

# Legal Notice

Information in accordance with §5 of the E-Commerce Act, §14 of the Unternehmensgesetzbuch, §63 of the Commercial Code and disclosure requirements under §25 of the Media Act.

ABIOS GmbH  
Schillerstraße 30,  
5020 Salzburg,  
Österreich

**Object of the company:** IT Dienstleistungen, ÖNACE Klassifikation: J62010

**VAT-Number:** ATU70021317

**Corporate register number:** 442186 z

**Corporate register court:** Salzburg

**Company location:** 5020 Salzburg

**Email:** [office@abios.at](mailto:office@abios.at)

**Member of:** WKO, Salzburg, WKS-Nr. 4162261

**Awarding country:** Österreich

## Chief executive

Mag. Anton Kesselbacher

## Contact details of the data protection controller

If you have any question about data protection, please find the contact details of the body or person responsible for data protection below:

Bernhard Feldbacher, ABIOS GmbH

5020 Salzburg, Schillerstraße 30

Authorised to represent: Bernhard Feldbacher

E-Mail: [datenschutz@abios.at](mailto:datenschutz@abios.at)

## EU Dispute Resolution

We would like to inform you about the Online Dispute Resolution platform (ODR platform) in accordance with the regulation on Online Dispute Resolution in consumer matters (ODR Regulation).

Consumers have the option of submitting complaints to the European Commission's Online Dispute Resolution platform at

<https://ec.europa.eu/consumers/odr/main/?event=main.home2.show>. You will find the necessary contact details in our imprint above.

However, we would like to note, that we are not willing or obliged to participate in dispute settlement procedures before a consumer arbitration board.

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## **Liability for Links on this Website**

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If you notice illegal links on our website, please contact us. You will find our contact details in the imprint.

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# Privacy Policy

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## Privacy Policy

We have written this privacy policy (version 07.04.2022-121993250) in order to explain to you, in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#) and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered as gender-neutral.

**In short:** We provide you with comprehensive information about any personal data we process about you.

Privacy policies usually sound very technical and use legal terminology. However, this privacy policy is intended to describe the most important things to you as simply and transparently as possible. So long as it aids transparency, technical **terms are explained in a reader-friendly manner, links** to further information are provided and **graphics** are used. We are thus informing in clear and simple language that we only process personal data in the context of our business activities if there is a legal basis for it. This is certainly not possible with brief, unclear and legal-technical statements, as is often standard on the Internet when it comes to data protection. I hope you find the following explanations interesting and informative. Maybe you will also find some information that you have not been familiar with.

If you still have questions, we would like to ask you to contact the responsible body named below or in the imprint, to follow the existing links and to look at further information on third-party sites. You can of course also find our contact details in the imprint.

## Scope

This privacy policy applies to all personal data processed by our company and to all personal data processed by companies commissioned by us (processors). With the term personal data, we refer to information within the meaning of Article 4 No. 1 GDPR, such as the name, email address and postal address of a person. The processing of personal data ensures that we can offer and invoice our services and products, be it online or offline. The scope of this privacy policy includes:

- all online presences (websites, online shops) that we operate
- Social media presences and email communication
- mobile apps for smartphones and other devices

**In short:** This privacy policy applies to all areas in which personal data is processed in a structured manner by the company via the channels mentioned. Should we enter into legal relations with you outside of these channels, we will inform you separately if necessary.

## Legal bases

In the following privacy policy, we provide you with transparent information on the legal principles and regulations, i.e. the legal bases of the General Data Protection Regulation, which enable us to process personal data.

Whenever EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016. You can of course access the General Data Protection Regulation of the EU online at EUR-Lex, the gateway to EU law, at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>.

We only process your data if at least one of the following conditions applies:

1. **Consent** (Article 6 Paragraph 1 lit. a GDPR): You have given us your consent to process data for a specific purpose. An example would be the storage of data you entered into a contact form.
2. **Contract** (Article 6 Paragraph 1 lit. b GDPR): We process your data in order to fulfill a contract or pre-contractual obligations with you. For example, if we conclude a sales contract with you, we need personal information in advance.
3. **Legal obligation** (Article 6 Paragraph 1 lit. c GDPR): If we are subject to a legal obligation, we will process your data. For example, we are legally required to keep invoices for our bookkeeping. These usually contain personal data.
4. **Legitimate interests** (Article 6 Paragraph 1 lit. f GDPR): In the case of legitimate interests that do not restrict your basic rights, we reserve the right to process personal data. For example, we have to process certain data in order to be able to operate our website securely and economically. Therefore, the processing is a legitimate interest.

Other conditions such as making recordings in the interest of the public, the exercise of official authority as well as the protection of vital interests do not usually occur with us. Should such a legal basis be relevant, it will be disclosed in the appropriate place.

In addition to the EU regulation, national laws also apply:

- In **Austria** this is the Austrian Data Protection Act (**Datenschutzgesetz**), in short **DSG**.
- In **Germany** this is the Federal Data Protection Act (**Bundesdatenschutzgesetz**), in short **BDSG**.

Should other regional or national laws apply, we will inform you about them in the following sections.

## Contact details of the data protection controller

If you have any questions about data protection, you will find the contact details of the responsible person or controller below:

Bernhard Feldbacher, ABIOS GmbH

5020 Salzburg, Schillerstraße 30

Authorised to represent: Bernhard Feldbacher

E-Mail: [datenschutz@abios.at](mailto:datenschutz@abios.at)

## Contact details of our data protection officer

You can find the contact details of our data protection officer below:

E-Mail: [datenschutz@abios.at](mailto:datenschutz@abios.at)

## Storage Period

It is a general criterion for us to store personal data only for as long as is absolutely necessary for the provision of our services and products. This means that we delete personal data as soon as any reason for the data processing no longer exists. In some cases, we are legally obliged to keep certain data stored even after the original purpose no longer exists, such as for accounting purposes.

If you want your data to be deleted or if you want to revoke your consent to data processing, the data will be deleted as soon as possible, provided there is no obligation to continue its storage.

We will inform you below about the specific duration of the respective data processing, provided we have further information.

## Rights in accordance with the General Data Protection Regulation

You are granted the following rights in accordance with the provisions of the [GDPR](#) (General Data Protection Regulation) and the Austrian [Data Protection Act \(DSG\)](#):

- right to rectification (article 16 GDPR)
- right to erasure ("right to be forgotten") (article 17 GDPR)

- right to restrict processing (article 18 GDPR)
- right to notification – notification obligation regarding rectification or erasure of personal data or restriction of processing (article 19 GDPR)
- right to data portability (article 20 GDPR)
- Right to object (article 21 GDPR)
- right not to be subject to a decision based solely on automated processing – including profiling – (article 22 GDPR)

If you think that the processing of your data violates the data protection law, or that your data protection rights have been infringed in any other way, you can lodge a complaint with your respective regulatory authority. For Austria this is the data protection authority, whose website you can access at <https://www.data-protection-authority.gv.at/>.

## **Austria Data protection authority**

**Manager:** Mag. Dr. Andrea Jelinek

**Address:** Barichgasse 40-42, 1030 Wien

**Phone number.:** +43 1 52 152-0

**E-mail address:** [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

**Website:** <https://www.dsb.gv.at/>

## **Data transfer to third countries**

We only transfer or process data to countries outside the EU (third countries) if you consent to this processing, if this is required by law or if it is contractually necessary. In any case, we generally only do so to the permitted extent. In most cases, your consent is the most important reason for data being processed in third countries. When personal data is being processed in third countries such as the USA, where many software manufacturers offer their services and have their servers located, your personal data may be processed and stored in unexpected ways.

We want to expressly point out, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing by US services (such as Google Analytics) may result in data processing and retention without the data having undergone anonymisation processes. Furthermore, US government authorities may be able to access individual data. The collected data may also get linked to data from other services of the same provider, should you have a user account with the respective provider. We try to use server locations within the EU, whenever this is offered and possible.

We will provide you with more details about data transfer to third countries in the appropriate sections of this privacy policy, whenever applicable.

## **Security of data processing operations**

In order to protect personal data, we have implemented both technical and organisational measures. We encrypt or pseudonymise personal data wherever this is possible. Thus, we make it

as difficult as we can for third parties to extract personal information from our data.


