

# Data privacy at a glance

As the operator of this website, we take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and these data protection notes.

When you use this website, various personal data are collected. Personal data is data that can be used to identify you personally. This privacy notice explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

## 1. General Notes

The following information provides a simple overview of what happens to your personal data when you visit our website. For detailed information on the subject of data protection, please refer to our data protection notices listed in this text.

### Data collection on our website

#### Who is responsible for data collection on this website?

The person responsible for data processing on this website is:

Billwerk+ Germany GmbH  
Director: Dr. Ricco Deutscher  
Mainzer Landstraße 51  
60329 Frankfurt am Main

Telefon: +49 69 348 7799 20  
e-mail: [contact@billwerk.plus](mailto:contact@billwerk.plus)

The controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data (e.g. names, e-mail addresses or similar).

#### How do we collect your personal data?

On the one hand, your data is collected when you provide it to us. For example, this can be data that you enter in a contact form.

Other data is collected automatically by our IT systems when you visit the website. This is mainly technical data (e.g. internet browser, operating system or time of page view). This data is collected automatically as soon as you enter our website.

We inform you in detail about the individual processing operations and their purposes in this data protection information.

### **What do we use your data for?**

Some of the data is collected to ensure that the website is provided without error. Other data may be used to analyze your user behavior.

### **Analysis services and services from third parties**

We have integrated third-party services on our website for analysis and advertising purposes, as well as to optimize our services. We only use these services with your consent, which you can give us when you first visit our website. You have the right to revoke your consent at any time. You can do this yourself via the cookie settings. For further information on these services, please refer to these data protection notices.

### **Transfer of personal data to third countries**

If we transfer data to third countries, i.e. countries outside the European Union, then the transfer takes place exclusively in compliance with the legally regulated permissibility requirements.

If the transfer of data to a third country is not for the purpose of fulfilling our contract with you, we do not have your consent, the transfer is not necessary for the assertion, exercise or defence of legal claims and no other exemption under [Article 49](#) of the GDPR applies, we will only transfer your data to a third country if an adequacy decision under [Article 45](#) of the GDPR or appropriate safeguards under [Article 46](#) of the GDPR are in place.

Due to the declaration of invalidity of the EU-US Privacy Shield (ECJ 16.7.2020), processing in the USA is only possible with your consent pursuant to Article 6 para. 1 lit. a GDPR. A transfer to the USA in the sense of the European data protection level is not guaranteed with the declaration of invalidity.

Alternatively or additionally, create appropriate safeguards pursuant to [Article 46 \(2\) c\)](#) GDPR and an adequate level of data protection by entering into the EU standard data protection clauses issued by the European Commission with the receiving entity. Copies of the EU standard data protection clauses are available on the website of the European Commission, available [here](#).

### **Disclosure of personal data**

Your personal data will not be passed on, sold or otherwise transferred to third parties unless this is necessary for the purpose of processing the contract.

Otherwise, we will only pass on your personal data to third parties within the framework of a legal permit or your consent, which can be revoked at any time for the future.

Service partners require your personal data and process it exclusively on our behalf within the framework of so-called order processing, which is expressly provided for in accordance with Article 28 (3) GDPR.

We only transfer your personal data to state institutions or authorities if we are obliged to do so by law.

## **SSL or TLS encryption**

For security reasons and to protect the transmission of confidential content, such as orders or enquiries that you send to us as the site operator, this site uses SSL or TLS encryption. You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

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

## **2. Your Rights**

### **Information, blocking, deletion and correction**

Within the framework of the applicable legal provisions, you have the right at any time to free information about your stored personal data, its origin and recipient and the purpose of the data processing and, if applicable, a right to correction, blocking or deletion of this data. For this purpose as well as for further questions on the subject of personal data, you can contact us or our data protection officer at any time at the address given in this document or within the imprint.

### **Revocation of your consent to data processing**

Many data processing operations are only possible with your express consent. You can revoke consent you have already given at any time. All you need to do is send us an informal e-mail. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

### **Right to object to data collection and direct marketing (Article 21 GDPR)**

If data processing is based on Article 6(1)(a) or (f) GDPR (consent, or legitimate interest), you have the right to object to the processing of your personal data at any time for reasons arising from your particular situation; this also applies to profiling based on these provisions. The respective legal basis on which processing is based can be found in this data protection notice. If you object, we will no longer process your personal data concerned unless we can demonstrate compelling grounds for the processing which override your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending legal claims (objection under Article 21(1) GDPR).

