Privacy Policy

Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing 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 services").

The terms used are not gender-specific.

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Controller

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Overview of processing operations

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

Categories of Processed Data

- Inventory data.
- Payment Data.
- Contact data.
- Content data.

- Contract data.
- Usage data.
- Meta, communication and process data.
- Log data.

Categories of Data Subjects

- Service recipients and clients.
- Employees.
- Prospective customers.
- Communication partner.
- Users.
- Business and contractual partners.
- Third parties.

Purposes of Processing

- Provision of contractual services and fulfillment of contractual obligations.
- Communication.
- Security measures.
- Office and organisational procedures.
- Organisational and Administrative Procedures.
- Feedback.
- Provision of our online services and usability.
- Information technology infrastructure.
- Financial and Payment Management.
- Public relations.
- Sales promotion.
- Business processes and management procedures.

Relevant legal bases

Relevant legal bases according to the GDPR: In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - 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.
- **Compliance with a legal obligation (Article 6 (1) (c) GDPR)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - the processing is necessary for the protection of the legitimate interests of the controller or a third party, provided that the interests, fundamental rights, and freedoms of the data subject, which require the protection of personal data, do not prevail.

National data protection regulations in Germany: In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, data protection laws of the individual federal states may apply.

Relevant legal basis according to the Swiss Data Protection Act: If you are located in Switzerland, we process your data based on the Federal Act on Data Protection (referred to as "Swiss DPA"). Unlike the GDPR, for instance, the Swiss DPA does not generally require that a legal basis for processing personal data be stated and that the processing of personal data is conducted in good faith, lawfully and proportionately (Art. 6 para. 1 and 2 of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose recognizable to the data subject and process it only in a manner compatible with this purpose (Art. 6 para. 3 of the Swiss DPA).

Reference to the applicability of the GDPR and the Swiss DPA: These privacy

policy serves both to provide information pursuant to the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the broader spatial application and comprehensibility, the terms used in the GDPR are applied. In particular, instead of the terms used in the Swiss FADP such as "processing" of "personal data", "predominant interest", and "particularly sensitive personal data", the terms used in the GDPR, namely "processing" of "personal data", as well as "legitimate interest" and "special categories of data" are used. However, the legal meaning of these terms will continue to be determined according to the Swiss FADP within its scope of application.

Drittland (außerhalb der EU und der Schweiz): The data protection regulations in the country of the controller's registered office apply in addition to or alongside the GDPR. These regulations may contain specific provisions that go beyond or differ from the requirements of the GDPR. This includes, among other things, rules on protection against misuse of personal data, regulations on rights of access and erasure, rights to object, processing of special categories of personal data, processing for other purposes, transfer and automated decision-making including profiling. The respective national data protection laws and regulations of the corresponding third country must be observed and can influence the processing of personal data. It is important to be informed about the specific data protection regulations of the respective third country to ensure that all data protection requirements are met.

Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security 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 access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

Securing online connections through TLS/SSL encryption technology (HTTPS): To protect the data of users transmitted via our online services from unauthorized access, we employ TLS/SSL encryption technology. Secure Sockets Layer (SSL) and

Transport Layer Security (TLS) are the cornerstones of secure data transmission on the internet. These technologies encrypt the information that is transferred between the website or app and the user's browser (or between two servers), thereby safeguarding the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions conform to the highest security standards. When a website is secured with an SSL/TLS certificate, this is indicated by the display of HTTPS in the URL. This serves as an indicator to users that their data is being securely and encryptedly transmitted.

Transmission of Personal Data

In the course of processing personal data, it may happen that this data is transmitted to or disclosed to other entities, companies, legally independent organizational units, or individuals. Recipients of this data may include service providers tasked with IT duties or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and particularly conclude relevant contracts or agreements that serve to protect your data with the recipients of your data.

Data Transfer within the Organization: We may transfer personal data to other departments or units within our organisation or grant them access to it. If the data is shared for administrative purposes, it is based on our legitimate business and economic interests or occurs if it is necessary to fulfil our contractual obligations or if the data subjects have given their consent or a legal permission exists.

International data transfers

Data Processing in Third Countries: If we transfer data to a third country (i.e., outside the European Union (EU) or the European Economic Area (EEA)), or if this occurs in the context of using third-party services or the disclosure or transfer of data to other individuals, entities, or companies (which becomes apparent either from the postal address of the respective provider or when explicitly mentioned in the privacy policy regarding data transfer to third countries), this is always done in accordance with legal requirements.