Article 25 of the GDPR refers to “data protection by technical design and by data protection-friendly default” which means that both software (e.g. forms) and hardware (e.g. access to server rooms) appropriate safeguards and security measures shall always be placed. If applicable, we will outline the specific measures below.

## TLS encryption with https

The terms TLS, encryption and https sound very technical, which they are indeed. We use HTTPS (Hypertext Transfer Protocol Secure) to securely transfer data on the Internet.

This means that the entire transmission of all data from your browser to our web server is secured – nobody can “listen in”.






We have thus introduced an additional layer of security and meet privacy requirements through technology design [Article 25 Section 1 GDPR](#). With the use of TLS (Transport Layer Security), which is an encryption protocol for safe data transfer on the internet, we can ensure the protection of confidential information.

You can recognise the use of this safeguarding tool by the little lock-symbol , which is situated in your browser's top left corner in the left of the internet address (e.g. examplepage.uk), as well as by the display of the letters https (instead of http) as a part of our web address.

If you want to know more about encryption, we recommend you to do a Google search for “Hypertext Transfer Protocol Secure wiki” to find good links to further information.

## Communications

### Communications Overview

-  Affected parties: Anyone who communicates with us via phone, email or online form
-  Processed data: e. g. telephone number, name, email address or data entered in forms. You can find more details on this under the respective form of contact
-  Purpose: handling communication with customers, business partners, etc.
-  Storage duration: for the duration of the business case and the legal requirements
-  Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1) (f) GDPR (legitimate interests)

If you contact us and communicate with us via phone, email or online form, your personal data may be processed.

The data will be processed for handling and processing your request and for the related business transaction. The data is stored for this period of time or for as long as is legally required.

### Affected persons

The above-mentioned processes affect all those who seek contact with us via the communication channels we provide.

## Telephone

When you call us, the call data is stored in a pseudonymised form on the respective terminal device, as well as by the telecommunications provider that is being used. In addition, data such as your name and telephone number may be sent via email and stored for answering your inquiries. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

## Email

If you communicate with us via email, your data is stored on the respective terminal device (computer, laptop, smartphone, ...) as well as on the email server. The data will be deleted as soon as the business case has ended and the legal requirements allow for its erasure.

## Online forms

If you communicate with us using an online form, your data is stored on our web server and, if necessary, forwarded to our email address. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

## Legal bases


Data processing is based on the following legal bases:


- Art. 6 para. 1 lit. a GDPR (consent): You give us your consent to store your data and to continue to use it for the purposes of the business case;
- Art. 6 para. 1 lit. b GDPR (contract): For the performance of a contract with you or a processor such as a telephone provider, or if we have to process the data for pre-contractual activities, such as preparing an offer;
- Art. 6 para. 1 lit. f GDPR (legitimate interests): We want to conduct our customer inquiries and business communication in a professional manner. Thus, certain technical facilities such as email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.


## Cookies


### Cookies Overview

 Affected parties: visitors to the website

 Purpose: depending on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

 Processed data: Depending on the cookie used. More details can be found below or from the manufacturer of the software that sets the cookie.

 Storage duration: can vary from hours to years, depending on the respective cookie

 Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)



## What are cookies?

Our website uses HTTP-cookies to store user-specific data.

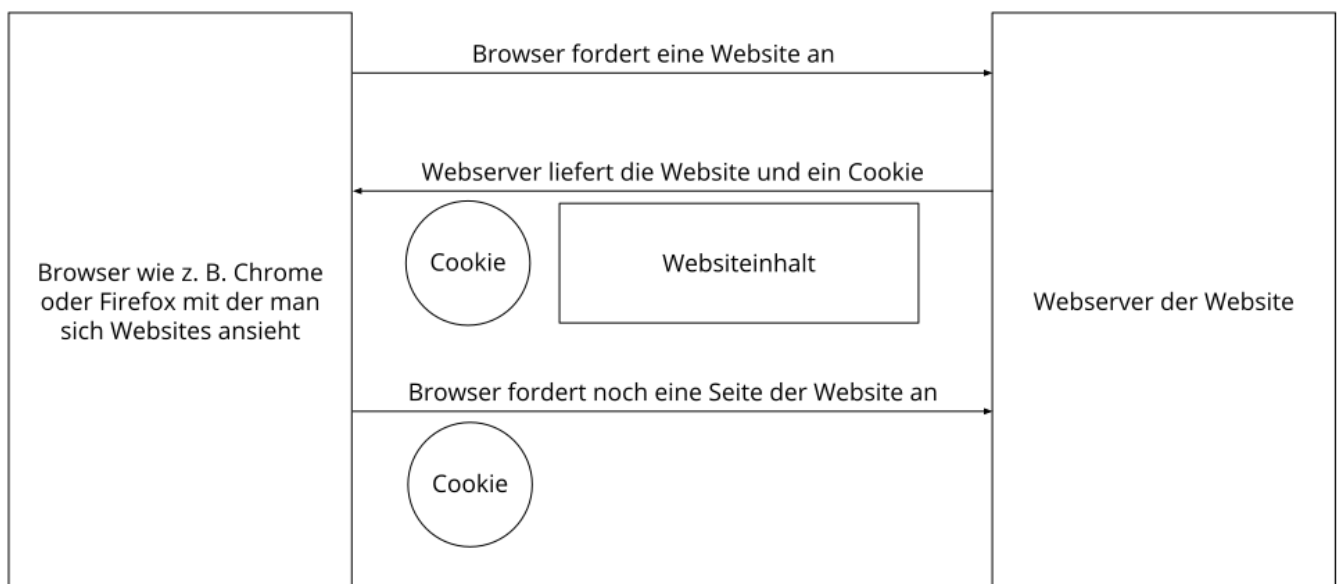
In the following we explain what cookies are and why they are used, so that you can better understand the following privacy policy.

Whenever you surf the Internet, you are using a browser. Common browsers are for example, Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

It is important to note that cookies are very useful little helpers. Almost every website uses cookies. More precisely, these are HTTP cookies, as there are also other cookies for other uses. HTTP cookies are small files that our website stores on your computer. These cookie files are automatically placed into the cookie-folder, which is the “brain” of your browser. A cookie consists of a name and a value. Moreover, to define a cookie, one or multiple attributes must be specified.

Cookies store certain user data about you, such as language or personal page settings. When you re-open our website to visit again, your browser submits these “user-related” information back to our site. Thanks to cookies, our website knows who you are and offers you the settings you are familiar to. In some browsers, each cookie has its own file, while in others, such as Firefox, all cookies are stored in one single file.

The following graphic shows a possible interaction between a web browser such as Chrome and the web server. The web browser requests a website and receives a cookie back from the server. The browser then uses this again as soon as another page is requested.



There are both first-party cookies and third-party cookies. First-party cookies are created directly by our site, while third-party cookies are created by partner-websites (e.g. Google Analytics). Each cookie must be evaluated individually, as each cookie stores different data. The expiry time of a cookie also varies from a few minutes to a few years. Cookies are not software programs and do not contain viruses, trojans or other malware. Cookies also cannot access your PC's information.

This is an example of how cookie-files can look:

**Name:** \_ga

**Value:** GA1.2.1326744211.152121993250-9

**Purpose:** Differentiation between website visitors

**Expiry date:** after 2 years

A browser should support these minimum sizes:

- At least 4096 bytes per cookie
- At least 50 cookies per domain
- At least 3000 cookies in total

## Which types of cookies are there?

The exact cookies that we use, depend on the used services, which will be outlined in the following sections of this privacy policy. Firstly, we will briefly focus on the different types of HTTP-cookies.

There are 4 different types of cookies:

### Essential cookies

These cookies are necessary to ensure the basic functions of a website. They are needed when a user for example puts a product into their shopping cart, then continues surfing on different websites and comes back later in order to proceed to the checkout. These cookies ensure the shopping cart does not get deleted, even if the user closes their browser window.

### Purposive cookies

These cookies collect information about user behaviour and whether the user receives any error messages. Furthermore, these cookies record the website's loading time as well as its behaviour in different browsers.

### Target-orientated cookies

These cookies ensure better user-friendliness. Thus, information such as previously entered locations, fonts sizes or data in forms stay stored.