If you are a customer of ours, your data may also be used for direct marketing if it concerns the same or similar topics in connection with the services you have ordered. If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing. If you object, your personal data will subsequently no longer be used for the purpose of direct advertising (objection pursuant to Article 21 (2) GDPR).

## **Right of appeal to the competent supervisory authority**

In the event of breaches of the GDPR, data subjects shall have a right of appeal to a supervisory authority, in particular in the Member State of their habitual residence, their place of work or the place of the alleged breach. The right of appeal is without prejudice to other administrative or judicial remedies.

The supervisory authority responsible for us is:

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit  
vertreten durch Prof. Dr. Alexander Roßnagel  
Gustav-Stresemann-Ring 1  
65189 Wiesbaden  
phone: +49 611 14080  
email: [poststelle@datenschutz.hessen.de](mailto:poststelle@datenschutz.hessen.de)

## **Right to data portability**

You have the right to have data that we process automatically on the basis of your consent or in fulfilment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another person responsible, this will only be done insofar as this is technically feasible.

## **Right to restriction of processing**

You have the right to request the restriction of the processing of your personal data. To do this, you can contact us at any time at the address given in the imprint. The right to restriction of processing exists in the following cases:

- If you dispute the accuracy of your personal data stored by us, we usually need time to check this. For the duration of the verification, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data has happened / is happening unlawfully, you can request the restriction of data processing instead of erasure.
- If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request the restriction of data processing instead of the deletion.
- request restriction of the processing of your personal data.
- If you have lodged an objection pursuant to Article 21 (1) GDPR a balancing of your interests and ours must be carried out. As long as it has not yet been

determined whose interests prevail, you have the right to demand the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, such data may - apart from being stored - only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or a Member State.

### **3. Data Protection Officer**

#### **Data Protection Officer required by law**

We have appointed a data protection officer for our company. His contact details are:

billwerk+ Germany GmbH  
Ronald Baranowski  
Mainzer Landstraße 51  
60329 Frankfurt am Main

phone: +49 69 348 7799 20 or +49 (0)6101-982 94 22  
e-mail: [datenschutz@billwerk.com](mailto:datenschutz@billwerk.com)

### **4. Data Collection on our Website**

#### **Cookies**

Our website uses cookies. Cookies do not harm your computer and do not contain viruses. Cookies are used to make our website more user-friendly, effective and secure. Cookies are small text files that are stored on your computer and saved by your browser.

Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your terminal device until you delete them. These cookies enable us to recognise your browser on your next visit.

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.

#### **Essential cookies**

Cookies that are required to carry out the electronic communication process or to provide certain functions you have requested (e.g. shopping basket function) are stored on the basis of Article 6 para. 1 lit. f and/or lit. b GDPR (legitimate interest or pre-contractual measures/fulfilment of contract). The website operator has a legitimate interest in storing cookies for the technically error-free and optimised

provision of its services. Insofar as other cookies (e.g. cookies to analyse your surfing behaviour) are stored, these are treated separately in this data protection declaration.

### **Consent with Borlabs Cookie**

Our website uses Borlabs Cookie Consent technology to obtain your consent to the storage of certain cookies in your browser or to the use of certain technologies and to document this consent in accordance with data protection law. The provider of this technology is Borlabs - Benjamin A. Bornschein, Rübenkamp 32, 22305 Hamburg (hereinafter "Borlabs").

When you enter our website, a Borlabs cookie is stored in your browser, in which the consents you have given or the revocation of these consents are stored. This data is not shared with the Borlabs provider.

The collected data will be stored until you request us to delete it or until you delete the Borlabs cookie yourself or until the purpose for storing the data no longer applies. Mandatory legal retention periods remain unaffected. Details on the data processing of Borlabs Cookie can be found at <https://de.borlabs.io/kb/welche-daten-speichert-borlabs-cookie/>.

Borlabs Cookie Consent Technology is used to obtain the legally required consent for the use of cookies. The legal basis for this is Article 6 para. 1 lit. c GDPR.

You can access the Consent Tool here.

### **Server log files**

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- browser type and browser version
- Operating system used
- referrer URL
- Host name of the accessing computer
- Time of the server request
- IP address

This data is not merged with other data sources.

