your transmitted data.

### 7.2 Data collection when visiting the website

If you only use our website for informational purposes, if you do not register or otherwise provide us with information or do not give your consent to processing that requires consent, we only collect data that is technically necessary for the provision of the service. This is regularly data that your browser transmits to our server (in so-called "server log files"). Our website collects a series of general data and information each time you or an automated system accesses a page. This general data and information is stored in the server log files. The following can be recorded:

1. browser types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system accesses our website (so-called referrer),
4. the sub-pages accessed via an accessing system on our website,
5. the date and time of access to the website,
6. an abbreviated internet protocol address (anonymised IP address) and,
7. the Internet service provider of the accessing system.

When using this general data and information, we do not draw any conclusions about your person. This information is rather required to:

1. deliver the contents of our website correctly,
2. optimise the contents of our website as well as to advertise it,
3. ensure the permanent operability of our IT systems and the technology of our website, and
4. provide law enforcement authorities with the information necessary to prosecute in the event of a cyber-attack.

This collected data and information is therefore statistically analysed and further analysed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The anonymous data from the server log files is stored separately from all personal data provided by a data subject.

The legal basis for data processing is Art. 6 (1) lit. f) GDPR. Our legitimate interest follows from the purposes for data collection listed above.

### **7.3 Cloudflare (Content Delivery Network)**

Our website uses functions from CloudFlare. The provider is CloudFlare, Inc. 665 3rd St. #200, San Francisco, CA 94107, USA.

CloudFlare offers a globally distributed Content Delivery Network with DNS. Technically, the information transfer between your browser and our website is routed via CloudFlare's network. CloudFlare is thus able to analyse the data traffic between users and our websites, for example, in order to detect and ward off attacks on our services. In addition, CloudFlare may store cookies on your computer for optimisation and analysis purposes.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If you deactivate cookies, the functionality of this website may be limited.

We have concluded a corresponding agreement with Cloudflare on the basis of the General Data Protection Regulation (GDPR) for commissioned processing or in accordance with the EU standard contractual clauses. Cloudflare collects statistical data about visits to this website. These include: Name of the accessed website, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider. Cloudflare uses the described log data for statistical evaluations for the purpose of the operation, security and optimisation of the offer.

If you have consented to Cloudflare being used, the legal basis for the processing of personal data is Art. 6 (1) lit. a) GDPR. In addition, we have a legitimate interest in using Cloudflare to optimise our online offer and make it more secure. The corresponding legal basis for this is Art. 6 (1) lit. f) GDPR. The personal data will be retained for as long as they are required to fulfil the purpose of the processing. The data will be deleted as soon as they are no longer required to achieve the purpose.

This US company is certified under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information and Cloudflares privacy policy can be found at <https://www.cloudflare.com/privacypolicy/>.

## **7.4 Hosting by Host Europe**

We host our website at the HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA (HubSpot).

When visiting our website your personal data (e.g. IP addresses in log files) are processed on the servers of HubSpot.

The use of Host Europe is based on Art. 6 (1) lit. f) GDPR. Our legitimate interest is the high-performance provision of our website.

We have concluded a corresponding agreement with HubSpot on the basis of GDPR for commissioned processing. This is a contract required by data protection law, which ensures that Host Europe only processes the personal data of our website visitors according to our instructions and in compliance with the GDPR.

Additional information and HubSpot's privacy policy can be found at <https://legal.hubspot.com/privacy-policy>.

## **8. Cookies**

### **8.1 General information about cookies**

We use cookies on our website. Cookies are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone or similar) when you visit our website.

Information generated from the specific device used is stored in cookies. This does not mean, however, that we will gain immediate knowledge of your identity.

The use of cookies helps us make it more convenient for you to use our website. For example, we use session cookies to detect whether you have already visited individual pages on our website. These are erased automatically when you leave our website.



In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your end device for a specific period of time. If you visit our site again to use our services, it is automatically recognised that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

We also use cookies to statistically record the use of our website and to evaluate our offer for you for the purpose of optimisation. These cookies enable us to automatically recognise that you have already visited our website when you visit it again. The cookies set in this way are automatically deleted after a defined period of time. The respective storage period of the cookies can be found in the settings of the consent tool used.

