

Privacy Policy

We have written this privacy policy (version 19.07.2021-111784085) in order to explain to you, in accordance with the provisions of the <u>General Data Protection Regulation (EU) 2016/679</u> and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered as gender-neutral.

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

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

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

Scope

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

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

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

Legal bases

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

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

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

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

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

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

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

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

Contact details of the data protection controller

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

JOPAMA GmbH Währinger Straße 5-7/15 1090 Wien

Authorised to represent: Joanna Mann MA MAS

Email: <u>info@almostfamily.at</u> Telephone: +43 664 1819560

Imprint: https://www.almostfamily.at/imprint

Storage Period

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

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

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

Rights in accordance with the General Data Protection Regulation

According to Article 13 of the GDPR, you have the following rights to ensure your data is processed fairly and transparently:

- According to Article 15 of the GDPR, you have a right to information as to whether we are processing your data. If this is the case, you have the right to receive a copy of the data in question, as well as the following information:
 - o the purpose of the processing;
 - o the categories of personal data concerned;
 - the recipients to whom the personal data is disclosed, and in particular how security can be guaranteed if the data is transferred to third countries;
 - o how long the data will be stored;
 - the existence of the right to request rectification, erasure or restriction of processing of personal data and the right to object to such processing;
 - the right to lodge a complaint with a supervisory authority (you can find links to these authorities below);
 - o the source of the data, if we have not collected it from you directly;
 - o whether profiling is carried out, i.e. whether data is automatically evaluated in order to be allocated to a personal profile on you.
- According to Article 16 of the GDPR, you have the right to request rectification of the data, which means that we have to correct your data should you find any errors.
- According to Article 17 of the GDPR, you have the right to have your personal data erased (the "right to be forgotten"), which specifically means that you can request to have your data deleted.
- According to Article 18 of the GDPR, you have the right to obtain restriction of processing, which means that we are only allowed to store the data but no longer use or process it.
- According to Article 20 of the GDPR, you have the right to request data portability, which means that on request, we will provide you with your data in a common format.
- According to Article 21 of the GDPR, you have a right to object, which will result in a change in processing after implementation.
 - o If the processing of your data is based on Article 6 (1) (e) (public interest, exercise of official authority) or Article 6 (1) (f) (legitimate interest), you can object to the processing. We will then check as soon as possible, whether we can legally comply with this objection.
 - o If data is used to operate direct mail, you can object to this type of data processing at any time. We will then no longer be allowed to use your data for direct marketing purposes.

- If your data is used for profiling, you can object to this type of data processing at any time. We will then no longer be allowed to use your data for profiling purposes.
- According to Article 22 of the GDPR, you may have the right not to be subject to a
 decision based solely on automated processing (including profiling).

If you believe that the processing of your data violates the data protection law, or your data protection claims have been violated in any other way, you can complain to the supervisory authority. For Austria this is the Data Protection Authority, whose website you can find at https://www.data-protection-authority.gv.at/ and for Germany you can contact the Federal Commissioner for Data Protection and Freedom of Information (BfDI).

In short: You have rights – do not hesitate to contact our responsible person or authority listed above!

Communications

Communications Overview

- 🚵 Affected parties: Anyone who communicates with us via phone, email or online form
- 🖩 Processed data: e. g. telephone number, name, email address or data entered in forms.

You can find more details on this under the respective form of contact

- Purpose: handling communication with customers, business partners, etc.
- Estorage duration: for the duration of the business case and the legal requirements
- Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1)
- (f) GDPR (legitimate interests)

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

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

Affected persons

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

Telephone

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

Email

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

Online forms

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

Legal bases

Data processing is based on the following legal bases:

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

Web hosting

Web hosting Overview

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

What is web hosting?

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

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

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

Whenever the browser on your computer establishes a connection (desktop, laptop, smartphone) and whenever data is being transferred to and from the web server, personal data may be

processed. After all, your computer stores data, and the web server also has to retain the data for a period of time in order to ensure it can operate properly.

Why do we process personal data?

The purposes of data processing are:

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

Which data are processed?

