

Preamble

With the following privacy policy, we would like to inform you about what types of your personal data (hereinafter also referred to as "data") we process, for what purposes and to what extent. The privacy policy applies to all processing of personal data carried out by us, both in the context of the provision of our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online offer").

The terms used are not gender-specific. Status: December 14,

2023

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Overview of processing

The following overview summarizes the types of data processed and the purposes of their processing and refers to the data subjects.

Types of data processed

- Inventory data.
- Payment data.
- Contact details.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.

Categories of affected persons

- Customers.
- Interested parties.
- Communication partner.
- Users.
- Competition and contest participants.
- Business and contractual partners.
- Pupils/ students/ participants.

Purposes of the processing

- Provision of contractual services and fulfillment of contractual obligations.
- Contact requests and communication.
- Safety measures.
- Direct marketing.
- Reach measurement.
- Tracking.
- Office and organizational procedures.
- Conversion measurement.
- Affiliate tracking.
- Managing and responding to inquiries.
- Organizing competitions and contests.
- Feedback.
- Marketing.

- Profiles with user-related information.
- Provision of our online services and user-friendliness.
- Information technology infrastructure.

Relevant legal bases

Relevant legal bases under the GDPR: Below you will find an overview of the legal bases of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. Should more specific legal bases also apply in individual cases, we will inform you of these in the privacy policy.

- **Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR** - The data subject has given their consent to the processing of their personal data for one or more specific purposes.
- **Performance of a contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR** - Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legal obligation (Art. 6 para. 1 sentence 1 lit. c) GDPR** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

National data protection regulations in Germany: In addition to the data protection regulations of the GDPR, national data protection regulations apply in Germany. These include, in particular, the Act on the Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special regulations on the right to information, the right to erasure, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated decision-making in individual cases, including profiling. The data protection laws of the individual federal states may also apply.

Note on the applicability of the GDPR and Swiss FADP: This data protection notice serves to provide information in accordance with both the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, please note that the terms of the GDPR are used due to the broader geographical application and comprehensibility. In particular, instead of the terms "processing" of "personal data", "overriding interest" and "particularly sensitive personal data" used in the Swiss DPA, the terms used in the GDPR are "processing" of "personal data" as well as "legitimate interest" and "special categories of data". However, the legal meaning of the terms will continue to be determined in accordance with the Swiss DPA within the scope of application of the Swiss DPA.

Security measures

We take appropriate technical and organizational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as the access, input, disclosure, safeguarding of availability and its separation. Furthermore, we have established procedures that ensure the exercise of data subject rights, the deletion of data and responses to data threats. Furthermore, we already take the protection of personal data into account during the development or selection of hardware, software and processes in accordance with the principle of data protection, through technology design and through data protection-friendly default settings.

TLS/SSL encryption (https): To protect user data transmitted via our online services, we use TLS/SSL encryption. Secure Sockets Layer (SSL) is the standard technology for securing internet connections by encrypting the data transmitted between a website or app and a browser (or between two servers). Transport Layer Security (TLS) is an updated and more secure version of SSL. Hyper Text Transfer Protocol Secure (HTTPS) is displayed in the URL when a website is secured by an SSL/TLS certificate.

Transmission of personal data

As part of our processing of personal data, the data may be transferred to other bodies, companies, legally independent organizational units or persons or disclosed to them. The recipients of this data may include

z. e.g. service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and, in particular, conclude corresponding contracts or agreements with the recipients of your data that serve to protect your data.

Data transfer within the organization: We may transfer personal data to other departments within our organization or grant them access to this data. If this transfer is for administrative purposes, the transfer of the data is based on our legitimate business and commercial interests or takes place if it is necessary to fulfill our contractual obligations or if the consent of the data subjects or a legal permission exists.

Rights of the data subjects

Rights of data subjects under the GDPR: As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Art. 15 to 21 GDPR:

- **Right to object: You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.**
- **Right to withdraw consent: You have the right to withdraw your consent at any time.**

- **Right of access:** You have the right to obtain confirmation as to whether or not personal data concerning you is being processed and to obtain information about this data and further information and a copy of the data in accordance with the legal requirements.
- **Right to rectification:** In accordance with the statutory provisions, you have the right to request the completion of data concerning you or the rectification of inaccurate data concerning you.
- **Right to erasure and restriction of processing:** In accordance with the statutory provisions, you have the right to demand that data concerning you be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive the data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format in accordance with the legal requirements or to request its transmission to another controller.
- **Complaint to the supervisory authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the provisions of the GDPR.

Use of cookies

Cookies are small text files or other storage notes that store information on end devices and read information from the end devices. For example, to store the login status in a user account, the contents of a shopping cart in an e-shop, the content accessed or functions used in an online offering. Cookies can also be used for various purposes, e.g. to ensure the functionality, security and convenience of online services and to analyze visitor flows.

Notes on consent: We use cookies in accordance with the statutory provisions. We therefore obtain prior consent from users, unless this is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is absolutely necessary in order to provide the user with a telemedia service expressly requested by them (i.e. our online offer). Strictly necessary cookies generally include cookies with functions that serve the display and operability of the online service, load balancing, security, storage of user preferences and selection options or similar purposes related to the provision of the main and secondary functions of the online service requested by the user. The revocable consent is clearly communicated to the users and contains the information on the respective use of cookies.

