

Privacy Policy

Preamble

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

The terms used are not gender-specific.

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Controller

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Legal Notice: vloom.io/imprint.

Contact information of the data protection officer

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Overview of processing operations

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

Categories of Processed Data

- Inventory data (e.g. 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 (e.g. contract object, duration, customer category).

Categories of Data Subjects

- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).
- Participants in sweepstakes and competitions.

Purposes of Processing

- A/B Tests.
- Authentication processes.
- Provision of our online services and usability.
- Conversion tracking (Measurement of the effectiveness of marketing activities).
- Clicktracking.
- Direct marketing (e.g. by e-mail or postal).
- Conducting sweepstakes and contests.
- Feedback (e.g. collecting feedback via online form).

- Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.).
- Marketing.
- Contact requests and communication.
- Profiles with user-related information (Creating user profiles).
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Polls and Questionnaires (e.g. surveys with input options, multiple choice questions).
- Provision of contractual services and customer support.
- Managing and responding to inquiries.

Legal Bases for the Processing

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

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

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

Security Precautions

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly.

Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

SSL encryption (https): In order to protect your data transmitted via our online services in the best possible way, we use SSL encryption. You can recognize such encrypted connections by the prefix <https://> in the address bar of your browser.

Transmission of Personal Data

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such a case, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of 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 third party services or disclosure or transfer of data to other persons, bodies

or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en).

Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose).

If the data is 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 restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person.

In the context of our information on data processing, we may provide users with further information on the deletion and retention of data that is specific to the respective processing operation.

Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his visit within an online service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term "cookies" also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

The following types and functions of cookies are distinguished:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed his browser.
- **Permanent cookies:** Permanent cookies remain stored even after closing the browser. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. The interests of users who are used for range measurement or marketing purposes can also be stored in such a cookie.
- **First-Party-Cookies:** First-Party-Cookies are set by ourselves.
- **Third party cookies:** Third party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential) cookies:** Cookies can be necessary for the operation of a website (e.g. to save logins or other user inputs or for security reasons).
- **Statistics, marketing and personalisation cookies:** Cookies are also generally used to measure a website's reach and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) are stored on individual websites 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. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or in the context of obtaining consent.

Information on legal basis: 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 applies 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 help 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.

Retention period: Unless we provide you with explicit information on the retention period of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the retention period can be as long as two years.

General information on Withdrawal of consent and objection (Opt-Out): Respective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as "opt-out"). You can initially explain your objection using the settings of your browser, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online services). An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via

the websites <https://www.aboutads.info/choices/> and <https://www.youronlinechoices.com>. In addition, you can receive further information on objections in the context of the information on the used service providers and cookies.

Processing Cookie Data on the Basis of Consent: We use a cookie management solution in which users' consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) in order to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Providers and services used in the course of business

In the course of our business activities, we use additional services, platforms, interfaces or plug-ins from third-party providers (in short, "services") that may process user data, in compliance with the legal requirements. In this context, the data protection notices of the respective services apply in addition to our data protection notices.

Information on legal basis: If we ask users for their consent to use the services, the legal basis for processing data is consent. Otherwise, the users' data is processed to provide our business services or, if it is not necessary for the performance of the contract, on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services).

- **Data subjects:** Customers, Prospective customers, Users (e.g. website

visitors, users of online services), Business and contractual partners.

- **Purposes of Processing:** Provision of contractual services and customer support.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Special Notes on Applications (Apps)

We process the data of the users of our application to the extent necessary to provide the users with the application and its functionalities, to monitor its security and to develop it further. Furthermore, we may contact users in compliance with the statutory provisions if communication is necessary for the purposes of administration or use of the application. In addition, we refer to the data protection information in this privacy policy with regard to the processing of user data.

