

Privacy policy

Introductory remarks

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also referred to as "data") we process for which purposes and to what extent. The data protection declaration applies to all processing of personal data carried out by us, both within the scope 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 offer").

Last updated: May 31, 2020

Table of contents

- Introductory remarks
- Person in charge
- Overview of processing operations
- Applicable legal bases
- Safety precautions
- Transmission and disclosure of personal data
- Data processing in third countries
- Use of cookies
- Commercial and business services
- Blogs and publication media
- Contact us
- Surveys and surveys
- Provision of online services and web hosting
- Newsletter and broad communication
- Online marketing
- Presence in social networks
- Plugins and embedded functions and content
- Deletion of data
- Modification and updating of the data protection declaration
- Rights of data subjects

- Definitions of terms

Entity in charge

Hübner Management GmbH

Birkenweg 6

LI-9490 Vaduz

Authorised representatives: Dr. Hartmut Hübner

E-mail address: info@hartmuthuebner.com

Overview of processing operations

The following table summarises the types of data processed and the purposes of their processing and refers to the data subjects.

Types of data processed

- Inventory data (for example, names, addresses).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Contract data (for example, contract object, validity period, customer category).
- Payment data (for example, bank details, invoices, payment history).

Special categories of data

- Health data (Art. 9 para. 1 DGSVO).

Categories of data subjects

- Business partners and contractual partners.
- Interested parties.
- Communication partner.
- Customers.
- Users (e.g. website visitors, users of online services).

Purposes of processing

- Provision of our online services and user friendliness.
- Visit action evaluation.
- Office and organisational procedures.
- Direct marketing (e.g. by e-mail or post).
- Feedback (e.g. collecting feedback via an online form).
- Interest-based and behavioral marketing.
- Contact requests and communication.
- Conversion measurement (measurement of the effectiveness of marketing measures).
- Profiling (creation of user profiles).
- Remarketing.
- Range measurement (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Tracking (e.g. interest/behavioural profiling, use of cookies).
- Contractual services and service.
- Management and answering of inquiries.

Applicable legal bases

In the following we inform you about the legal basis of the Data Protection Ordinance (DSGVO), on the basis of which we process personal data. Please note that in addition to the provisions of the DSGVO, the national data protection regulations in your or our country of residence and domicile may apply.

- Consent (Art. 6 para. 1 sentence 1 lit. a DSGVO) - The data subject has given his/her consent to the processing of his/her personal data for one or more specific purposes.
- Contract performance and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO) - Processing is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures at the request of the data subject.
- Legal obligation (Art. 6 para. 1 sentence 1 lit. c. DSGVO) - The processing is necessary to fulfil a legal obligation to which the controller is subject.
- Protection of vital interests (Art. 6 para. 1 sentence 1 lit. d. DSGVO) - Processing is necessary in order to protect the vital interests of the data subject or another natural person.
- Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO) - Processing is necessary to safeguard the legitimate interests of the data controller or of a third party, unless the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, prevail.

National data protection regulations in Germany: In addition to the data protection regulations of the Basic Data Protection Regulation, national regulations apply to data protection in Germany. In particular, this includes the Act on Protection against Misuse of Personal Data in Data Processing (Bundesdatenschutzgesetz - BDSG). In particular, the BDSG contains special provisions on the right of information, the right of deletion, the right of objection, the processing of special categories of personal data, processing for other purposes and transmission as well as automated decision-making in individual cases, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may be applied.

Safety precautions

We shall take appropriate technical and organisational measures in accordance with the statutory requirements, taking into account the state of the art, the implementation costs and the nature, extent, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and

freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

Measures shall include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to, and access to, input, disclosure, securing and separation of data. In addition, we have established procedures to ensure the exercise of data subject rights, the deletion of data and responses to data breaches. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and procedures in accordance with the principle of data protection, through technology design and through data protection-friendly default settings.

Shorten the IP address: If it is possible for us or a storage of the IP address is not necessary, we shorten or let shorten your IP address. If the IP address is shortened, also known as "IP masking", the last octet, i.e. the last two numbers of an IP address, is deleted (in this context, the IP address is an identifier individually assigned to an Internet connection by the online access provider). By shortening the IP address, the identification of a person on the basis of their IP address is to be prevented or made considerably more difficult.

