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## **PRIVACY POLICY**

### **1. AN OVERVIEW OF DATA PROTECTION**

#### **GENERAL INFORMATION**

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

#### **DATA RECORDING ON THIS WEBSITE**

Who is the responsible party for the recording of data on this website (i.e. the “controller”)?  
The data on this website is processed by the operator of the website, whose contact information is available under section “Information Required by Law” on this website.

#### **How do we record your data?**

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g. web browser, operating system or time the site was accessed). This information is recorded automatically when you access this website.

#### **What are the purposes we use your data for?**

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns.

#### **What rights do you have as far as your information is concerned?**

You have the right to receive information about the source, recipients and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time under the address disclosed in section “Information Required by Law” on this website if you have questions about this or any other data protection related issues.

#### **ANALYSIS TOOLS AND TOOLS PROVIDED BY THIRD PARTIES**

There is a possibility that your browsing patterns will be statistically analyzed when your visit this website. Such analyses are performed primarily with what we refer to as analysis programs. For detailed information about these analysis programs please consult our Data Protection Declaration below.

### **2. HOSTING AND CONTENT DELIVERY NETWORKS (CDN)**

#### **EXTERNAL HOSTING**

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site.

The host is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 para. 1 lit. b GDPR) and in the interest of secure, fast and efficient provision of our online services by a professional provider (Art. 6 para. 1 lit. f GDPR).

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

#### **Execution of a contract data processing agreement**

In order to guarantee processing in compliance with data protection regulations, we have concluded an order processing contract with our host.

### **3. GENERAL INFORMATION AND MANDATORY INFORMATION**

#### **DATA PROTECTION**

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e. through Email communications) may be prone to security gaps. It is not possible to completely protect data against third party access.

#### **INFORMATION ABOUT THE RESPONSIBLE PARTY (REFERRED TO AS THE “CONTROLLER” IN THE GDPR)**

The data processing controller on this website is:

August Storm GmbH & Co. KG  
August-Storm-Straße 6  
48480 Spelle  
Phone: +49 5977 73-0  
Email: [info@a-storm.com](mailto:info@a-storm.com)

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, Email addresses, etc.).

#### **DESIGNATION OF A DATA PROTECTION OFFICER AS MANDATED BY LAW**

We have appointed a data protection officer for our company.

CompliPro GmbH  
René Floitgraf  
Frankenstrasse 34  
52223 Stolberg  
Phone: +49 2402 9245980  
Email: [dsb@complipro.de](mailto:dsb@complipro.de)

#### **INFORMATION ON DATA TRANSFER TO THE USA**

Our website uses, in particular, tools from companies based in the USA. When these tools are active, your personal information may be transferred to the US servers of these companies. We must point out that the USA is not a safe third country within the meaning of EU data protection law. US companies are required to release personal data to security authorities without you as the data subject being able to take legal action against this. The possibility cannot therefore be excluded that US authorities (e.g. secret services) may process, evaluate and permanently store your data on US servers for monitoring purposes. We have no influence over these processing activities.

#### **REVOCAION OF YOUR CONSENT TO THE PROCESSING OF DATA**

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

**RIGHT TO OBJECT TO THE COLLECTION OF DATA IN SPECIAL CASES; RIGHT TO OBJECT TO DIRECT ADVERTISING (ART. 21 GDPR)**

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6 SECT. 1 LIT. E OR F GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21 SECT. 1 GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21 SECT. 2 GDPR).

**RIGHT TO LOG A COMPLAINT WITH THE COMPETENT SUPERVISORY AGENCY**

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

**RIGHT TO DATA PORTABILITY**

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

**SSL AND/OR TLS ENCRYPTION**

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from "http://" to "https://" and also by the appearance of the lock icon in the browser line.

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

**INFORMATION ABOUT, RECTIFICATION AND ERADICATION OF DATA**

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time at the address provided in section "Information Required by Law."

**RIGHT TO DEMAND PROCESSING RESTRICTIONS**

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time at the address provided in section "Information Required by Law." The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.

- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21 Sect. 1 GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.
- If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

#### **REJECTION OF UNSOLICITED EMAILS**

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in section “Information Required by Law” to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

#### **4. RECORDING OF DATA ON THIS WEBSITE**

##### **COOKIES**

Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them or they are automatically eradicated by your web browser.