## **8.2 Legal basis for the use of cookies**

The data processed by the cookies, which are required for the proper functioning of the website, are thus necessary to protect our legitimate interests as well as those of third parties in accordance with Art. 6 (1) lit. f) GDPR.

For all other cookies, the following applies: You have given your consent to this within the meaning of Art. 6 (1) lit. a) GDPR via our opt-in cookie banner.

## **8.3 Tips for avoiding cookies in common browsers**

You can delete cookies, allow only selected cookies or completely deactivate cookies at any time via the settings of the browser you are using. You can find more information on the support pages of the respective providers:

- Chrome: <https://support.google.com/chrome/answer/95647?tid=311178978>.

- Safari: <https://support.apple.com/de-at/guide/safari/sfri11471/mac?tid=311178978>.

- Firefox:

<https://support.mozilla.org/de/kb/cookies-und-website-daten-in-firefox-loschen?tid=311178978>.

- Microsoft Edge:

<https://support.microsoft.com/de-de/microsoft-edge/cookies-in-microsoft-edge-l%C3%B6sungen-63947406-40ac-c3b8-57b9-2a946a29ae09>.

## **8.4 Consent Management with HubSpot**

On this website, we use the consent management software "HubSpot Consent Management" from the provider HubSpot Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, United States.

This software allows us to obtain and manage your consent to the use of cookies and other tracking technologies on our website. To do this, HubSpot stores certain personal data such as your IP address, browser information, and your consent choices.

HubSpot's processing of your personal data is based on our legitimate interest in complying with applicable data protection laws, such as the General Data Protection Regulation (GDPR).

You can revoke your consent at any time via the cookie settings on our website. There you also have the option to adjust your consent decision.

For more information about data processing by HubSpot and your rights, please see the HubSpot Privacy Policy: <https://legal.hubspot.com/privacy-policy>

## **9. Contents of our website**

### **9.1 Registration as a user**

You have the option of registering on our website by providing personal data.

Which personal data is transmitted to us in this process can be seen from the respective input mask used for registration. The personal data you enter is collected and stored exclusively for internal use by us and for our own purposes. We may arrange for data to be passed on to one or more data processors, for example a parcel service provider, who will also use the personal data exclusively for an internal use attributable to us.

By registering on our website, the IP address assigned by your internet service provider (ISP), the date and the time of registration are also stored. This is done only for the purpose of preventing our services from being misused. If necessary, this data may be used to clarify the situation surrounding any crimes committed. In this respect, the storage of this data is necessary for our protection. As a matter of principle, this data is not disclosed to third parties. This does not apply if we are legally obliged to pass on the data or if the data is passed on for the purpose of criminal prosecution.

Your registration, including voluntary provision of personal data, also serves us to offer you content or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have it completely erased from our database.

Upon request, we will provide you at any time with information about which personal data is stored about you. Furthermore, we will correct or delete personal data at your request, insofar as this does not conflict with any statutory retention obligations. A data protection officer named in this Privacy Policy and all other employees are available to the data subject as contact persons in this context.

The processing of your data is in the interest of a convenient and easy use of our website. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f) GDPR.

## **9.2 Data processing when opening a customer account and for contract execution**

The personal data collected by us will be passed on to the relevant registration authorities as part of the contract processing, insofar as this is necessary for the performance of the contract. We will pass on your payment data to the commissioned bank as part of the payment processing process, if this is necessary for the payment processing. If payment service providers are used, we provide explicit information about this below. The legal basis for the disclosure of the data is Art. 6 (1) (b) GDPR.

## **9.3 Data processing for order handling**

The personal data collected by us will be passed on to the transport company commissioned with the delivery as part of the contract execution, insofar as this is necessary for the delivery of the goods. We disclose your payment data to the commissioned credit institution within the scope of payment processing, insofar as this is necessary for payment processing. If payment service providers are used, we will explicitly inform you about this below. The legal basis for the transfer of data is Art. 6 (1) lit. b) GDPR.

## **9.4 Data processing for identity verification**

Where necessary, we verify your identity on the legal basis of Art. 6 (1) lit. b) and f) GDPR by using information from service providers. The authorisation to do so results from the protection of your identity and the prevention of fraud attempts at our expense. The circumstance and the result of our enquiry will be stored in your customer account or your guest account for the duration of the contractual relationship.