SSL encryption (https): To protect your data transmitted via our online service, we use SSL encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

Transmission and disclosure of personal data

As part of our processing of personal data, it may happen that the data is transferred to other offices, companies, legally independent organisational units or persons or that it is disclosed to them. Recipients of this data may include, for example, payment institutions within the framework of payment transactions, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases we observe the legal requirements and in particular conclude corresponding contracts or agreements with the recipients of your data which serve to protect your data.

Data processing in third countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of services of third parties or the disclosure or transfer of data to other persons, bodies or companies, this is only done in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we will only process or have the data processed in third countries with a recognised level of data protection, which includes US processors certified under the "Privacy Shield", or on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission, the existence of certifications or binding internal data protection regulations (Art. 44 to 49 DSGVO, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_de).

Use of cookies

"Cookies" are small files that are stored on the user's devices. Cookies can be used to store different data. The information can include, for example, the language settings on a website, the login status, a shopping cart or the location where a video was viewed.

As a rule, cookies are also used if a user's interests or behaviour (e.g. viewing certain content, use of functions, etc.) are stored on individual web pages in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This procedure is also referred to as "tracking", i.e. tracking the potential interests of users. The term "cookies" also includes other technologies that perform the same functions as cookies (e.g. when user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

If we use cookies or tracking technologies, we will inform you separately in our privacy policy.

Notes on legal bases: The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this is the case and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the aid of cookies will be processed on the basis of our legitimate interests (e.g. in a business operation of our

online service and its improvement) or, if the use of cookies is necessary to fulfill our contractual obligations.

Revocation and objection (opt-out): Irrespective of whether processing is based on consent or legal permission, you have the option at any time to revoke a consent given or to object to the processing of your data using cookie technologies (collectively referred to as "opt-out").

You can initially explain your objection using your browser settings, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online service).

An objection to the use of cookies for online marketing purposes can be raised through a variety of services, in particular in the case of tracking, via the US website <http://www.aboutads.info/choices/> or the EU website <http://www.youronlinechoices.com/> or generally on <http://optout.aboutads.info>

Processing of cookie data on the basis of consent: Before we process or have processed data within the framework of the use of cookies, we ask the user for consent that can be revoked at any time. Before the consent has not been given, we may use cookies that are necessary for the operation of our online offer. Their use is based on our interest and the user's interest in the expected functionality of our online service.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- Affected persons: Users (e.g. website visitors, users of online services).
- Legal basis: consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

Commercial and 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 framework of contractual and comparable legal relationships as well as associated measures and within the framework of communication with the contractual partners (or pre-contractual), e.g. in order to answer inquiries.

We process this data in order to fulfil our contractual obligations, to safeguard our rights and for the purposes of the administrative tasks associated with this data and the entrepreneurial organisation. Within the framework of the applicable law, we only pass on the data of the contractual partners to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or is carried out with the consent of the contractual partners (e.g. to involved telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the framework of this data protection declaration.

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 on-line 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 are stored in a customer account, e.g., as long as they must be kept for legal reasons of archiving (e.g. for tax purposes usually 10 years). Data disclosed to us by the contractual partner within the framework of an order shall be deleted in accordance with the specifications of the order, in principle after the end of the order.

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

Economic analyses and market research: For economic reasons and in order to be able to recognise market trends, wishes of contractual partners and users, we analyse the data available to us on business transactions, contracts, enquiries, etc., whereby contractual partners, interested parties, customers, visitors and users of our online offer may fall into the group of persons concerned.

The analyses are carried out for the purpose of business evaluations, marketing and market research (for example, to determine customer groups with different characteristics). If available, we can take into account the profiles of registered users including their details, e.g. on services used. The analyses serve us alone and are not disclosed externally unless they are anonymous analyses with summarised, i.e. anonymised values. Furthermore, we respect the privacy of the users and process the

data for analysis purposes as pseudonymously as possible and, if feasible, anonymously (e.g. as combined data).

Agency services: We process our customers' data as part of our contractual services, which may include, for example, conceptual and strategic consulting, campaign planning, software and design development / consulting or maintenance, implementation of campaigns and processes, handling, server administration, data analysis / consulting services and training services.

