

## 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 our 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 our 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.

Our IT systems automatically record other data when you visit our website. 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 our 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 analyse 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, blocked or eradicated. 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. You also have the right to log a complaint with the competent supervising agency.

Moreover, under certain circumstances, you have the right to demand the restriction of the processing of your personal data. For details, please consult the Data Protection Declaration under section “Right to Restriction of Data Processing.”

## **Analysis tools and tools provided by third parties**

There is a possibility that your browsing patterns will be statistically analysed when you visit our website. Such analyses are performed primarily with cookies and with what we refer to as analysis programmes. As a rule, the analyses of your browsing patterns are conducted anonymously; i.e. the browsing patterns cannot be traced back to you. You have the option to object to such analyses or you can prevent their performance by not using certain tools. For detailed information about this, please consult our Data Protection Declaration below.

You do have the option to object to such analyses. We will brief you on the objection options in this Data Protection Declaration.

## **2. 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 e-mail 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:

billwerk GmbH

Geschäftsführer: Dr. Ricco Deutscher

Mainzer Landstraße 51

60329 Frankfurt am Main

Telephone: +49 69 348 7799 20

Email: hello@billwerk.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, e-mail addresses, etc.).

### **Revocation 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. To do so, all you are required to do is sent us an informal notification via e-mail. 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 programme. You can recognise 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, blockage, 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, blocked 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:

- i. 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.
- ii. 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.
- iii. 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.
- iv. 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 e-mails**

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.

## **3. Data protection officer**

### **Designation of a data protection officer as mandated by law**

We have appointed a data protection officer for our company.

billwerk GmbH

Datenschutzbeauftragter: Ronald Baranowski

Mainzer Landstraße 51  
60329 Frankfurt am Main  
Telephone: +49 69 348 7799 20  
Email: [datenschutz@billwerk.com](mailto:datenschutz@billwerk.com)

## 4. Recording of data on our website

### Cookies

In some instances, our website and its pages use so-called cookies. Cookies do not cause any damage to your computer and do not contain viruses. The purpose of cookies is to make our website more user friendly, effective and more secure. Cookies are small text files that are placed on your computer and stored by your browser.

Most of the cookies we use are so-called “session cookies.” They are automatically deleted after you leave our site. Other cookies will remain archived on your device until you delete them. These cookies enable us to recognise your browser the next time you visit our website.

You can adjust the settings of your browser to make sure that you are notified every time cookies are placed and to enable you to accept cookies only in specific cases or to exclude the acceptance of cookies for specific situations or in general and to activate the automatic deletion of cookies when you close your browser. If you deactivate cookies, the functions of this website may be limited.

Cookies that are required for the performance of the electronic communications transaction or to provide certain functions you want to use (e.g. the shopping cart function), are stored on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in storing cookies to ensure the technically error free and optimised provision of the operator’s services. If other cookies (e.g. cookies for the analysis of your browsing patterns) should be stored, they are addressed separately in this Data Protection Declaration.

### Server log files

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used
- The used operating system

- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address

This data is not merged with other data sources.

This data is recorded on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

### 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.

Hence, the processing of the data entered into the contact form occurs exclusively based on your consent (Art. 6 Sect. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. To do so, all you are required to do is send us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

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.

### Registration on this website

You have the option to register on our website to be able to use additional website functions. We shall use the data you enter only for the purpose of using the respective offer or service you have registered for. The required information we request at the time of registration must be entered in full. Otherwise we shall reject the registration.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use the e-mail address provided during the registration process.

We shall process the data entered during the registration process on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You have the right to revoke at any time any

consent you have already given us. To do so, all you are required to do is sent us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

The data recorded during the registration process shall be stored by us as long as you are registered on our website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

### **The comment function on this website**

When you use the comment function on this website, information on the time the comment was generated and, if you are not posting anonymously, the user name you have selected will be archived in addition to your comments.

### **Storage of the IP address**

Our comment function stores the IP addresses of all users who enter comments. Given that we do not review the comments prior to publishing them, we need this information in order to take action against the author in the event of rights violations, such as defamation or propaganda.