For data transfers to the USA, we primarily rely on the Data Privacy Framework (DPF), which has been recognized as a secure legal framework by the EU Commission's adequacy decision of July 10, 2023. Additionally, we have concluded Standard Contractual Clauses with the respective providers, which comply with the EU Commission's requirements and establish contractual obligations to protect your data.

This dual safeguard ensures comprehensive protection of your data: The DPF

serves as the primary level of protection, while the Standard Contractual Clauses act as an additional security measure. Should any changes occur within the DPF framework, the Standard Contractual Clauses will serve as a reliable fallback option. This ensures that your data remains adequately protected even in the event of political or legal changes.

For individual service providers, we will inform you whether they are certified under the DPF and if Standard Contractual Clauses are in place. The list of certified companies and further information about the DPF can be found on the U.S. Department of Commerce's website at https://www.dataprivacyframework.gov/.

For data transfers to other third countries, appropriate safeguards apply, particularly Standard Contractual Clauses, explicit consent, or legally required transfers. Information on third-country transfers and applicable adequacy decisions can be found in the information provided by the EU Commission: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection_en.

We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

Disclosure of Personal Data Abroad: In accordance with the Swiss Data Protection Act (Swiss DPA), we only disclose personal data abroad when an appropriate level of protection for the affected persons is ensured (Art. 16 Swiss DPA). If the Federal Council has not determined an adequate level of protection (list of states: https://www.bj.admin.ch/bj/de/home/staat/datenschutz/internationales/anerkennung-staaten.html), we implement alternative security measures.

For data transfers to the USA, we primarily rely on the Data Privacy Framework (DPF), which has been recognized as a secure legal framework by Switzerland's adequacy decision of June 7, 2024. Additionally, we have concluded Standard Data Protection Clauses with the respective providers, which have been approved by the Federal Data Protection and Information Commissioner (FDPIC) and establish contractual obligations to protect your data.

This dual safeguard ensures comprehensive protection of your data: The DPF serves as the primary level of protection, while the Standard Data Protection Clauses act as an additional security measure. Should any changes occur within the DPF framework, the Standard Data Protection Clauses will serve as a reliable fallback option. This ensures that your data remains adequately protected even in the event of political or legal changes.

For individual service providers, we will inform you whether they are certified under the DPF and if Standard Data Protection Clauses are in place. The list of certified companies and further information about the DPF can be found on the U.S. Department of Commerce's website at https://www.dataprivacyframework.gov/.

For data transfers to other third countries, appropriate safeguards apply, including international agreements, specific guarantees, FDPIC-approved Standard Data Protection Clauses, or internal company data protection regulations previously recognized by the FDPIC or a competent data protection authority of another country.

Under Art. 16 of the Swiss DPA, exceptions can be made for the disclosure of data abroad if certain conditions are met, including the consent of the affected person, contract execution, public interest, protection of life or physical integrity, publicly made data, or data from a legally provided register. Such disclosures always comply with the legal requirements.

We will inform you which of our service providers are certified under the Data Privacy Framework as part of our privacy notices.

General Information on Data Retention and Deletion

We delete personal data that we process in accordance with legal regulations as soon as the underlying consents are revoked or no further legal bases for processing exist. This applies to cases where the original purpose of processing is no longer applicable or the data is no longer needed. Exceptions to this rule exist if statutory obligations or special interests require a longer retention or archiving of the data.

In particular, data that must be retained for commercial or tax law reasons, or whose storage is necessary for legal prosecution or protection of the rights of other natural or legal persons, must be archived accordingly.

Our privacy notices contain additional information on the retention and deletion of data specifically applicable to certain processing processes.

In cases where multiple retention periods or deletion deadlines for a date are specified, the longest period always prevails.

If a period does not expressly start on a specific date and lasts at least one year, it automatically begins at the end of the calendar year in which the event triggering the period occurred. In the case of ongoing contractual relationships in the context of which data is stored, the event triggering the deadline is the time at which the termination or other termination of the legal relationship takes effect.

Data that is no longer stored for its originally intended purpose but due to legal requirements or other reasons are processed exclusively for the reasons justifying their retention.