Information on legal bases under data protection law: The legal basis under data protection law on which we process users' personal data with the help of cookies depends on whether we ask users for their consent. If users give their consent, the legal basis for processing their data is the consent given. Otherwise, the data processed using cookies will be processed on the basis of our legitimate interests (e.g. in the commercial operation of our online offering and improving its usability) or, if this is done in the context of fulfilling our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. We will clarify the purposes for which cookies are processed by us in the course of

of this privacy policy or as part of our consent and processing procedures.

Storage period: With regard to the storage period, a distinction is made between the following types of cookies:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed their end device (e.g. browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the end device is closed. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. The user data collected with the help of cookies can also be used to measure reach. If we do not provide users with explicit information on the type and storage duration of cookies (e.g. when obtaining consent), users should assume that cookies are permanent and can be stored for up to two years.

General information on revocation and objection (so-called "opt-out"): Users can revoke the consent they have given at any time and object to processing in accordance with the legal requirements. Among other things, users can restrict the use of cookies in their browser settings (although this may also restrict the functionality of our online offering). An objection to the use of cookies for online marketing purposes can also be declared via the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>.

- **Legal bases:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

Further information on processing operations, procedures and services:

- **Processing of cookie data on the basis of consent:** We use a cookie consent management procedure in which the consent of users to the use of cookies or the processing and providers mentioned in the cookie consent management procedure can be obtained, managed and revoked by users. The declaration of consent is stored so that it does not have to be requested again and the consent can be proven in accordance with the legal obligation. Consent can be stored on the server and/or in a cookie (so-called opt-in cookie or with the help of comparable technologies) in order to be able to assign the consent to a user or their device. Subject to individual information on the providers of cookie management services, the following information applies: Consent may be stored for up to two years. A pseudonymous user identifier is created and stored with the time of consent, information on the scope of consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and end device used; **legal basis:** consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") in the context of contractual and comparable legal relationships and associated measures and in the context of communication with the contractual partners (or pre-contractual), e.g. in order to answer inquiries.

We process this data in order to fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any updating obligations and remedies in the event of warranty and other service disruptions.

In addition, we process the data to safeguard our rights and for the purpose of the administrative tasks associated with these obligations and the company organization. In addition, we process the data on the basis of our legitimate interests in proper and efficient business management and in security measures to protect our contractual partners and our business operations from misuse, threats to their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only pass on the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about other forms of processing, e.g. for marketing purposes, as part of this privacy policy.

We inform the contractual partners which data is required for the aforementioned purposes before or during data collection, e.g. in online forms, by means of special marking (e.g. colors) or symbols (e.g. asterisks or similar), or personally.

We delete the data after the expiry of statutory warranty and comparable obligations, i.e. generally after 4 years, unless the data is stored in a customer account, e.g. as long as it must be retained for legal archiving reasons. The statutory retention period is ten years for documents relevant under tax law and for commercial books, inventories, opening balance sheets, annual financial statements, the work instructions and other organizational documents and accounting records required to understand these documents, and six years for commercial and business letters received and reproductions of commercial and business letters sent. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent or the accounting document was created, the record was made or the other documents were created.

Insofar as we use third-party providers or platforms to provide our services, the terms and conditions and data protection notices of the respective third-party providers or platforms apply in the relationship between the users and the providers.

- **Processed data types:** Inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contact data (e.g. email, telephone numbers); contract data (e.g. subject matter of contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Customers; interested parties; business and contractual partners. Pupils/ students/ participants.
- **Purposes of Processing:** Provision of contractual services and performance of contractual obligations; Security measures; Contact requests and communication; Office and organizational procedures; Managing and responding to inquiries; Conversion tracking (Measurement of the effectiveness of marketing activities). Profiles with user-related information (creation of user profiles).

- **Legal basis:** Fulfilment of contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); Legal obligation (Art. 6 para. 1 sentence 1 lit. c) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Customer account:** Customers can create an account within our online offering (e.g. customer or user account, "customer account" for short). If it is necessary to register a customer account, customers will be informed of this and of the information required for registration. Customer accounts are not public and cannot be indexed by search engines. As part of the registration process and subsequent logins and use of the customer account, we store the IP addresses of customers together with the access times in order to be able to prove registration and prevent any misuse of the customer account. If the customer account has been terminated, the customer account data will be deleted after the termination date, unless it is stored for purposes other than provision in the customer account or must be stored for legal reasons (e.g. internal storage of customer data, order processes or invoices). It is the customer's responsibility to back up their data when the customer account is terminated; **legal basis:** contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).
- **Economic analyses and market research:** For economic reasons and in order to be able to recognize market trends, wishes of contractual partners and users, we analyze the data available to us on business transactions, contracts, inquiries, etc., whereby the group of data subjects may include contractual partners, interested parties, customers, visitors and users of our online offer. The analyses are carried out for the purpose of business evaluations, marketing and market research (e.g. to determine customer groups with different characteristics). If available, we can use the profiles of registered users, including their details, z. e.g. on services used. The analyses serve us alone and are not disclosed externally, unless they are anonymous analyses with summarized, i.e. anonymized values. Furthermore, we take into account the privacy of users and process the data for analysis purposes as pseudonymously as possible and, if feasible, anonymously (e.g. as summarized data); **legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- **Store and e-commerce:** We process the data of our customers to enable them to select, purchase or order the selected products, goods and associated services, as well as their payment and delivery or execution. If necessary for the execution of an order, we use service providers, in particular postal, forwarding and shipping companies, to carry out the delivery or execution for our customers. We use the services of banks and payment service providers to process payment transactions. The required information is marked as such in the context of the order or comparable purchase process and includes the information required for delivery or provision and billing as well as contact information in order to be able to hold any consultation; **legal basis:** contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).
- **Education and training services:** We process the data of participants in our education and training services (uniformly referred to as "trainees") in order to be able to provide them with our training services. The data processed in this context, the type, scope, purpose and necessity of its processing are determined by the underlying contractual and training relationship. The forms of processing also include the performance assessment and evaluation of our services and those of our instructors. Within the scope of our

