# **Everyguides: Privacy policy**

This English version of the Privacy policy is provided for convenience only. The legally binding version is the German version at https://de.everyguides.com/guides/Everyguides:Datenschutz (https://de.everyguides.com/guides/Everyguides:Datenschutz).

#### **Preamble**

Status: August 21th, 2025

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

The terms used are not gender-specific.

## Person responsible

Lars Erichsen IT Solutions c/o Postflex #8990 Emsdettener Str. 10 48268 Greven

E-mail address: dataprotection@everyguides.com (mailto:dataprotection@everyguides.com)

Phone: +49(0)151 1044 3374

#### Contact data protection officer

dataprotection@everyguides.com (mailto:dataprotection@everyguides.com)

#### Overview of the processing operations

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

## Types of data processed

- Inventory
- data. Payment

data. • Contact

data.

- Content data.
- Contract

data.

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

#### Categories of data subjects

- Service recipients and clients.• Interested parties.
- Users
- Business and contractual partners.

## Purposes of the processing

- Provision of contractual services and fulfillment of contractual obligations. Communication.
- Security measures.
- Range

measurement. •

Tracking.

Conversion

measurement. • Target

group formation.

•

Feedback.

•

Marketing.

- Profiles with user-related information. Provision of our online offering and user-friendliness. Information technology infrastructure. Public relations.
- Business processes and business management procedures.

#### Relevant legal bases

**Relevant legal bases according to the GDPR:** Below you will find an overview of the legalbases of the GDPR on the basis of which we process personal data. Please note that, in addition to the provisions of the GDPR, national data protection regulations

may apply in your or our country of residence or domicile. Should more specific legal bases alsoapply in individual cases, we will inform you of these in the privacy policy.

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

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

Reference to the validity of the GDPR and Swiss FADP: This data protection notice servesto provide information in accordance with both the Swiss FADP and the General DataProtection Regulation (GDPR). For this reason, we ask you to note that the terms of the GDPR used due to the broader geographical application and comprehensibility. In particular, instead of the terms "processing" of "personal data", "overriding interest" and "sensitive personal data" used in the Swiss DPA, the terms "processing" of "personal data", "legitimate interest" and "special categories of data" used in the GDPR are used. However, the legalmeaning of the terms will continue to be determined in accordance with the Swiss DPA within the scope of application of the Swiss DPA.

## **Security measures**

We take appropriate technical and organizational measures in accordance with the legalrequirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and

purposes of the processing as well as the different probabilities ofoccurrence and the extent of the threat to the rights and freedoms of natural persons, in order toensure a level of protection appropriate to the risk. The measures include, in particular, safeguarding the confidentiality, integrity and availability ofdata by controlling physical and electronic access to the data as well as access, input, disclosure, safeguarding availability and separation of the data. Furthermore, we have established procedures that ensure the exercise of data subject rights, the deletion of data and responses to data threats.

guarantee. Furthermore, we already take the protection of personal data into account whendeveloping or selecting hardware, software and processes in accordance with the principle ofdata protection, through technology design and through data protection-friendly defaultsettings.

Securing online connections using TLS/SSL encryption technology (HTTPS): To protect userdata transmitted via our online services from unauthorized access, we use TLS/SSL encryptiontechnology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are thecornerstones of secure data transmission on the Internet. These technologies encrypt theinformation transmitted between the website or app and the user's browser (or between twoservers), protecting the data from unauthorized access. TLS, as the more advanced and secureversion of SSL, ensures that all data transmissions meet the highest security standards. If a website is secured by an SSL/TLS certificate, this is signaled by the display of HTTPS inthe URL. This serves as an indicator to users that their data is being transmitted securely andencrypted.

## Transmission of personal data

As part of our processing of personal data, it may be transmitted to other bodies, companies,legally independent organizational units or persons or disclosed to them. The recipients of thisdata may include z. For example, recipients of this data may include service providers commissioned with ITtasks or providers of services and content that are integrated into a website. In such cases, weobserve the legal requirements and, in particular, conclude corresponding contracts oragreements with the recipients of your data that serve to protect your data.