Publishing activities: We process the data of our contact partners, interview partners and other persons who are the subject of our publishing, editorial, journalistic and related activities. In this context, we refer you to the application of protective provisions of freedom of expression and freedom of the press pursuant to Art. 85 DSGVO in conjunction with the respective national laws. The processing serves the fulfilment of our order activities and otherwise takes place in particular on the basis of the general public's interest in information and media offers.

- Processed data types: inventory data (e.g. names, addresses), payment data (e.g. bank details, invoices, payment history), contact data (e.g. e-mail, telephone numbers), contract data (e.g. subject of contract, duration, customer category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- Affected persons: Interested parties, business and contractual partners, customers.
- Purposes of processing: contractual services, contact enquiries and communication, office and organisational procedures, management and response to enquiries, evaluation of visits, marketing based on interests and behaviour, profiling (creation of user profiles).
- Legal basis: Contract performance and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legal obligation (Art. 6 para. 1 sentence 1 lit. c. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

Blogs and publication media

We use blogs or comparable means of online communication and publication (hereinafter "publication medium"). Readers' data will only be processed for the purposes of the publication medium to the extent necessary for its presentation and communication between authors and readers or for security reasons. For the rest, we refer to the information on the processing of visitors to our publication medium in the context of this data protection notice.

Comments and contributions: When users leave comments or other contributions, their IP addresses may be stored based on our legitimate interests. This is done for our safety, if someone leaves illegal contents (insults, forbidden political propaganda etc.) in comments and contributions. In this case, we ourselves can be prosecuted for the comment or contribution and are therefore interested in the author's identity.

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

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

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

- Processed data types: inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- Affected persons: Users (e.g. website visitors, users of online services).
- Purposes of processing: contractual services, feedback (e.g. collection of feedback via online form), security measures, administration and response to inquiries.
- Legal basis: fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO), consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), protection of vital interests (Art. 6 para. 1 sentence 1 lit. d. DSGVO).

Contact us

When contacting us (e.g. via contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested measures.

The response to contact enquiries within the framework of contractual or pre-contractual relationships is made in order to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise on the basis of the legitimate interests in responding to the enquiries.

- Processed data types: inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos).
- Affected persons: Communication partner.
- Purposes of processing: contact requests and communication.
- Legal basis: Contract performance and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

Surveys and surveys

The surveys and surveys we conduct (hereinafter referred to as "surveys") are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical execution of the surveys (e.g. processing the IP address to display the survey in the user's browser or to enable a resumption of the survey with the aid of a temporary cookie (session cookie)) or users have consented.

Information on legal bases: If we ask the participants for their consent to the processing of their data, this is the legal basis for the processing, otherwise the processing of the participants' data takes place on the basis of our legitimate interests in carrying out an objective survey.

- Processed data types: contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).

- Affected persons: Communication partners, users (e.g. website visitors, users of online services).
- Purposes of processing: contact enquiries and communication, direct marketing (e.g. by e-mail or post), tracking (e.g. interest/behavioural profiling, use of cookies), feedback (e.g. collecting feedback via online forms).
- Legal basis: consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

Services and service providers used:

- Google form: Google Cloud Forms; Service Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://firebase.google.com>; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAItatus=Active>; Opt-Out: Opt-Out Plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>; Advertising Display <https://adssettings.google.com/authenticated>.

Provision of online services and web hosting

In order to provide our online services securely and efficiently, we use the services of one or more web hosting providers from whose servers (or servers they manage) the online services can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services, as well as security and technical maintenance services.

The data processed within the framework of the provision of the hosting offer may include all information relating to the users of our online offer that is collected within the scope of use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online offers to browsers, and all entries made within our online offer or from websites.

E-mail dispatch and hosting: The web hosting services we use also include the dispatch, receipt and storage of e-mails. For these purposes, the addresses of the recipients and senders as well as further information regarding 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.

Collection of access data and log files: We ourselves (or our web hosting provider) collect data on each access to the server (so-called server log files). Server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider.

The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the utilization of the servers and their stability.