We may also process special categories of data, in particular information on the health of the trainees and data revealing ethnic origin, political opinions, religious or philosophical beliefs. Where necessary, we obtain the express consent of the trainees for this purpose and otherwise only process the special categories of data if it is necessary for the provision of training services, for the purposes of health care, social protection or the protection of vital interests of the trainees; **legal basis:** fulfillment of the contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

- **Events and functions:** We process the data of participants in events, functions and similar activities offered or organized by us (hereinafter uniformly referred to as "participants" and "events") in order to enable them to participate in the events and take advantage of the services or promotions associated with participation.

If we process health-related data, religious, political or other special categories of data in this context, this is done in the context of disclosure (e.g. for themed events or for health care, security or with the consent of the data subjects).

The required information is identified as such in the context of the conclusion of the contract, order or comparable contract and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations. Insofar as we receive access to information from end customers, employees or other persons, we process this in accordance with legal and contractual requirements;

Legal basis: Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

Use of online platforms for offer and sales purposes

We offer our services on online platforms that are operated by other service providers. In this context, the data protection notices of the respective platforms apply in addition to our data protection notices. This applies in particular with regard to the execution of the payment process and the procedures used on the platforms to measure reach and for interest-based marketing.

- **Processed data types:** Inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contact data (e.g. email, telephone numbers); contract data (e.g. subject matter of contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Persons affected:** Customers.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Marketing.
- **Legal basis:** Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

Providers and services used in the course of business activities

As part of our business activities, we use additional services, platforms, interfaces or plug-ins from third-party providers ("services" for short) in compliance with legal requirements. Their use is based on our interests in a proper, lawful and - This text area must be activated with a premium license. - premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext

- **Processed data types:** inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history - This text area must be activated with a premium license. - premiumtext premiumtext); contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms); contract data (e.g. subject matter of the contract, term, customer category - This text area must be activated with a premium license. - premiumtext premiumtext).
- **Data subjects:** Customers; Interested parties; Users (e.g. website visitors, users of - This text area must be activated with a premium license. - premiumtext premiumtext premiumtext premiumtext). Business and contractual partners.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Office and organizational procedures.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Payment procedure

As part of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our legitimate interests, we offer the data subjects efficient and secure payment options and use other service providers in addition to banks and credit institutions (collectively referred to as "payment service providers").

The data processed by the payment service providers includes inventory data, such as the name and address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as contract, total and recipient-related information. The information is required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored by them.

This means that we do not receive any account or credit card-related information, but only information with confirmation or negative information about the payment. Under certain circumstances, the data may be transmitted by the payment service providers to credit agencies. The purpose of this transmission is to check identity and creditworthiness. Please refer to the general terms and conditions and the data protection information of the payment service providers.

Payment transactions are subject to the terms and conditions and the data protection notices of the respective payment service providers, which can be found on the respective websites or websites of the respective payment service providers.

transaction applications. We also refer to these for further information and the assertion of rights of revocation, information and other rights of data subjects.

- **Processed data types:** inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contract data (e.g. subject matter of the contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).

- **Persons affected:** Customers. Interested parties.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations.
- **Legal basis:** Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

Further information on processing operations, procedures and services:

- **Amazon Payments:** Payment services (technical connection of online payment methods); **Service provider:** Amazon Payments Europe S.C.A. 38 avenue J.F. Kennedy, L-1855 Luxembourg; **Legal basis:** Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); **Website:** <https://pay.amazon.de/>. **Privacy Policy:** <https://pay.amazon.de/help/201212490>.
- **PayPal:** Payment services (technical connection of online payment methods) (e.g. PayPal, PayPal Plus, Braintree); **Service provider:** PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; **Legal basis:** Performance of contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); **Website:** <https://www.paypal.com/de>. **Privacy policy:** <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.
- **Stripe:** Payment services (technical connection of online payment methods); **Service provider:** Stripe, Inc, 510 Townsend Street, San Francisco, CA 94103, USA; **Legal basis:** Performance of a contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); **Website:** <https://stripe.com>; **Privacy Policy:** <https://stripe.com/de/privacy>. **Basis for transfer to third countries:** EU-US Data Privacy Framework (DPF).