Legal basis: The processing of data necessary for the provision of the functionalities of the application serves to fulfil contractual obligations. This also applies if the provision of the functions requires user authorisation (e.g. release of device functions). If the processing of data is not necessary for the provision of the functionalities of the application, but serves the security of the application or our business interests (e.g. collection of data for the purpose of optimising the application or security purposes), it is carried out on the basis of our legitimate interests. If users are expressly requested to give their consent to the processing of their data, the data covered by the consent is processed on the basis of the consent.

Device authorizations for access to functions and data: The use of certain functions of our application may require access to the camera and the stored recordings of the users. By default, these authorizations must be granted by the user and can be revoked at any time in the settings of the respective devices. The exact procedure for controlling app permissions may depend on the user's device and software. Users can contact us if they require further explanation. We would like to point out that the refusal or revocation of the respective authorizations can affect the functionality of our application.

- **Processed data types:** Inventory data (e.g. names, addresses), Meta/communication data (e.g. device information, IP addresses).
- **Purposes of Processing:** Provision of contractual services and customer support.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Registration, Login and User Account

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

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

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

Registration with pseudonyms: Users may use pseudonyms as user names instead of real names.

Deletion of data after termination: If users have terminated their user account, their data relating to the user account will be deleted, subject to any legal permission, obligation or consent of the users.

It is the responsibility of the users to secure their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract.

- **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), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Security measures, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Single Sign-on Authentication

Single Sign-On" or "Single Sign-On Authentication or Logon" are procedures that allow users to log in to our online services using a user account with a provider of

Single Sign-On services (e.g. a social network). The prerequisite for Single Sign-On Authentication is that users are registered with the respective Single Sign-On provider and enter the required access data in the online form provided for this purpose, or are already logged in with the Single Sign-On provider and confirm the Single Sign-On login via the button.

Authentication takes place directly with the respective single sign-on provider. Within the scope of such authentication, we receive a user ID with the information that the user is logged in with the respective single sign-on provider under this user ID and an ID that cannot be used for other purposes (so-called "user handle").

Whether we receive further data depends solely on the single sign-on procedure used, the data releases selected as part of authentication and also which data users have released in the privacy or other settings of the user account with the single sign-on provider.

Depending on the single sign-on provider and the user's choice, there can be different data, usually the e-mail address and the user name. The password entered by the single sign-on provider as part of the single sign-on procedure is neither visible to us nor is it stored by us.

Users are requested to note that their data stored with us can be automatically compared with their user account with the single sign-on provider, but this is not always possible or actual. If, for example, the e-mail addresses of users change, users must change these manually in their user account with us.

We can use single sign-on authentication, provided that it has been agreed with users in the context of pre-fulfillment or fulfilment of the contract, in the context of consent processing and otherwise use it on the basis of our legitimate interests and the interests of users in an effective and secure authentication system.

Should users decide to no longer want to use the link of their user account with the Single Sign-On provider for the Single Sign-On procedure, they must remove this link within their user account with the Single Sign-On provider. If users wish to delete their data from us, they must cancel their registration with us.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Authentication processes.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Google Single-Sign-On:** Authentication service; 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>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **Twitter Single-Sign-On:** Authentication service; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: <https://twitter.com>; Privacy Policy: <https://twitter.com/de/privacy>; Opt-Out: <https://twitter.com/personalization>.

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 within the scope of this privacy policy.

- **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).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Push notifications

With the consent of the users, we can send the users so-called "push notifications". These are messages that are displayed on users' screens, devices or browsers, even if our online services are not being actively used.

In order to sign up for push messages, users must confirm that their browser or device has requested to receive push messages. This approval process is documented and stored. The storage is necessary to recognize whether users have

consented to receive the push messages and to be able to prove their consent. For these purposes, a pseudonymous identifier of the browser (so-called "push token") or the device ID of a terminal device is stored.

The push messages may be necessary for the fulfilment of contractual obligations (e.g. technical and organisational information relevant for the use of our online offer) and will otherwise be sent, unless specifically mentioned below, on the basis of user consent. Users can change the receipt of push messages at any time using the notification settings of their respective browsers or end devices.