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

## **International data transfers**

Data processing in third countries: If we transfer data to a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this occurs in the context of the use of third-party services or the disclosure or transfer of data to other persons, bodies or companies (which is recognizable by the postal address of the respective provider or if the dataprotection declaration expressly refers to the transfer of data to third countries), this is always done in accordance with the legal requirements. For data transfers to the USA, we rely primarily on the Data Privacy Framework (DPF), which was recognized as a secure legal framework by an adequacy decision of the EU Commission on 10.07.2023. In addition, we have concluded standard contractual clauses with the respective providers that comply with the requirements of the EU Commission and define contractual obligations to protect your data.

This dual safeguard ensures comprehensive protection of your data: The DPF forms the primarylevel of protection, while the standard contractual clauses serve as additional security. Shouldthere be any changes to the DPF, the standard contractual clauses act as a reliable fall-backoption. In this way, we ensure that your data always remains adequately protected, even in theevent of any political or legal changes. For the individual service providers, we will inform you whether they are certified inaccordance with the DPF and whether standard contractual clauses are in place. Furtherinformation on the DPF and a list of certified companies can be found on the website of the USDepartment of Commerce at https://www.dataprivacyframework.gov/ (https://www.dataprivacyframework.gov/). For data transfers to other third countries, appropriate safeguards apply, in particular standardcontractual clauses, explicit consent or legally required transfers. Information on third countrytransfers and applicable adequacy decisions can be found in the information provided by the EU Commission: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection\_en?

prefLang=en (https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection en?prefLang=en).

## General information on data storage and deletion

We delete personal data that we process in accordance with the statutory provisions as soon asthe underlying consents are revoked or there is no further legal basis for the processing. Thisapplies to cases in which the original purpose of processing no longer applies or the data is nolonger required. There are exceptions to this rule if legal obligations or special interests requirelonger storage or archiving of the data. In particular, data that must be stored for commercial or tax law reasons or whose storage isnecessary for legal prosecution or to protect the rights of other natural or legal persons mustbe archived accordingly. Our data protection information contains additional information on the retention and deletion ofdata that applies specifically to certain processing operations.

If there is more than one indication of the retention period or deletion period for a date, thelongest period shall always apply.

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

We process data that is no longer stored for the originally intended purpose, but due to legalrequirements or other reasons, exclusively for the reasons that justify its storage.

## Further information on processing processes, procedures and services:

- Retention and deletion of data: The following general periods apply to retention and archiving under German law:
  - 10 years retention period for books and records, annual financial statements, inventories, management reports, opening balance sheet and the workinstructions and other organizational documents required for theirunderstanding (Section 147 (1) no. 1 in conjunction with. Para. 3 AO, § 14bPara. 1 UStG, § 257 Para. 1 No. 1 i.V.m. para. 4 HGB).
  - 8 years Accounting documents, such as invoices and expense receipts (§ 147 para. 1 no. 4 and 4a in conjunction with para. para. 3 sentence 1 AO and § 257 para. 1 no. 4 in conjunction with para. Para. 4 HGB).
  - 6 years Other business documents: commercial or business letters received, reproductions of commercial or business letters sent, other documents, insofar asthey are of significance for taxation, e.g. time sheets, company accountingsheets, calculation documents, price labels, but also payroll accountingdocuments, insofar as they are not already accounting documents and cashregister slips (Section 147 (1) nos. 2, 3, 5 in conjunction with (3) AO, Section257 (1) no. 1 in conjunction with (3) AO and Section 257 (1) no. 4 inconjunction with (4) HGB). Para. 3 AO, § 257 Para. 1 No. 2 and 3 in conjunctionwith Para. para. 4 HGB).
  - 3 years Data required to consider potential warranty and compensation claims or similar contractual claims and rights and to process related inquiries based on past business experience and standard industry practices will bestored for the duration of the regular statutory limitation period of three years (Sections 195, 199 BGB).

#### Rights of the data subjects

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

- Right to object: you have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning youwhich is based on point (e) or (f) of Article 6(1) GDPR, including profiling basedon those provisions. If the personal data concerning you are processed for directmarketing purposes, you have the right to object at any time to the processing ofpersonal data concerning you for such marketing, which includes profiling to theextent that it is related to such direct marketing.
- **Right to withdraw consent:** You have the right to withdraw any consent you have given at any time.
- **Right to information:** You have the right to request confirmation as to whether the data in question is being processed and to information about this data as well as further information and a copy of the data in accordance with the legal requirements.