Provision of the online offer and web hosting

We process users' data in order to provide them with our online services. For this purpose, we process the user's IP address, which is necessary to transmit the content and functions of our online services to the user's browser or end device.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status); content data (e.g. entries in online forms).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online offer and user-friendliness; information technology infrastructure (operation and provision of information systems and technical devices (computers, servers, etc.)). Security measures.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Collection of access data and log files:** Access to our online offering is logged in the form of so-called "server log files". The server log files may include the address and name of the web pages and files accessed, date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the event of abusive attacks, so-called DDoS attacks) and to monitor the utilization of the servers and their stability.

Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). **Deletion of data:** Log file information is stored for a maximum of 30 days and then deleted or anonymized. Data whose further storage is required for evidentiary purposes is excluded from deletion until the respective incident has been finally clarified.

- **ALL-INKL:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** ALL-INKL.COM - Neue Medien Münnich, Owner: René Münnich, Hauptstraße 68, 02742 Friedersdorf, Germany; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://all-inkl.com/>; **Privacy Policy:** <https://all-inkl.com/datenschutzinformationen/>. **Data processing agreement:** Provided by the service provider.
- **WordPress.com:** Hosting and software for the creation, provision and operation of websites, blogs and other online offers; **Service provider:** Aut O'Mattic A8C Ireland Ltd, Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://wordpress.com/>; **Privacy Policy:** <https://automattic.com/de/privacy/>; **Data processing agreement:** <https://wordpress.com/support/data-processing-agreements/>. **Basis for transfer to third countries:** EU-US Data Privacy Framework (DPF).

Registration, login and user account

Users can create a user account. As part of the registration process, users are provided with the required mandatory information and processed for the purpose of providing the user account on the basis of contractual obligations. The processed data includes in particular the login information (user name, password and an e-mail address).

As part of the use of our registration and login functions and the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests as well as those of the users in protection against misuse and other unauthorized use. This data is not passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

Users can be informed by email about processes that are relevant to their user account, such as technical changes.

- **Processed data types:** inventory data (e.g. names, addresses); contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; security measures; managing and responding to inquiries. Provision of our online services and user-friendliness.
- **Legal bases:** Fulfilment of contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Blogs and publication media

We use blogs or comparable means of online communication and publication (hereinafter "publication medium"). Readers' data will only be processed for the purposes of the publication medium to the extent that it is necessary for its presentation and the

communication between authors and readers or for security reasons. In addition, we refer to the information on the processing of visitors to our publication medium in the context of this data protection notice.

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; feedback (e.g. collecting feedback via online form); provision of our online offer and user-friendliness; security measures. Managing and responding to inquiries.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Comments and contributions:** When users leave comments or other contributions, their IP addresses may be stored on the basis of our legitimate interests. This is done for our security in case someone leaves illegal content in comments and posts (insults, prohibited political propaganda, etc.). In this case, we ourselves may be prosecuted for the comment or post and are therefore interested in the identity of the author.

Furthermore, we reserve the right to process user data for the purpose of spam detection on the basis of our legitimate interests.

On the same legal basis, we reserve the right to store the IP addresses of users for the duration of surveys and to use cookies in order to avoid multiple votes.

The personal information provided as part of the comments and contributions, any contact and website information as well as the content information will be stored permanently by us until the user objects;

Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

- **UpdraftPlus:** Backup software and backup storage; **Service provider:** Simba Hosting Ltd, 11, Barringer Way, St. Neots, Cambs, PE19 1LW, UK; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://updraftplus.com/>. **Privacy Policy:** <https://updraftplus.com/data-protection-and-privacy-centre/>.

Contact and inquiry management

When contacting us (e.g. by post, contact form, email, telephone or via social media) and in the context of existing user and business relationships, the data of the inquiring persons are processed insofar as this is necessary to answer the contact inquiries and any requested measures.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Affected persons:** Communication partner.

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- **Processed data types:** Contact data (e.g. e-mail, telephone numbers); Usage data (e.g. websites visited, interest in content, - This text area must be activated with a premium license. - premiumtext premiumtext premiumtext premiumtext); meta, communication and process data (e.g. IP addresses, time data, identification numbers, - This text area must be activated with a premium license. - premiumtext premiumtext premiumtext premiumtext).
- **Affected persons:** Communication partner.
- **Purposes of processing:** contact requests and communication; direct marketing (e.g. by e-mail or post).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Audio content

We use hosting and analysis services from service providers to offer our audio content for listening or downloading and to obtain statistical information on the retrieval of audio content.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Reach measurement (e.g. access statistics, recognition of returning visitors); conversion measurement (measurement of the effectiveness of marketing measures); profiles with user-related information (creation of user profiles). Provision of our online services and user-friendliness.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Spotify:** Spotify - music hosting and widget; **Service provider:** Spotify AB, Regeringsgatan 19, SE-111 53 Stockholm, Sweden; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://www.spotify.com/de>. **Privacy policy:** <https://www.spotify.com/de/legal/privacy-policy/>.