### Advertising cookies

These cookies are also known as targeting cookies. They serve the purpose of delivering customised advertisements to the user. This can be very practical, but also rather annoying.

Upon your first visit to a website you are usually asked which of these cookie-types you want to accept. Furthermore, this decision will of course also be stored in a cookie.

If you want to learn more about cookies and do not mind technical documentation, we recommend <https://tools.ietf.org/html/rfc6265>, the Request for Comments of the Internet Engineering Task Force (IETF) called "HTTP State Management Mechanism".

## **Purpose of processing via cookies**

The purpose ultimately depends on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

## **Which data are processed?**

Cookies are little helpers for a wide variety of tasks. Unfortunately, it is not possible to tell which data is generally stored in cookies, but in the privacy policy below we will inform you on what data is processed or stored.

## **Storage period of cookies**

The storage period depends on the respective cookie and is further specified below. Some cookies are erased after less than an hour, while others can remain on a computer for several years.

You can also influence the storage duration yourself. You can manually erase all cookies at any time in your browser (also see "Right of objection" below). Furthermore, the latest instance cookies based on consent will be erased is after you withdraw your consent. The legality of storage will remain unaffected until then.

## **Right of objection – how can I erase cookies?**

You can decide for yourself how and whether you want to use cookies. Regardless of which service or website the cookies originate from, you always have the option of erasing, deactivating or only partially accepting cookies. You can for example block third-party cookies but allow all other cookies.

If you want to find out which cookies have been stored in your browser, or if you want to change or erase cookie settings, you can find this option in your browser settings:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

If you generally do not want cookies, you can set up your browser in a way to notify you whenever a cookie is about to be set. This gives you the opportunity to manually decide to either permit or deny the placement of every single cookie. This procedure varies depending on the browser. Therefore, it might be best for you to search for the instructions in Google. If you are using Chrome, you could for example put the search term "delete cookies Chrome" or "deactivate cookies Chrome" into Google.

## Legal basis

The so-called “cookie directive” has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section 96 (3) of the Telecommunications Act (TKG). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in Section 15 (3) of the Telemedia Act (TMG).






For absolutely necessary cookies, even if no consent has been given, there are legitimate interests (Article 6 (1) (f) GDPR), which in most cases are of an economic nature. We want to offer our visitors a pleasant user experience on our website. For this, certain cookies often are absolutely necessary.

This is exclusively done with your consent, unless absolutely necessary cookies are used. The legal basis for this is Article 6 (1) (a) of the GDPR.

In the following sections you will find more detail on the use of cookies, provided the used software does use cookies.

## Web hosting

### Web hosting Overview

-  Affected parties: visitors to the website
-  Purpose: professional hosting of the website and security of operations
-  Processed data: IP address, time of website visit, browser used and other data. You can find more details on this below or at the respective web hosting provider.
-  Storage period: dependent on the respective provider, but usually 2 weeks
-  Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is web hosting?

Every time you visit a website nowadays, certain information – including personal data – is automatically created and stored, including on this website. This data should be processed as sparingly as possible, and only with good reason. By website, we mean the entirety of all websites on your domain, i.e. everything from the homepage to the very last subpage (like this one here). By domain we mean example.uk or examplepage.com.

When you want to view a website on a screen, you use a program called a web browser. You probably know the names of some web browsers: Google Chrome, Microsoft Edge, Mozilla Firefox, and Apple Safari.

The web browser has to connect to another computer which stores the website’s code: the web server. Operating a web server is complicated and time-consuming, which is why this is usually done by professional providers. They offer web hosting and thus ensure the reliable and flawless storage of website data.

Whenever the browser on your computer establishes a connection (desktop, laptop, smartphone)

and whenever data is being transferred to and from the web server, personal data may be processed. After all, your computer stores data, and the web server also has to retain the data for a period of time in order to ensure it can operate properly.

Illustration:



## Why do we process personal data?

The purposes of data processing are:

1. Professional hosting of the website and operational security
2. To maintain the operational as well as IT security
3. Anonymous evaluation of access patterns to improve our offer, and if necessary, for prosecution or the pursuit of claims.

## Which data are processed?

Even while you are visiting our website, our web server, that is the computer on which this website is saved, usually automatically saves data such as

- the full address (URL) of the accessed website (e. g. <https://www.examplepage.uk/examplesubpage.html?tid=121993250>)
- browser and browser version (e.g. Chrome 87)
- the operating system used (e.g. Windows 10)
- the address (URL) of the previously visited page (referrer URL) (e. g. <https://www.examplepage.uk/icamefromhere.html/>)
- the host name and the IP address of the device from the website is being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- date and time
- in so-called web server log files

## How long is the data stored?

Generally, the data mentioned above are stored for two weeks and are then automatically deleted. We do not pass these data on to others, but we cannot rule out the possibility that this data may be viewed by the authorities in the event of illegal conduct.

**In short:** Your visit is logged by our provider (company that runs our website on special computers (servers)), but we do not pass on your data without your consent!

## Legal basis

The lawfulness of processing personal data in the context of web hosting is justified in Art. 6 para. 1 lit. f GDPR (safeguarding of legitimate interests), as the use of professional hosting with a provider is necessary to present the company in a safe and user-friendly manner on the internet, as well as to have the ability to track any attacks and claims, if necessary.

## Hetzner Privacy Policy


We use Hetzner for our website, which is a web hosting provider, among other things. The provider of this service is the German company Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany. You can find out more about the data that is processed through the use of Hetzner in their Privacy Policy at <https://www.hetzner.com/de/rechtliches/datenschutz>.


## Web Analytics


### Web Analytics Privacy Policy Overview

 Affected parties: visitors to the website

 Purpose: Evaluation of visitor information to optimise the website.

 Processed data: Access statistics that contain data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this from the respective web analytics tool directly.

 Storage period: depending on the respective web analytics tool used

 Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Web Analytics?

We use software on our website, which is known as web analytics, in order to evaluate website visitor behaviour. Thus, data is collected, which the analytic tool provider (also called tracking tool) stores, manages and processes. Analyses of user behaviour on our website are created with this data, which we as the website operator receive. Most tools also offer various testing options. These enable us, to for example test which offers or content our visitors prefer. For this, we may show you two different offers for a limited period of time. After the test (a so-called A/B test) we know which product or content our website visitors find more interesting. For such testing as well as for various other analyses, user profiles are created and the respective data is stored in cookies.

## Why do we run Web Analytics?

We have a clear goal in mind when it comes to our website: we want to offer our industry's best website on the market. Therefore, we want to give you both, the best and most interesting offer as well as comfort when you visit our website. With web analysis tools, we can observe the behaviour of our website visitors, and then improve our website accordingly for you and for us. For example, we can see the average age of our visitors, where they come from, the times our website gets visited the most, and which content or products are particularly popular. All this information helps

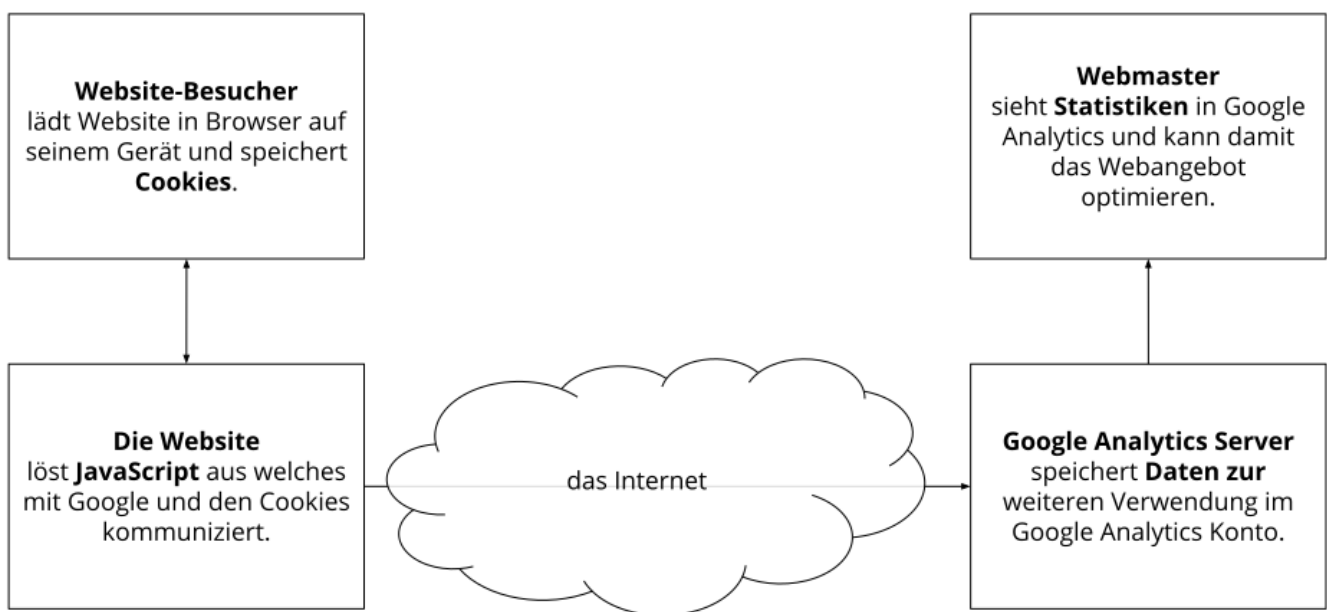
us to optimise our website and adapt it to your needs, interests and wishes.