- **Right to rectification:** You have the right to request the completion of data concerning you or the rectification of inaccurate data concerning you in accordance with the legalrequirements.
- Right to erasure and restriction of processing: In accordance with the legal requirements, you have the right to demand that data concerning you be erasedimmediately or, alternatively, to demand that the processing of the data be restricted inaccordance with the legal requirements.
- **Right to data portability:** You have the right to receive the data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format in accordance with the legal requirements or to request its transmission to another controller.
- Complaint to the supervisory authority: Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with asupervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the provisions of the GDPR.

## **Payment procedures**

In the context of contractual and other legal relationships, due to legal obligations or otherwiseon the basis of our legitimate interests, we offer the data subjects efficient and secure paymentoptions and use other service providers in addition to banks and credit institutions (collectively"payment service providers"). The data processed by the payment service providers includes inventory data, such as the nameand address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as contract, total and recipient-related information. The information is required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored by them.

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

Payment transactions are subject to the terms and conditions and data protection notices of therespective payment service providers, which can be accessed on the respective websites ortransaction applications. transaction applications. We also refer to these for further information and the assertion of rightsof revocation, information and other rights of data subjects.

- Processed data types: inventory data (e.g. full name, residential address, contact information, customer number, etc.); payment data (e.g. bank details, invoices,payment history); contract data (e.g. subject matter of the contract, duration, customercategory); usage data (e.g. page views and length of stay, click paths, intensity andfrequency of use, device types and operating systems used, interactions with contentand functions). Meta, communication and process data (e.g. IP addresses, time data,identification numbers, persons involved).
- **Data subjects:** Service recipients and clients; business and contractual partners. Interested parties.
- **Purposes of processing:** Provision of contractual services and fulfillment of contractual obligations. Business processes and business management procedures.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- Legal basis: Fulfillment of contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Further information on processing processes, procedures and services:

• Stripe: Payment services (technical connection of online payment methods); Service provider: Stripe, Inc, 510 Townsend Street, San Francisco, CA 94103, USA; Legalbasis: Performance of contract and pre-contractual inquiries (Art. 6 para. 1 sentence 1lit. b) GDPR); Website: https://stripe.com (https://stripe.com/); (https://stripe.com/)Privacy Policy:

https://stripe.com/de/privacy (https://stripe.com/de/privacy). (https://stripe.com/de/privacy)Basis for transfers to third countries: Data Privacy Framework (DPF), Data Privacy Framework (DPF).

#### Provision of the online offer and web hosting

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

- Processed data types: Usage data (e.g. page views and dwell time, click paths, usage intensity and frequency, device types and operating systems used, interactions withcontent and functions); meta, communication and procedural data (e.g. IP addresses,time data, identification numbers, persons involved); log data (e.g. log files relating tologins or the retrieval of data or access times). Content data (e.g. text or image messagesand contributions as well as the information relating to them, such as information onauthorship or time of creation). When using our AI-based instructions, we store the user's IP address together with atimestamp. This serves the sole purpose of being able to prove in the event of a disputethat the content was created by an external user and did not originate from us. The generated content is then made publicly available on our platform. The content isstored on the basis of Art. 6 para. 1 lit. f GDPR (legitimate interest in legal protection and preservation of evidence).
- Data subjects: Users (e.g. website visitors, users of online services).• Purposes of processing: Provision of our online services and user-friendliness; information technology infrastructure (operation and provision of information systems and technical devices (computers, servers, etc.)). Security measures.• Storage and deletion: Deletion in accordance with the information in the section "General information on data storage and deletion".
- Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Further information on processing processes, procedures and services:

- Provision of online offer on rented storage space: For the provision of our online offer, we use storage space, computing capacity and software that we rent or otherwiseobtain from a corresponding server provider (also called "web host"); legal basis:Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- Collection of access data and log files: Access to our online offering is recorded in the form of so-called "server log files". The server log files may include the address andname of the web pages and files accessed, the date and time of access, the amount ofdata transferred, notification of successful access, browser type and version, the user'soperating system, referrer URL (the previously visited page) and, as a rule, IP addressesand the requesting provider. The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the event of abusive attacks, so-calledDDoS attacks), and to ensure the utilization of the servers and their stability; legalbasis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Deletion of data:Log file information is stored for a maximum of 30 days and then deleted oranonymized. Data whose further storage is required for evidentiary purposes is excludedfrom deletion until the respective incident has been finally clarified.
- 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 therecipients and senders as well as other information relating to the sending of e-mails (e.g.the providers involved) and the content of the respective e-mails are processed. Theaforementioned data may also be processed for the purpose of detecting SPAM. Pleasenote that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted in transit, but not on the servers from which they are sent andreceived (unless an end-to-end encryption method is used). We can therefore assume noresponsibility for the transmission path of the e-mails between the sender and receipt onour server; legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- Hetzner: Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); Serviceprovider: Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website:https://www.hetzner.com (https://www.hetzner.com/); (https://www.hetzner.com/)Privacy Policy:

https://www.hetzner.com/de/rechtliches/datenschutz (https://www.hetzner.com/de/rechtliches/datenschutz). (https://www.hetzner.com/de/rechtliches/datenschutz) **Data processing agreement:** https://docs.hetzner.com/de/general/general-terms-and-conditions/data-privacy-faq/ (https://docs.hetzner.com/de/general/general-terms-and-conditions/data-privacy-faq/). (https://docs.hetzner.com/de/general/general-terms-and-conditions/data-privacy-faq/)

#### Use of cookies

The term "cookies" refers to functions that store information on users' end devices and read itfrom them. Cookies can also be used for various purposes, for example to ensure thefunctionality, security and convenience of online services and to analyze visitor flows. We usecookies in accordance with the statutory provisions. If necessary, we obtain the user's consent inadvance.

consent of the user in advance. If consent is not required, we rely on our legitimate interests. This applies if the storage and reading of information is essential in order to be able to provide expressly requested content and functions. This includes, for example, saving settings and ensuring the functionality and security of our online offering. Consent can be revoked at anytime. We provide clear information about the scope and which cookies are used.

**Information on the legal basis under data protection law:** Whether we process personal datausing cookies depends on consent. If consent has been given, it serves as the legal basis. Without consent, we rely on our legitimate interests, which are explained above in this section and in the context of the respective services and procedures.

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

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

General information on revocation and objection (opt-out): Users can revoke the consentsthey have given at any time and also declare an objection to processing in accordance with thelegal requirements, including by means of their browser's privacy settings.

- **Processed data types:** Meta, communication and process data (e.g. IP addresses, time data, identification numbers, persons involved).
- Data subjects: Users (e.g. website visitors, users of online services).
- Legal bases: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR).

# Further information on processing processes, procedures and services:

• Processing of cookie data on the basis of consent: We use a consent management solution in which user consent is obtained for the use of cookies or for the procedures and providers mentioned in the consent management solution. This procedure is used toobtain, log, manage and revoke consent, in particular with regard to the use of cookiesand comparable technologies that are used to store, read and process information onusers' end devices. As part of this procedure, user consent is obtained for the use of cookies and the associated processing of information, including the specific processingand providers mentioned in the consent management procedure.

processing and providers, are obtained. Users also have the option of managing andrevoking their consent. The declarations of consent are stored in order to avoid repeatedqueries and to be able to provide proof of consent in accordance with legal requirements. The storage takes place on the server side and/or in a cookie (so-called opt-in cookie) orby means of comparable technologies in order to be able to assign the consent to aspecific user or their device. If no specific information on the providers of consentmanagement services is available, the following general information

applies: Consent isstored for up to two years. A pseudonymous user identifier is created, which is storedtogether with the time of consent, information on the scope of consent (e.g. relevantcategories of cookies and/or service providers) and information on the browser, the system and the end device used; **legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a)GDPR).

## Web analysis, monitoring and optimization

Web analysis (also referred to as "reach measurement") is used to evaluate the flow of visitors our online offering and may include behavior, interests or demographic information aboutvisitors, such as age or gender, as pseudonymous values. With the help of reach analysis, wecan, for example, recognize at what time our online offer or its functions or content are mostfrequently used, or invite visitors to reuse them. It also enables us to understand which areasrequire optimization.