Push messages with commercial information: The push notifications we send may contain commercial information. The commercial push messages are processed on the basis of user consent. If the contents of the push messages are described in detail in the context of the consent to receive the commercial push messages, the descriptions are decisive for the consent of the users. In addition, our newsletters contain information about our services and us.

Analysis and performance measurement: We statistically evaluate push messages and can thus identify if and when push messages were displayed and clicked on. This information is used for the technical improvement of our push messages based on technical data or target groups and their retrieval behavior or retrieval times. This analysis also includes determining whether the push messages are opened, when they are opened and whether users interact with their content or buttons. For technical reasons, this information can be assigned to individual push message recipients. However, it is neither our intention nor, if used, that of the push message service provider to monitor individual users. Rather, the evaluations serve to identify the usage habits of our users and to adapt our push messages to them or to send different push messages according to the interests of our users.

The evaluation of the push messages and the measurement of performance are based on the consent of the users, which is given with their permission to receive the push messages. Users can object to the analysis and performance measurement by unsubscribing from the push messages. Unfortunately, it is not possible to cancel the analysis and performance measurement separately.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times).
- **Purposes of Processing:** Provision of contractual services and customer support, Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Services and service providers being used:

- **OneSignal:** Provider for sending and managing push notifications; Service provider: OneSignal, Inc., 2850 S Delaware St Suite 201, San Mateo, CA 94403, USA; Website: <https://onesignal.com>; Privacy Policy: https://onesignal.com/privacy_policy; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): are concluded with the provider.

Newsletter and Electronic Communications

We send newsletters, e-mails and other electronic communications (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. Otherwise, our newsletters contain information about our services and us.

In order to subscribe to our newsletters, it is generally sufficient to enter your e-mail address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

Double opt-in procedure: The registration to our newsletter takes place in general 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 external 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 restriction 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 an obligation to permanently observe an objection, we reserve the right to store the e-mail address solely for this purpose in a blacklist.

Information on legal bases: The sending of the newsletter is based on the consent of the recipients or, if consent is not required, on the basis of our legitimate interests in direct marketing. Insofar as we engage a service provider for sending e-mails, this is done on the basis of our legitimate interests. The registration procedure is recorded on the basis of our legitimate interests for the purpose of demonstrating that it has been conducted in accordance with the law.

Contents: Information about us, our services, promotions and offers.

Measurement of opening rates and click rates: The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file, which is retrieved from our server when the newsletter is opened or, if we use a mailing service provider, from its server. Within the scope of this retrieval, technical information such as information about the browser and your system, as well as your IP address and time of 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 points (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. This information is assigned to the individual newsletter recipients and stored in their profiles until the profiles are deleted. The evaluations serve us much more 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 measurement of opening rates and click rates as well as the storage of the measurement results in the profiles of the users and their further processing are based on the consent of the users.

A separate objection to the performance measurement is unfortunately not possible, in this case the entire newsletter subscription must be cancelled or objected to. In this case, the stored profile information will be deleted.

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 would like to take advantage of the free service without registering for the newsletter, we offer them to 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).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors), Conversion tracking (Measurement of the effectiveness of marketing activities), Profiles with user-related information (Creating user profiles), Provision of contractual services and customer support.

- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **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 being used:

- **Google Analytics:** Measuring the success of email campaigns and building user profiles with a storage period of up to two years; 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/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **SendGrid:** Email marketing platform; Service provider: SendGrid, Inc. 1801 California Street, Suite 500 Denver, Colorado 80202, USA; Website: <https://sendgrid.com>; Privacy Policy: <https://sendgrid.com/policies/privacy/>.

Commercial communication by E-Mail, Postal Mail, Fax or Telephone

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After withdrawal or objection, we may store the data required to prove consent for up to three years on the basis of our legitimate interests before we delete them. 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 affirmed.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).

- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Sweepstakes and Contests

We process the personal data of participants in We process personal data of participants in competitions, contents, raffles, prize-draws or sweepstakes (hereinafter referred to as "competitions") only in compliance with the relevant data protection regulations and if the processing is contractually necessary for the provision, execution and handling of the competition, the participants have consented to the processing or the processing serves our legitimate interests (e.g. in the security of the competition or the protection of our interests against misuse by possible recording of IP addresses when submitting entries to the competition).

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

If the competitions take place within an online platform or a social network (e.g. Facebook or Instagram, hereinafter referred to as "online platform"), the usage and data protection provisions of the respective online platforms also apply. In such cases, we would like to point out that we are responsible for the information provided by the participants as part of the competition and that we must be contacted with regard to the competitions.

The data of the participants will be deleted as soon as the competition has ended and the data is no longer required to inform the winners or because questions about the competition can be expected. In general, the data of the participants will be deleted at the latest 6 months after the end of the competition. Winners' data can be retained for a longer period of time, e.g. in order to answer questions about the prizes or to fulfil the prizes; in this case, the retention period depends on the type of prize and is up to three years for items or services, e.g. in order to be able to process warranty claims. Furthermore, the participants' data may be stored for longer, e.g. in the form of coverage of the competition in online and offline media.

Insofar as data was collected for other purposes as part of the competition, its processing and storage period shall be governed by the privacy information for this use (e.g. in the case of registration for a newsletter as part of a competition).

- **Processed data types:** Inventory data (e.g. names, addresses), Content data (e.g. text input, photographs, videos).

- **Data subjects:** Participants in sweepstakes and competitions.
- **Purposes of Processing:** Conducting sweepstakes and contests.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

Surveys and Questionnaires

The surveys and questionnaires ("surveys") carried out by us are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical execution of the survey (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 participants have consented.

Information on legal basis: 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 is based on our legitimate interests in conducting 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).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components.

For these purposes, so-called user profiles can be created and stored in a file (so-called "cookie") or similar procedures in which the relevant user information for the aforementioned analyses is stored. This information may include, for example, content viewed, web pages visited and elements and technical data used there, such as the browser used, computer system used and information on times of use. If users have consented to the collection of their location data, these may also be processed, depending on the provider.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

Information on legal basis: If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. 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 refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors), Profiles with user-related information (Creating user profiles), Clicktracking, A/B Tests, Feedback (e.g. collecting feedback via online form), Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.), Polls and Questionnaires (e.g. surveys with input options, multiple choice questions), Marketing.
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Google Analytics:** 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/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>.

- **Hotjar:** Software for the analysis and optimisation of online services on the basis of feedback functions as well as pseudonymously conducted measurements and analyses of user behaviour, which may include in particular A/B tests (measurement of the preference and user-friendliness of different contents and functions), measurement of click paths and other interactions with contents and functions of the online services; Service provider: Hotjar Ltd., 3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta ; Website: <https://www.hotjar.com>; Privacy Policy: <https://www.hotjar.com/legal/policies/privacy>. Cookie Policy: <https://www.hotjar.com/legal/policies/cookie-information>; Retention period: The cookies that Hotjar uses have a different "lifetime"; some last up to 365 days, some only last during the current visit; Opt-Out: <https://www.hotjar.com/legal/compliance/opt-out>.

Online Marketing

We process personal data for the purposes of online marketing, which may include in particular the marketing of advertising space or the display 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 procedure in which the relevant user information for the display of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online networks used, communication partners and technical information such as the browser used, computer system used and information on usage times. If users have consented to the collection of their sideline data, these can also be processed.

The IP addresses of the users are also stored. However, we use provided IP masking procedures (i.e. pseudonymisation by shortening the IP address) to ensure the protection of the user's by using a pseudonym. In general, within the framework of the online marketing process, no clear user data (such as e-mail addresses or names) is secured, 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 similar memorizing procedures. These cookies can later, generally also on other websites that use the same online marketing technology, be read and analyzed for purposes of content display, as well as supplemented with other data and stored on the server of the online marketing technology provider.

Exceptionally, clear 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 technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

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

Unless otherwise stated, we kindly ask you to consider that cookies used will be stored for a period of two years.