### **Subscribing to comments**

As a user of this website, you have the option to subscribe to comments after you have registered. You will receive a confirmation e-mail, the purpose of which is to verify whether you are the actual holder of the provided e-mail address. You can deactivate this function at any time by following a respective link in the information e-mails. The data entered in conjunction with subscriptions to comments will be deleted in this case. However, if you have communicated this information to us for other purposes and from a different location (e.g. when subscribing to the newsletter), the data shall remain in our possession.

### **Storage period for comments**

Comments and any affiliated information (e.g. the IP address) shall be stored by us and remain on our website until the content the comment pertained to has been deleted in its entirety or if the comments had to be deleted for legal reasons (e.g. insulting comments).



## Legal basis

Comments are stored on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. To do so, all you are required to do is sent us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

## 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 our 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.

## Data transfer upon closing of contracts for services and digital content

We share personal data with third parties only if this is necessary in conjunction with the handling of the contract; for instance, with the financial institution tasked with the processing of payments.

Any further transfer of data shall not occur or shall only occur if you have expressly consented to the transfer. Any sharing of your data with third parties in the absence of your express consent, for instance for advertising purposes, shall not occur.

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

## 5. Social media

### Facebook plug-ins (Like & Share button)

We have integrated plug-ins of the social network Facebook, provided by Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA, on our website. You will be able to recognise Facebook plug-ins by the Facebook logo or the „Like“ button on our

website. An overview of the Facebook plug-ins is available under the following link: <https://developers.facebook.com/docs/plugins/>.

Whenever you visit our 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 our 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 our website and its pages with your Facebook profile. As a result, Facebook will be able to allocate the visit to our 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 our website and its pages to your Facebook user account, please log out of your Facebook account while you are on our 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.

### Twitter plug-in

We have integrated functions of the social media platform Twitter into our website. These functions are provided by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. While you use Twitter and the „Re-Tweet“ function, websites you visit are linked to your Twitter account and disclosed to other users. During this process, data are transferred to Twitter as well. We must point out, that we, the providers of the website and its pages do not know anything about the content of the data transferred and the use of this information by Twitter. For more details, please consult Twitter’s Data Privacy Declaration at: <https://twitter.com/en/privacy>.

The use of Twitter plug-ins 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.

You have the option to reset your data protection settings on Twitter under the account settings at <https://twitter.com/account/settings>.

### Google+ plug-in

Our website and its pages use functions of Google+; the provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Recording and sharing of information: With the assistance of the Google+ button, you can publish information worldwide. The Google+ button provides you and other users with custom tailored Google content as well as content of our partners. Google saves the information you have entered for content with +1 as well as information about the website/page you viewed when you clicked on +1. Your +1 entries may appear as information along with your profile name and your photo on Google services, such as in search results or in your Google profile or in other locations on websites and ads on the Internet.

Google records information about your +1 activities to improve Google's services for you and others. To be able to use the Google+ button, you will need a public Google profile, which is visible around the world, which must contain at least the name you have chosen for your profile. This name is used in conjunction with all Google services. In some cases, this name may also replace another name you have used when sharing content via your Google account. The identity of your Google profile may be displayed to users who know your e-mail address or are in possession of other information related to you that identifies you.

Use of the recorded information: Besides the abovementioned purposes of use, the information you provide is also used in compliance with the applicable Google Data Privacy Policies. Google may potentially publish summary statistics about the +1 activities of its users or shares this information with users and partners, such as publishers, prospective customers or affiliated websites.

The use of the Google+ 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.

### Instagram plug-in

We have integrated functions of the public media platform Instagram into our 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 our website to your Instagram profile. This enables Instagram to allocate your visit to our 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.

The use of the Instagram 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.

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

### LinkedIn plug-in

Our website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Any time you access one of our sites that contains functions of LinkedIn, a connection to LinkedIn's servers is established. LinkedIn is notified that you have visited our websites with your IP address. If you click on LinkedIn's „Recommend“ button and are logged into your LinkedIn account at the time, LinkedIn will be in a position to allocate your visit to our website to your user account. We have to point out that we as the provider of the websites do not have any knowledge of the content of the transferred data and its use by LinkedIn.

The use of the LinkedIn 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.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at: <https://www.linkedin.com/legal/privacy-policy>.

### XING plug-in

Our website uses functions of the XING network. The provider is the XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany.