In addition to web analysis, we may also use test procedures, for example to test and optimizedifferent versions of our online offering or its components.

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

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

In general, no clear user data (such as e-mail addresses or names) is stored in the context ofweb analysis, A/B testing and optimization, but pseudonyms. This means that neither we northe providers of the software used know the actual identity of the users, but only theinformation stored in their profiles for the purpose of the respective procedures.

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

Otherwise, the user data is processed on the basis of our legitimate interests (i.e. interest in

efficient, economical and recipient-friendly services). In this context, we would also like todraw your attention to the information on the use of cookies in this privacy policy.

- Processed data types: Usage data (e.g. page views and length of stay, click paths, intensity and frequency of use, device types and operating systems used, interactions with content and functions). Meta, communication and process data (e.g. IP addresses, time data, identification numbers, persons involved).
- Data subjects: Users (e.g. website visitors, users of online services).• Purposes of processing: Reach measurement (e.g. access statistics, recognition of returning visitors); profiles with user-related information (creation of user profiles). Provision of our online services and user-friendliness.
- Storage and deletion: Deletion in accordance with the information in the section "General information on data storage and deletion". Storage of cookies for up to 2 years(Unless otherwise stated, cookies and similar storage methods may be stored on users'devices for a period of two years).
- Security measures: IP masking (pseudonymization of the IP address).
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

# Further information on processing processes, procedures and services:

• Google Analytics: We use Google Analytics to measure and analyze the use of our online offering on the basis of a pseudonymous user identification number. Thisidentification number does not contain any unique data, such as names or emailaddresses. It is used to assign analysis information to an end device in order to recognizewhich content users have called up within one or more usage processes, which searchterms they have used, which they have called up again or which they have interacted with our online offering. The time of use and its duration are also stored, as well as the sources of the users who refer to our online offering and technical aspects of their enddevices and browsers.

Pseudonymous profiles of users are created with information from the use of various devices, whereby cookies may be used. Google Analytics does not log or store individual IP addresses for EU users. However, Analytics provides rough geographic location data by deriving the following

metadata from IP addresses: City (and the city'sinferred latitude and longitude), Continent, Country, Region, Subcontinent (and ID-based counterparts). For EU traffic, IP address data is used exclusively for thisderivation of geolocation data before it is immediately deleted. They are not logged, arenot accessible and are not used for other purposes. When Google Analytics collectsmeasurement data, all IP queries are performed on EU-based servers before the traffic isforwarded to Analytics servers for processing; **service provider:** Google IrelandLimited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal basis:** Consent (Art. 6para. 1 sentence 1 lit. a) GDPR); **Website:** 

https://marketingplatform.google.com/intl/en/about/analytics/ (https://marketingplatform.google.com/intl/en/about/analytics/); (https://marketingplatform.google.com/intl/de/about/analytics/%3B) Security measures: IP-

Masking (pseudonymization of the IP address); Privacy Policy:

https://policies.google.com/privacy%3B)//policies.google.com/privacy; (https://policies.google.com/privacy; (https://policies.google.com/privacy; (https://business.safety.google/adsprocess orterms/%3B)//business.safety.google/adsprocessorterms/; (https://business.safety.google/adsprocessorterms/%3B)**Basis for third country transfers:**Data Privacy Framework (DPF), Standard Contractual Clauses

((https://business.safety.google/adsprocessorterms))

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https://business.safety.google/adsprocessorterms); (https://business.safety.google/adsprocessorterm s)%3B)**Opt-Out:** Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=d e)//tools.google.com/dlpage/gaoptout?hl=de, Sett (https://tools.google.com/dlpage/gaoptout?hl=de) ings forthe display of advertisements: https://myadcenter.google.com/personalizationof f)//myadcenter.google.com/personalizationoff. (https://myadcenter.google.com/personalizationoff) **Further information:** https://business.safety.google/adsservices/ (https://business.safety.google/adsservices/)(types of processingand processed data).