In some cases it is possible that third party cookies are stored on your device once you enter our site (third party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g. cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g. the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions (required cookies) or for the provision of certain functions you want to use (functional cookies, e.g. for the shopping cart function) or those that are necessary for the optimization of the website (e.g. cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6 Sect. 1 lit. f GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of cookies to ensure the technically error free and optimized provision of the operator’s services. If your consent to the storage of the cookies has been requested, the respective cookies are stored exclusively on the basis of the consent obtained (Art. 6 Sect. 1 lit. a GDPR); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

## **CONTACT FORM**

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6 para. 1 lit. b GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 Para. 1 lit. f GDPR) or on your agreement (Art. 6 Para. 1 lit. a GDPR) if this has been requested.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions – in particular retention periods.

## **REQUEST BY EMAIL, TELEPHONE OR FAX**

If you contact us by Email, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6 Sect. 1 lit. b GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6 Sect. 1 lit. f GDPR) or on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR) if it has been obtained.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

## **5. SOCIAL MEDIA**

### **FACEBOOK PLUG-INS (LIKE & SHARE BUTTON)**

We have integrated plug-ins of the social network Facebook on this website. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too.

You will be able to recognize Facebook plug-ins by the Facebook logo or the "Like" button on this website. An overview of the Facebook plug-ins is available under the following link:

<https://developers.facebook.com/docs/plugins/>

Whenever you visit this website and its pages, the plug-in will establish a direct connection between your browser and the Facebook server. As a result, Facebook will receive the information that you have visited this website with your plug-in. However, if you click the Facebook "Like" button while you are logged into your Facebook account, you can link the content of this website and its pages with your Facebook profile. As a result, Facebook will be able to allocate the visit to this website and its pages to your Facebook user account. We have to point out, that we as the provider of the website do not have any knowledge of the transferred data and its use by Facebook. For more detailed information, please consult the Data Privacy Declaration of Facebook at:

<https://www.facebook.com/privacy/explanation>

If you do not want Facebook to be able to allocate your visit to this website and its pages to your Facebook user account, please log out of your Facebook account while you are on this website.

The use of the Facebook plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

## **INSTAGRAM PLUG-IN**

We have integrated functions of the public media platform Instagram into this website. These functions are being offered by Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA.

If you are logged into your Instagram account, you may click the Instagram button to link contents from this website to your Instagram profile. This enables Instagram to allocate your visit to this website to your user account. We have to point out that we as the provider of the website and its pages do not have any knowledge of the content of the data transferred and its use by Instagram.

Data are stored and analyzed on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in the highest possible visibility on social media. If a respective declaration of consent has been obtained, the data will be processed exclusively on the basis of Art. 6 Sect. 1 lit. a DGDPR. Any such consent may be revoked at any time.

For more information on this subject, please consult Instagram's Data Privacy Declaration at: <https://instagram.com/about/legal/privacy/>

## **6. ANALYSIS TOOLS AND ADVERTISING**

### **GOOGLE ANALYTICS**

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user's origin. Google may consolidate these data in a profile that is allocated to the respective user or the user's device.

Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g. cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

This analysis tool is used on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator's advertising activities. If a corresponding agreement has been requested (e.g. an agreement to the storage of cookies), the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

### **IP anonymization**

On this website, we have activated the IP anonymization function. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases. On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession.

### **Browser plug-in**

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at: <https://support.google.com/analytics/answer/6004245?hl=en>

**Contract data processing**

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

**Demographic parameters provided by Google Analytics**

This website uses the “demographic characteristics” function of Google Analytics, to be able to display to the website visitor compatible ads within the Google advertising network. This allows reports to be created that contain information about the age, gender and interests of the website visitors. The sources of this information are interest-related advertising by Google as well as visitor data obtained from third party providers. This data cannot be allocated to a specific individual. You have the option to deactivate this function at any time by making pertinent settings changes for advertising in your Google account or you can generally prohibit the recording of your data by Google Analytics as explained in section “Objection to the recording of data”.

**Archiving period**

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) will be anonymized or deleted after 26 month. For details please click the following link: <https://support.google.com/analytics/answer/7667196?hl=en>

**GOOGLE ADS**

The website operator uses Google Ads. Google Ads is an online promotional program of Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display ads in the Google search engine or on third party websites, if the user enters certain search terms into Google (keyword targeting). It is also possible to place targeted ads based on the user data Google has in its possession (e.g. location data and interests; target group targeting). As the website operator, we can analyze these data quantitatively, for instance by analyzing which search terms resulted in the display of our ads and how many ads led to respective clicks. The use of Google Ads is based on Art. 6 Sect. 1 lit. et seq. GDPR. The website operator has a legitimate interest in marketing the operator’s services and products as effectively as possible.