## **9.5 Contact support / Contact form**

Personal data is collected when contacting us (e.g. via contact form or e-mail). Which data is collected in the case of the use of a contact form can be seen from the respective contact form. This data is stored and used exclusively for the purpose of answering your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request in accordance with Art. 6 (1) lit. f) GDPR. If your contact is aimed at concluding a contract, the additional legal basis for processing is Art. 6 (1) lit. b) GDPR. Your data will be deleted after final processing of your request; this is the case if it can be inferred from the circumstances that the matter concerned has been conclusively clarified and the deletion does not conflict with any legal obligations to retain data.

# **10. Social media plugins**

## **10.1 Facebook Plugin**

We have integrated components of the company Facebook on this website. Facebook is a social network.

A social network is a social meeting place operated on the Internet, an online community that generally allows users to communicate and interact with each other in virtual space. A social network can serve as a platform for sharing opinions and experiences or enables the Internet community to provide personal or company-related information. Facebook allows social network users to create private profiles, upload photos, and network through friend requests, among other features.

The operating company of Facebook is Facebook, Inc, 1 Hacker Way, Menlo Park, CA 94025, USA. The controller of personal data, if a data subject lives outside the USA or Canada, is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Whenever you access one of the individual pages of this website that is operated by us and on which a Facebook component (Facebook plugin) has been integrated, the Internet browser on your IT system is automatically prompted by the respective Facebook component to download a representation of the corresponding Facebook component from Facebook. A complete overview of all Facebook plugins can be found at [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE). Within the scope of this technical procedure, Facebook obtains knowledge about which specific subpage of our website is visited by you.

If you are logged in to Facebook at the same time, Facebook recognizes which specific subpage of our website you are visiting each time you call up our website and for the entire duration of your respective stay on our website. This information is collected by the Facebook component and assigned by Facebook to the respective Facebook account. If you press one of the Facebook buttons integrated on our website, for example the "Like" button, or make a comment, Facebook assigns this information to your personal Facebook user account and stores this personal data.

Facebook always receives information via the Facebook component that you have visited our website if you are simultaneously logged into Facebook at the time of calling up our website; this takes place regardless of whether you have clicked on the Facebook component or not. If you do not want this information to be transmitted to Facebook, you can prevent the transmission by logging out of your Facebook account before accessing our website.

This US company is certified under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Personal data is only processed via social media buttons after your express consent in accordance with Art. 6 (1) lit. a) GDPR.

The data policy published by Facebook, which can be accessed at <https://de-de.facebook.com/about/privacy/> provides information about the collection, processing and use of personal data by Facebook. It also explains which setting options Facebook offers to protect privacy. In addition, various applications are available that make it possible to suppress data transmission to Facebook. Such applications can be used by you to suppress data transmission to Facebook.

## **10.2 Twitter Plugin (X)**

We have integrated X (formerly Twitter) components on this website. X is a multilingual, publicly accessible microblogging service on which users can publish and distribute so-called tweets, i.e. short messages limited to 140 characters. These short messages can be accessed by anyone, including people who are not registered with X. However, the tweets are also displayed to the so-called followers of the respective user. Followers are other X users who follow the tweets of a user. Furthermore, X makes it possible to address a broad audience via hashtags, links or retweets.

The operating company of X is X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.

Each time you call up one of the individual pages of this website that is operated by us and on which a X component (Twitter button) has been integrated, the internet browser on your IT system is automatically prompted by the respective X component to download a representation of the corresponding X component from X. Further information on the Twitter buttons can be found at <https://about.twitter.com/de/resources/buttons>. Within the scope of this technical procedure, X receives information about which specific sub-page of our website you are visiting. The purpose of integrating the X component is to enable our users to disseminate the content of this website, to make this website known in the digital world and to increase our visitor numbers.

If you are logged in to X at the same time, X recognises which specific subpage of our website you are visiting each time you call up our website and for the entire duration of your respective stay on our website. This information is collected by the X component and assigned to your X account by X. If you click on one of the Twitter buttons integrated on our website, the data and information thus transmitted will be assigned to your personal X user account and stored and processed by X.

Whenever you are logged into X at the time of accessing our website, X receives information via the X component that you are visiting our website; this takes place regardless of whether you click on the X component or not. If you do not want this information to be transmitted to

X, you can prevent the transmission by logging out of your X account before accessing our website.

Personal data is only processed via social media buttons after your express consent in accordance with Art. 6 (1) lit. a) GDPR.