#### **Online marketing**

We process personal data for the purpose of online marketing, which may include in particularthe marketing of advertising space or the presentation of advertising and other content(collectively referred to as "content") based on the potential interests of users and themeasurement of their effectiveness. For these purposes, so-called user profiles are created and stored in a file (the so-called"cookie") or similar procedures are used, by means of which the user data relevant to the presentation of the aforementioned content is stored. This may include, for example, contentviewed, websites visited, online networks used, but also communication partners and technicalinformation, such as the browser used, the computer system used and information on usagetimes and functions used. If users have consented to the collection of their location data, this can also be processed.

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

The statements in the profiles are generally stored in cookies or by means of similar procedures. These cookies can generally also be read later on other websites that use the same onlinemarketing process, analyzed for the purpose of displaying content, supplemented with furtherdata and stored on the server of the online marketing process provider.

In exceptional cases, it is possible to assign clear data to the profiles, primarily if, for example, the users are members of a social network whose online marketing process we use and thenetwork links the user profiles with the aforementioned data. Please note that users can make additional agreements with the providers, for example by giving their consent during registration.

In principle, we only receive access to summarized information about the success of ouradvertisements. However, as part of so-called conversion measurements, we can

which of our online marketing processes have led to a so-called conversion, i.e. to the conclusion of a contract with us, for example. The conversion measurement is used solely to analyze the success of our marketing measures.

Unless otherwise stated, we ask you to assume that the cookies used are stored for a period oftwo years. **Notes on legal bases:** If we ask users for their consent to the use of third-party providers, thelegal basis for data processing is permission. Otherwise, user data is processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookiesin this privacy policy.

#### Information on revocation and objection:

We refer you to the data protection notices of the respective providers and the objection optionsspecified for the providers (so-called "opt-out"). If no explicit opt-out option has been specified, you have the option of deactivating cookies in your browser settings. However, this may restrict functions of our online offer. We therefore recommend the following additional opt-outoptions, which are summarized for the respective areas:

- a) Europe: https://www.youronlinechoices.eu. (https://www.youronlinechoices.eu/)
- b) Cross-territory: https://optout.aboutads.info. (https://optout.aboutads.info/)
  - **Processed data types:** Usage data (e.g. page views and dwell time, click paths, usage intensity and frequency, device types and operating systems used, interactions withcontent and functions). Meta, communication and process data (e.g. IP addresses, timedata, identification numbers, persons involved).
  - Data subjects: Users (e.g. website visitors, users of online services).
  - Purposes of Processing: Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behavior, use ofcookies); Custom Audiences; Marketing; Profiles with user-related information(Creating user profiles). Conversion measurement (measurement of theeffectiveness of marketing measures).
  - Storage and deletion: Deletion in accordance with the information in the section "General information on data storage and deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years).
  - Security measures: IP masking (pseudonymization of the IP address).
  - **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Further information on processing operations, procedures and services:

- Google Ads and conversion measurement: online marketing process for the purpose of placing content and ads within the service provider's advertising network (e.g. insearch results, in videos, on websites, etc.) so that they are displayed to users who have apresumed interest in the ads. In addition, we measure the conversion of the ads, i.e. whether users have taken them as an opportunity to interact with the ads and use theadvertised offers (so-called conversions). However, we only receive anonymous information and no personal information about individual users; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: https://marketingplatform.google.com; (https://marketingplatform.googl e.com/)PrivacyPolicy: https://policies.google.com/privacy; (https://policies.google.com/privacy%3 B)Basis for third country transfers: DataPrivacy Framework (DPF), Data Privacy Framework (DPF); Further information: Types of processing and data processed: https://business.safet y.google/adsservices/)//business.safety.google/adsservices/. (https://business.safety.google/adsservi ces/)Data processing conditions between controllers and standard contractual clauses forthird country transfers of data: https://business.safety.google/adscontrollerterm s)//business.safety.google/adscontrollerterms. (https://business.safety.google/adscontrollerterms)
- Google Adsense with personalized ads: We integrate the Google Adsense service, which makes it possible to place personalized ads within our online offering. GoogleAdsense analyzes user behavior and uses this data to display targeted advertising that istailored to the interests of our visitors. We receive financial compensation for each adplacement or other use of these ads; service provider: Google Ireland Limited, GordonHouse, Barrow Street, Dublin 4, Ireland; Legal basis: Consent (Art. 6 para. 1 sentence 1lit. a) GDPR); Website: https://marketingplatform.google.co