Further information on processing methods, procedures and services used:

- **Data Retention and Deletion:** The following general deadlines apply for the retention and archiving according to German law:
    - 10 Years - Fiscal Code/Commercial Code - Retention period for books and records, annual financial statements, inventories, management reports, opening balance sheet as well as the necessary work instructions and other organisational documents (Section 147 Paragraph 1 No. 1 in conjunction with Paragraph 3 of the German General Tax Code (AO), Section 14b Paragraph 1 of the German VAT Act (UStG), Section 257 Paragraph 1 No. 1 in conjunction with Paragraph 4 of the German Commercial Code (HGB)).
    - 8 years - Accounting documents, such as invoices, booking and expense receipts (Section 147 Paragraph 1 No. 4 and 4a in conjunction with Paragraph 3 of the German General Tax Code (AO), Section 257 Paragraph 1 No. 4 in conjunction with Paragraph 4 of the German Commercial Code (HGB))
    - 6 Years - Other business documents: received commercial or business letters, copies of dispatched commercial or business letters, and other documents to the extent that they are significant for taxation purposes, for example, hourly wage slips, operating accounting sheets, calculation documents, price tags, as well as payroll accounting documents, provided they are not already accounting vouchers and cash register tapes Section (Section 147 Paragraph 1 No. 2, 3, 5 in conjunction with Paragraph 3 of the German General Tax Code (AO), Section 257 Paragraph 1 No. 2 and 3 in conjunction with Paragraph 4 of the German Commercial Code (HGB)).
    - 3 Years - Data required to consider potential warranty and compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the regular statutory limitation period of three years. This period begins at the end of the year in which the relevant contractual transaction took place or the contractual relationship ended in the case of ongoing contracts (Sections 195, 199 of the German Civil Code).
- **Data Retention and Deletion:** The following general retention and archiving periods apply under Swiss law:
    - 10 years - Retention period for books and records, annual financial statements, inventories, management reports, opening balances, accounting vouchers and invoices, as well as all necessary working instructions and other organizational documents (Article 958f of the Swiss Code of Obligations (OR)).

- 10 years - Data necessary to consider potential claims for damages or similar contractual claims and rights, as well as for the processing of related inquiries based on previous business experiences and usual industry practices, will be stored for the statutory limitation period of ten years, unless a shorter period of five years is applicable, which is relevant in certain cases (Articles 127, 130 OR). Claims for rent, lease, and interest on capital, as well as other periodic services, for the delivery of food, for board and lodging, for innkeeper debts, as well as for craftsmanship, small-scale sales of goods, medical care, professional services by lawyers, legal agents, procurators, and notaries, and from the employment relationship of employees, expire after five years (Article 128 OR).

Rights of Data Subjects

Rights of the Data Subjects under the GDPR: As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.**
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data 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 data concerning you

which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.

- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

Rights of the data subjects under the Swiss DPA:

As the data subject, you have the following rights in accordance with the provisions of the Swiss DPA:

- **Right to information:** You have the right to request confirmation as to whether personal data concerning you are being processed, and to receive the information necessary for you to assert your rights under the Swiss DPA and to ensure transparent data processing.
- **Right to data release or transfer:** You have the right to request the release of your personal data, which you have provided to us, in a common electronic format, as well as its transfer to another data controller, provided this does not require disproportionate effort.
- **Right to rectification:** You have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, deletion, and destruction:** You have the right to object to the processing of your data, as well as to request that personal data concerning you be deleted or destroyed.

Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. 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 update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks

associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of 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 disclose 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 further forms of processing, e.g. for marketing purposes, within the scope of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving. The statutory retention period for documents relevant under tax law as well as for commercial books, inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters and reproductions of sent commercial and business letters six years. 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, furthermore the record was made or the other documents were created.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers). Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Service recipients and clients; Prospective customers. Business and contractual partners.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Communication; Office and organisational procedures; Organisational and Administrative Procedures. Business processes and management procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".

- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Event Management:** We process the data of the participants of the events, events 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 to make use of the services or actions associated with their participation.

  Insofar as we process health-related data, religious, political or other special categories of data in this context, this is done within the framework of disclosure (e.g. for thematically oriented events or serves health care, security or is done with the consent of the data subjects).

  The necessary information is identified as such in the context of the conclusion of the agreement, booking or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any enquiries. Insofar as we gain access to information of end customers, employees or other persons, we process this in accordance with the legal and contractual requirements; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Business processes and operations

Personal data of service recipients and clients - including customers, clients, or in specific cases, mandates, patients, or business partners as well as other third parties - are processed within the framework of contractual and comparable legal relationships and pre-contractual measures such as the initiation of business relations. This data processing supports and facilitates business processes in areas such as customer management, sales, payment transactions, accounting, and project management.