This data is collected on the basis of Article 6 para. 1 lit. f GDPR (legitimate interest). The website operator has a legitimate interest in the technically error-free presentation and optimisation of its website - for this purpose, the server log files must be collected.

### **Contact form**

If you send us enquiries via the contact form, your details from the enquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the enquiry and in the event of follow-up questions. We do not pass on this data without your consent.

The processing of the data entered in the contact form is thus exclusively based on your consent (Article 6 para. 1 lit. a GDPR) or if you wish to conclude a contract with us or should have questions in this regard (Article 6 para. 1 lit. b GDPR). You can revoke this consent at any time. For this purpose, an informal communication by e-mail to us is sufficient. The legality of the data processing operations carried out until the revocation remains unaffected by the revocation.

The data you entered in the contact form will remain with us until you request us to delete it, revoke your consent to store it or the purpose for storing the data no longer applies (e.g. after we have completed processing your enquiry). Mandatory legal provisions - in particular retention periods - remain unaffected.

## **Registration on this website**

You can register on our website in order to use additional functions on the site. We will only use the data entered for this purpose for the purpose of using the respective offer or service for which you have registered. The mandatory information requested during registration must be provided in full. Otherwise we will reject the registration.

For important changes, for example in the scope of the offer or in the case of technically necessary changes, we will use the e-mail address provided during registration to inform you in this way.

The processing of the data entered during registration is based on your consent (Article 6 para. 1 lit. a DSGVO). You can revoke your consent at any time. For this purpose, an informal communication by e-mail to us is sufficient. The legality of the data processing already carried out remains unaffected by the revocation.

The data collected during registration will be stored by us for as long as you are registered on our website and will then be deleted. Legal retention periods remain unaffected.

## **Processing of data (customer and contract data)**

We collect, process and use personal data only insofar as they are necessary for the establishment, content or amendment of the legal relationship (inventory data). This is done on the basis of Article 6 para. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or pre-contractual measures. We collect, process and use personal data about the use of our Internet pages (usage data) only insofar as this is necessary to enable the user to use the service or to bill the user.

The collected customer data will be deleted after completion of the order or termination of the business relationship. Statutory retention periods remain unaffected.

## **Data transmission when concluding contracts for services and digital content**

We only transmit personal data to third parties if this is necessary within the framework of the contract processing, for example to the credit institution commissioned with the payment processing.

Further transmission of data does not take place or only if you have expressly consented to the transmission. Your data will not be passed on to third parties without your express consent, for example for advertising purposes.

The basis for data processing is Article 6 para. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or pre-contractual measures.

## **5. Social Media**

We maintain publicly accessible profiles on social networks.

As a rule, the social networks comprehensively analyse your user behaviour when you visit their websites. Visiting our social media sites therefore triggers numerous data protection-relevant processing operations. For the social networks Facebook and Xing, we have included a direct link to our pages. You can recognise the link by the Facebook and Xing symbols.

If you are logged into your social media account and visit our social media presence on a social network, the operator of the social network can assign this visit to your user account. However, your personal data may also be collected under certain circumstances if you are not logged in or do not have an account with the respective social network. In this case, this data collection takes place, for example, via cookies that are stored on your end device or by recording your IP address.

With the help of the data collected in this way, the operators of the social networks can create user profiles in which your preferences and interests are stored. In this way, you can be shown interest-based advertising inside and outside the respective social networks. If you have an account with the respective social network, the interest-based advertising can be displayed on all devices on which you are or were logged in.

Please also note that we are not able to track all processing operations of the social networks. Depending on the provider, further processing operations may therefore be carried out. For details, please refer to the terms of use and data protection provisions of the respective social network (see below).

Our social media presences are intended to ensure the most comprehensive possible presence of our company, our goods and services on the Internet. This is a legitimate interest within the meaning of Article 6 para. 1 lit. f GDPR. The analysis processes initiated by the social networks may be based on deviating legal bases to be specified by the operators of the social networks (e.g. your consent within the meaning of Article 6 para. 1 lit. a GDPR).

If you visit one of our social media sites (e.g. our Facebook page), we are jointly responsible with the operator of the respective social network for the data processing operations triggered during this visit. In principle, you can assert your rights (to information, correction, deletion, restriction of processing, data portability as well as your right of complaint) against both us and the operator of the respective social network.



Please note that despite the joint responsibility pursuant to Article 26 GDPR, we do not have full influence on the data processing operations by the operators of the respective social network. Our (influence) possibilities are largely determined by the corporate policy of the respective provider.