- Processed data types: Content data (e.g. text input, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- Affected persons: Users (e.g. website visitors, users of online services).
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

Newsletter and broad communication

We send newsletters, e-mails and other electronic notifications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. In addition, our newsletters contain information about our services and us.

To subscribe to our newsletters, it is sufficient to enter your e-mail address. However, we may ask you to provide a name for the purpose of personally contacting us in the newsletter, or other information if this is required for the purposes of the newsletter.

Double opt-in process: The registration to our newsletter takes place in principle in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with foreign e-mail addresses. The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

Deletion and limitation of processing: We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of obligations to permanently observe contradictions, we reserve the right to store the e-mail address solely for this purpose in a blacklist.

The logging of the registration procedure is carried out on the basis of our legitimate interests for the purpose of proving its proper course. If we hire a service provider to send e-mails, we do so on the basis of our legitimate interests in an efficient and secure delivery system.

Notes on legal bases: The newsletter is sent on the basis of the recipient's consent or, if consent is not required, on the basis of our legitimate interests in direct marketing, provided and to the extent that this is permitted by law, e.g. in the case of existing customer advertising. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests. The registration process is recorded on the basis of our legitimate interests to demonstrate that it has been conducted in accordance with the law.

Contents: Information about us, our services, promotions and offers as well as general topics of communication.

Success measurement: The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file, which is retrieved from our server or, if we use a dispatch service provider, from its server when the newsletter is opened. Within the scope of this retrieval, technical information such as information about the browser and your system, as well as your IP address and the time of the retrieval, are first collected.

This information is used for the technical improvement of our newsletter on the basis of technical data or target groups and their reading behaviour on the basis of their retrieval locations (which can be determined with the help of the IP address) or access times. This analysis also includes determining whether newsletters are opened, when they are opened and which links are clicked. For technical reasons, this information can be assigned to the individual newsletter recipients. However, it is neither our aim nor, if used, that of the shipping service provider to monitor individual users. Rather, the evaluations serve us to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The evaluation of the newsletter and the performance measurement are carried out, subject to the express consent of the user, on the basis of our legitimate interests for the purposes of using a user-friendly and secure newsletter system which serves both our business interests and the expectations of the user.

A separate revocation of the performance measurement is unfortunately not possible, in this case the entire newsletter subscription must be cancelled or contradicted.

Prerequisite for the use of free services: Consent to the sending of mailings can be made dependent on the use of free services (e.g. access to certain content or participation in certain campaigns) as a prerequisite. If the users wish to make use of the free service without registering for the newsletter, please contact us.

- Processed data types: inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), meta/communication data (e.g. device information, IP addresses), usage data (e.g. websites visited, interest in content, access times).
- Special categories of data: Health data (Art. 9 para. 1 DGSVO).
- Affected persons: Communication partners, users (e.g. website visitors, users of online services).
- Purposes of processing: direct marketing (e.g. by e-mail or post), contractual services and service.
- Legal basis: consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).
- Opt-out: You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

Services and service providers used:

- Rapidmail: E-mail marketing platform; service provider: rapidmail GmbH, Augustinerplatz 2, 79098 Freiburg i.Br., Germany; website: <https://www.rapidmail.de>; privacy policy: <https://www.rapidmail.de/datenschutzbestimmungen>; opt-out: testi.

Online marketing

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

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

The IP addresses of the users are also stored. However, we use IP masking methods (i.e. pseudonymisation by shortening the IP address) to protect users. In general, within the framework of the online marketing procedure, no plain data of the users (such as e-mail addresses or names) is stored, but pseudonyms. This means that we as well as the providers of online marketing procedures do not know the actual identity of the users, but only the information stored in their profiles.

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

Exceptionally, plain data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing procedures we use

and the network links the profiles of the users in the aforementioned information. We kindly ask you to note that users can make additional agreements with the providers, e.g. by consenting within the scope of registration.

As a matter of principle, we only gain access to summarised information about the success of our advertisements. However, within the framework of so-called conversion measurements, we can check which of our online marketing procedures have led to a so-called conversion, i.e. to the conclusion of a contract with us, for example. The conversion measurement is used alone to analyze the success of our marketing measures.