The collected data is used to fulfil contractual obligations and make business processes efficient. This includes the execution of business transactions, the management of customer relationships, the optimisation of sales strategies, and ensuring internal invoicing and financial processes. Additionally, the data supports the protection of the rights of the controller and promotes administrative tasks as well as the organisation of the company.

Personal data may be transferred to third parties if necessary for fulfilling the

mentioned purposes or legal obligations. After legal retention periods expire or when the purpose of processing no longer applies, the data will be deleted. This also includes data that must be stored for longer periods due to tax law and legal obligations to provide evidence.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Contract data (e.g. contract object, duration, customer category); Log data (e.g. log files concerning logins or data retrieval or access times.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Service recipients and clients; Prospective customers; Communication partner (Recipients of e-mails, letters, etc.); Business and contractual partners; Third parties. Employees (e.g. employees, job applicants, temporary workers, and other personnel.).
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Office and organisational procedures; Business processes and management procedures; Communication; Public relations; Sales promotion; Financial and Payment Management. Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.)).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Legitimate Interests (Article 6 (1) (f) GDPR). Compliance with a legal obligation (Article 6 (1) (c) GDPR).

Further information on processing methods, procedures and services used:

- **Contact management and contact maintenance:** Processes required in the context of organizing, maintaining, and securing contact information (e.g., setting up and maintaining a central contact database, regular updates of contact information, monitoring data integrity, implementing data protection measures, ensuring access controls, conducting backups and restorations of contact data, training employees in effective use of contact management software, regular review of communication history and adjustment of contact strategies); **Legal Basis:** Performance of a contract and prior requests

(Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

- **General Payment Transactions:** Procedures required for carrying out payment transactions, monitoring bank accounts, and controlling payment flows (e.g., creation and verification of transfers, processing of direct debit transactions, checking of account statements, monitoring of incoming and outgoing payments, management of chargebacks, account reconciliation, cash management); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Accounting, accounts payable, accounts receivable:** Procedures required for the collection, processing, and control of business transactions in the area of accounts payable and receivable accounting (e.g., creation and verification of incoming and outgoing invoices, monitoring and management of outstanding items, execution of payment transactions, handling of dunning processes, account reconciliation within the scope of receivables and payables, accounts payable accounting, and accounts receivable accounting); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Financial Accounting and Taxes:** Procedures required for the collection, management, and control of finance-related business transactions as well as for the calculation, reporting, and payment of taxes (e.g., accounting and posting of business transactions, preparation of quarterly and annual financial statements, execution of payment transactions, handling of dunning processes, account reconciliation, tax consulting, preparation and submission of tax returns, management of tax affairs); **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Compliance with a legal obligation (Article 6 (1) (c) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Public Relations:** Processes required in the context of public relations and public relations activities (e.g., development and implementation of communication strategies, planning and execution of PR campaigns, creation and distribution of press releases, maintenance of media contacts, monitoring and analysis of media response, organisation of press conferences and public events, crisis communication, creation of content for social media and corporate websites, management of corporate branding); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Payment Procedure

Within the framework of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our legitimate interests, we offer data subjects efficient and secure payment options and use other service providers for

this purpose 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 the 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 with them. I.e. we do not receive any account or credit card related information, but only information with confirmation or negative information of 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 terms and conditions and data protection information of the payment service providers.

The terms and conditions and data protection information of the respective payment service providers apply to the payment transactions and can be accessed within the respective websites or transaction applications. We also refer to these for further information and the assertion of revocation, information and other data subject rights.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Contact data (e.g. postal and email addresses or phone numbers).
- **Data subjects:** Service recipients and clients. Business and contractual partners.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations; Business processes and management procedures. Office and organisational procedures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Saferpay:** Payment-Service-Provider (technical integration of online-payment-methods); **Service provider**: Worldline Suisse SA, Hardturmstrasse

201, 8021 Zürich, Switzerland; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** https://worldline.com/en-ch/home/main-navigation/solutions/merchants/solutions-and-services/e-commerce/saferpay-payment-solution.html. **Privacy Policy:** https://worldline.com/en/compliancy/privacy.html.

Provision of online services and web hosting

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

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Log data (e.g. log files concerning logins or data retrieval or access times.). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.)). Security measures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Collection of Access Data and Log Files:** Access to our online service is logged in the form of so-called "server log files". Server log files may include the address and name of the accessed web pages and files, date and time of

access, transferred data volumes, notification of successful retrieval, browser type along with version, the user's operating system, referrer URL (the previously visited page), and typically IP addresses and the requesting provider. The server log files can be used for security purposes, e.g., to prevent server overload (especially in the case of abusive attacks, known as DDoS attacks), and to ensure server load management and stability; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.