X's applicable privacy policy can be found at <https://twitter.com/privacy?lang=de> abrufbar.

## **11. Web analytics**

### **11.1 HubSpot**

We use HubSpot functions on this website provided by HubSpot, Inc., 25 First Street, Cambridge, MA 02141, USA.

HubSpot tracks visitors to our website using browser cookies.

Regarding HubSpot's handling of tracking cookies, the following should be noticed:

- Your visit to our websites is only tracked using the HubSpot cookie if you have given your consent to the setting of the HubSpot cookie or all tracking cookies.
- If you fill in and submit one of the forms on our websites (e.g. a contact form) and have given your consent to the setting of the HubSpot cookie, HubSpot will associate your previous page views resulting from the tracking cookie with the form you submitted.
- If you have already been in contact with us, the e-mail address you submit via the form will be assigned to the information already stored by us.
- If you delete all your cookies or specifically the HubSpot cookies, you will be considered a new visitor on our websites and a new cookie will be set. However, HubSpot automatically duplicates all form submissions received from the same email address, even if different browser cookies have been assigned to those submissions.
- Because cookies are only set once on a browser, submissions from two people sharing a single computer are assigned to the same contact record. This cookie deduplication ensures that if a contact sends forms to your website from different email addresses, all submissions will be associated with a single contact record in HubSpot.
- HubSpot assigns page views to a contact when the contact clicks a link in a tracked marketing email that continues to a page where the HubSpot tracking code is installed.

These processing operations are only carried out when express consent is given in accordance with Art. 6 (1) lit. a) GDPR. Your data will be stored until you withdraw your consent.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be limited.

This US company is certified under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link:  
<https://legal.hubspot.com/privacy-policy>.

## **11.2 LinkedIn Analytics**

This website uses the retargeting tool as well as the conversion tracking of LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland (LinkedIn).

For this purpose, the LinkedIn Insight Tag is integrated on our website, which enables LinkedIn to collect statistical data about your visit and use of our website and to provide us with corresponding aggregated statistics on this basis. In addition, the service is used to be able to show you interest-specific and relevant offers and recommendations after you have found out about certain services, information and offers on the website. The relevant information is stored in a cookie.

As a rule, the following data are collected and processed in the process:

- IP-address,
- Device-information,
- Browser-information,
- Referrer-URL and
- Timestamp.

These processing operations are only carried out when express consent is given in accordance with Art. 6 (1) lit. a) GDPR. Your data will be stored until you withdraw your consent.

Personal data are kept for as long as they are necessary to fulfil the purpose of processing. The data will be deleted as soon as they are no longer necessary to achieve the purpose.

Within the scope of processing via LinkedIn, data may be transferred to the USA and Singapore. The US company is certified under the EU-US Data Privacy Framework. This constitutes an adequacy decision pursuant to Art. 45 GDPR, meaning that personal data may be transferred without further guarantees or additional measures. Furthermore the security of the transfer is regularly ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to ensure an adequate level of security, your consent will be obtained in accordance with Art. 49 (1) lit. a) GDPR.

Additional information on the service can be found at the following link:  
<https://de.linkedin.com/legal/privacy-policy>.

## **12. Advertising**

### **12.1 Google Ads (AdWords) Remarketing/Retargeting**

Our website uses the functions of Google Ads. We use these to advertise this website in Google search results and on third-party websites. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). For this purpose, Google sets a cookie in the browser of your terminal device, which automatically enables interest-based advertising by means of a pseudonymous cookie ID and on the basis of the pages you have visited.

Additional data processing will only take place if you have granted Google permission to link your internet and app browsing history to your Google Account and to use information from your Google Account to personalise the ads you view on the web. In this case, if you are logged into Google while visiting our website, Google will use your data together with Google Analytics data to create and define target group lists for cross-device remarketing. For this purpose, your personal data will be temporarily linked by Google with Google Analytics data in order to form said target groups.

These processing operations are only carried out when express consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link:  
<https://www.google.com/policies/technologies/ads/>.



## **12.2 Google AdSense**

We have integrated Google AdSense on this website. The operating company of the Google AdSense component is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google AdSense is an online service that enables the placement of advertisements on third-party websites. Google AdSense is based on an algorithm that selects the advertisements displayed on third-party sites to match the content of the respective third-party site. Google AdSense allows interest-based targeting of Internet users, which is implemented by generating individual user profiles.