The data collected directly by us via the social media presence will be deleted from our systems as soon as the purpose for storing it no longer applies, you request us to delete your data, revoke your consent to store it or the purpose for storing the data no longer applies. Stored cookies remain on your terminal device until you delete them. Mandatory legal provisions and retention periods remain unaffected.

We have no influence on the duration of the storage of your personal data by the operators of the social networks for their own purposes. Please obtain information directly from the operators of the social networks (e.g. in their data protection notices, see below).

## **LinkedIn Plugin**

Our website uses functions of the LinkedIn network. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland), hereinafter: LinkedIn).

Each time one of our pages containing LinkedIn functions is accessed, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. If you click the LinkedIn "Recommend" button and are logged into your LinkedIn account, it is possible for LinkedIn to associate your visit to our website with you and your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by LinkedIn.

The use of the LinkedIn plugin is based on Article 6 para. 1 lit. a GDPR, with your consent given to the service provider.

For the analysis of our advertising campaigns on the pages of the social media service LinkedIn, we use the integrated analysis platform "LinkedIn Analytics". Using this platform, we can analyse visitor data (e.g. number of visitors, number of new visitors and followers) and performance data and use them to optimise our advertising campaigns and become more relevant to our target group.

For more information, please see LinkedIn's privacy policy at:

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

When using this service, data may be transferred to third countries outside the EU, this is done in accordance with the above information on transfer to third countries.

## **LinkedIn Insights (Script)**

Our website uses the conversion tool "LinkedIn Insight Tag" of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. This tool creates a cookie in your web browser, which enables the collection of the following data, among others: IP address, device and browser properties and page events (e.g.

page views). This data is encrypted, anonymised within seven days and the anonymised data is deleted within 90 days.

LinkedIn does not share any personal data with us, but provides anonymised reports on website audience and ad performance. In addition, LinkedIn offers the possibility of retargeting via the Insight Tag. The controller can use this data to display targeted advertising outside its website without identifying you as a website visitor. For more information on data protection at LinkedIn, please refer to the LinkedIn [privacy notice](#).

Your data will be processed with your consent in accordance with Article 6 para. 1 lit. a GDPR.

LinkedIn members can control the use of their personal data for advertising purposes in their account settings. To deactivate the Insight tag on our website, please change this in the cookie settings.

## **YouTube with enhanced privacy & Google Photos**

Our website uses plugins from the website YouTube. The operator of the pages is Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter: YouTube.

We use YouTube in extended data protection mode. According to YouTube, this mode means that YouTube does not store any information about visitors to this website before they watch the video. However, the disclosure of data to YouTube partners is not necessarily excluded by the extended data protection mode. For example, YouTube establishes a connection to the Google DoubleClick network - regardless of whether you watch a video.

YouTube also uses other services, such as Google Photos, among others, to preview individual images and Google Fonts, which transmit personal data to Google Inc./USA.

As soon as you start a YouTube video on our website, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited. If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account.

Furthermore, YouTube can save various cookies on your end device after starting a video. With the help of these cookies, YouTube can obtain information about visitors to our website. This information is used, among other things, to collect video statistics, improve the user experience and prevent fraud attempts. Cookies remain on your device until you delete them.

If necessary, further data processing processes may be triggered after the start of a YouTube video, over which we have no influence.

The use of YouTube and the services used by YouTube (e.g. Google Photos, Google Fonts) is based on your consent to use this service (Article 6 para. 1 lit. a GDPR).

You can find more information about data protection at YouTube in their privacy policy at: <https://policies.google.com/privacy?hl=de>.

Please note that when using this service, personal data is transferred to third countries outside the EU!

## **6. Analysis Services and Advertising**

### **Matomo**

When you visit our website, we store general technical data such as the date and duration of your visit or the domain name of your internet service provider by default in order to track visitors' preferences and to be able to optimally design the website according to them.

To collect this data, we use the web analytics service Matomo, of InnoCraft Ltd, 150 Willis St, 6011 Wellington, New Zealand, which uses so-called cookies for this purpose ("Matomo"). These are text files that contain data about your visit to our website and are stored on your hard drive. Cookies enable you to navigate more easily and thus increase user-friendliness.