Any time one of our sites/pages that contains functions of XING is accessed, a connection with XING's servers is established. As far as we know, this does not result in the archiving of any personal data. In particular, the service does not store any IP addresses or analyse user patterns.

The use of the XING 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.

For more information on data protection and the XING share button please consult the Data Protection Declaration of Xing at: [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection).

## 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 Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called cookies. Cookies are text files, which are stored on your computer and that enable an analysis of the use of the website by users. The information generated by cookies on your use of this website is usually transferred to a Google server in the United States, where it is stored.

The storage of Google Analytics cookies and the utilization of this analysis tool are based on 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.

## Browser plug-in

You do have the option to prevent the archiving of cookies by making pertinent changes to the settings of your browser software. However, we have to point out that in this case you may not be able to use all of the functions of this website to their fullest extent. Moreover, you have the option prevent the recording of the data generated by the cookie and affiliated with your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

## Objection to the recording of data

You have the option to prevent the recording of your data by Google Analytics by clicking on the following link. This will result in the placement of an opt out cookie, which prevents the recording of your data during future visits to this website: [Google Analytics deactivation](#).

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 function “demographic parameters” provided by Google Analytics. It makes it possible to generate reports providing information on the age, gender and interests of 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.”

### WordPress Stats

This website uses the WordPress tool Stats in order to statistically analyse user access information. The provider of the solution is Automattic Inc., 60 29th Street #343, San Francisco, CA 94110-4929, USA.

WordPress Stats uses cookies that are stored on your computer and that make it possible to analyse the use of this website. The information generated by the cookies concerning the use of our website is stored on servers in the United States. Your IP address is rendered anonymous after processing and prior to the storage of the data. “WordPress Stats” cookies will remain on your device until you delete them.

The storage of “WordPress Stats” cookies and the use of this analysis tool are based on Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in the anonymous analysis of user patterns, in order to optimize the operator’s web offerings and advertising.

You can set up your browser in such a manner that you will be notified anytime cookies are placed and you can permit cookies only in certain cases or exclude the acceptance of cookies in certain instances or in general and you can also activate the automatic deletion of cookies upon closing of the browser. If you deactivate cookies, the functions of this website may be limited.

You do have the option to object to the collection and use of your data for future implications by placing an opt out cookie into your browser by clicking on the following link: <https://www.quantcast.com/opt-out/>.

### Google Analytics Remarketing

Our websites use the functions of Google Analytics Remarketing in combination with the functions of Google AdWords and Google DoubleClick, which work on all devices. The provider of these solutions is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

This function makes it possible to connect the advertising target groups generated with Google Analytics Remarketing with the functions of Google AdWords and Google DoubleClick, which work on all devices. 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 given us pertinent consent, Google will connect your web and app browser progressions with your Google account for this purpose. As a result, it is possible to display the same personalized advertising messages on every device you log into with your Google account.

To support this function, Google Analytics records Google authenticated IDs of users that are temporarily connected with our Google Analytics data to define and compile the target groups for the ads to be displayed on all devices.

You have the option to permanently object to remarketing / targeting across all devices by deactivating personalized advertising in your Google account. To do this, please follow this link: <https://www.google.com/settings/ads/onweb/>.

The consolidation of the recorded data in your Google account shall occur exclusively based on your consent, which you may give to Google and also revoke there (Art. 6 Sect. 1 lit. a GDPR). Data recording processes that are not consolidated in your Google account (for instance because you do not have a Google account or have objected to the consolidation of data), the recording of data is based on Art. 6 Sect. 1 lit. f GDPR. The legitimate interest arises from the fact that the operator of the website has a legitimate interest in the anonymized analysis of website visitor for advertising purposes.

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 AdWords and Google Conversion Tracking**

This website uses Google AdWords. AdWords is an online promotional program of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States ("Google").

In conjunction with Google AdWords, we use a tool called Conversion Tracking. If you click on an ad posted by Google, a cookie for Conversion Tracking purposes will be placed. Cookies are small text files the web browser places on the user's computer. These cookies expire after 30 days and are not used to personally identify users. 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 has clicked on an ad and has been linked to this page.