m/)//marketingplatform.google.com/; (https://marketingplatform.google.com/) Privacy Policy: https://policies.google.com/privacy%3B)//policies.google.com/privacy; (https://policies.google.com/privacy%3B)Basis for third country transfers: Data PrivacyFramework (DPF), Data Privacy Framework (DPF); Further information: Types ofprocessing and data processed: https://business.safety.google/adsservices/)/business.safety.google/adsservices/. (https://business.safety.google/adsservices/) Data (https://business.safety.google/adsservices/)processing conditions for Google advertising products: Information on the services Data processing terms between controllers and standard contractual clauses for third countrytransfers of data: https://business.safety.google/adscontrollerterm s)//business.safety.google/adscontrollerterms. (https://business.safety.google/adscontrollerterms)

• Google Adsense with non-personalized ads: We use the Google Adsense service to place non-personalized ads in our online offering. These ads are not based on individual user behavior, but are selected based on general characteristics such as the content of the

page or your approximate geographical location. We receive remuneration fordisplaying or otherwise using these ads; service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal basis: Consent (Art. 6 para. 1sentence 1 lit. a) GDPR); Website: https://marketingplatform.google.com/)//marketingplatform.google.com; (https://marketingplatform.google.com/)/marketingplatform.google.com/privacy%3 B)//policies.google.com/privacyPolicy: https://policies.google.com/privacy%3B)Basis for third country transfers: DataPrivacy Framework (DPF), Data Privacy Framework (DPF); Further information: Types of processing and data processed: https://business.safety.google/adsservices/)/business.safety.google/adsservices/. (https://business.safety.google/adsservices/)Data processing conditions for Google advertising products: Information on the servicesData processing terms between controllers and standard contractual clauses for thirdcountry transfers of data: https://business.safety.google/adscontrollerterms)//business.safety.google/adscontrollerterms. (https://business.safety.google/adscontrollerterms).

#### Presence in social networks (social media)

We maintain online presences within social networks and process user data in this context inorder 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. Thismay result in risks for users, for example because it could make it more difficult to enforce userrights.

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

For a detailed description of the respective forms of processing and the opt-out options, pleaserefer to the data protection declarations and information provided by the operators of therespective networks. In the case of requests for information and the assertion of data subject rights, we would also liketo point out that these can be asserted most effectively with the providers. Only the latter haveaccess to the user data and can take appropriate measures and provide information directly. Should you nevertheless require assistance, you can contact us.

• Types of data processed: Contact data (e.g. postal and e-mail addresses or telephone numbers); content data (e.g. text or image messages and contributions as well as theinformation relating to them, such as information on authorship or time of creation). Usage data (e.g. page views and length of stay, click paths, intensity and frequency of

use, device types and operating systems used, interactions with content and functions). • **Data subjects:** Users (e.g. website visitors, users of online services). • **Purposes of Processing:** Communication; Feedback (e.g. collecting feedback via online form). Public relations work.

• **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".

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

## Further information on processing processes, procedures and services:

• Facebook pages: Profiles within the social network Facebook - We are jointly responsible with Meta Platforms Ireland Limited for the collection (but not the furtherprocessing) of data of visitors to our Facebook page (so-called "fan page"). This dataincludes information about the types of content that users view or interact with, or theactions they take (see under "From you and to us").

actions they take (see under "Things you and others do and provide" in the FacebookData Policy: https: (https://www.facebook.com/privacy/policy/))//www.facebook.com/privacy/policy/), a (http s://www.facebook.com/privacy/policy/))s well as information about the devices used by users (e.g. IP addresses, operating system, browser type, languagesettings, cookie data; see under "Device information" in the Facebook Data Policy:https://www.facebook.com/privacy/polic y/))//www.facebook.com/privacy/policy/). As expla (https://www.facebook.com/privacy/policy/)) ined in the Facebook Data Policyunder "How do we use this information?", Facebook also collects and uses information to provide analytics services, known as "Page Insights", for page operators to help themunderstand how people interact with their pages and the content associated with them. We have concluded a special agreement with Facebook ("Information on Page Insights", https://www.facebook.com/legal/terms/page controller addendum), which regula (https:// www.facebook.com/legal/terms/page controller addendum))tes inparticular which security measures Facebook must observe and in which Facebook hasagreed to fulfill the rights of data subjects (i.e. users can, for example, send information or deletion requests directly to Facebook). The rights of users (in particular toinformation, deletion, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information on Page Insights"