In addition, cookies allow us to analyse the use of our website, such as identifying particularly popular content. This enables us to adapt our internet offer to your needs as a user. The usage information collected (including your shortened IP address) is transmitted to our server and stored. Your IP address is anonymised so that the data cannot be assigned to an identifiable person and the individual user remains anonymous. The usage data collected is not passed on to third parties. You can switch off the acceptance of cookies at any time via your browser. Please note, however, that parts of our website may then not be displayed optimally and may not function properly.

We process your data with your consent in accordance with Article 6 para. 1 lit. a GDPR. Your data will be stored for 6 months and then automatically deleted.

### **Google Analytics**

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

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and enable an analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there.

The storage of Google Analytics cookies and the use of this analysis tool are based on Article 6 para. 1 lit. a GDPR, with your consent.

When using this service, data may be transferred to third countries outside the EU; this is done in accordance with the above information on transfer to third countries.

## **Browser plugin**

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. In addition, you can prevent the collection of data generated by the cookie and related to your use of the website (incl. your IP address) to Google as well as the processing of this data by Google by downloading and installing the browser plugin available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>.

## **Objection to data collection**

You can prevent the collection of your data by Google Analytics by clicking on the following link. An opt-out cookie will be set, which will prevent the collection of your data during future visits to this website: [Deactivate Google Analytics](#).

You can find more information on how Google Analytics handles user data in Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=de>.

## **Order processing**

We have concluded an order processing contract with Google and fully implement the strict requirements of the German data protection authorities when using Google Analytics.

## **Demographic characteristics with Google Analytics**

This website uses the "demographic characteristics" function of Google Analytics. This allows reports to be generated that contain statements about the age, gender and interests of site visitors. This data comes from interest-based advertising from Google as well as visitor data from third-party providers. This data cannot be assigned to a specific person. You can deactivate this function at any time via the ad settings in your Google account or generally prohibit the collection of your data by Google Analytics as shown in the item "Objection to data collection".

## **New Relic**

We use the New Relic service of New Relic Inc. Delaware corporation, located at 188 Spear Street, Suite 1200, San Francisco, CA 94105, USA, [www.newrelic.com](http://www.newrelic.com), on our website. This analyses your website usage. The information stored by the cookie, including your IP address, is transmitted to a NewRelic server in the USA.

NewRelic evaluates the stored information on the use of the website in order to compile reports on website activities for the website operators and to provide other services associated with website and internet use.

The data collected includes:

- Frequency of page views
- Use of website functions
- Search terms entered

- Your IP and MAC address
- Browser type and version
- Operating system used
- The website accessed
- Date and time of your access
- Your location (country)

The storage of Newrelic cookies and the use of this analysis tool are based on Article 6 para. 1 lit. a GDPR, with your consent.

When using this service, data may be transferred to third countries outside the EU.

For more information on Newrelic's data protection, please visit:

<https://newrelic.com/termsandconditions/privacy> and  
[https://newrelic.com/termsandconditions/privacy#who\\_we\\_are](https://newrelic.com/termsandconditions/privacy#who_we_are)

## **VWO**

We use the VWO service of Wingify Inc, 14th Floor, KLJ Tower North, Netaji Subhash Place, Pitam Pura, Delhi 110034, India. VWO is a web analytics service that can be used to test the usability of websites and web presences. The user behaviour on these websites is collected.

In order to obtain meaningful test results, cookies are also used to temporarily store information and/or to access it later. The cookies are deleted after 100 days.

You can delete the cookies yourself in your browser at any time. In addition, you can prevent your user behaviour from being recorded and deactivate the service for you via the following link: [https://billwerk.com/?vwo\\_opt\\_out=1](https://billwerk.com/?vwo_opt_out=1) or <https://vwo.com/opt-out/>.

Further information on the data protection of Wingify Inc. can be found here: <https://vwo.com/de/impressum/> as well as [https://vwo.com/privacy-policy/#locale\\_lang](https://vwo.com/privacy-policy/#locale_lang)

## **Oribi**

This website uses the web analysis service Oribi of Oribi Ltd, Shim'on Rokah St 101, Tel Aviv-Yafo, Tel Aviv, Israel, Tel.: Aviv-Yafo, [privacy@oribi.io](mailto:privacy@oribi.io), for the statistical evaluation of visitor accesses, for measuring and analysing conversion rates and for tracking. Using cookies and a unique identifier, Oribi can track your visit to our website.

Oribi Analytics uses technologies that enable the recognition of the user (e.g. via individual identifiers). The following data are processed, among others:

- log files
- the origin of website visitors (country, city)
- whether and which clicks, views, downloads they have made on the site.