Information on legal bases: If we ask the users for their consent to the use of third party providers, the legal basis of the processing of data is consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this data protection declaration.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- Affected persons: Users (e.g. website visitors, users of online services), interested parties.
- Purposes of processing: tracking (e.g. interest/behavioural profiling, use of cookies), remarketing, evaluation of visitation campaigns, interest-based and behavioural marketing, profiling (creation of user profiles), conversion measurement (measurement of the effectiveness of marketing measures), measurement of reach (e.g. access statistics, recognition of returning visitors).
- Security measures: IP masking (pseudonymization of the IP address).
- Legal basis: consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).
- Opt-Out: We refer to the data protection information of the respective providers and the possibilities of objection given to the providers (so-called "Opt-Out"). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered in summary for each area: a) Europe: <https://www.youronlinechoices.eu>. b) Canada:

<https://www.youradchoices.ca/choices>. c) USA:
<https://www.aboutads.info/choices>. d) Cross-regional:
<http://optout.aboutads.info>.

Services and service providers used:

- Google Analytics: online marketing and web analytics; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/de/about/analytics/>; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt00000001L5AAItatus=Active>; Opt-Out: Opt-Out-Plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>; Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- LinkedIn: Insights tag / conversion measurement; service provider: LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA; website: <https://www.linkedin.com>; security measures: IP masking (pseudonymisation of the IP address); privacy policy: <https://www.linkedin.com/legal/privacy-policy>, cookie policy: https://www.linkedin.com/legal/cookie_policy; privacy shield (guarantee of data protection level when processing data in the USA): <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0tatus=Active>; opt-out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- Twitter: Twitter marketing and advertising; service providers: Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: <https://twitter.com/de>; Privacy Policy: <https://twitter.com/de/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAOtatus=Active>; Opt-Out: <https://twitter.com/personalization>.

Presence in social networks

We maintain online presences within social networks in order to communicate with the users active there or to offer information about us there.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights. With regard to US providers that are certified under the Privacy Shield or offer comparable guarantees of a secure level of data protection, we would like to point out that by doing so they commit themselves to complying with EU data protection standards.

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

For a detailed description of the respective forms of processing and the possibilities for objection (opt-out), we refer to the data protection declarations and information of the operators of the respective networks.

Also in the case of requests for information and the assertion of rights of data subjects, we point out that these can be asserted most effectively with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

- Processed data types: inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- Affected persons: Users (e.g. website visitors, users of online services).
- Purposes of processing: contact enquiries and communication, tracking (e.g. interest/behavioural profiling, use of cookies), remarketing, range measurement (e.g. access statistics, recognition of returning visitors).
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO).

Services and service providers used:

- Instagram : Social Network; Service Provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; Website: <https://www.instagram.com>; Privacy Policy: <http://instagram.com/about/legal/privacy>.
- Facebook: Social network; service provider: Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Statement: <https://www.facebook.com/about/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>; Opt-Out: Advertisement Settings: <https://www.facebook.com/settings?tab=ads>; Additional Privacy Notice: Agreement on the Shared Processing of Personal Information on Facebook Pages: https://www.facebook.com/legal/terms/page_controller_addendum; [Privacy Notice](https://www.facebook.com/legal/terms/information_about_page_insights_data) for Facebook Pages: https://www.facebook.com/legal/terms/information_about_page_insights_data.
- LinkedIn: Social Network; Service Provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Statement: <https://www.linkedin.com/legal/privacy-policy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZA&status=Active>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- Twitter: social network; service provider: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Statement: <https://twitter.com/de/privacy>, (Settings) <https://twitter.com/personalization>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000TORzAA&status=Active>.
- YouTube: Social network; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AA&status=Active>; Opt-Out: <https://adssettings.google.com/authenticated>.

- Xing: social network; service provider: XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany; Website: <https://www.xing.de>; Privacy Policy: <https://privacy.xing.com/de/datenschutzerklaerung>.

Plugins and embedded functions and content

We include in our online offer functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be graphics, videos or social media buttons as well as contributions (hereinafter uniformly referred to as "Content").

The integration always presupposes that the third party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain technical information about the browser and operating system, websites to be referred to, visiting times and other information about the use of our online services, as well as may be linked to such information from other sources.

Information on legal bases: If we ask the users for their consent to the use of third party providers, the legal basis of the processing of data is consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this data protection declaration.