The purpose of the Google AdSense component is to integrate advertisements on our website. Google-AdSense sets a cookie on your IT system. By setting the cookie, Alphabet Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA, is enabled to analyze the use of our website. By each call of one of the individual pages of this website, which is operated by us and on which a Google AdSense component has been integrated, the internet browser on your IT system is automatically caused by the respective Google AdSense component to transmit data to Alphabet Inc. for the purpose of online advertising and the settlement of commissions. Within the scope of this technical procedure, Alphabet Inc. obtains knowledge of personal data, such as your IP address, which Alphabet Inc. uses, among other things, to trace the origin of visitors and clicks and subsequently to enable commission settlements.

Google AdSense also uses so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in Internet pages to enable log file recording and log file analysis, whereby a statistical evaluation can be performed. By means of the embedded tracking pixel, Alphabet Inc. can recognize whether and when an Internet page was opened by your IT system and which links you clicked on. Among other things, tracking pixels are used to evaluate the flow of visitors to a website.

Via Google AdSense, personal data and information, which also includes the IP address and is necessary for the collection and billing of the displayed advertisements, is transferred to Alphabet Inc. in the United States of America. This personal data is stored and processed in the United States of America. Alphabet Inc. may disclose this personal data collected via the technical process to third parties.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR .

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following links:

<https://www.google.de/intl/de/adsense/start/> and

<https://www.google.com/policies/technologies/ads/>.

## **13. Partner and affiliate programmes**

### **13.1 DoubleClick**

This website contains components of DoubleClick by Google. DoubleClick is a brand of Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland), under which special online marketing solutions are marketed to advertising agencies and publishers.

DoubleClick by Google transmits data to the DoubleClick server with each impression as well as with clicks or other activities. Each of these data transfers triggers a cookie request to your browser. If the browser accepts this request, DoubleClick sets a cookie on your IT system. The purpose of the cookie is to optimize and display advertising. The cookie is used, among other things, to serve and display user-relevant advertising and to generate reports on advertising campaigns or to improve them. Furthermore, the cookie is used to avoid multiple displays of the same advertising.

DoubleClick uses a cookie ID, which is necessary to handle the technical process. The cookie ID is required, for example, to display an advertisement in a browser. DoubleClick can also use the cookie ID to record which advertisements have already been displayed in a browser in order to avoid duplicate placements. Furthermore, the cookie ID enables DoubleClick to record conversions.

A DoubleClick cookie does not contain any personal data. However, a DoubleClick cookie may contain additional campaign identifiers. A campaign identifier is used to identify the campaigns with which you have already been in contact.

Whenever you call up one of the individual pages of this website that is operated by us and on which a DoubleClick component has been integrated, the Internet browser on your IT system is caused by the respective DoubleClick component to transmit data to Google for the purpose of online advertising and the settlement of commissions. As part of this technical process, Google obtains knowledge of data that Google also uses to generate commission statements. Among other things, Google can track that you have clicked on certain links on our website.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link:  
<https://www.google.com/intl/de/policies/>.

## **14. Plugins and other services**

### **14.1 Google reCAPTCHA**

On this website we use the reCAPTCHA function. The operating company of Google reCAPTCHA is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies with headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The reCAPTCHA function is primarily used to distinguish whether an input is made by a natural person or is abused by machine and automated processing. The service also includes the sending of the IP address and possibly other data required by Google for the reCAPTCHA service to Google.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Further information on Google reCAPTCHA as well as Google's privacy policy can be viewed at: <https://www.google.com/intl/de/policies/privacy/>.

### **14.2 Google Tag Manager**

On this website we use the Google Tag Manager service. The operating company of Google Tag Manager is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Through this tool, "website tags" (i.e. keywords, which are integrated into HTML elements) can be implemented and managed via an interface. Through the use of Google Tag Manager,

we can automatically track which button, link or personalized image you have actively clicked on and can then record which content of our website is of particular interest to you.

The tool also triggers other tags, which in turn may collect data. Google Tag Manager does not access this data. If you have made a deactivation at the domain or cookie level, this remains in place for all tracking tags implemented with Google Tag Manager.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following link:  
<https://www.google.com/intl/de/policies/privacy/>.