Newsletter and electronic notifications

We only send newsletters, emails and other electronic notifications (hereinafter "newsletter") with the consent of the recipient or with legal permission. If in the

If the contents of the newsletter are specifically described when registering for the newsletter, they are decisive for the user's consent. Our newsletters also contain information about our services and us.

To subscribe to our newsletters, it is generally sufficient to provide your e-mail address. However, we may ask you to provide a name so that we can address you personally in the newsletter, or other information if this is necessary for the purposes of the newsletter.

Double opt-in procedure: Registration for our newsletter is always carried out in a so-called double opt-in procedure. This means that after registering you will receive an e-mail asking you to confirm your registration. This confirmation is necessary so that no one can register with other people's e-mail addresses. Subscriptions to the newsletter are logged in order to be able to prove the registration process in accordance with legal requirements. This includes storing the time of registration and confirmation as well as the IP address. Changes to your data stored by the mailing service provider are also logged.

Deletion and restriction of processing: We may store the unsubscribed e-mail addresses for up to three years on the basis of our legitimate interests before deleting them in order to be able to prove that consent was previously given. The processing of this data is limited to the purpose of a possible defense against claims. An individual request for erasure is possible at any time, provided that the former existence of consent is confirmed at the same time. In the event of obligations to permanently observe objections, we reserve the right to store the e-mail address in a block list solely for this purpose.

The registration process is logged on the basis of our legitimate interests for the purpose of verifying that it is carried out properly. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests in an efficient and secure sending system.

Contents:

Information about us, our services, promotions and offers.

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status); Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Communication partners; users (e.g. website visitors, users of online services).
- **Purposes of processing:** Direct marketing (e.g. by email or post). Provision of contractual services and fulfillment of contractual obligations.
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).
- **Option to object (opt-out):** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to unsubscribe from the newsletter either at the end of each newsletter or you can use one of the contact options listed above, preferably e-mail.

Further information on processing operations, procedures and services:

- **Processed data types:** inventory data (e.g. names, addresses); contact data (e.g. e-mail, telephone numbers).
- **Affected persons:** Communication partner.
- **Purposes of processing:** Direct marketing (e.g. by e-mail or post).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Competitions and contests

We process personal data of participants in competitions and contests only in compliance with the relevant data protection regulations, insofar as the processing is contractually required for the provision, execution and handling of the competition, the participants have consented to the processing or the processing serves our legitimate interests (e.g. in the security of the competition or the protection of our interests against misuse through the possible collection of IP addresses when submitting competition entries).

If participants' contributions are published as part of the competitions (e.g. as part of a vote or presentation of the competition entries or winners or reporting on the competition), we would like to point out that the names of the participants may also be published in this context. Participants can object to this at any time.

If the competition takes place within an online platform or a social network (e.g. Facebook or Instagram, hereinafter referred to as "online platform"), the terms of use and data protection provisions of the respective platforms also apply. In these cases, we would like to point out that we are responsible for the information provided by the participants as part of the competition and that inquiries regarding the competition should be directed to us.

Participants' data will be deleted as soon as the competition or contest has ended and the data is no longer required to inform the winners or because no further queries about the competition are to be expected. In principle, participants' data will be deleted no later than 6 months after the end of the competition. Winners' data may be retained for longer, e.g. in order to answer queries about the prizes or to fulfill the prize; in this case, the retention period depends on the type of prize and is up to three years for items or services, e.g. in order to be able to process warranty claims. Furthermore, the participants' data may be stored for longer, e.g. in the form of reporting on the competition in online and offline media.

If data is also collected for other purposes as part of the competition, its processing and retention period will be based on the data protection information for this use (e.g. in the case of registration for the newsletter as part of a competition).

- **Processed data types:** inventory data (e.g. names, addresses); content data (e.g. entries in online forms); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Affected persons:** Competition and contest participants.
- **Purposes of the processing:** Organization of competitions and contests.
- **Legal basis:** Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

Web analysis, monitoring and optimization

Web analysis (also referred to as "reach measurement") is used to evaluate the flow of visitors to our online offering and may include behavior, interests or demographic information about visitors, such as age or gender, as pseudonymous values. With the help of reach analysis, we can, for example, recognize at what time our online offer or its functions or content are most frequently used or invite reuse. We can also understand which areas require optimization.

In addition to web analysis, we may also use test procedures, e.g. to test and optimize different versions of our online offering or its components.

Unless otherwise stated below, profiles, i.e. data summarized for a usage process, can be created for these purposes and information can be stored in a browser or in an end device and read out from it. The information collected includes, in particular, websites visited and the elements used there, as well as technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

The IP addresses of users are also stored. However, we use an IP masking procedure (i.e. pseudonymization by shortening the IP address) to protect users.