- IP addresses (are replaced by unique identifiers before storage).

The use of this analysis tool is based on your consent pursuant to Article 6 para. 1 lit. a GDPR. You can revoke your consent at any time by calling up the consent tool and changing your settings.

Information on data protection at Oribi can be found here: <https://oribi.io/gdpr> and here: <https://oribi.io/privacy>.

## **WordPress functionalities and tools**

This website uses functionalities and tools of the provider WordPress, e.g. Imagify and WP Rocket or equivalent. The provider is Aut O'Mattic A8C Ireland Ltd, Business Centre, No.1 Lower Mayor Street, International Financial Services Centre, Dublin 1, Ireland, hereinafter: WordPress).

Imagify is a tool for optimising image files that are on our website. By compressing the images, the file size can be greatly reduced, thus improving the loading time of our website. No personal data is processed for the use of this tool.

WP Rocket is a premium caching plugin that helps us to improve the loading speed of our website and the SEO ranking. It also offers a variety of automated features, such as optimising files, improving slow-loading images and much more. No personal data is processed for the use of this tool.

## **Google Analytics Remarketing**

Our website uses the functions of Google Analytics Remarketing in conjunction with the cross-device functions of Google AdWords and Google DoubleClick. The provider is Google Ireland Ltd (Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter: Google Analytics Remarketing).

This function enables to link the advertising target groups created with Google Analytics Remarketing with the cross-device functions of Google AdWords and Google DoubleClick. In this way, interest-based, personalized advertising messages that have been adapted to you depending on your previous usage and surfing behavior on one end device (e.g. smartphone) can also be displayed on another of your end devices (e.g. tablet or PC).

If you have given your consent, Google will link your web and app browsing history to your Google account for this purpose. In this way, the same personalized advertising messages can be displayed on every device on which you log in with your Google account.

To support this feature, Google Analytics collects Google-authenticated IDs of users, which are temporarily linked to our Google Analytics data to define and create audiences for cross-device ad targeting.

You can permanently object to cross-device remarketing/targeting by deactivating personalized advertising in your Google account; follow this link: <https://www.google.com/settings/ads/onweb/>.

The aggregation of the collected data in your Google account is based solely on your consent, which you can give or revoke at Google (Article 6 para. 1 lit. a DSGVO), or which you gave us when you first visited our website.

Further information and the data protection information can be found in Google's data protection declaration at: <https://policies.google.com/technologies/ads?hl=de>.

### **Google Analytics and Rank Math**

The website uses the functions of the web analytics service Google Analytics in connection with the WordPress plugin Rank Math SEO. The providers are Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland and Aut O'Mattic A8C Ireland Ltd, Business Centre, No.1 Lower Mayor Street, International Financial Services Centre Dublin 1, Ireland ("Wordpress").

Google Analytics enables the website operator to analyse the behaviour of website visitors. In doing so, the website operator receives various usage data, such as page views, length of stay, operating systems used and the origin of the user. This data may be summarised by Google in a profile that is assigned to the respective user or their end device.

Google Analytics uses technologies that enable the recognition of the user for the purpose of analysing user behaviour (e.g. cookies or device fingerprinting). The information collected by Google about the use of this website is generally transferred to a Google server in the USA and stored there.

The use of this analysis tool is based on your consent in accordance with Article 6 para. 1 lit. a GDPR.

However, the WordPress plugin Rank Math SEO is also used. Cookie-free tracking and an anonymised IP address are possible via the plugin. Rank Math installs the Google Analytics tracking code in such a way that the assignment of a unique ID for visitors does not require a cookie. This is done by dynamically generating and using an encrypted ID when the website loads. This means that no consent is required, as no cookie is set and no sensitive, personally identifiable data is collected and transmitted to Google. The use of Rank Math SEO is based on Article 6 para. 1 lit. a GDPR.

### **Google Ads/AdWords and Google Conversion-Tracking**

This website uses Google AdWords. AdWords is an online advertising programme of Google Ireland Ltd (Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter: Google AdWords).

Within the framework of Google AdWords, we use so-called conversion tracking. When you click on an ad placed by Google, a cookie is set for conversion tracking. Cookies are small text files that the internet browser stores on the user's computer. These cookies lose their validity after 30 days and are not used to personally identify the user. If the user visits certain pages of this website and the cookie has not yet

expired, Google and we will be able to recognise that the user clicked on the ad and was redirected to this page.