A different cookie is allocated to every Google AdWords customer. These cookies cannot be tracked via websites of AdWords customers. The information obtained with the assistance of the Conversion cookie is used to generate Conversion statistics for AdWords customers who have opted to use Conversion Tracking. The users receive the total number of users that have clicked on their ads and have been linked to a page equipped with a Conversion Tracking tag. However, they do not receive any information that would allow them to personally identify these users. If you do not want to participate in tracking, you have the option to object to this use by easily deactivating the Google Conversion Tracking cookie via your web browser under user settings. If you do this, you will not be included in the Conversion Tracking statistics. The storage of "Conversion" cookies and the use of this tracking tool are based on Art. 6 Sect. 1 lit. f GDPR.

The website operator has a legitimate interest in the analysis of user patterns, in order to optimize the operator's web offerings and advertising.

To review more detailed information about Google AdWords and Google Conversion Tracking, please consult the Data Privacy Policies of Google at: <https://policies.google.com/privacy?hl=en>.

You can set up your browser in such a manner that you will be notified anytime cookies are placed and you can permit cookies only in certain cases or exclude the acceptance of cookies in certain instances or in general and you can also activate the automatic deletion of cookies upon closing of the browser. If you deactivate cookies, the functions of this website may be limited.

### Facebook Pixel

To measure our conversion rates, our website uses the visitor activity pixel of Facebook, Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook").

This tool allows the tracking of page visitors after they have been linked to the website of the provider after clicking on a Facebook ad. This makes it possible to



analyse the effectiveness of Facebook ads for statistical and market research purposes and to optimize future advertising campaigns.

For us as the operators of this website, the collected data is anonymous. We are not in a position to arrive at any conclusions as to the identity of users. However, Facebook archives the information and processes it, so that it is possible to make a connection to the respective user profile and Facebook is in a position to use the data for its own promotional purposes in compliance with the [Facebook Data Usage Policy](#). This enables Facebook to display ads on Facebook pages as well as in locations outside of Facebook. We as the operator of this website have no control over the use of such data.

The use of Facebook Pixel is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in effective advertising campaigns, which also include social media.

In Facebook's Data Privacy Policies, you will find additional information about the protection of your privacy at: <https://www.facebook.com/about/privacy/>.

You also have the option to deactivate the remarketing function "Custom Audiences" in the ad settings section

under [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_scr](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)  
[een](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_scr). To do this, you first have to log into Facebook.

If you do not have a Facebook account, you can deactivate any user based advertising by Facebook on the website of the European Interactive Digital Advertising Alliance: <http://www.youronlinechoices.com/de/praferenzmanagement/>.

## 7. Newsletter

### Newsletter data

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail 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 e-mail 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 you archive with us for the purpose of the newsletter subscription shall be archived by us until you unsubscribe from the newsletter. Once you cancel your subscription to the newsletter, the data shall be deleted. This shall not affect data we have been archiving for other purposes.

### MailChimp

This website uses the services of MailChimp to send out its newsletters. The provider is the Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

Among other things, MailChimp is a service that can be deployed to organize and analyse the sending of newsletters. Whenever you enter data for the purpose of subscribing to a newsletter (e.g. your e-mail address), the information is stored on MailChimp servers in the United States.

With the assistance of the MailChimp tool, we can analyse the performance of our newsletter campaigns. If you open an e-mail that has been sent through the MailChimp tool, a file that has been integrated into the e-mail (a so-called web-beacon) connects to MailChimp's servers in the United States. As a result, it can be determined whether a newsletter message has been opened and which links the recipient possibly clicked on. Technical information is also recorded at that time (e.g. the time of access, the IP address, type of browser and operating system). This information cannot be allocated to the respective newsletter recipient. Their sole purpose is the performance of statistical analyses of newsletter campaigns. The results of such analyses can be used to tailor future newsletters to the interests of their recipients more effectively.

If you do not want to permit an analysis by MailChimp, 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.

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.

The data you archive with us for the purpose of the newsletter subscription shall be archived by us until you unsubscribe from the newsletter. Once you cancel your

subscription to the newsletter, the data shall be deleted from our servers as well as those of MailChimp. This shall not affect data we have been archiving for other purposes.

For more details, please consult the Data Privacy Policies of MailChimp at: <https://mailchimp.com/legal/terms/>.

Please note that when using Mailchimp, personal data is transferred to third countries outside the EU! This is done in accordance with point 4. of this data protection notice (notice for the transfer of personal data to third countries).