**GOOGLE REMARKETING**

This website uses the functions of Google Analytics Remarketing. The provider of these solutions is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Remarketing analyzes your user patterns on our website (e.g. clicks on specific products), to allocate a certain advertising target groups to you and to subsequently display matching online offers to you when you visit other online offers (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Remarketing to device encompassing functions of Google. This makes it possible to display interest-based customized advertising messages, depending on your prior usage and browsing patterns on a device (e.g. cell phone) in a manner tailored to you as well as on any of your devices (e.g. tablet or PC).

If you have a Google account, you have the option to object to personalized advertising under the following link: <https://www.google.com/settings/ads/onweb/>.

The use of Google Remarketing is based on Art. 6 1 lit. et seq. GDPR. The website operator has a legitimate interest in the marketing of the operator’s products that is as effective as possible. If a respective declaration of consent was requested, processing shall occur exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

For further information and the pertinent data protection regulations, please consult the Data Privacy Policies of Google

at: <https://policies.google.com/technologies/ads?hl=en>

**GOOGLE CONVERSION-TRACKING**

This website uses Google Conversion Tracking. The provider of this service is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google Conversion Tracking we are in a position to recognize whether the user has completed certain actions. For instance, we can analyze the how frequently which buttons on our website have been clicked and which products are reviewed or purchased with particular frequency. The purpose of this information is to compile conversion statistics. We learn how many users have clicked on our ads and which actions they have completed. We do not receive any information that would allow us to personally identify the users. Google as such uses cookies or comparable recognition technologies for identification purposes.

We use Google Conversion Tracking on the basis of Art. 6 Sect. 1 lit. et seq. GDPR. The operator of the website has a legitimate interest in the analysis of the user patterns with the aim of optimizing both, the operator's web presentation and advertising. If a respective declaration of consent was requested (e.g. concerning the storage of cookies), processing shall occur exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

For more information about Google Conversion Tracking, please review Google's data protection policy at: <https://policies.google.com/privacy?hl=en>

## **7. NEWSLETTER**

### **NEWSLETTER DATA**

If you would like to subscribe to the newsletter offered on this website, we will need from you an Email address as well as information that allow us to verify that you are the owner of the Email address provided and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke the consent you have given to the archiving of data, the Email address and the use of this information for the sending of the newsletter at any time, for instance by clicking on the "Unsubscribe" link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your Email address may be stored by us or the newsletter service provider in a blacklist to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

### **SENDINBLUE**

This website uses Sendinblue for the sending of newsletters. The provider is the Sendinblue GmbH, Köpenicker Straße 126, 10179 Berlin, Germany.

Sendinblue services can, among other things, be used to organize and analyze the sending of newsletters. The data you enter for the purpose of subscribing to the newsletter are archived on Sendinblue's servers in Germany.

If you do not want to permit an analysis by Sendinblue, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message. Moreover, you can also unsubscribe from the newsletter right on the website.

### **Data analysis by Sendinblue**



Sendinblue enables us to analyze our newsletter campaigns. For instance, it allows us to see whether a newsletter message has been opened and, if so, which links may have been clicked. This enables us to determine, which links drew an extraordinary number of clicks.

Moreover, we are also able to see whether once the Email was opened or a link was clicked, any previously defined actions were taken (conversion rate). This allows us to determine whether you have made a purchase after clicking on the newsletter.

Sendinblue also enables us to divide the subscribers to our newsletter into various categories (i.e. to “cluster” recipients). For instance, newsletter recipients can be categorized based on age, gender or place of residence. This enables us to tailor our newsletter more effectively to the needs of the respective target groups.

For detailed information on the functions of Sendinblue please follow this link:

<https://www.sendinblue.com/newsletter-software/>

### **Legal basis**

The data is processed based on your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

### **Storage period**

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your Email address may be stored by us or the newsletter service provider in a blacklist to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

For more details, please consult the Data Protection Regulations of Sendinblue at:

<https://de.sendinblue.com/datenschutz-uebersicht/>

### **Execution of a contract data processing agreement**

We have executed a contract with Sendinblue, in which we require Newsletters2Go to protect our customers’ data and to refrain from sharing such data with third parties.

## **8. PLUG-INS AND TOOLS**

### **YOUTUBE**

This website embeds videos of the website YouTube. The website operator is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

If you visit a page on this website into which a YouTube has been embedded, a connection with YouTube’s servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited.

Furthermore, YouTube will be able to place various cookies on your device or comparable technologies for recognition (e.g. device fingerprinting). In this way YouTube will be able to obtain information about this website’s visitors. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud.