### **14.3 Google WebFonts**

Our website uses so-called Web Fonts for the uniform display of fonts. The Google WebFonts are provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google group of companies with headquarters at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

These processing operations are carried out exclusively when explicit consent is given in accordance with Art. 6 (1) lit. a) GDPR.

The parent company Google LLC is certified as a US company under the EU-US Data Privacy Framework. There is hereby an adequacy decision pursuant to Art. 45 GDPR, so that a transfer of personal data may also take place without further guarantees or additional measures.

Additional information on the service can be found at the following links:  
<https://developers.google.com/fonts/faq> and <https://www.google.com/policies/privacy/>.

### **14.4 HubSpot CRM-System**

We use the CRM software provided by HubSpot, Inc, 25 First Street, Cambridge, MA 02141, USA ("HubSpot").

Hubspot is a software CRM solution for managing customer relationships and includes the following features:

- Deal administration, lead management and task management,
- Email tracking and notification,
- Email Templates and Scheduling,
- Document sharing,
- Online booking system for appointments,
- Telephony solutions such as automatic call recording & logging.

All departments, (including e.g. marketing, sales, customer service as well as online and stationary trade) work together with the described software.

The provider of HubSpot necessarily receives knowledge of the above-mentioned data, as far as this is provided for in the context of our data processing contract (Art. 28 GDPR), with HubSpot. These may include the names, addresses, e-mail addresses and telephone numbers. A processing of the personal data thus also takes place in a third country (outside the EU and the EEA).

If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 (1) lit. a) GDPR. In the context of an employee relationship, corresponding data processing is carried out on the basis of § 26 German Federal Data Protection Act (Bundesdatenschutzgesetz [BDSG]). The legal basis for the use of the service in the context of existing contractual relationships or contractual relationships to be initiated is Art. 6 (1) lit. b) GDPR. In all other cases, the legal basis for processing your personal data is Art. 6 (1) lit. f) GDPR. Here, our interest is in the effective coordination of internal as well as external communication and the management of client relationships.

To the extent HubSpot processes personal data in connection with its own legitimate business operations, HubSpot is an independent data controller for such use and, as such, is responsible for complying with applicable laws and obligations of a data controller.

Additional information on the service can be found at the following link:  
<https://legal.hubspot.com/de/privacy-policy>.

## **14.5 Stripe**

We offer the option of processing the payment transaction through the payment service provider Stripe, Legal Process, 510, Townsend St., San Francisco, CA 94103 (Stripe). This corresponds to our legitimate interest in offering an efficient and secure payment method (Art. 6 para. 1 lit. f GDPR). In this context, we pass on the following data to Stripe insofar as it is necessary for the performance of the contract (Art. 6 para. 1 lit. b. GDPR).

1. Cardholder Name
2. E-mail-Address
3. Customer
4. Order number
5. Bank account
6. Credit card
7. Credit card validity period
8. Credit Card Verification Number (CVC)
9. Date and time of the transaction
10. Transaction Sum
11. Name of the provider
12. Place

The processing of the data provided under this section is not required by law or contract. Without submitting your personal information, we will not be able to process a payment through Stripe.

Stripe has a dual role as a controller and processor in data processing activities. As a controller, Stripe uses your submitted data to comply with regulatory obligations. This corresponds to Stripe's legitimate interest (pursuant to Art. 6 para. 1 lit. f GDPR) and serves the performance of the contract (pursuant to Art. 6 para. 1 lit. b GDPR). We have no influence on this process.

Stripe acts as a processor in order to be able to complete transactions within the payment networks. Within the framework of the order processing relationship, Stripe acts exclusively according to our instructions and has been contractually obliged to comply with the data protection regulations within the meaning of Art. 28 GDPR.

Stripe has implemented compliance measures for international data transfers. These apply to all global activities where Stripe processes personal data of individuals in the EU. These measures are based on the EU Standard Contractual Clauses (SCCs).

For more information on objection and removal options to Stripe, please visit:

<https://stripe.com/privacy-center/legal>

Your data will be stored by us until the payment processing is completed. This includes the time required to process refunds, receivables management, and fraud prevention. In accordance with § 147 AO and § 257 HGB, we have a statutory retention period of 10 years.

## **14.6 Pandadoc**

If we send you an offer or a contract at your request, we will use Pandadoc for electronic signature.