- Processed data types: Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos), inventory data (e.g. names, addresses).
- Affected persons: Users (e.g. website visitors, users of online services), communication partners.

- Purposes of processing: provision of our online services and user-friendliness, contractual services and support, contact enquiries and communication, direct marketing (e.g. by e-mail or post), tracking (e.g. interest/behavioural profiling, use of cookies), interest-based and behavioural marketing, profiling (creation of user profiles), security measures, administration and response to enquiries.
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. DSGVO), consent (Art. 6 para. 1 sentence 1 lit. a DSGVO), fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. DSGVO).

Services and service providers used:

- Facebook Social Plugins: Facebook Social Plugins - This can include content such as images, videos or text and buttons with which users can share content from this online service within Facebook. The list and appearance of Facebook Social Plugins can be viewed here: <https://developers.facebook.com/docs/plugins/>; Service Providers: <https://www.facebook.com>, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, Parent Company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>; Opt-Out: Settings for Advertisements: <https://www.facebook.com/settings?tab=ads>.
- Google Fonts: We integrate the fonts ("Google Fonts") of the provider Google, whereby the data of the users are used solely for purposes of the representation of the fonts in the browser of the users. The integration takes place on the basis of our legitimate interests in a technically secure, maintenance-free and efficient use of fonts, their uniform presentation and taking into account possible licensing restrictions for their integration. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://fonts.google.com/>; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000TRkEAAW&tatus=Active>.

- Google Maps: We integrate the maps of the service "Google Maps" of the provider Google. The data processed may include, in particular, IP addresses and location data of users, which are not collected without their consent (usually within the framework of the settings of their mobile devices). Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://maps.google.de>; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000TRkEAAWtatus=Active>; Opt-Out: Opt-Out-Plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>; Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- Content of Getty Images: Integration of Getty Images - images; service provider: Getty Images, Inc. 605 5th Avenue South, Suite 400, Seattle, Washington 98104, USA; Website: <https://www.gettyimages.de>; Privacy Statement: <https://www.gettyimages.de/company/privacy-policy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000TNchAAGtatus=Active>.
- LinkedIn plugins and buttons: LinkedIn Plugins and Buttons - This can include content such as images, videos or text and buttons with which users can share content from this online offering within LinkedIn. Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.instagram.com>; Privacy Statement: <https://www.linkedin.com/legal/privacy-policy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0tatus=Active>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- ReCaptcha: We include the function "ReCaptcha" for the recognition of bots, e.g. for entries in online forms. The behaviour data of the users (e.g. mouse movements or queries) are evaluated in order to be able to distinguish people from bots. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://www.google.com/recaptcha/>; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000TRkEAAWtatus=Active>

ive; Opt-Out: Opt-Out Plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>;
Advertising Display <https://adssettings.google.com/authenticated>.

- SlideShare presentations: Integration of SlideShare presentations; service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Statement: <https://www.linkedin.com/legal/privacy-policy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&tatus=Active>.
- Twitter plugins and buttons: Twitter plugins and buttons - This may include content such as images, videos or text and buttons with which users can share content from this online service within Twitter. Service provider: Twitter Inc. 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: <https://twitter.com/de>; Privacy Policy: <https://twitter.com/de/privacy>.
- YouTube: Videos; Service Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://www.youtube.com>; Privacy Statement: <https://policies.google.com/privacy>; Privacy Shield: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&tatus=Active>; Opt-Out: Opt-Out-Plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>;
Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

Deletion of data

The data processed by us will be deleted in accordance with the statutory provisions as soon as their consent permitted for processing is revoked or other permissions lapse (e.g. if the purpose of processing this data has lapsed or it is not necessary for the purpose).

If the data are not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be blocked and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or whose storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

Further information on the deletion of personal data can also be found in the individual data protection notices of this data protection declaration.