In general, no clear user data (such as e-mail addresses or names) is stored in the context of web analysis, A/B testing and optimization, but pseudonyms. This means that neither we nor the providers of the software used know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective procedures.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Reach measurement (e.g. access statistics, recognition of returning visitors); profiles with user-related information (creation of user profiles). Provision of our online services and user-friendliness.
- **Security measures:** IP masking (pseudonymization of the IP address).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Google Analytics 4:** We use Google Analytics to measure and analyze the use of our online offering on the basis of a pseudonymous user identification number. This identification number does not contain any unique data, such as names or e-mail addresses. It is used to assign analysis information to an end device in order to recognize which content users have called up within one or more usage processes, which search terms they have used, which they have called up again or which they have interacted with our online offering. The time of use and its duration are also stored, as well as the sources of the users who refer to our online offering and technical aspects of their end devices and browsers. Pseudonymous profiles of users are created with information from the use of various devices, whereby cookies may be used. Google Analytics does not log or store individual IP addresses for EU users. However, Analytics provides rough geographical location data by using the following metadata from IP addresses

Addresses derived: City (and the derived latitude and longitude of the city), continent, country, region, subcontinent (and ID-based counterparts). For EU traffic, IP address data is used exclusively for this derivation of geolocation data before it is immediately deleted. They are not logged, are not accessible and are not used for other purposes. When Google Analytics collects measurement data, all IP queries are performed on EU-based servers before the traffic is forwarded to Analytics servers for processing; **service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://marketingplatform.google.com/intl/de/about/analytics/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data processing agreement:** <https://business.safety.google/adsprocessorterms/>; **Basis for third country transfer:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (<https://business.safety.google/adsprocessorterms/>); **Opt-Out:** Opt-out plug-in: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the display of advertisements: <https://adssettings.google.com/authenticated>. **Further information:** <https://business.safety.google/adsservices/> (types of processing and data processed).

- **Jetpack (WordPress Stats):** Jetpack offers analysis functions for WordPress software; **Service provider:** Aut O'Mattic A8C Ireland Ltd, Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland; **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR); **Website:** <https://automattic.com>; **Privacy Policy:** <https://automattic.com/privacy>. **Basis for third country transfer:** EU-US Data Privacy Framework (DPF).

Online marketing

We process personal data for online marketing purposes, which may include in particular the marketing of advertising space or the presentation of advertising and other content (collectively referred to as "content") based on the potential interests of users and the measurement of its effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar procedures are used, by means of which the user information relevant for the presentation of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, but also communication partners and technical information such as the browser used, the computer system used and information on usage times and functions used. If users have consented to the collection of their location data, this can also be processed.

The IP addresses of users are also stored. However, we use available IP masking procedures (i.e. pseudonymization by shortening the IP address) to protect users. In general, no clear user data (such as e-mail addresses or names) is stored as part of the online marketing process, but pseudonyms. This means that neither we nor the providers of the online marketing processes know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is generally stored in cookies or by means of similar procedures. These cookies can generally also be read later on other websites that use the same online marketing process and analyzed for the purpose of displaying content as well as supplemented with further data and stored on the server of the online marketing process provider.

In exceptional cases, clear data may be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing processes we use and the network links the user profiles with the aforementioned data. Please note that users can make additional agreements with the providers, e.g. by giving their consent during registration.

In principle, we only receive access to summarized information about the success of our advertisements. However, as part of so-called conversion measurements, we can check which of our online marketing processes have led to a so-called conversion, i.e. e.g. to the conclusion of a contract with us. The conversion measurement is used solely to analyze the success of our marketing measures.

Unless otherwise stated, we ask you to assume that cookies used are stored for a period of two years.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behavior, use of cookies); Marketing; Profiles with user-related information (Creating user profiles). Conversion measurement (measurement of the effectiveness of marketing measures).
- **Security measures:** IP masking (pseudonymization of the IP address).
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- **Possibility of objection (opt-out):** We refer to the data protection notices of the respective providers and the opt-out options specified for the providers. If no explicit opt-out option has been specified, you have the option of deactivating cookies in your browser settings. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are summarized for each area:

a) Europe: <https://www.youronlinechoices.eu>.

b) Canada: <https://www.youradchoices.ca/choices>.

c) USA: <https://www.aboutads.info/choices>.

d) Cross-territory: <https://optout.aboutads.info>.

Further information on processing operations, procedures and services:

- **Google Ads and conversion measurement:** Online marketing process for the purpose of placing content and ads within the service provider's advertising network (e.g. in search results, in videos, on websites, etc.) so that they are displayed to users who have a presumed interest in the ads. In addition, we measure the conversion of the ads, i.e. whether users have taken them as an opportunity to interact with the ads and use the advertised offers (so-called conversion). However, we only receive anonymous information and no personal information about individual users; **service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/>

[privacy](#); **Basis for third country transfer:** EU-US Data Privacy Framework (DPF); **Further information:** Types of processing and data processed: <https://business.safety.google/adsservices/>. Data processing conditions between controllers and standard contractual clauses for third country transfers of data: <https://business.safety.google/adscontrollerterms>.

Affiliate programs and affiliate links

We include so-called affiliate links or other references (which may include, for example, search masks, widgets or discount codes) to the offers and services of third-party providers (collectively referred to as "affiliate links") in our online offer. If users follow the affiliate links or subsequently take advantage of the offers, we may receive a commission or other benefits from these third-party providers (collectively referred to as "commission").

In order to be able to track whether the users have taken up the offers of an affiliate link used by us, it is necessary for the respective third-party providers to learn that the users have followed an affiliate link used within our online offer. The assignment of the affiliate links to the respective business transactions or other actions (e.g. purchases) serves the sole purpose of commission settlement and is canceled as soon as it is no longer required for this purpose.