## Which data are processed?

The exact data that is stored depends on the analysis tools that are being used. But generally, data such as the content you view on our website are stored, as well as e. g. which buttons or links you click, when you open a page, which browser you use, which device (PC, tablet, smartphone, etc.) you visit the website with, or which computer system you use. If you have agreed that location data may also be collected, this data may also be processed by the provider of the web analysis tool.

Moreover, your IP address is also stored. According to the General Data Protection Regulation (GDPR), IP addresses are personal data. However, your IP address is usually stored in a pseudonymised form (i.e. in an unrecognisable and abbreviated form). No directly linkable data such as your name, age, address or email address are stored for testing purposes, web analyses and web optimisations. If this data is collected, it is retained in a pseudonymised form. Therefore, it cannot be used to identify you as a person.

The following example shows Google Analytics' functionality as an example for client-based web tracking with JavaScript code.



The storage period of the respective data always depends on the provider. Some cookies only retain data for a few minutes or until you leave the website, while other cookies can store data for several years.

## Duration of data processing

If we have any further information on the duration of data processing, you will find it below. We generally only process personal data for as long as is absolutely necessary to provide products and services. The storage period may be extended if it is required by law, such as for accounting purposes for example for accounting.

## Right to object

You also have the option and the right to revoke your consent to the use of cookies or third-party providers at any time. This works either via our cookie management tool or via other opt-out functions. For example, you can also prevent data processing by cookies by managing, deactivating or erasing cookies in your browser.

## Legal basis

The use of Web Analytics requires your consent, which we obtained with our cookie popup. According to **Art. 6 para. 1 lit. a of the GDPR (consent)**, this consent represents the legal basis for the processing of personal data, such as by collection through Web Analytics tools.






In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors, which enables us to technically and economically improve our offer. With Web Analytics, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f of the GDPR (legitimate interests)**. Nevertheless, we only use these tools if you have given your consent.

Since Web Analytics tools use cookies, we recommend you to read our privacy policy on cookies. If you want to find out which of your data are stored and processed, you should read the privacy policies of the respective tools.

If available, information on special Web Analytics tools can be found in the following sections.

## Google Analytics Privacy Policy

### Google Analytics Privacy Policy Overview

-  Affected parties: website visitors
-  Purpose: Evaluation of visitor information to optimise the website.
-  Processed data: Access statistics that contain data such as the location of access, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this in the privacy policy below.
-  Storage period: depending on the properties used
-  Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Google Analytics?

We use the tracking and analysis tool Google Analytics (GA) of the US-American company Google LLC (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). Google Analytics collects data on your actions on our website. Whenever you click a link for example, this action is saved in a cookie and transferred to Google Analytics. With the help of reports which we receive from Google Analytics, we can adapt our website and our services better to your wishes. In the following, we will explain the tracking tool in more detail, and most of all, we will inform you what data is saved and how you can prevent this.



Google Analytics is a tracking tool with the purpose of conducting data traffic analysis of our website. For Google Analytics to work, there is a tracking code integrated to our website. Upon your visit to our website, this code records various actions you perform on your website. As soon as you leave our website, this data is sent to the Google Analytics server, where it is stored.

Google processes this data and we then receive reports on your user behaviour. These reports can be one of the following:

- Target audience reports: With the help of target audience reports we can get to know our users better and can therefore better understand who is interested in our service.
- Advertising reports: Through advertising reports we can analyse our online advertising better and hence improve it.
- Acquisition reports: Acquisition reports provide us helpful information on how we can get more people enthusiastic about our service.
- Behaviour reports: With these reports, we can find out how you interact with our website. By the means of behaviour reports, we can understand what path you go on our website and what links you click.
- Conversion reports: A conversion is the process of leading you to carry out a desired action due to a marketing message. An example of this would be transforming you from a mere website visitor into a buyer or a newsletter subscriber. Hence, with the help of these reports we can see in more detail, if our marketing measures are successful with you. Our aim is to increase our conversion rate.
- Real time reports: With the help of these reports we can see in real time, what happens on our website. It makes us for example see, we can see how many users are reading this text right now.

## **Why do we use Google Analytics on our website?**

The objective of our website is clear: We want to offer you the best possible service. Google Analytics' statistics and data help us with reaching this goal.

Statistically evaluated data give us a clear picture of the strengths and weaknesses of our website. On the one hand, we can optimise our page in a way, that makes it easier to be found by interested people on Google. On the other hand, the data helps us to get a better understanding of you as our visitor. Therefore, we can very accurately find out what we must improve on our website, in order to offer you the best possible service. The analysis of that data also enables us to carry out our advertising and marketing measures in a more individual and more cost-effective way. After all, it only makes sense to show our products and services exclusively to people who are interested in them.

## **What data is stored by Google Analytics?**

With the aid of a tracking code, Google Analytics creates a random, unique ID which is connected to your browser cookie. That way, Google Analytics recognises you as a new user. The next time you visit our site, you will be recognised as a "recurring" user. All data that is collected gets saved together with this very user ID. Only this is how it is made possible for us to evaluate and analyse

pseudonymous user profiles.

To analyse our website with Google Analytics, a property ID must be inserted into the tracking code. The data is then stored in the corresponding property. Google Analytics 4-property is standard for every newly created property. An alternative however, is the Universal Analytics Property. Depending on the property that is being used, data are stored for different periods of time.

Your interactions on our website are measured by tags such as cookies and app instance IDs. Interactions are all kinds of actions that you perform on our website. If you are also using other Google systems (such as a Google Account), data generated by Google Analytics can be linked with third-party cookies. Google does not pass on any Google Analytics data, unless we as the website owners authorise it. In case it is required by law, exceptions can occur.

The following cookies are used by Google Analytics:

**Name:** \_ga

**Value:**2.1326744211.152121993250-5

**Purpose:** By default, analytics.js uses the cookie \_ga, to save the user ID. It generally serves the purpose of differentiating between website visitors.

**Expiration date:** After 2 years

**Name:** \_gid

**Value:**2.1687193234.152121993250-1

**Purpose:** This cookie also serves the purpose of differentiating between website users

**Expiration date:** After 24 hours

**Name:** \_gat\_gtag\_UA\_<property-id>

**Value:** 1

**Verwendungszweck:** It is used for decreasing the demand rate. If Google Analytics is provided via Google Tag Manager, this cookie gets the name \_dc\_gtm\_ <property-id>.

**Expiration date:** After 1 minute

**Name:** AMP\_TOKEN

**Value:** No information

**Purpose:** This cookie has a token which is used to retrieve the user ID by the AMP Client ID Service. Other possible values suggest a logoff, a request or an error.

**Expiration date:** After 30 seconds up to one year

**Name:** \_\_utma

**Value:**1564498958.1564498958.1564498958.1

**Purpose:** With this cookie your behaviour on the website can be tracked and the site performance can be measured. The cookie is updated every time the information is sent to Google Analytics.