If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6 Sect. 1 lit. f GDPR, this is a legitimate interest. If a corresponding agreement has been requested, the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under: <https://policies.google.com/privacy?hl=en>

### **GOOGLE RECAPTCHA**

We use “Google reCAPTCHA” (hereinafter referred to as “reCAPTCHA”) on this website. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to determine whether data entered on this website (e.g. information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyzes the behavior of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g. IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google.

reCAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway.

Data are stored and analyzed on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in the protection of the operator’s websites against abusive automated spying and against SPAM. If a respective declaration of consent has been obtained, the data will be processed exclusively on the basis of Art. 6 Sect. 1 lit. a DGDPR. Any such consent may be revoked at any time.

For more information about Google reCAPTCHA please refer to the Google Data Privacy Declaration and Terms Of Use under the following links: <https://policies.google.com/privacy?hl=en> and <https://policies.google.com/terms?hl=en>

## **9. ECOMMERCE AND PAYMENT SERVICE PROVIDERS**

### **PROCESSING OF DATA (CUSTOMER AND CONTRACT DATA)**

We collect, process and use personal data only to the extent necessary for the establishment, content organization or change of the legal relationship (data inventory). These actions are taken on the basis of Art. 6 Sect. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or pre-contractual actions. We collect, process and use personal data concerning the use of this website (usage data) only to the extent that this is necessary to make it possible for users to utilize the services and to bill for them.

The collected customer data shall be eradicated upon completion of the order or the termination of the business relationship. This shall be without prejudice to any statutory retention mandates.

## **10. ONLINE-BASED AUDIO AND VIDEO CONFERENCES (CONFERENCE TOOLS)**

### **Data processing**

We use online conference tools, among other things, for communication with our customers. The tools we use are listed in detail below. If you communicate with us by video or audio conference using the Internet, your personal data will be collected and processed by the provider of the respective conference tool and by us. The conferencing tools collect all information that you provide/access to use the tools (email address and/or your phone number). Furthermore, the conference tools process the duration of the conference, start and end (time) of participation in the conference, number of participants and other “context information” related to the communication process (metadata).

Furthermore, the provider of the tool processes all the technical data required for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Should content be exchanged, uploaded or otherwise made available within the tool, it is also stored on the servers of the tool provider. Such content includes, but is not limited to, cloud recordings, chat/instant messages, voicemail uploaded photos and videos, files, whiteboards and other information shared while using the service.

Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

### **Purpose and legal bases**

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6 para. 1 sentence 1 lit. b GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art. 6 para. 1 lit. f GDPR). Insofar as consent has been requested, the tools in question will be used on the basis of this consent; the consent may be revoked at any time with effect from that date.

### **Duration of storage**

Data collected directly by us via the video and conference tools will be deleted from our systems immediately after you request us to delete it, revoke your consent to storage, or the reason for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the duration of storage of your data that is stored by the operators of the conference tools for their own purposes. For details, please contact directly the operators of the conference tools.

### **Conference tools used**

We employ the following conference tools:

#### **ZOOM**

We use Zoom. The provider of this service is Zoom Communications Inc, San Jose, 55 Almaden Boulevard, 6th Floor, San Jose, CA 95113, USA. For details on data processing, please refer to Zoom's privacy policy: <https://zoom.us/en-us/privacy.html>

#### **Execution of a contract data processing agreement**

We have entered into a contract data processing agreement with the provider of Zoom and implement the strict provisions of the German data protection agencies to the fullest when using Zoom.

#### **MICROSOFT TEAMS**

We use Microsoft Teams. The provider is Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For details on data processing, please refer to the Microsoft Teams privacy policy: <https://privacy.microsoft.com/en-us/privacystatement>

#### **Execution of a contract data processing agreement**

We have entered into a contract data processing agreement with the provider of Microsoft Teams and implement the strict provisions of the German data protection agencies to the fullest when using Microsoft Teams.

## 11. CUSTOM SERVICES

### JOB APPLICATIONS

We offer website visitors the opportunity to submit job applications to us (e.g. via Email, via postal services or by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

#### Scope and purpose of the collection of data

If you submit a job application to us, we will process any affiliated personal data (e.g. contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The legal grounds for the aforementioned are § 26 New GDPR according to German Law (Negotiation of an Employment Relationship), Art. 6 Sect. 1 lit. b GDPR (General Contract Negotiations) and – provided you have given us your consent – Art. 6 Sect. 1 lit. a GDPR. You may revoke any consent given at any time.

Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application.

