

# Privacy Policy

## 1. An overview of data protection

### General information

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

### Data recording on this website

#### Who is the responsible party for the recording of data on this website (i.e., the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the GDPR)” in this Privacy Policy.

#### How do we record your data?

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

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

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

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

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

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

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

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

There is a possibility that your browsing patterns will be statistically analyzed when you visit this website. Such analyses are performed primarily with what we refer to as analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

## **2. Hosting**

We are hosting the content of our website at the following provider:

### **External Hosting**

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

The external hosting serves the purpose of fulfilling the contract with our potential and existing customers (Art. 6(1)(b) GDPR) and in the interest of secure, fast, and efficient provision of our online services by a professional provider (Art. 6(1)(f) GDPR). If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 (1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

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

We are using the following host(s):

ANEXIA Internetdienstleistungs GmbH, Feldkirchner Straße 140, 9020 Klagenfurt, Österreich

### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **3. General information and mandatory information**

### **Data protection**

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

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

We herewith advise you that the transmission of data via the Internet (i.e., through 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:

tolltickets GmbH  
Markus Niedermaier, Jan Kersten, Quentin Couret  
Kaiserstraße 28  
83022 Rosenheim

Phone: +49 (0)8031 94144-44  
E-mail: [info@tolltickets.com](mailto:info@tolltickets.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.).

## **Storage duration**

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

## **General information on the legal basis for the data processing on this website**

If you have consented to data processing, we process your personal data on the basis of Art. 6(1)(a) GDPR or Art. 9 (2)(a) GDPR, if special categories of data are processed according to Art. 9 (1) DSGVO. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR. If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based

on § 25 (1) TTDSG. The consent can be revoked at any time. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1)(b) GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(f) GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

## **Designation of a data protection officer**

We have appointed a data protection officer.

neto consulting, Münchener Str. 74, 83022 Rosenheim

Phone: +49 (0)8031 798766-0

E-mail: [datenschutz@tolltickets.com](mailto:datenschutz@tolltickets.com)

## **Information on data transfer to the USA and other non-EU countries**

Among other things, we use tools of companies domiciled in the United States or other from a data protection perspective non-secure non-EU countries. If these tools are active, your personal data may potentially be transferred to these non-EU countries and may be processed there. We must point out that in these countries, a data protection level that is comparable to that in the EU cannot be guaranteed. For instance, U.S. enterprises are under a mandate to release personal data to the security agencies and you as the data subject do not have any litigation options to defend yourself in court. Hence, it cannot be ruled out that U.S. agencies (e.g., the Secret Service) may process, analyze, and permanently archive your personal data for surveillance purposes. We have no control over these processing activities.

## **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. 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(1)(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(1) GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING AT ANY TIME. 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(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 have data that we process automatically on the basis of your consent or in fulfillment of a contract handed over to you or to a third party in a common, 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.

## **Information about, rectification and eradication of data**

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

## **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. The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data instead of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21(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.

## **SSL and/or TLS encryption**

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

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

## **Encrypted payment transactions on this website**

If you are under an obligation to share your payment information (e.g. account number if you give us the authority to debit your bank account) with us after you have entered into a fee-based contract with us, this information is required to process payments.

Payment transactions using common modes of paying (Visa/MasterCard, debit to your bank account) are processed exclusively via encrypted SSL or TLS connections. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line.

If the communication with us is encrypted, third parties will not be able to read the payment information you share with us.

## **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 our Site Notice to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

# **4. Recording of data on this website**

## **Cookies**

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

Cookies can be issued by us (first-party cookies) or by third-party companies (so-called third-party cookies). Third-party cookies enable the integration of certain services of third-party companies into websites (e.g., cookies for handling payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of these cookies (e.g., the shopping cart function or the display of videos). Other cookies may be used to analyze user behavior or for promotional purposes.

Cookies, which are required for the performance of electronic communication transactions, for the provision of certain functions you want to use (e.g., for the shopping cart function) or those that are necessary for the optimization (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6(1)(f) GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error-free and optimized provision of the operator's services. If your consent to the storage of the cookies and similar recognition technologies has been requested, the processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TTDSG); this consent may be revoked at any time.

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

Which cookies and services are used on this website can be found in this privacy policy.