**Expiration date:** After 2 years

**Name:** \_\_utmt

**Value:** 1

**Purpose:** Just like `_gat_gtag_UA_<property-id>` this cookie is used for keeping the requirement rate in check.

**Expiration date:** After 10 minutes

**Name:** `__utmb`

**Value:** 3.10.1564498958

**Purpose:** This cookie is used to determine new sessions. It is updated every time new data or information gets sent to Google Analytics.

**Expiration date:** After 30 minutes

**Name:** `__utmc`

**Value:** 167421564

**Purpose:** This cookie is used to determine new sessions for recurring visitors. It is therefore a session cookie, and only stays stored until you close the browser again.

**Expiration date:** After closing the browser

**Name:** `__utmz`

**Value:** `m|utmccn=(referral)|utmcmd=referral|utmcct=`

**Purpose:** This cookie is used to identify the source of the number of visitors to our website. This means, that the cookie stored information on where you came to our website from. This could be another site or an advertisement.

**Expiration date:** After 6 months

**Name:** `__utmv`

**Value:** No information

**Purpose:** The cookie is used to store custom user data. It gets updated whenever information is sent to Google Analytics.

**Expiration date:** After 2 years

**Note:** This list is by no means exhaustive, since Google are repeatedly changing the use of their cookies.

Below we will give you an overview of the most important data that can be evaluated by Google Analytics:

**Heatmaps:** Google creates so-called Heatmaps. These Heatmaps make it possible to see the exact areas you click on, so we can get information on what routes you make on our website.

**Session duration:** Google calls the time you spend on our website without leaving it session duration. Whenever you are inactive for 20 minutes, the session ends automatically.

**Bounce rate** If you only look at one page of our website and then leave our website again, it is called a bounce.

**Account creation:** If you create an account or make an order on our website, Google Analytics collects this data.

**IP-Address:** The IP address is only shown in a shortened form, to make it impossible to clearly allocate it.

**Location:** Your approximate location and the country you are in can be defined by the IP address. This process is called IP location determination.

**Technical information:** Information about your browser type, your internet provider and your screen resolution are called technical information.

**Source:** Both, Google Analytics as well as ourselves, are interested what website or what advertisement led you to our site.

Further possibly stored data include contact data, potential reviews, playing media (e.g. when you play a video on our site), sharing of contents via social media or adding our site to your favourites. This list is not exhaustive and only serves as general guidance on Google Analytics' data retention.

## **How long and where is the data stored?**

Google has servers across the globe. Most of them are in America and therefore your data is mainly saved on American servers. Here you can read detailed information on where Google's data centres are located: <https://www.google.com/about/datacenters/inside/locations/?hl=en>

Your data is allocated to various physical data mediums. This has the advantage of allowing to retrieve the data faster, and of protecting it better from manipulation. Every Google data centre has respective emergency programs for your data. Hence, in case of a hardware failure at Google or a server error due to natural disasters, the risk for a service interruption stays relatively low.

The data retention period depends on the properties used. When using the newer Google Analytics 4-properties, the retention period of your user data is set to 14 months. For so-called event data, we have the option of choosing a retention period of either 2 months or 14 months.

Google Analytics has a 26 months standardised period of retaining your user data. After this time, your user data is deleted. However, we have the possibility to choose the retention period of user data ourselves. There are the following five options:

- Deletion after 14 months
- Deletion after 26 months
- Deletion after 38 months
- Deletion after 50 months
- No automatical deletion

Additionally, there is the option for data to be deleted only if you no longer visit our website within a period determined by us. In this case, the retention period will be reset every time you revisit our website within the specified period.

As soon as the chosen period is expired, the data is deleted once a month. This retention period applies to any of your data which is linked to cookies, user identification and advertisement IDs (e.g. cookies of the DoubleClick domain). Any report results are based on aggregated information and

are stored independently of any user data. Aggregated information is a merge of individual data into a single and bigger unit.

## How can I delete my data or prevent data retention?

Under the provisions of the European Union's data protection law, you have the right to obtain information on your data and to update, delete or restrict it. With the help of a browser add on that can deactivate Google Analytics' JavaScript (ga.js, analytics.js, dc.js), you can prevent Google Analytics from using your data. You can download this add on at <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. Please consider that this add on can only deactivate any data collection by Google Analytics.

If you generally want to deactivate, delete or manage all cookies (independently of Google Analytics), you can use one of the guides that are available for any browser:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

## Legal basis

The use of Google Analytics requires your consent, which we obtained via our cookie popup. According to **Art. 6 para. 1 lit. a of the GDPR (consent)**, this is the legal basis for the processing of personal data when collected via web analytics tools.

In addition to consent, we have legitimate interest in analysing the behaviour of website visitors, in order to technically and economically improve our offer. With Google Analytics, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f of the GDPR (legitimate interests)**. Nevertheless, we only use Google Analytics if you have given your consent.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Google to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847)

We hope we could provide you with the most important information about data processing by Google Analytics. If you want to find out more on the tracking service, we recommend these two links: <https://marketingplatform.google.com/about/analytics/terms/gb/> and <https://support.google.com/analytics/answer/6004245?hl=en>.






## Google Analytics IP Anonymisation

We implemented Google Analytics' IP address anonymisation to this website. Google developed this function, so this website can comply with the applicable privacy laws and the local data protection authorities' recommendations, should they prohibit the retention of any full IP addresses. The anonymisation or masking of IP addresses takes place, as soon as they reach Google Analytics' data collection network, but before the data would be saved or processed.

You can find more information on IP anonymisation at <https://support.google.com/analytics/answer/2763052?hl=en>.

## Social Media

### Social Media Privacy Policy Overview

-  Affected parties: website visitors
-  Purpose: Service presentation and optimisation, staying in contact with visitors, interested parties, etc. as well as advertising
-  Processed data: data such as telephone numbers, email addresses, contact data, data on user behaviour, information about your device and your IP address.  
You can find more details on this directly at the respective social media tool used.
-  Storage period: depending on the social media platforms used
-  Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Social Media?

In addition to our website, we are also active on various social media platforms. For us to be able to target interested users via social networks, user data may be processed. Additionally, elements of social media platforms may be embedded directly in our website. This is e.g. the case if you click a so-called social button on our website and are forwarded directly to our social media presence. So-called social media are websites and apps on which registered members can produce and exchange content with other members, be it openly or in certain groups and networks.

## Why do we use Social Media?

For years, social media platforms have been the place where people communicate and get into contact online. With our social media presence, we can familiarise interested people better with our products and services. The social media elements integrated on our website help you switch to our social media content quickly and hassle free.

The data that is retained and processed when you use a social media channel is primarily used to conduct web analyses. The aim of these analyses is to be able to develop more precise and personal marketing and advertising strategies. The evaluated data on your behaviour on any social media platform can help to draw appropriate conclusions about your interests. Moreover, so-called user profiles can be created. Thus, the platforms may also present you with customised advertisements. For this, cookies are usually placed in your browser, which store data on your user behaviour.

We generally assume that we will continue to be responsible under Data Protection Law, even when using the services of a social media platform. However, the European Court of Justice has ruled that, within the meaning of Art. 26 GDPR, in certain cases the operator of the social media platform can be jointly responsible with us. Should this be the case, we will point it out separately and work on the basis of a related agreement. You will then find the essence of the agreement for the concerned platform below.

Please note that when you use social media platforms or our built-in elements, your data may also be processed outside the European Union, as many social media channels, such as Facebook or Twitter, are American companies. As a result, you may no longer be able to easily claim or enforce your rights regarding your personal data.

## **Which data are processed?**

Exactly which data are stored and processed depends on the respective provider of the social media platform. But usually it is data such as telephone numbers, email addresses, data you enter in contact forms, user data such as which buttons you click, what you like or who you follow, when you visited which pages, as well as information about your device and IP address. Most of this data is stored in cookies. Should you have a profile on the social media channel you are visiting and are logged in, data may be linked to your profile.

All data that are collected via social media platforms are also stored on the providers' servers. This means that only the providers have access to the data and can provide you with appropriate information or make changes for you.

If you want to know exactly which data is stored and processed by social media providers and how you can object to the data processing, we recommend you to carefully read the privacy policy of the respective company. We also recommend you to contact the provider directly if you have any questions about data storage and data processing or if you want to assert any corresponding rights.