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

- the full address (URL) of the accessed website (e. g. https://www.examplepage.uk/examplesubpage.html?tid=111784085)
- browser and browser version (e.g. Chrome 87)
- the operating system used (e.g. Windows 10)
- the address (URL) of the previously visited page (referrer URL) (e. g. https://www.examplepage.uk/icamefromhere.html/)
- the host name and the IP address of the device from the website is being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- date and time
- in so-called web server log files

How long is the data stored?

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

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

Legal basis

The lawfulness of processing personal data in the context of web hosting is justified in Art. 6 para.

1 lit. f GDPR (safeguarding of legitimate interests), as the use of professional hosting with a provider is necessary to present the company in a safe and user-friendly manner on the internet, as well as to have the ability to track any attacks and claims, if necessary.

Cookies

Cookies Overview

Affected parties: visitors to the website

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

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

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

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

What are cookies?

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

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

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

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

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

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

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

Name: ga

Value: GA1.2.1326744211.152111784085-9 Purpose: Differentiation between website visitors

Expiry date: after 2 years

A browser should support these minimum sizes:

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

Which types of cookies are there?

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

There are 4 different types of cookies:

Essential cookies

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

Purposive cookies

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

Target-orientated cookies

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

Advertising cookies

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

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

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

Purpose of processing via cookies

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

Which data are processed?

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

Storage period of cookies

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

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

Right of objection – how can I erase cookies?

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

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

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

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

Legal basis

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

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

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

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

Web Analytics

Web Analytics Privacy Policy Overview

Affected parties: visitors to the website

Purpose: Evaluation of visitor information to optimise the website.

- Processed data: Access statistics that contain data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this from the respective web analytics tool directly.
- Storage period: depending on the respective web analytics tool used
- Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

What is Web Analytics?

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

Why do we run Web Analytics?

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

Which data are processed?

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

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

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

Duration of data processing

If we have any further information on the duration of data processing, you will find it below. We generally only process personal data for as long as is absolutely necessary to provide products and

services. The storage period may be extended if it is required by law, such as for accounting purposes for example for accounting.

Right to object

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

Legal basis

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

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

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

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

Facebook Pixel Privacy Policy

We use Facebook's Facebook pixel on our website. For that, we have implemented a code on our website. The Facebook pixel is a segment of a JavaScript code, which, in case you came to our website via Facebook ads, loads an array or functions that enable Facebook to track your user actions. For example, if you buy a product on our website, the Facebook pixel is triggered and stores your actions on our website in one or more cookies. These cookies enable Facebook to match your user data (customer data such as IP address, user ID) with the data of your Facebook account. After that, Facebook deletes your data again. The collected data is anonymous as well as inaccessible and can only be used for ad placement purposes. If you are a Facebook user and you are logged in, your visit to our website is automatically assigned to your Facebook user account.

We exclusively want to show our products or services to persons, who are interested in them. With the aid of the Facebook pixel, our advertising measures can get better adjusted to your wishes and interests. Therefore, Facebook users get to see suitable advertisement (if they allowed personalised advertisement). Moreover, Facebook uses the collected data for analytical purposes and for its own advertisements.

In the following we will show you the cookies, which were set on a test page with the Facebook pixel integrated to it. Please consider that these cookies are only examples. Depending on the interaction that is made on our website, different cookies are set.

Name: fbp

Value: fb.1.1568287647279.257405483-6111784085-7

Purpose: Facebook uses this cookie to display advertising products.

Expiration date: after 3 months

Name: fr

Value: OaPf312HOS5Pboo2r..Bdeiuf...1.0.Bdeiuf.

Purpose: This cookie is used for Facebook pixels to function properly.

Expiration date: after 3 months

Name: comment author 50ae8267e2bdf1253ec1a5769f48e062111784085-3

Value: Name of the author

Purpose: This cookie saves the text and name of a user who e.g. leaves a comment.

Expiration date: after 12 months

Name: comment_author_url_50ae8267e2bdf1253ec1a5769f48e062 Value: https%3A%2F%2Fwww.testseite...%2F (URL of the author)

Purpose: This cookie saved the URL of the website that the user types into a text box on our

website.