## **Contact form**

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

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

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 this 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(1)(a) GDPR).

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

## 5. Social media

### Facebook

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

An overview of the Facebook social media elements is available under the following link:

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

If the social media element has been activated, a direct connection between your device and the Facebook server will be established. As a result, Facebook will receive information confirming your visit to this website with your IP address. If you click on the Facebook Like button while you are logged into your Facebook account, you can link content of this website to your Facebook profile. Consequently, Facebook will be able to allocate your visit to this website to your user account. We have to emphasize that we as the provider of the website do not receive any information on the content of the transferred data and its use by Facebook. For more information, please consult the Data Privacy Policy of Facebook at:

<https://de-de.facebook.com/privacy/explanation>.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6 Sect. 1 lit. a GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our website. Facebook is



responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum), <https://de-de.facebook.com/help/566994660333381> and <https://www.facebook.com/policy.php>.

## **Twitter**

We have integrated functions of the social media platform Twitter into this website. These functions are provided by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland.

If the social media element has been activated, a direct connection between your device and Twitter's server will be established. As a result, Twitter will receive information on your visit to this website. While you use Twitter and the "Re-Tweet" function, websites you visit are linked to your Twitter account and disclosed to other users. 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>.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://gdpr.twitter.com/en/controller-to-controller-transfers.html>.

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

## **LinkedIn**

This website uses elements of the LinkedIn network. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

Any time you access a page of this website that contains elements of LinkedIn, a connection to LinkedIn's servers is established. LinkedIn is notified that you have visited this website 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 this 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.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6 (1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.linkedin.com/help/linkedin/answer/62538/datenubertragung-aus-der-eu-dem-ewr-und-der-schweiz?lang=en>.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at:

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

## **6. Analysis tools and advertising**

### **Google Tag Manager**

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

The Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create any user profiles, does not store cookies, and does not carry out any independent analyses. It only manages and runs the tools integrated via it. However, the Google Tag Manager does collect your IP address, which may also be transferred to Google's parent company in the United States.

The Google Tag Manager is used on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the quick and uncomplicated integration and administration of various tools on his website. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

### **Clarity**

This website uses Clarity. The provider is the Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland, <https://docs.microsoft.com/en-us/clarity/> (hereinafter referred to as "Clarity").

Clarity is a tool to analyze user patterns on this website. Clarity records in particular cursor movements and compiles graphics that show on which parts of the website users are scrolling with great frequency (heatmaps). Clarity can also record sessions so that we can watch the use of the site in the form of videos. Moreover, we receive information on the general user conduct within our website.

Clarity uses technologies that make it possible to recognize users for the purpose of analyzing user patterns (e.g., cookies or use of device fingerprinting). Your personal data will be archived on Microsoft servers (Microsoft Azure Cloud Service) in the United States.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR; the website operator has a legitimate interest in the effective analysis of user patterns.

For more details on Clarity's data privacy policy, please see: <https://docs.microsoft.com/en-us/clarity/faq>.

## Data processing

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## Meta-Pixel (formerly Facebook Pixel)

To measure conversion rates, this website uses the visitor activity pixel of Facebook/Meta. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too.

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 analyze 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 (<https://www.facebook.com/about/privacy/>). 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 these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum).

According to this agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our website. Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) and <https://de-de.facebook.com/help/566994660333381>.

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\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). 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/prferenzmanagement/>.

## 7. Plug-ins and Tools

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

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

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

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(1)(f) GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

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

## **Vimeo Without Tracking (Do-Not-Track)**

This website uses plugins of the Vimeo video portal. The provider is Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

Whenever you visit one of our pages featuring Vimeo videos, a connection with the servers of Vimeo is established. In conjunction with this, the Vimeo server receives information about which of our sites you have visited. Vimeo also receives your IP address. However, we have set up Vimeo in such a way that Vimeo cannot track your user activities and does not place any cookies.

We use Vimeo to make our online presentation attractive for you. This is a legitimate interest on our part pursuant to Art. 6(1)(f) GDPR. If a respective declaration of consent was requested (e.g. concerning the storage of cookies), processing shall occur exclusively on the basis of Art. 6(1)(a) GDPR; the given consent may be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission and, according to Vimeo, on "legitimate business interests". Details can be found here: <https://vimeo.com/privacy>.