If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of § 26 New GDPR and Art. 6 Sect. 1 lit. b GDPR for the purpose of implementing the employment relationship in our data processing system.

#### Data Archiving Period

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6 para. 1 lit. f GDPR) for up to 6 months from the end of the application procedure (rejection or withdrawal of the application). Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g. due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your agreement (Article 6 (1) (a) GDPR) or if statutory data retention requirements preclude the deletion.

## 12. OUR SOCIAL MEDIA APPEARANCES

### DATA PROCESSING THROUGH SOCIAL NETWORKS

We maintain publicly available profiles in social networks. The individual social networks we use can be found below.

Social networks such as Facebook, Google+ etc. can generally analyze your user behavior comprehensively if you visit their website or a website with integrated social media content (e.g. like buttons or banner ads). When you visit our social media pages, numerous data protection-relevant processing operations are triggered. In detail:

If you are logged in to your social media account and visit our social media page, the operator of the social media portal can assign this visit to your user account. Under certain circumstances, your personal data may also be recorded if you are not logged in or do not have an account with the respective social media portal. In this case, this data is collected, for example, via cookies stored on your device or by recording your IP address.

Using the data collected in this way, the operators of the social media portals can create user profiles in which their preferences and interests are stored. This way you can see interest-based advertising inside and outside of your social media presence. If you have an account with the social network, interest-based advertising can be displayed on any device you are logged in to or have logged in to.

Please also note that we cannot retrace all processing operations on the social media portals. Depending on the provider, additional processing operations may therefore be carried out by the operators of the social media portals. Details can be found in the terms of use and privacy policy of the respective social media portals.

### **Legal basis**

Our social media appearances should ensure the widest possible presence on the Internet. This is a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. The analysis processes initiated by the social networks may be based on divergent legal bases to be specified by the operators of the social networks (e.g. consent within the meaning of Art. 6 (1) (a) GDPR).

### **Responsibility and assertion of rights**

If you visit one of our social media sites (e.g., Facebook), we, together with the operator of the social media platform, are responsible for the data processing operations triggered during this visit. You can in principle protect your rights (information, correction, deletion, limitation of processing, data portability and complaint) vis-à-vis us as well as vis-à-vis the operator of the respective social media portal (e.g. Facebook).

Please note that despite the shared responsibility with the social media portal operators, we do not have full influence on the data processing operations of the social media portals. Our options are determined by the company policy of the respective provider.

### **Storage time**

The data collected directly from us via the social media presence will be deleted from our systems as soon as the purpose for their storage lapses, you ask us to delete it, you revoke your consent to the storage or the purpose for the data storage lapses. Stored cookies remain on your device until you delete them. Mandatory statutory provisions - in particular, retention periods - remain unaffected.

We have no control over the storage duration of your data that are stored by the social network operators for their own purposes. For details, please contact the social network operators directly (e.g. in their privacy policy, see below).

## **13. INDIVIDUAL SOCIAL NETWORKS**

### **Facebook**

We have a profile on Facebook. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will also be transferred to the USA and to other third-party countries.

We have signed an agreement with Facebook on shared responsibility for the processing of data (Controller Addendum). This agreement determines which data processing operations we or Facebook are responsible for when you visit our Facebook Fanpage. This agreement can be viewed at the following

link: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

**You can customize your advertising settings independently in your user account. Click on the following link and log in:** <https://www.facebook.com/settings?tab=ads>

Details can be found in the Facebook privacy policy: <https://www.facebook.com/about/privacy/>

### **Twitter**

We use the short message service Twitter. The provider is Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, United States.

**You can customize your Twitter privacy settings in your user account. Click on the following link and log in:** <https://twitter.com/personalization>

For details, see the Twitter Privacy Policy: <https://twitter.com/privacy>

### **Instagram**

We have a profile on Instagram. The provider is Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA. For details on how they handle your personal information, see the Instagram Privacy

Policy: <https://help.instagram.com/519522125107875>

**XING**

We have a profile on XING. The provider is New Work SE, Dammtorstraße 30, 20354 Hamburg, Germany. Details on their handling of your personal data can be found in the XING Privacy Policy: <https://privacy.xing.com/de/datenschutzerklaerung>

**LinkedIn**

We have a LinkedIn profile. The provider is the LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

**If you want to disable LinkedIn advertising cookies, please use the following**

**link:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

For details on how they handle your personal information, please refer to LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>

**YouTube**

We have a profile on YouTube. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Details on how they handle your personal data can be found in the YouTube privacy policy: <https://policies.google.com/privacy?hl=en>