Each Google AdWords customer receives a different cookie. The cookies cannot be tracked across AdWords customers' websites. The information obtained using the conversion cookie is used to create conversion statistics for AdWords customers who have opted in to conversion tracking. The customers learn the total number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking tag. However, they do not receive any information that can be used to personally identify users. If you do not wish to participate in the tracking, you can object to this use by easily deactivating the Google conversion tracking cookie via your internet browser under user settings. You will then not be included in the conversion tracking statistics.

The storage of "conversion cookies" and the use of this tracking tool are based on Article 6 para. 1 lit. a GDPR, your consent.

You can find more information on Google AdWords and Google conversion tracking in [Google's privacy policy](#).

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.

Please note the above information on transfer to third countries.

## **Google Tag Manager**

We use the service called Google Tag Manager from Google. "Google" is a group of companies and consists of Google Ireland Ltd (provider of the service), Gordon House, Barrow Street, Dublin 4, Ireland and Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA as well as other affiliated companies of Google LLC.

We have concluded an order processing agreement with Google. The Google Tag Manager is an auxiliary service and only processes personal data itself for technically necessary purposes. The Google Tag Manager takes care of loading other components, which in turn may collect data. The Google Tag Manager does not access this data.

For more information on the Google Tag Manager, please see [Google's privacy policy](#).

Please note that American authorities, such as intelligence agencies, could potentially gain access to personal data that is inevitably exchanged with Google due to the Internet Protocol (TCP) when this service is integrated, due to American laws such as the Cloud Act.

## **7. Newsletter**



## Newsletter Data

If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. The newsletter will only be sent after you have entered your e-mail address and confirmed that you are the owner of the e-mail address and that you agree to receive the newsletter (so-called "double opt-in procedure"). No further data is collected or only on a voluntary basis. We use this data exclusively for sending the requested information and do not pass it on to third parties.

The processing of the data entered in the newsletter registration form is based exclusively on your consent (Article 6 para. 1 lit. a GDPR). You can revoke your consent to the storage of the data, the e-mail address and their use for sending the newsletter at any time, for example via the "unsubscribe" link in the newsletter. The legality of the data processing operations already carried out remains unaffected by the revocation.

The data you provide for the purpose of receiving the newsletter will be stored by us until you unsubscribe from the newsletter and will be deleted after you unsubscribe from the newsletter. Data that has been stored by us for other purposes remains unaffected by this.

## 8. Plugins and Tools

### HubSpot

We use HubSpot for our online marketing activities. This is an integrated software-as-a-service (SaaS) solution that we use to cover various aspects of our online marketing.

These include:

- Email marketing (newsletters, personal emails as well as automated emailings).
- Social media publishing & reporting
- Reporting (e.g. traffic sources, hits, etc. ...)
- Contact management (e.g. user segmentation & CRM)
- Landing pages and contact forms

This information is stored on servers of our software partner HubSpot. It can be used by us to contact visitors to our website and to determine which of our company's services are of interest to them.

The data processing is based on your consent (Art. 6 para. 1 lit. a DSGVO). You can revoke this consent at any time. The legality of the data processing operations already carried out remains unaffected by the revocation.

All information collected by us is subject to this data protection notice. We use all collected information exclusively to optimize our marketing.

HubSpot is a software company from the USA with a branch in Ireland: HubSpot, 2nd Floor 30 North Wall Quay, Dublin 1, Ireland, Telephone: +353 1 5187500.

Please also note the information above regarding transfers to third countries.

- More information about HubSpot's [privacy policy](#)
- More information from HubSpot regarding [EU data protection regulations](#)
- More information about the cookies used by HubSpot can be found [here](#) & [here](#)

## **Content Delivery Network (CDN)**

For the purpose of shorter loading times, we use a so-called Content Delivery Network ("CDN") for some offers. With this service, content, e.g. large media files, are delivered via regionally distributed servers of external CDN service providers. Therefore, access data (e.g. IP address, date and time of access) is processed on the servers of the service providers. The storage period is determined by the respective service provider, over which we have no influence.