You can find more information about Pandadoc's privacy policy here:

<https://www.pandadoc.com/privacy-policy/>

Adresse: 153 Kearny St 94108, San Francisco, United States

The transfer of your data to Pandadoc takes place on the basis of Art. 6 (1) (a) GDPR (consent) and Art. 6 (1) (b) GDPR (processing for the performance of a contract). For this purpose, we have concluded a contract with Pandadoc with so-called standard contractual clauses, in which Pandadoc undertakes to process user data only in accordance with the EU data protection level. You have the option of withdrawing your consent to data processing at any time. A revocation does not affect the effectiveness of data processing operations carried out in the past.

## **15. Your rights as a data subject**

### **15.1 Right to confirmation**

You have the right to request confirmation from us as to whether personal data relating to you will be processed.

### **15.2 Right to information (Article 15 GDPR)**

You have the right to obtain information about the personal data stored about you at any time, free of charge, as well as the right to access a copy of such data from us, in accordance with the statutory provisions.

### **15.3 Right to rectification (Article 16 GDPR)**

You have the right to request the immediate rectification of incorrect personal data relating to yourself. Furthermore, the data subject has the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

### **15.4 Erasure (Article 17 GDPR)**

You have the right to demand that we erase the personal data relating to you be deleted without delay, provided that one of the reasons provided by law applies and if processing or further storage is not required.

### **15.5 Restriction to processing (Article 18 GDPR)**

You have the right to request that we restrict the processing of your data if one of the legal requirements is met.

### **15.6 Data transferability (Article 20 GDPR)**

You have the right obtain personal data relating to you that you provided us in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another controller without hindrance by us, to whom the personal data was provided, provided that the processing is based on the consent pursuant to Art. 6 (1) lit. a) GDPR or Art. 9 (2) lit. a) GDPR or on a contract pursuant to Art. 6 (1) lit. b) GDPR, and the data are

processed using automated procedures, unless processing is necessary to complete a task, is in the public interest or is carried out in the exercise of an official authority assigned to us.

Furthermore, when exercising your right to data transferability pursuant to Art. 20 (1) GDPR, you have the right to have personal data transferred directly from one controller to another, provided this is technically feasible and does not impede the rights and freedoms of other persons.

### **15.7 Objection (Article 21 GDPR)**

You have the right to lodge an objection to the processing of personal data relating to you for reasons relating to your particular situation where this is done on the basis of Art. 6 (1) lit. e) (data processing in the public interest) or lit. f) (data processing on the basis of the weighing of legitimate interests) GDPR.

This also applies to profiling based on these provisions pursuant to Article 4 Number 4 GDPR.

Should you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling and legitimate reasons for such processing that outweigh your interests, rights and freedoms, or where processing serves the assertion, exercise or defence of legal claims.

In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling where this is connected to this kind of direct marketing. Should you object to the processing of your data for direct marketing purposes, we will no longer process your personal data for this purpose.

In addition, you have the right to object to our processing of your personal data for scientific or historical research purposes or for statistical purposes pursuant to Article 89 (1) GDPR for reasons arising from your particular situation, unless such processing is necessary for the performance of a task in the public interest.

You are free to exercise your right to lodge an objection in relation to the use of information society services, Directive 2002/58/EC notwithstanding, by means of automated procedures using technical specifications.



### **15.8 Revocation of consent regarding data protection**

You have the right to revoke any consent to the processing of personal data at any time with future effect.

### **15.9 Lodging a complaint with a supervisory authority**

You have the right to complain to a supervisory authority responsible for data protection about our processing of personal data.

## **16. Routine storage, erasure and blocking of personal data**

We process and store your personal data only for the period of time necessary to meet the storage purpose or as required by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a required retention period expires, personal data will be routinely blocked or erased in accordance with the statutory provisions.

## **17. Duration of storage of personal data**

The criterion for the duration of the retention of personal data is the respective legal retention period. Once this period expires, the data in question will be routinely erased, provided it is no longer required for the fulfilment or initiation of the contract.

## **18. Version and amendments to the Privacy Notice**

This Privacy Policy is currently valid as of: [[monthYear]].

Due to the further development of our Internet pages and offers or due to changed legal or official requirements, it may become necessary to change this Privacy Policy. You can access and print out the current data protection declaration at any time on the website under "[LINK]".

This privacy statement has been prepared with the assistance of the privacy software: audatis MANAGER erstellt.