For the purposes of the aforementioned assignment of affiliate links, the affiliate links can be supplemented by certain values that are part of the link or can be stored elsewhere, e.g. in a cookie. The values may include, in particular, the source website (referrer), the time, an online identifier of the operator of the website on which the affiliate link was located, an online identifier of the respective offer, the type of link used, the type of offer and an online identifier of the user.

Notes on legal bases: If we ask users for their consent to the use of third-party providers, the legal basis for the processing of data is consent.

Otherwise, user data is processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Contract data (e.g. subject matter of the contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Affiliate tracking.
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Amazon Affiliate Program:** Affiliate Partner Program (Amazon and the Amazon logo are trademarks of Amazon.com, Inc. or one of its affiliates); **Service provider:** Amazon EU S.à r.l. (Société à responsabilité limitée), 38 avenue John F. Kennedy, L-1855 Luxembourg; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://www.amazon.de>; **Privacy Policy:** <https://www.amazon.de/gp/help/customer/display.html?nodeId=201909010>. **Basis for transfer to third countries:** EU-US Data Privacy Framework (DPF).

The data is sent to the respective evaluation platform with regard to the customer and the service used (including name, e-mail address and order number or item number). This data is used solely to verify the authenticity of the user.

- **Processed data types:** Contract data (e.g. subject matter of the contract, duration, customer category); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Customers; users (e.g. website visitors, users of online services).
- **Purposes of processing:** Feedback (e.g. collecting feedback via online form). Marketing.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Presence in social networks (social media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may result in risks for users because, for example, it could make it more difficult to enforce users' rights.

Furthermore, user data within social networks is generally processed for market research and advertising purposes. For example, user profiles can be created based on user behavior and the resulting interests of users. The user profiles can in turn be used, for example, to place advertisements within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are generally stored on the user's computer, in which the user's usage behavior and interests are stored. Furthermore, data can also be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective platforms and are logged in to them).

For a detailed description of the respective forms of processing and the opt-out options, please refer to the data protection declarations and information provided by the operators of the respective networks.

In the case of requests for information and the assertion of data subject rights, we would also like to point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. If you still need help, you can contact us.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers); Content data (e.g. entries in online forms); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Contact requests and communication; feedback (e.g. collecting feedback via online form). Marketing.

- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Instagram:** Social network; **Service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://www.instagram.com>. **Privacy Policy:** <https://instagram.com/about/legal/privacy>.
- **Facebook pages:** Profiles within the social network Facebook; **Service provider:** Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://www.facebook.com>; **Privacy Policy:** <https://www.facebook.com/about/privacy>; **Basis for transfer to third countries:** EU-US Data Privacy Framework (DPF), Standard Contractual Clauses (https://www.facebook.com/legal/EU_data_transfer_addendum); **Further information:** We are jointly responsible with Meta Platforms Ireland Limited for the collection (but not the further processing) of data from visitors to our Facebook page (so-called "fan page"). This data includes information about the types of content users view or interact with, or the actions they take (see under "Things you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), as well as information about the devices used by users (e.g. IP addresses, operating system, browser type, language settings, cookie data; see under "Device Information" in the Facebook Data Policy: <https://www.facebook.com/policy>). As explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and uses information to provide analytics services, so-called "Page Insights", for page operators to gain insights into how people interact with their pages and with the content associated with them. We have concluded a special agreement with Facebook ("Information on Page Insights", https://www.facebook.com/legal/terms/page_controller_addendum), which regulates in particular which security measures Facebook must observe and in which Facebook has agreed to fulfill the rights of data subjects (i.e. users can, for example, send information or deletion requests directly to Facebook). The rights of users (in particular to information, deletion, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information on Page Insights" (https://www.facebook.com/legal/terms/information_about_page_insights_data). The joint responsibility is limited to the collection by and transfer of data to Meta Platforms Ireland Limited, a company based in the EU. The further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which in particular concerns the transfer of data to the parent company Meta Platforms, Inc. in the USA.

Plugins and embedded functions and content

We incorporate functional and content elements into our online offering that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may be, for example, graphics, videos or city maps (hereinafter uniformly referred to as "content").

The integration always requires that the third-party providers of this content process the IP address of the user, as they would not be able to send the content to their browser without the IP address. The IP address is therefore required to display this content or function. We make every effort,

only use content whose respective providers only use the IP address to deliver the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags can be used to analyze information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer, as well as being linked to such information from other sources.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status); inventory data (e.g. names, addresses); contact data (e.g. e-mail, telephone numbers); content data (e.g. entries in online forms).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online offer and user-friendliness; profiles with user-related information (creation of user profiles). Marketing.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

Further information on processing operations, procedures and services:

- **Google Fonts (provision on own server):** Provision of font files for the purpose of a user-friendly presentation of our online offer; **Service provider:** The Google Fonts are hosted on our server, no data is transmitted to Google; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- **Google Fonts (obtained from the Google server):** Obtaining fonts (and symbols) for the purpose of a technically secure, maintenance-free and efficient use of fonts and symbols with regard to up-to-dateness and loading times, their uniform presentation and consideration of possible licensing restrictions. The provider of the fonts is informed of the user's IP address so that the fonts can be made available in the user's browser. In addition, technical data (language settings, screen resolution, operating system, hardware used) are transmitted that are necessary for the provision of the fonts depending on the devices used and the technical environment. This data may be processed on a server of the font provider in the USA - When visiting our online offer, users' browsers send their browser HTTP requests to the Google Fonts Web API (i.e. a software interface for retrieving fonts). The Google Fonts Web API provides users with the Google Fonts Cascading Style Sheets (CSS) and then the fonts specified in the CCS. These HTTP requests include (1) the IP address used by the respective user to access the Internet, (2) the requested URL on the Google server and (3) the HTTP headers, including the user agent, which describes the browser and operating system versions of the website visitors, as well as the referrer URL (i.e. the web page on which the Google font is to be displayed). IP addresses are neither logged nor stored on Google servers and are not analyzed. The Google Fonts Web API logs details of HTTP requests (requested URL, user agent and referrer URL). Access to this data is restricted and strictly controlled. The requested URL identifies the font families for which the user wishes to load fonts. This data is logged so that Google can determine how often a particular font family is requested. With the Google Fonts Web API, the user must

agent to customize the font that is generated for the respective browser type. The user agent is primarily logged for debugging and used to generate aggregated usage statistics to measure the popularity of font families. These aggregated usage statistics are published on the Google Fonts "Analytics" page. Finally, the referral URL is logged so that the data can be used for production maintenance and to generate an aggregated report on the top integrations based on the number of font requests.

According to Google, it does not use any of the information collected by Google Fonts to create profiles of end users or to display targeted ads; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://fonts.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for transfer to third countries:** EU-US Data Privacy Framework (DPF).

Further information: <https://developers.google.com/fonts/faq/privacy?hl=de>.

- **Instagram plugins and content:** Instagram plugins and content - This may include, for example, content such as images, videos or text and buttons with which users can share content from this online offering within Instagram. - We are jointly responsible with Meta Platforms Ireland Limited for the collection or receipt in the context of a transmission (but not the further processing) of "event data" that Facebook collects using Instagram functions (e.g. embedding functions for content) that are executed on our online offer or receives in the context of a transmission for the following purposes: a) Display of content and advertising information that corresponds to the presumed interests of the users; b) Delivery of commercial and transaction-related messages (e.g. addressing users via Instagram). (e.g. addressing users via Facebook Messenger); c) improving ad delivery and personalization of features and content (e.g. improving the recognition of which content or advertising information presumably corresponds to the interests of users). We have concluded a special agreement with Facebook ("Addendum for Data Controllers", https://www.facebook.com/legal/controller_addendum), which regulates in particular which security measures Facebook must observe (https://www.facebook.com/legal/terms/data_security_terms) and in which Facebook has agreed to fulfill the rights of data subjects (i.e. users can, for example, send information or deletion requests directly to Facebook). Note: If Facebook provides us with measured values, analyses and reports (which are aggregated, i.e. do not contain any information about individual users and are anonymous to us), this processing is not carried out within the framework of joint responsibility, but on the basis of a data processing agreement ("Data Processing Terms", <https://www.facebook.com/legal/terms/dataprocessing>) which "Data Security Terms" (https://www.facebook.com/legal/terms/data_security_terms) and with regard to processing in the USA on the basis of standard contractual clauses ("Facebook-EU Data Transfer Addendum, https://www.facebook.com/legal/EU_data_transfer_addendum). The rights of users (in particular to information, deletion, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook; **service provider:** Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://www.instagram.com>. **Privacy Policy:** <https://instagram.com/about/legal/privacy>.
- **YouTube videos:** Video content; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://www.youtube.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Basis for third country transfers:** EU-US Data Privacy

Framework (DPF). **Possibility of objection (opt-out):** Opt-out plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, settings for the display of advertisements: <https://adssettings.google.com/authenticated>.

- **Vimeo video player:** Integration of a video player; **Service provider:** Vimeo Inc., Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA; **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); **Website:** <https://vimeo.com>; **Privacy Policy:** <https://vimeo.com/privacy>; **Data processing agreement:** <https://vimeo.com/enterpriseterms/dpa>. **Basis for third country transfers:** Standard Contractual Clauses (<https://vimeo.com/enterpriseterms/dpa>).

Management, organization and support tools

We use services, platforms and software from other providers (hereinafter referred to as "third-party providers") for the purposes of organizing, managing, planning and providing our services. When selecting third-party providers and their services, we observe the legal requirements.

In this context, personal data may be processed and stored on the servers of third-party providers. This may affect various data that we process in accordance with this privacy policy. This data may include, in particular, master data and contact data of users, data on transactions, contracts, other processes and their content.

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party providers may process usage data and metadata for security purposes, service optimization or marketing purposes. We therefore ask you to observe the data protection notices of the respective third-party providers.

- **Processed data types:** Content data (e.g. entries in online forms); usage data (e.g. websites visited, interest in content, access times); meta, communication and process data (e.g. IP addresses, time data, identification numbers, consent status).
- **Data subjects:** Communication partners; users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Office and organizational procedures.

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