The following service provider is used:

- Bootstrap CDN of Cloudflare Inc. (101 Townsend St., San Francisco, CA 94107, USA), Information on data protection: <https://www.jsdelivr.com/terms/privacy-policy-jsdelivr-net>

When using this service, personal data may be transmitted to servers that are not located in the EU, e.g. in the USA, and where there is no adequate level of data protection. Due to the declaration of invalidity of the EU-US Privacy Shield (ECJ 16.7.2020), processing is only possible with your consent pursuant to Article 6 para 1 lit. a GDPR. A transfer in the sense of the European level of data protection is not guaranteed with the declaration of invalidity.

If you have any questions about our service providers and the basis of our cooperation with them, please use the contact option described in this privacy notice.

## **Google Fonts**

For the graphically uniform display of fonts, we use the fonts of the provider Google Webfonts (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland).

We only use locally installed fonts ourselves. This means that the fonts are initially loaded and installed by us and that no personal data is required for the operation of these services and is not transmitted to the providers. If these services were not used statically but dynamically, technical data (e.g. your IP address) would be forwarded to the respective service provider for the construction of the page view and the display of the fonts in your browser.

The use of the above-mentioned services is in the interest of a uniform and appealing presentation of our online offers. This represents a legitimate interest within the meaning of the legal basis of Article 6 para. 1 lit. f GDPR.

Certain service providers, such as YouTube, use Google Fonts.

## **9. Data protection in applications and the application process**

The controller collects and processes the personal data of applicants for the purpose of handling the application procedure and for the decision on the establishment of an employment relationship. This takes place and is carried out on the basis of Article 88 para. 1 GDPR in conjunction with. (in conjunction with) Section 26 of the Federal Data Protection Act (BDSG) as well as Article 6 para. 1 lit. b GDPR - pre-contractual measures. Processing may also take place electronically. This is particularly the case if an applicant sends the relevant application documents to the controller electronically, for example by e-mail or via a web form on the website. Your data will only be forwarded to the relevant departments responsible for the application procedure.

If the controller concludes an employment contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions.

If the data controller does not conclude an employment contract with the applicant, the application documents are automatically deleted six months after the notification of the rejection decision, provided that no contractual, legal or other legitimate interests of the data controller oppose such deletion. Other legitimate interest in this sense is, for example, a duty to provide evidence in the event of a defence in proceedings under the General Equal Treatment Act (AGG).

## **10. Participation in webinars and use of the download function for documents/files**

You have the possibility to participate in webinars or download white papers and other downloads (files, keynotes, etc.) on various topics via our website.

This offer is provided by us. After you have provided us with your personal data such as first name, surname, e-mail address and, if applicable, other data for marketing purposes (for sending our newsletter and other e-mails on subscription topics and, if applicable, for addressing you by telephone) in return for the services which are otherwise free of charge, you can use these services. You will not be able to use our services without providing the data required to conduct the webinar or to download files. These data are marked as mandatory fields during registration.

Information about webinars:

The webinars are held live and recorded. This only concerns the speaker and his presentation. Image/sound/text messages from the participating persons will not be recorded. Participants will be informed in advance that a recording will be made. The recordings will subsequently be available to the participants on our YouTube channel (via a link sent by e-mail). See also point 5 Social media/YouTube.

Information on white papers and other downloads:

The white papers, keynotes, documents, files and reports are created by billwerk+ Germany GmbH and/or partners and offered for download on the billwerk+ Germany GmbH website. For the download, registration is required, in which you must enter your personal data such as first name, last name and e-mail address. After sending the registration, you will receive a confirmation e-mail from hello@billwerk.com in which you are asked to confirm your e-mail address (double opt-in). Only after you have confirmed your e-mail address will you receive another e-mail containing the link to the desired download.

We process your data in order to provide you with services - the legal basis for this is Article 6 para. 1 lit. b GDPR - contract performance -, and in order to be able to design and offer services efficiently - the legal basis for the data processing described above is legitimate interests, Article 6 para. 1 lit. f GDPR of the responsible party. This also includes addressing you for marketing purposes, e.g. via e-mail newsletters on subscription topics and addressing you through our above-mentioned partners for their own marketing purposes.

Apart from that, we will of course treat your data confidentially and will not pass it on to third parties without your consent.

Storage period:

Unless there are legal retention periods, we delete your data as soon as it is no longer required for the purpose for which we collected it. In the case of statutory retention periods, we delete your data after the period for the retention obligation has expired.

## **Objection to advertising e-mails**

We hereby object to the use of contact data published within the scope of the imprint obligation to send advertising and information material that has not been expressly requested. The operators of the pages expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, for example by spam e-mails.

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