## **Duration of data processing**

Provided we have any further information on this, we will inform you about the duration of the data processing below. The social media platform Facebook example stores data until they are no longer needed for the company's own purposes. However, customer data that is synchronised with your own user data is erased within two days. Generally, we only process personal data for as long as is absolutely necessary for the provision of our services and products. This storage period can also be exceeded however, if it is required by law, such as e.g. in the case of accounting.

## Right to object

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers such as embedded social media elements at any time. This can be done either via our cookie management tool or via other opt-out functions. You can e.g. also prevent data collection via cookies by managing, deactivating or erasing cookies in your browser.

Since cookies may be used with social media tools, we also recommend you to read our privacy policy on cookies. If you want to find out which of your data is stored and processed, we advise you to read the privacy policies of the respective tools.


## Legal basis


If you have consented to the processing and storage of your data by integrated social media elements, this consent serves as the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, provided you have given your consent, your data will also be stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) in maintaining fast and good communication with you and other customers and business partners. Nevertheless, we only use the tools if you have consented. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy on cookies carefully and to take a look at the privacy policy or cookie policy of the respective service provider.


in the following section you can find information on special social media platforms – provided this information is available.

## Instagram Privacy Policy


### Instagram Privacy Policy Overview


 Affected parties: website visitors

 Purpose: optimising our service

 Processed data: includes data on user behaviour, information about your device and IP address.

More details can be found in the privacy policy below.

 Storage period: until Instagram no longer needs the data for its purposes

 Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is Instagram?

We have integrated functions of Instagram to our website. Instagram is a social media platform of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA. Since 2012, Instagram is a subsidiary company of Facebook Inc. and is a part of Facebook's products. The inclusion of Instagram's contents on our website is called embedding. With this, we can show you Instagram contents such as buttons, photos or videos directly on our website. If you open websites of our online presence, that have an integrated Instagram function, data gets transmitted to, as well as stored and processed by Instagram. Instagram uses the same systems and technologies as Facebook. Therefore, your data will be processed across all Facebook firms.



In the following, we want to give you a more detailed insight on why Instagram collects data, what data these are and how you can control data processing. As Instagram belongs to Facebook Inc., we have, on the one hand received this information from the Instagram guidelines, and on the other hand from Facebook's Data Policy.

Instagram is one of the most famous social media networks worldwide. Instagram combines the benefits of a blog with the benefits of audio-visual platforms such as YouTube or Vimeo. To "Insta" (how the platform is casually called by many users) you can upload photos and short videos, edit them with different filters and also share them to other social networks. Also, if you do not want to be active on Instagram yourself, you can just follow other interesting users.

## **Why do we use Instagram on our website?**

Instagram is a social media platform whose success has skyrocketed within recent years. Naturally, we have also reacted to this boom. We want you to feel as comfortable as possible on our website. Therefore, we attach great importance to diversified contents. With the embedded Instagram features we can enrich our content with helpful, funny or exciting Instagram contents. Since Instagram is a subsidiary company of Facebook, the collected data can also serve us for customised advertising on Facebook. Hence, only persons who are genuinely interested in our products or services can see our ads.

Instagram also uses the collected data for tracking and analysis purposes. We receive summarised statistics and therefore more insight to your wishes and interests. It is important to mention that these reports do not identify you personally.

## **What data is stored by Instagram?**

Whenever you land on one of our sites, which have Instagram functions (i.e. Instagram photos or plugins) integrated to them, your browser automatically connects with Instagram's servers. Thereby, data is sent to, as well as saved and processed by Instagram. This always happens, whether you have an Instagram account or not. Moreover, it includes information on our website, your computer, your purchases, the advertisements you see and on how you use our offer. The date and time of your interaction is also stored. If you have an Instagram account or are logged in, Instagram saves significantly more data on you.

Facebook distinguishes between customer data and event data. We assume this is also the case for Instagram. Customer data are for example names, addresses, phone numbers and IP addresses. These data are only transmitted to Instagram, if they have been "hashed" first. Thereby, a set of data is transformed into a string of characters, which encrypts any contact data. Moreover, the aforementioned "event data" (data on your user behaviour) is transmitted as well. It is also possible, that contact data may get combined with event data. The collected data data is matched with any data Instagram already has on you.

Furthermore, the gathered data are transferred to Facebook via little text files (cookies) which usually get set in your browser. Depending on the Instagram function used, and whether you have an Instagram account yourself, the amount of data that gets stored varies.

We assume data processing on Instagram works the same way as on Facebook. Therefore, if you have an account on Instagram or have visited [www.instagram.com](http://www.instagram.com), Instagram has set at least one cookie. If this is the case, your browser uses the cookie to send information to Instagram, as soon as you come across an Instagram function. No later than 90 days (after matching) the data is deleted or anonymised. Even though we have studied Instagram's data processing in-depth, we cannot tell for sure what exact data Instagram collects and retains.

In the following we will show you a list of the least cookies placed in your browser when click on an Instagram function (e.g. button or an Insta picture). In our test we assume you do not have an Instagram account, since if you would be logged in to your Instagram account, your browser would place significantly more cookies.

The following cookies were used in our test:

**Name:** csrftoken

**Value:** ""

**Purpose:** This cookie is most likely set for security reasons to prevent falsifications of requests. We could not find out more information on it.

**Expiry date:** after one year

**Name:** mid

**Value:** ""

**Purpose:** Instagram places this cookie to optimise its own offers and services in- and outside of Instagram. The cookie allocates a unique user ID.

**Expiry date:** after end of session

**Name:** fbsr\_121993250124024

**Value:** no information

**Purpose:** This cookie stores the login request of Instagram app users.

**Expiry date:** after end of session

**Name:** rur

**Value:** ATN

**Purpose:** This is an Instagram cookie which guarantees functionality on Instagram.

**Expiry date:** after end of session

**Name:** urlgen

**Value:** "{ \"194.96.75.33\": 1901 }; 1iEtYv:Y833k2\_UjKvXgYe121993250"

**Purpose:** This cookie serves Instagram's marketing purposes.

**Expiry date:** after end of session

**Note:** We do not claim this list to be exhaustive. The cookies that are placed in each individual case, depend on the functions embedded as well as on your use of Instagram.

## How long and where are these data stored?

Instagram shares the information obtained within the Facebook businesses with external partners and persons you are globally connected with. Data processing is done according to Facebook's internal data policy. Your data is distributed to Facebook's servers across the world, partially for security reasons. Most of these servers are in the USA.

## How can I erase my data or prevent data retention?

Thanks to the General Data Protection Regulation (GDPR), you have the right of information, rectification, transfer and deletion of your data. Furthermore, you can manage your data in Instagram's settings. If you want to delete your data on Instagram completely, you will have to delete your Instagram account permanently.

And this is how an Instagram account can be deleted:

First, open the Instagram app. Then, navigate to your profile page, select the three bars in the top right, choose "Settings" and then click "Help". Now, you will be redirected to the company's website, where you must click on "Managing Your Account" and then "Delete Your Account".

When you delete your account completely, Instagram deletes posts such as your photos and status updates. Any information other people shared about you are not a part of your account and do therefore not get deleted.

As mentioned before, Instagram primarily stores your data via cookies. You can manage, deactivate or delete these cookies in your browser. Depending on your browser, managing them varies a bit. We will show you the instructions of the most relevant browsers here.

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

Generally, you can set your browser to notify you whenever a cookie is about to be set. Then you can individually decide upon the permission of every cookie.

## Legal basis

If you have consented to the processing and storage of your data by integrated social media elements, this consent is the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, your data is also stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) to maintain fast and good communication with you or other customers and business partners. We only use the integrated social media elements if you have given your consent. Most

social media platforms also place cookies in your browser to store data. We therefore recommend you to read our privacy policy about cookies carefully and to take a look at the privacy policy or the cookie policy of the respective service provider.

Instagram and Facebook also process data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. This can be associated with various risks to the legality and security of data processing.


As a basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfers there, Facebook uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:


[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847)


We have tried to give you the most important information about data processing by Instagram. On <https://help.instagram.com/519522125107875> you can take a closer look at Instagram's data guidelines.