((https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data)) https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data). T (https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data))hejoint controllership is limited to the collection by and transfer of data to Meta PlatformsIreland Limited, a company based in the EU. The further processing of the data is thesole responsibility of Meta Platforms Ireland Limited, which in particular concerns thetransfer of data to the parent company Meta Platforms, Inc. in the USA; serviceprovider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5,Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: https://www.facebook.com/)//www.facebook.com/) Privacy Policy:

https://www.facebook.com/privacy/polic

y/)//www.facebook.com/privacy/policy/. (https://www.facebook.com/privacy/polic

y/)Basis for third country transfers: Data Privacy Framework (DPF), Standard Contractual Clauses

((https://www.facebook.com/legal/EU data transfer addendum))

https://www.facebook.com/legal/EU\_data\_transfer\_addendum), Data Priva (https://www.facebook.com/legal/EU\_data\_transfer\_addendum))cyFramework (DPF)Standard Contractual Clauses ((https://www.facebook.com/legal/EU\_data\_transfer\_addendum))

https://www.facebook.com/legal/EU\_data\_transfer\_addendum). (https://www.facebook.com/legal/EU\_data\_transfer\_addendum))

• X: Social network; service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland; Legal basis:Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: https://x.com. (https://x.com/)Privacy Policy: https://x.com/de/privacy)//x.com/de/privacy)

#### Plug-ins and embedded functions and content

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

The integration always requires that the third-party providers of this content process the IPaddress of the user, as they would not be able to send the content to their browser without the IPaddress. The IP address is

therefore required to display this content or function. We endeavor toonly use content whose respective providers only use the IP address to deliver the content.

delivery of the content. Third-party providers may also use so-called pixel tags (invisiblegraphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags can beused to analyze information such as visitor traffic on the pages of this website. Thepseudonymous information may also be stored in cookies on the user's device and contain, among other things, technical information about the browser and operating system, referringwebsites, time of visit and other information about the use of our online offer, but may also belinked to such information from other sources.

**Notes on legal bases:** If we ask users for their consent to the use of third-party providers, thelegal basis for data processing is permission. Otherwise, user data is processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookiesin this privacy policy.

- **Processed data types:** Usage data (e.g. page views and length of stay, click paths, intensity and frequency of use, device types and operating systems used, interactions with content and functions). Meta, communication and process data (e.g. IP addresses, time data, identification numbers, persons involved).
- Data subjects: Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and user-friendliness.
- Storage and deletion: Deletion in accordance with the information in the section "General information on data storage and deletion". Storage of cookies for up to 2 years(Unless otherwise stated, cookies and similar storage methods may be stored on users'devices for a period of two years).
- Legal basis: Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

# Further information on processing processes, procedures and services:

• Integration of third-party software, scripts or frameworks (e.g. jQuery): We integrate software into our online offering that we retrieve from servers of otherproviders (e.g. function libraries that we use for the purpose of displaying or user-friendliness of our online offering). The respective providers collect the IP address of theusers and can process it for the purpose of transmitting the software to the user's browserand for security purposes, as well as for the evaluation and optimization of their offer. -We integrate software into our online offering that we retrieve from servers of otherproviders (e.g. function libraries that we use for the purpose of displaying or user-friendliness of our online offering). The respective providers collect the IP address of theusers and can use it for the purpose of

the transmission of the software to the user's browser and for security purposes, as wellas for the evaluation and optimization of their offer; **legal basis:** Legitimate interests(Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **Changes and updates**

We ask you to inform yourself regularly about the content of our privacy policy. We will adapt the privacy policy as soon as changes to the data processing carried out by us make this necessary. We will inform you as soon as the changes require an act of cooperation on your part(e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, please note that the addresses may change over time and please check their formation before contacting us.