Information on legal basis: If we ask users for their consent (e.g. in the context of a so-called "cookie banner consent"), the legal basis for processing data for online marketing purposes is this consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Marketing, Profiles with user-related information (Creating user profiles), Conversion tracking (Measurement of the effectiveness of marketing activities).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** We refer to the privacy policies of the respective service providers and the possibilities for objection (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 collectively 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:

<https://optout.aboutads.info>.

Services and service providers being used:

- **Google Tag Manager:** Google Tag Manager is a solution with which we can manage so-called website tags via an interface and thus integrate other services into our online services (please refer to further details in this privacy policy). With the Tag Manager itself (which implements the tags), for example, no user profiles are created or cookies are stored. Google only receives the IP address of the user, which is necessary to run the Google Tag Manager. 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>; Privacy Policy: <https://policies.google.com/privacy>.
- **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/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **Google Ads and Conversion Tracking:** We use the Google "Ads" online marketing method to place ads on the Google advertising network (e.g., in search results, videos, websites, etc.) so that they are displayed to users who have an alleged interest in the ads. We also measure the conversion of the ads. However, we only know the anonymous total number of users who clicked on our ad and were redirected to a page tagged with a conversion tracking tag. However, we ourselves do not receive any information that can be used to identify users. 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>; Privacy Policy: <https://policies.google.com/privacy>.
- **Google AdSense with personalized ads:** We use the Google AdSense service with personalized ads, which helps us to display ads within our online services and we receive a remuneration for their display or other use. ; 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>; Privacy Policy: <https://policies.google.com/privacy>.

- **Google AdSense with non-personalized ads:** We use the Google AdSense service with non-personalized ads, which helps us to display ads within our online services and we receive a remuneration for their display or other use. ; 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>; Privacy Policy: <https://policies.google.com/privacy>.
- **Twitter:** Twitter Marketing und Anzeigen; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: <https://twitter.com>; Privacy Policy: <https://twitter.com/en/privacy>; Opt-Out: <https://twitter.com/personalization>.

Rating Platforms

We participate in rating procedures to evaluate, optimise and advertise our performance. If users rate us via the participating rating platforms or methods or otherwise provide feedback, the General Terms and Conditions of Business or Use and the data protection information of the providers also apply. As a rule, the rating also requires registration with the respective provider.

In order to ensure that the evaluators have actually made use of our services, we transmit, with the consent of the customer, the necessary data relating to the customer and the service or products used to the respective rating platform (this includes the name, e-mail address, order number or article number). This data is used solely to verify the authenticity of the user.

- **Processed data types:** Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Feedback (e.g. collecting feedback via online form).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Trustpilot:** Review and rating platform; Service provider: Trustpilot A/S, Pilestræde 58, 5, 1112 København, Denmark; Website: <https://www.trustedshops.de>; Privacy Policy: <https://legal.trustpilot.com/end-user-privacy-terms>.

Profiles in Social Networks (Social Media)

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

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights.

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 associated interests of users. The user profiles can then 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 can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

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

Also in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued 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.

Facebook: We are jointly responsible (so called "joint controller") with Facebook Ireland Ltd. for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: <https://www.facebook.com/policy>). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site

operators to help them understand how people interact with their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", https://www.facebook.com/legal/terms/page_controller_addendum), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfill the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information about Page Insights" (https://www.facebook.com/legal/terms/information_about_page_insights_data).

- **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).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication, Feedback (e.g. collecting feedback via online form), Marketing.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Instagram:** Social network; Service provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA, , Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.instagram.com>; Privacy Policy: <https://instagram.com/about/legal/privacy>.
- **Facebook:** Social network; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Opt-Out: Settings for advertisements: https://www.facebook.com/adpreferences/ad_settings (login at Facebook is required).
- **Twitter:** Social network; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Policy: <https://twitter.com/de/privacy>, (Settings) <https://twitter.com/personalization>.
- **YouTube:** Social network and video platform; 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 Policy: <https://policies.google.com/privacy>; Opt-Out: <https://adssettings.google.com/authenticated>.