## Miscellaneous Overview


### Miscellaneous Privacy Policy Overview

 Affected parties: website visitors

 Purpose: Improvement of user experience

 Processed data: The processed data depends heavily on the services used. Usually, it is an IP address and/or technical data. You can find more details on this in the sections of the respective tools.

 Storage duration: depends on the tools used

 Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

## What is included in "Miscellaneous"?

The "Miscellaneous" category includes any services that do not fit into any of the above categories. Usually, they are various plugins and integrated elements that are meant to improve our website. Generally, these functions are obtained from third parties and integrated into our website. They may e.g. be web search services such as Algolia Place, Giphy, Programmable Search Engine or online services for weather data such as OpenWeather.

## Why do we use these third parties?

With our website, we want to provide you with the best web offer in our industry. Websites have long been so much more than just a business card for companies. Instead, they are a place designed to help you find what you're looking for. And in order to make our website even more

interesting and helpful for you, we use various third-party services.

## Which data is processed?

Whenever elements are integrated into our website, your IP address will be transmitted to the respective provider, where it will be stored and processed. This is necessary to send the content to your browser which will then display it for you. Moreover, service providers may also use pixel tags or web beacons. These are small graphics on websites that can record a log file and create analyses of it. Providers can improve their own marketing measures with the information they receive this way. In addition to pixel tags, this information (e.g. which button you click or when you access which page) can also be stored in cookies. In addition to data analyses on your web behaviour, technical information such as your browser type or operating system may also be stored there. Some providers can also link the data they obtain to other internal services or to third-party providers. Each provider handles your data differently. Therefore, we recommend you carefully read the privacy policies of the respective services. We make every effort to only use services that operate very carefully in regards to data protection and privacy.

## Duration of data processing

Below we will inform you about the duration of data processing, provided we have further information on this. In general, we only process personal data for as long as is absolutely necessary for the provision of our services and products.


## Legal Basis

If we ask for your consent and you agree to us using a service, this consent serves as the legal basis for the processing of your data (Article 6 (1) (a) GDPR). In addition to your consent, we have a legitimate interest in analysing the behaviour of our website visitors and thus technically and economically improving our offer. The legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use any tools if you have given your consent.

Information on the special tools – if available – can be found in the following sections.

## Google Fonts Privacy Policy


### Google Fonts Privacy Policy Overview


 Affected parties: website visitors

 Purpose: service optimisation

 Processed data: data such as IP address, CSS and font requests

You can find more details on this in the Privacy Policy below.

 Storage period: Google stores font files for one year

 Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What are Google Fonts?

On our website we use Google Fonts, by the company Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA).

To use Google Fonts, you must log in and set up a password. Furthermore, no cookies will be saved in your browser. The data (CSS, Fonts) will be requested via the Google domains [fonts.googleapis.com](https://fonts.googleapis.com) and [fonts.gstatic.com](https://fonts.gstatic.com). According to Google, all requests for CSS and fonts are fully separated from any other Google services. If you have a Google account, you do not need to worry that your Google account details are transmitted to Google while you use Google Fonts. Google records the use of CSS (Cascading Style Sheets) as well as the utilised fonts and stores these data securely. We will have a detailed look at how exactly the data storage works.

Google Fonts (previously Google Web Fonts) is a directory with over 800 fonts that [Google](https://www.google.com/fonts) provides its users free of charge.

Many of these fonts have been published under the SIL Open Font License license, while others have been published under the Apache license. Both are free software licenses.

## Why do we use Google Fonts on our website?

With Google Fonts we can use different fonts on our website and do not have to upload them to our own server. Google Fonts is an important element which helps to keep the quality of our website high. All Google fonts are automatically optimised for the web, which saves data volume and is an advantage especially for the use of mobile terminal devices. When you use our website, the low data size provides fast loading times. Moreover, Google Fonts are secure Web Fonts. Various image synthesis systems (rendering) can lead to errors in different browsers, operating systems and mobile terminal devices. These errors could optically distort parts of texts or entire websites. Due to the fast Content Delivery Network (CDN) there are no cross-platform issues with Google Fonts. All common browsers (Google Chrome, Mozilla Firefox, Apple Safari, Opera) are supported by Google Fonts, and it reliably operates on most modern mobile operating systems, including Android 2.2+ and iOS 4.2+ (iPhone, iPad, iPod). We also use Google Fonts for presenting our entire online service as pleasantly and as uniformly as possible.

## Which data is stored by Google?

Whenever you visit our website, the fonts are reloaded by a Google server. Through this external cue, data gets transferred to Google's servers. Therefore, this makes Google recognise that you (or your IP-address) is visiting our website. The Google Fonts API was developed to reduce the usage, storage and gathering of end user data to the minimum needed for the proper depiction of fonts. What is more, API stands for „Application Programming Interface“ and works as a software data intermediary.

Google Fonts stores CSS and font requests safely with Google, and therefore it is protected. Using its collected usage figures, Google can determine how popular the individual fonts are. Google publishes the results on internal analysis pages, such as Google Analytics. Moreover, Google also utilises data of its own web crawler, in order to determine which websites are using Google fonts.

This data is published in Google Fonts' BigQuery database. Entrepreneurs and developers use Google's webservice BigQuery to be able to inspect and move big volumes of data.

One more thing that should be considered, is that every request for Google Fonts automatically transmits information such as language preferences, IP address, browser version, as well as the browser's screen resolution and name to Google's servers. It cannot be clearly identified if this data is saved, as Google has not directly declared it.

## How long and where is the data stored?

Google saves requests for CSS assets for one day in a tag on their servers, which are primarily located outside of the EU. This makes it possible for us to use the fonts by means of a Google stylesheet. With the help of a stylesheet, e.g. designs or fonts of a website can get changed swiftly and easily.

Any font related data is stored with Google for one year. This is because Google's aim is to fundamentally boost websites' loading times. With millions of websites referring to the same fonts, they are buffered after the first visit and instantly reappear on any other websites that are visited thereafter. Sometimes Google updates font files to either reduce the data sizes, increase the language coverage or to improve the design.

## How can I erase my data or prevent it being stored?

The data Google stores for either a day or a year cannot be deleted easily. Upon opening the page this data is automatically transmitted to Google. In order to clear the data ahead of time, you have to contact Google's support at <https://support.google.com/?hl=en-GB&tid=121993250>. The only way for you to prevent the retention of your data is by not visiting our website.

Unlike other web fonts, Google offers us unrestricted access to all its fonts. Thus, we have a vast sea of font types at our disposal, which helps us to get the most out of our website. You can find out more answers and information on Google Fonts at <https://developers.google.com/fonts/faq?tid=121993250>. While Google does address relevant elements on data protection at this link, it does not contain any detailed information on data retention.

It proves rather difficult to receive any precise information on stored data by Google.

## Legal basis

If you have consented to the use of Google Fonts, your consent is the legal basis for the corresponding data processing. According to **Art. 6 Paragraph 1 lit. a GDPR (Consent)** your consent is the legal basis for the processing of personal data, as can occur when it is processed by Google Fonts.

We also have a legitimate interest in using Google Font to optimise our online service. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use Google Font if you have given your consent to it.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.


Google uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Google to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:


[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847)


You can find more information on which data is generally retained by Google and what this data is used at <https://policies.google.com/privacy?hl=en-GB>.

## Google reCAPTCHA Privacy Policy


### Google reCAPTCHA Privacy Policy Overview


 Affected parties: website visitors

 Purpose: Service optimisation and protection against cyber attacks

 Processed data: data such as IP address, browser information, operating system, limited location and usage data

You can find more details on this in the Privacy Policy below.

 Storage duration: depending on the retained data

 Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is reCAPTCHA?