- **E-mail Sending and Hosting:** The web hosting services we use also include sending, receiving and storing e-mails. For these purposes, the addresses of the recipients and senders, as well as other information relating to the sending of e-mails (e.g. the providers involved) and the contents of the respective e-mails are processed. The above data may also be processed for SPAM detection purposes. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received (unless a so-called end-to-end encryption method is used). We can therefore accept no responsibility for the transmission path of e-mails between the sender and reception on our server; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Profihost:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider**: Profihost AG, Expo Plaza 1, 30539 Hannover, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** https://www.profihost.com/; **Privacy Policy:** https://www.profihost.com/datenschutzerklaerung. **Data Processing Agreement:** Provided by the service provider.

Use of Cookies

The term "cookies" refers to functions that store information on users' devices and read it from them. Cookies can also be used for different purposes, such as ensuring the functionality, security, and convenience of online services, as well as analyzing visitor traffic. We use cookies in accordance with legal regulations. If necessary, we obtain users' consent in advance. If consent is not required, we rely on our legitimate interests. This applies when storing and reading information is essential to provide explicitly requested content and functions. This includes, for example, saving settings and ensuring the functionality and security of our online services. Consent can be withdrawn at any time. We clearly inform users about the scope of the consent and which cookies are used.

Information on legal data protection bases: Whether we process personal data using cookies depends on users' consent. If consent is given, it serves as the legal basis. Without consent, we rely on our legitimate interests, as outlined in this section and in the context of the respective services and procedures.

Storage duration: The following types of cookies are distinguished based on their storage duration:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user leaves an online service and closes their device (e.g., browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the device is closed. For example, the login status can be saved, and preferred content can be displayed directly when the user revisits a website. Additionally, the user data collected with cookies may be used for audience measurement. Unless we provide explicit information to users about the type and storage duration of cookies (e.g., when obtaining consent), users should assume that these are permanent and may have a storage duration of up to two years.

General information on withdrawal and objection (opt-out): Users can withdraw their consent at any time and also object to the processing according to legal regulations, including through the privacy settings of their browser.

- **Processed data types:** Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Consent (Article 6 (1) (a) GDPR).

Further information on processing methods, procedures and services used:

- **Processing Cookie Data on the Basis of Consent:** We implement a consent management solution that obtains users' consent for the use of cookies or for the processes and providers mentioned within the consent management framework. This procedure is designed to solicit, log, manage, and revoke consents, particularly regarding the use of cookies and similar technologies employed to store, read from, and process information on users' devices. As part of this procedure, user consents are obtained for the use of cookies and the associated processing of information, including specific processing and providers named in the consent management process. Users also have the option to manage and withdraw their consents. Consent declarations are stored to avoid repeated queries and to provide proof of consent according to legal requirements. The storage is carried out server-side and/or in a cookie (so-called opt-in cookie) or by means of comparable

technologies in order to associate the consent with a specific user or their device.If no specific details about the providers of consent management services are provided, the following general notes apply: The duration of consent storage is up to two years. A pseudonymous user identifier is created, which is stored along with the time of consent, details on the scope of consent (e.g., relevant categories of cookies and/or service providers), as well as information about the browser, system, and device used; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

Registration, Login and User Account

Users can create a user account. Within the scope of registration, the required mandatory information is communicated to the users and processed for the purposes of providing the user account on the basis of contractual fulfilment of obligations. The processed data includes in particular the login information (name, password and an e-mail address).

Within the scope of using our registration and login functions as well as 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 the user's protection against misuse and other unauthorized use. This data will not be passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

Users may be informed by e-mail of information relevant to their user account, such as technical changes.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Log data (e.g. log files concerning logins or data retrieval or access times.).
- **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; Organisational and Administrative Procedures. Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".

Deletion after termination.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Registration with a real name:** Due to the nature of our community, we ask users to use our services only with their real names. This means that the use of pseudonyms is not permitted; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Users' profiles are public:** The users' profiles are not publicly visible or accessible.
- **Deletion of data after termination:** If users have terminated their user account, their data relating to the user account will be deleted, subject to any legal permission, obligation or consent of the users; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **No obligation to retain data:** It is the responsibility of the users to secure their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Contact and Inquiry Management

When contacting us (e.g. via mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested measures.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Communication; Organisational and Administrative

Procedures; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.

- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Further information on processing methods, procedures and services used:

- **Contact form:** Upon contacting us via our contact form, email, or other means of communication, we process the personal data transmitted to us for the purpose of responding to and handling the respective matter. This typically includes details such as name, contact information, and possibly additional information provided to us that is necessary for appropriate processing. We use this data exclusively for the stated purpose of contact and communication; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Changes and Updates

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.

Terminology and Definitions

In this section, you will find an overview of the terminology used in this privacy policy. Where the terminology is legally defined, their legal definitions apply. The following explanations, however, are primarily intended to aid understanding.

- **Contact data:** Contact details are essential information that enables communication with individuals or organizations. They include, among others, phone numbers, postal addresses, and email addresses, as well as means of communication like social media handles and instant messaging identifiers.
- **Content data:** Content data comprise information generated in the process of creating, editing, and publishing content of all types. This category of data

may include texts, images, videos, audio files, and other multimedia content published across various platforms and media. Content data are not limited to the content itself but also include metadata providing information about the content, such as tags, descriptions, authorship details, and publication dates.

- **Contract data:** Contract data are specific details pertaining to the formalisation of an agreement between two or more parties. They document the terms under which services or products are provided, exchanged, or sold. This category of data is essential for managing and fulfilling contractual obligations and includes both the identification of the contracting parties and the specific terms and conditions of the agreement. Contract data may encompass the start and end dates of the contract, the nature of the agreed-upon services or products, pricing arrangements, payment terms, termination rights, extension options, and special conditions or clauses. They serve as the legal foundation for the relationship between the parties and are crucial for clarifying rights and duties, enforcing claims, and resolving disputes.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Employees:** As employees, individuals are those who are engaged in an employment relationship, whether as staff, employees, or in similar positions. Employment refers to a legal relationship between an employer and an employee, established through an employment contract or agreement. It entails the obligation of the employer to pay the employee remuneration while the employee performs their work. The employment relationship encompasses various stages, including establishment, where the employment contract is concluded, execution, where the employee carries out their work activities, and termination, when the employment relationship ends, whether through termination, mutual agreement, or otherwise. Employee data encompasses all information pertaining to these individuals within the context of their employment. This includes aspects such as personal identification details, identification numbers, salary and banking information, working hours, holiday entitlements, health data, and performance assessments.
- **Inventory data:** Inventory data encompass essential information required for the identification and management of contractual partners, user accounts, profiles, and similar assignments. These data may include, among others, personal and demographic details such as names, contact information (addresses, phone numbers, email addresses), birth dates, and specific identifiers (user IDs). Inventory data form the foundation for any formal interaction between individuals and services, facilities, or systems, by enabling unique assignment and communication.
- **Log data:** Protocol data, or log data, refer to information regarding events or activities that have been logged within a system or network. These data typically include details such as timestamps, IP addresses, user actions, error

messages, and other specifics about the usage or operation of a system. Protocol data is often used for analyzing system issues, monitoring security, or generating performance reports.

- **Meta, communication and process data:** Meta-, communication, and procedural data are categories that contain information about how data is processed, transmitted, and managed. Meta-data, also known as data about data, include information that describes the context, origin, and structure of other data. They can include details about file size, creation date, the author of a document, and modification histories. Communication data capture the exchange of information between users across various channels, such as email traffic, call logs, messages in social networks, and chat histories, including the involved parties, timestamps, and transmission paths. Procedural data describe the processes and operations within systems or organisations, including workflow documentations, logs of transactions and activities, and audit logs used for tracking and verifying procedures.
- **Payment Data:** Payment data comprise all information necessary for processing payment transactions between buyers and sellers. This data is crucial for e-commerce, online banking, and any other form of financial transaction. It includes details such as credit card numbers, bank account information, payment amounts, transaction dates, verification numbers, and billing information. Payment data may also contain information on payment status, chargebacks, authorizations, and fees.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Usage data:** Usage data refer to information that captures how users interact with digital products, services, or platforms. These data encompass a wide range of information that demonstrates how users utilise applications, which features they prefer, how long they spend on specific pages, and through what paths they navigate an application. Usage data can also include the frequency of use, timestamps of activities, IP addresses, device information, and location data. They are particularly valuable for analysing user behaviour, optimising user experiences, personalising content, and improving products or services. Furthermore, usage data play a crucial role in identifying trends, preferences, and potential problem areas within digital offerings