Plugins and embedded functions and content

Within our online services, we integrate 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 city maps (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. The "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 include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

Information on legal basis: If we ask users for their consent (e.g. in the context of a so-called "cookie banner consent"), the legal basis for processing is this consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. We refer you to the note on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Font Awesome:** Display of fonts and symbols; Service provider: Fonticons, Inc. ,6 Porter Road Apartment 3R, Cambridge, MA 02140, USA; Website: <https://fontawesome.com/>; Privacy Policy: <https://fontawesome.com/privacy>.
- **YouTube videos:** Video contents; 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 Policy: <https://policies.google.com/privacy>; Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

Management, Organization and Utilities

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

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

If users are referred to the third-party providers or their software or platforms in the context of communication, business or other relationships with us, the third-party provider processing may process usage data and metadata that can be processed by them for security purposes, service optimisation or marketing purposes. We therefore ask you to read the data protection notices of the respective third party providers.

Information on legal basis: If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. 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 refer you to the information on the use of cookies in this privacy policy.

- **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).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.),

Users (e.g. website visitors, users of online services), Business and contractual partners.

- **Purposes of Processing:** Contact requests and communication, Web Analytics (e.g. access statistics, recognition of returning visitors), Profiles with user-related information (Creating user profiles), Provision of contractual services and customer support.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Services and service providers being used:

- **Basecamp:** Project management tool; Service provider: Basecamp, LLC., 30 N. Racine Ave, Suite 200 Chicago, Illinois 60607, USA; Website: <https://basecamp.com>; Privacy Policy: <https://basecamp.com/about/policies>.
- **Bitly:** URL shortening service and link management platform; Service provider: Bitly, Inc., 139 Fifth Avenue, 5th Floor, New York, NY 10010, USA; Website: <https://bitly.com>; Privacy Policy: <https://bitly.com/pages/privacy>.
- **DocuSign:** DocuSign provides a digital transaction management platform to facilitate digital transactions that include the signing process of contractual documents and other documents; Service provider: DocuSign, Inc., 221 Main Street Suite 1000 San Francisco, CA 94105, USA; Website: <https://www.docusign.com/>; Privacy Policy: <https://www.docusign.com/company/privacy-policy>; The processing as processor and controller is carried out on the basis of approved Binding Corporate Rules, which ensure a level of data protection in accordance with the requirements of the GDPR (Article 47 GDPR): <https://www.docusign.com/trust/privacy/binding-corporate-rules>.

Changes and Updates to the Privacy Policy

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

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

Rights of Data Subjects

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

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR , including profiling based on those provisions.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.

- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

Terminology and Definitions

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- **A/B Tests:** A/B tests are designed to improve the usability and performance of online services. For example, users are presented with different versions of a website or its elements, such as input forms, on which the placement of the contents or labels of the navigation elements can differ. The behaviour of users, e.g. prolonged visits to the site or more frequent interaction with the elements, can then be used to determine which of these sites or elements are more responsive to users' needs.
- **Clicktracking:** Clicktracking allows users to keep track of their movements within an entire website. Since the results of these tests are more accurate if the interaction of the users can be followed over a certain period of time (e.g. if a user likes to return), cookies are usually stored on the computers of the users for these test purposes.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually 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 (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- **Heatmaps:** "Heatmaps" are mouse movements of the users, which are combined to an overall picture, with the help of which it can be recognized, for example, which web page elements are preferred and which web page elements users prefer less.
- **IP Masking:** IP masking is a method by which the last octet, i.e. the last two numbers of an IP address, are deleted so that the IP address alone can no longer be used to uniquely identify a person. IP masking is therefore a means of pseudonymising processing methods, particularly in online marketing.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific

to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This allows them, for example, to optimize the content of the website to better meet the needs of their visitors. For purposes of web analytics, 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 service.