Our primary goal is to provide you an experience on our website that is as secure and protected as possible. To do this, we use Google reCAPTCHA from Google Inc. (1600 Amphitheater Parkway Mountain View, CA 94043, USA). With reCAPTCHA we can determine whether you are a real person from flesh and bones, and not a robot or a spam software. By spam we mean any electronically undesirable information we receive involuntarily. Classic CAPTCHAS usually needed you to solve text or picture puzzles to check. But thanks to Google's reCAPTCHA you usually do have to do such puzzles. Most of the times it is enough to simply tick a box and confirm you are not a bot. With the new Invisible reCAPTCHA version you don't even have to tick a box. In this privacy policy you will find out how exactly this works, and what data is used for it.

reCAPTCHA is a free captcha service from Google that protects websites from spam software and misuse by non-human visitors. This service is used the most when you fill out forms on the Internet. A captcha service is a type of automatic Turing-test that is designed to ensure specific actions on the Internet are done by human beings and not bots. During the classic Turing-test (named after computer scientist Alan Turing), a person differentiates between bot and human. With Captchas, a computer or software program does the same. Classic captchas function with small



tasks that are easy to solve for humans but provide considerable difficulties to machines. With reCAPTCHA, you no longer must actively solve puzzles. The tool uses modern risk techniques to distinguish people from bots. The only thing you must do there, is to tick the text field "I am not a robot". However, with Invisible reCAPTCHA even that is no longer necessary. reCAPTCHA, integrates a JavaScript element into the source text, after which the tool then runs in the background and analyses your user behaviour. The software calculates a so-called captcha score from your user actions. Google uses this score to calculate the likelihood of you being a human, before entering the captcha. reCAPTCHA and Captchas in general are used every time bots could manipulate or misuse certain actions (such as registrations, surveys, etc.).

## **Why do we use reCAPTCHA on our website?**

We only want to welcome people from flesh and bones on our side and want bots or spam software of all kinds to stay away. Therefore, we are doing everything we can to stay protected and to offer you the highest possible user friendliness. For this reason, we use Google reCAPTCHA from Google. Thus, we can be pretty sure that we will remain a "bot-free" website. Using reCAPTCHA, data is transmitted to Google to determine whether you genuinely are human. reCAPTCHA thus ensures our website's and subsequently your security. Without reCAPTCHA it could e.g. happen that a bot would register as many email addresses as possible when registering, in order to subsequently "spam" forums or blogs with unwanted advertising content. With reCAPTCHA we can avoid such bot attacks.

## **What data is stored by reCAPTCHA?**

reCAPTCHA collects personal user data to determine whether the actions on our website are made by people. Thus, IP addresses and other data Google needs for its reCAPTCHA service, may be sent to Google. Within member states of the European Economic Area, IP addresses are almost always compressed before the data makes its way to a server in the USA. Moreover, your IP address will not be combined with any other of Google's data, unless you are logged into your Google account while using reCAPTCHA. Firstly, the reCAPTCHA algorithm checks whether Google cookies from other Google services (YouTube, Gmail, etc.) have already been placed in your browser. Then reCAPTCHA sets an additional cookie in your browser and takes a snapshot of your browser window.

The following list of collected browser and user data is not exhaustive. Rather, it provides examples of data, which to our knowledge, is processed by Google.

- Referrer URL (the address of the page the visitor has come from)
- IP-address (z.B. 256.123.123.1)
- Information on the operating system (the software that enables the operation of your computers. Popular operating systems are Windows, Mac OS X or Linux)
- Cookies (small text files that save data in your browser)
- Mouse and keyboard behaviour (every action you take with your mouse or keyboard is stored)
- Date and language settings (the language and date you have set on your PC is saved)
- All Javascript objects (JavaScript is a programming language that allows websites to adapt to

the user. JavaScript objects can collect all kinds of data under one name)

- Screen resolution (shows how many pixels the image display consists of)

Google may use and analyse this data even before you click on the “I am not a robot” checkmark. In the Invisible reCAPTCHA version, there is no need to even tick at all, as the entire recognition process runs in the background. Moreover, Google have not given details on what information and how much data they retain.

The following cookies are used by reCAPTCHA: With the following list we are referring to Google’s reCAPTCHA demo version at <https://www.google.com/recaptcha/api2/demo>.

For tracking purposes, all these cookies require a unique identifier. Here is a list of cookies that Google reCAPTCHA has set in the demo version:

**Name:** IDE

**Value:** WqTUmlnmv\_qXyi\_DGNPLESKnRNrpgXoy1K-pAZtAkMbHI-121993250-8

**Purpose:** This cookie is set by DoubleClick (which is owned by Google) to register and report a user’s interactions with advertisements. With it, ad effectiveness can be measured, and appropriate optimisation measures can be taken. IDE is stored in browsers under the domain doubleclick.net.

**Expiry date:** after one year

**Name:** 1P\_JAR

**Value:** 2019-5-14-12

**Purpose:** This cookie collects website usage statistics and measures conversions. A conversion e.g. takes place, when a user becomes a buyer. The cookie is also used to display relevant adverts to users. Furthermore, the cookie can prevent a user from seeing the same ad more than once.

**Expiry date:** after one month

**Name:** ANID

**Value:** U7j1v3dZa1219932500xgZFmiqWppRWKOr

**Purpose:** We could not find out much about this cookie. In Google’s privacy statement, the cookie is mentioned in connection with “advertising cookies” such as “DSID”, “FLC”, “AID” and “TAID”. ANID is stored under the domain google.com.

**Expiry date:** after 9 months

**Name:** CONSENT

**Value:** YES+AT.de+20150628-20-0

**Purpose:** This cookie stores the status of a user’s consent to the use of various Google services. CONSENT also serves to prevent fraudulent logins and to protect user data from unauthorised attacks.

**Expiry date:** after 19 years

**Name:** NID

**Value:** 0WmuWqy121993250zILzqV\_nmt3sDXwPeM5Q

**Purpose:** Google uses NID to customise advertisements to your Google searches. With the help of cookies, Google “remembers” your most frequently entered search queries or your previous ad interactions. Thus, you always receive advertisements tailored to you. The cookie contains a unique

ID to collect users' personal settings for advertising purposes.

**Expiry date:** after 6 months

**Name:** DV

**Value:** gEAABBCjJMXcl0dSAAAANbqc121993250-4

**Purpose:** This cookie is set when you tick the "I am not a robot" checkmark. Google Analytics uses the cookie personalised advertising. DV collects anonymous information and is also used to distinct between users.

**Expiry date:** after 10 minutes

**Note:** We do not claim for this list to be extensive, as Google often change the choice of their cookies.

## **How long and where are the data stored?**

Due to the integration of reCAPTCHA, your data will be transferred to the Google server. Google have not disclosed where exactly this data is stored, despite repeated inquiries. But even without confirmation from Google, it can be assumed that data such as mouse interaction, length of stay on a website or language settings are stored on the European or American Google servers. The IP address that your browser transmits to Google does generally not get merged with other Google data from the company's other services.

However, the data will be merged if you are logged in to your Google account while using the reCAPTCHA plug-in. Google's diverging privacy policy applies for this.

## **How can I erase my data or prevent data retention?**

If you want to prevent any data about you and your behaviour to be transmitted to Google, you must fully log out of Google and delete all Google cookies before visiting our website or use the reCAPTCHA software. Generally, the data is automatically sent to Google as soon as you visit our website. To delete this data, you must contact Google Support at <https://support.google.com/?hl=en-GB&tid=121993250>.

If you use our website, you agree that Google LLC and its representatives automatically collect, edit and use data.

Please note that when using this tool, your data can also be stored and processed outside the EU. Most third countries (including the USA) are not considered secure under current European data protection law. Data to insecure third countries must not simply be transferred to, stored and processed there unless there are suitable guarantees (such as EU's Standard Contractual Clauses) between us and the non-European service provider.

## **Legal basis**

If you have consented to the use of Google reCAPTCHA, your consent is the legal basis for the corresponding data processing. According to **Art. 6 Paragraph 1 lit. a GDPR (consent)** your consent is the legal basis for the processing of personal data, as can occur when processed by Google reCAPTCHA.

We also have a legitimate interest in using Google reCAPTCHA to optimise our online service and make it more secure. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use Google reCAPTCHA if you have given your consent to it.

Google also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Google uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Google to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

You can find out a little more about reCAPTCHA on Google's web developer page at <https://developers.google.com/recaptcha/>. Google goes into the technical development of the reCAPTCHA in more detail here, but you will look in vain for detailed information about data storage and data protection issues. A good overview of the basic use of data by Google can be found in the in-house data protection declaration at <https://policies.google.com/privacy?hl=en-GB>.

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