For more information on the handling of user data, please consult Vimeo's data privacy policy at: <https://vimeo.com/privacy>

## **Google Maps**

This website uses the mapping service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

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. In case Google Maps has been activated, Google has the option to use Google Fonts for the purpose of the uniform depiction of fonts. When you access Google Maps, your browser will load the required web fonts into your browser cache, to correctly display text and fonts.

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(1)(f) GDPR. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://privacy.google.com/businesses/gdprcontrollerterms/> and <https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>.

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 this website. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

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

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

Data are stored and analyzed on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the protection of the operator's websites against abusive automated spying and against SPAM. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

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

## **8. eCommerce and payment service providers**

### **Processing of Customer and Contract Data**

We collect, process, and use personal customer and contract data for the establishment, content arrangement and modification of our contractual relationships. Data with personal references to the use of this website (usage data) will be collected, processed, and used only if this is necessary to enable the user to use our services or required for billing purposes. The legal basis for these processes is Art. 6(1)(b) GDPR.

The collected customer data shall be deleted upon completion of the order or termination of the business relationship and upon expiration of any existing statutory archiving periods. This shall be without prejudice to any statutory archiving periods.

## **Data transfer upon closing of contracts for online stores, retailers, and the shipment of merchandise**

Whenever you order merchandise from us, we will share your personal data with the transportation company entrusted with the delivery as well as the payment service commissioned to handle the payment transactions. Only the data these respective service providers require to meet their obligations will be shared. The legal basis for this sharing is Art. 6 (1)(b) GDPR, which permits the processing of data for the fulfillment of contractual or pre-contractual obligations. If you give us your respective consent pursuant to Art. 6 (1)(a) GDPR, we will share your email address with the transportation company entrusted with the delivery so that this company can notify you on the shipping status for your order via email. You have the option to revoke your consent at any time.

### **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(1)(b) GDPR, which permits the processing of data for the fulfillment of a contract or for pre-contractual actions.

## **Payment services**

We integrate payment services of third-party companies on our website. When you make a purchase from us, your payment data (e.g. name, payment amount, bank account details, credit card number) are processed by the payment service provider for the purpose of payment processing. For these transactions, the respective contractual and data protection provisions of the respective providers apply. The use of the payment service providers is based on Art. 6(1)(b) GDPR (contract processing) and in the interest of a smooth, convenient, and secure payment transaction (Art. 6(1)(f) GDPR). Insofar as your consent is requested for certain actions, Art. 6(1)(a) GDPR is the legal basis for data processing; consent may be revoked at any time for the future.

We use the following payment services / payment service providers within the scope of this website:

## **PayPal**

The provider of this payment service is PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter "PayPal").

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.paypal.com/de/webapps/mpp/ua/pocpsa-full>.

Details can be found in PayPal's privacy policy: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

## **Mastercard**

The provider of this payment service is the Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium (hereinafter "Mastercard").

Mastercard may transfer data to its parent company in the US. The data transfer to the US is based on Mastercard's Binding Corporate Rules. Details can be found here: <https://www.mastercard.de/de-de/datenschutz.html> and <https://www.mastercard.us/content/dam/mccom/global/documents/mastercard-bcrs.pdf>.

## **VISA**

The provider of this payment service is the Visa Europe Services Inc, London Branch, 1 Sheldon Square, London W2 6TT, United Kingdom (hereinafter "VISA").

Great Britain is considered a secure non-EU country as far as data protection legislation is concerned. This means that the data protection level in Great Britain is equivalent to the data protection level of the European Union.

VISA may transfer data to its parent company in the US. The data transfer to the US is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://www.visa.de/nutzungsbedingungen/visa-globale-datenschutzmitteilung/mitteilung-zu-zustandigkeitsfragen-fur-den-ewr.html>.

For more information, please refer to VISA's privacy policy: <https://www.visa.de/nutzungsbedingungen/visa-privacy-center.html>.

# **9. Custom Services**

## **Handling applicant data**

We offer website visitors the opportunity to submit job applications to us (e.g., via e-mail, via postal services on by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable



data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

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

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

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

### **Data Archiving Period**

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

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