### Execution of a contract data processing agreement

We have executed a so-called “Data Processing Agreement” with MailChimp, in which we mandate that MailChimp undertakes to protect the data of our customers and to refrain from sharing it with third parties. You may review this Agreement under the following link: <https://mailchimp.com/legal/forms/data-processing-agreement/sample-agreement/>.

### Rapidmail

This website uses Rapidmail for the sending of newsletters. The provider is the rapidmail GmbH, Augustinerplatz 2, 79098 Freiburg i.Br., Germany.

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

If you do not want to permit an analysis by Rapidmail, 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 Rapidmail

For analytical purposes, e-mails sent via Rapidmail are tagged with a so-called “Tracking Pixel”, which connects to Rapidmail’s servers once the e-mail is opened. As a result, it is possible to determine whether a newsletter e-mail was actually opened. With the assistance of Rapidmail we are also able to determine whether and which links in the newsletter message the recipient clicked. All links integrated into the e-mail are so-called Tracking Links that enable us to count your clicks.

For more details on the Rapidmail analysis functions, please follow this link: <https://de.rapidmail.wiki/kategorien/statistiken/>.

### 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 you archive with us for the purpose of the newsletter subscription shall be archived by us until you unsubscribe from the newsletter. Once you cancel your subscription to the newsletter, the data shall be deleted from our servers as well as those of CleverElements. This shall not affect data we have been archiving for other purposes.

For more details, please consult the Data Protection Regulations of Rapidmail at: <https://www.rapidmail.de/datensicherheit>.

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

We have executed a contract with Rapidmail, in which we require Rapidmail to protect our customers' data and to refrain from sharing such data with third parties. You may review this contract under the following link: <https://de.rapidmail.wiki/files/adv/muster-auftragsdatenverarbeitung.pdf>.

## **8. Plug-ins and Tools**

### **YouTube with expanded data protection integration**

Our website uses plug-ins of the YouTube platform, which is being operated by YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

We use YouTube in the expanded data protection mode. According to YouTube, this mode ensures that YouTube does not store any information about visitors to this website before they watch the video. Nevertheless, this does not necessarily mean that the sharing of data with YouTube partners can be ruled out as a result of the expanded data protection mode. For instance, regardless of whether you are watching a video, YouTube will always establish a connection with the Google DoubleClick network.

As soon as you start to play a YouTube video on our website, a connection to YouTube's servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited. 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.

Furthermore, after you have started to play a video, YouTube will be able to place various cookies on your device. With the assistance of these cookies, YouTube will be able to obtain information about our website visitor. 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. These cookies will stay on your device until you delete them.

Under certain circumstances, additional data processing transactions may be triggered after you have started to play a YouTube video, which are beyond our control.

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. 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 Web Fonts

To ensure that fonts used on this website are uniform, this website uses so-called Web Fonts provided by Google. When you access a page on our website, your browser will load the required web fonts into your browser cache to correctly display text and fonts.

To do this, the browser you use will have to establish a connection with Google's servers. As a result, Google will learn that your IP address was used to access our website. The use of Google Web Fonts is based on our interest in presenting our online content in a uniform and appealing way. According to Art. 6 Sect. 1 lit. f GDPR, this is a legitimate interest.

If your browser should not support Web Fonts, a standard font installed on your computer will be used.

For more information on Google Web Fonts, please follow this link: <https://developers.google.com/fonts/faq> and consult Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

### Google Maps

Via an API, this website uses the mapping service Google Maps. The provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6 Sect. 1 lit. f GDPR.

For more information on the handling of user data, please review Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

### Google reCAPTCHA

We use "Google reCAPTCHA" (hereinafter referred to as "reCAPTCHA") on our websites. The provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

The purpose of reCAPTCHA is to determine whether data entered on our websites (e.g. information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyses the behaviour 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.

The data is processed on the basis of Art. 6 Sect. 1 lit. f GDPR. It is in the website operators legitimate interest, to protect the operator's web content against misuse by automated industrial espionage systems and against SPAM.

For more information about Google reCAPTCHA and to review the Data Privacy Declaration of Google, please follow these links: <https://policies.google.com/privacy?hl=en> and <https://www.google.com/recaptcha/intro/android.html>.