Modification and updating of the data protection declaration

We ask you to inform yourself regularly about the content of our data protection declaration. We will adapt the data protection declaration as soon as changes in the data processing we carry out make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

Rights of data subjects

Under the DSGVO, they are entitled to various rights as affected parties, which result in particular from Articles 15 to 18 and 21 of the DS Block Exemption Regulation:

- Right of objection: You have the right, for reasons arising from your particular situation, to object at any time to the processing of personal data concerning you on the basis of Art. 6 para. 1 lit. e or f DSGVO; this also applies to profiling based on these provisions. If the personal data concerning you are processed for the purpose of direct advertising, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such advertising; this also applies to profiling to the extent that it is connected with such direct advertising.
- Right of withdrawal for consents: You have the right to revoke your consent at any time.
- Right of access: You have the right to obtain confirmation as to whether the data in question will be processed and to obtain access to such data, as well as further information and a copy of the data in accordance with the provisions of the law.
- Right of rectification: You have the right, in accordance with the law, to request the completion of data concerning you or the rectification of incorrect data concerning you.
- Right to deletion and limitation of processing: You have the right, in accordance with the statutory provisions, to demand that data concerning you be deleted immediately or, alternatively, to demand a limitation of data processing in accordance with the statutory provisions.

- Right to data transfer: 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 demand that it be transferred to another responsible party.
- Complaint to the supervisory authority: You also have the right, in accordance with the statutory provisions, to complain to a supervisory authority, in particular in the Member State of your habitual residence, your place of work or the place where the alleged infringement was committed, if you are of the opinion that the processing of your personal data is in breach of the DSGVO.

Definitions of terms

This section provides an overview of the terms used in this privacy statement. Many of the terms are taken from the law and defined above all in Art. 4 DSGVO. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the sake of understanding. The terms are sorted alphabetically.

- Conversion Tracking: The term "Conversion Tracking" refers to a process by which the effectiveness of marketing measures can be determined. As a rule, a cookie is stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website. For example, we can track whether the ads we placed on other websites were successful).
- IP masking: IP masking is a method by which the last octet, i.e. the last two numbers of an IP address, is deleted so that the IP address can no longer be used to uniquely identify a person. IP masking is therefore a means of pseudonymizing processing methods, especially in online marketing.
- Interest-based and behavioral marketing: Interest-based and/or behavioral marketing is the term used when potential interests of users in ads and other content are determined as precisely as possible. This is done on the basis of information on their previous behaviour (e.g. visiting certain websites and staying on them, purchasing behaviour or interaction with other users), which is stored in a so-called profile. Cookies are generally used for these purposes.
- Conversion measurement: Conversion measurement is a method by which the effectiveness of marketing measures can be determined. As a rule, a cookie is stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website. For

example, we can track whether the ads we placed on other websites were successful.

- Personal data: "personal data" means any information relating to an identified or identifiable natural person (hereinafter "data subject"); a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier (e.g. a cookie) or to one or more specific characteristics which express the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, is regarded as identifiable.
- Profiling: "Profiling" means any automated processing of personal data consisting of the use of such personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (including, depending on the type of profiling, information relating to age, gender, location and movement data, interaction with websites and their content, shopping behaviour, social interactions with other people) (e.g. interest in certain content or products, click behaviour on a website or location). Cookies and web beacons are frequently used for profiling purposes.
- Range measurement: Range measurement (also known as web analytics) is used to evaluate the flow of visitors to an online offering and may include the behaviour or interests of visitors in certain information, such as the content of websites. With the help of reach analysis, website owners can recognize, for example, at what time visitors visit their website and what content they are interested in. This allows them, for example, to better adapt the content of the website to the needs of their visitors. For purposes of range analysis, pseudonymous cookies and web beacons are frequently used in order to recognise returning visitors and thus obtain more precise analyses of the use of an online offer.
- Remarketing: Remarketing or retargeting is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website in order to remind the user of these products on other websites, e.g. in advertisements.
- Tracking: The term "tracking" is used when the behaviour of users can be traced across several online offers. As a rule, with regard to the online offers used, behavioural and interest information is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users that are likely to match their interests.

- Data controller: a "data controller" is a 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.
- Processing: "processing" means any operation or set of operations which is carried out with or without the aid of automated processes and which is related to personal data. The term reaches far and covers practically every handling of data, be it collection, evaluation, storage, transmission or deletion.

Created with [Datenschutz-Generator.de](https://www.datenschutz-generator.de) by Dr. jur. Thomas Schwenke

Translated from German to English via www.deepl.com