Expiration date: after 12 months

Name: comment author email 50ae8267e2bdf1253ec1a5769f48e062

Value: email address of the author

Purpose: This cookie saves the email address of the user, if they provided it on the website.

Expiration date: after 12 months

Note: The above-mentioned cookies relate to an individual user behaviour. Moreover, especially concerning the usage of cookies, changes at Facebook can never be ruled out.

If you are registered on Facebook, you can change the settings for advertisements yourself at https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen. If you are not a Facebook user, you can manage your user based online advertising at https://www.youronlinechoices.com/uk/your-ad-choices. You have the option to activate or deactivate any providers there.

We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing is done mainly through Facebook Pixel. This may lead to data not being anonymously processed and stored. Furthermore, US government authorities may get access to individual data. The data may also get linked to data from other Facebook services you have a user account with.

If you want to learn more about Facebook's data protection, we recommend you the view the company's in-house data policies at https://www.facebook.com/policy.php.

Privacy Policy for Facebook's Automatic Advanced Matching

Along with Facebook's pixel function, we have also activated Automatic Advanced Matching. This function allows us to send hashed emails, names, genders, cities, states, postcodes and dates of birth or telephone numbers as additional information to Facebook, provided you have made them available to us. This activation gives us the opportunity to customise advertising campaigns even better to persons who are interested in our services or products.

Google Analytics Privacy Policy

Google Analytics Privacy Policy Overview

Affected parties: website visitors

☐ Purpose: Evaluation of visitor information to optimise the website.

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

What is Google Analytics?

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

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

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

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

Why do we use Google Analytics on our website?

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

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

What data is stored by Google Analytics?

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

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

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

The following cookies are used by Google Analytics:

Name: _ga

Value: 2.1326744211.152111784085-5

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

Expiration date: After 2 years

Name: gid

Value: 2.1687193234.152111784085-1

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

Expiration date: After 24 hours

Name: _gat_gtag_UA_

Value: 1

Verwendungszweck: It is used for decreasing the demand rate. If Google Analytics is provided via

Google Tag Manager, this cookie gets the name _dc_gtm_ .

Expiration date: After 1 minute

Name: AMP_TOKEN Value: No information

Purpose: This cookie has a token which is used to retrieve the user ID by the AMP Client ID Service.

Other possible values suggest a logoff, a request or an error.

Expiration date: After 30 seconds up to one year

Name: utma

Value: 1564498958.1564498958.1564498958.1

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

Expiration date: After 2 years

Name: __utmt Value: 1

Purpose: Just like _gat_gtag_UA_ this cookie is used for keeping the requirement rate in check.

Expiration date: Afer 10 minutes

Name: utmb

Value: 3.10.1564498958

Purpose: This cookie is used to determine new sessions. It is updated every time new data or

information gets sent to Google Analytics.

Expiration date: After 30 minutes

Name: __utmc Value: 167421564

Purpose: This cookie is used to determine new sessions for recurring visitors. It is therefore a

session cookie, and only stays stored until you close the browser again.

Expiration date: After closing the browser

Name: utmz

Value: m | utmccn=(referral) | utmcmd=referral | utmcct=/

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

Expiration date: After 6 months

Name: utmv

Value: No information

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

sent to Google Analytics. **Expiration date:** After 2 years

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

cookies.

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

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

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

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

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

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

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

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

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

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

How long and where is the data stored?

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

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

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

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

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

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

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

How can I delete my data or prevent data retention?

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

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

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

Legal basis

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

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

We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing is mainly done by Google. This may result in data not being anonymously processed and stored. Furthermore, US government authorities may get access to individual data. It may also happen for this data to get linked to data from other Google services you have a user account with.

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

Google Analytics IP Anonymisation

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

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

Email-Marketing

Email Marketing Overview

- Affected parties: newsletter subscribers
- ☐ Purpose: direct marketing via email, notification of events that are relevant to the system
- Processed data: data entered during registration, but at least the email address. You can find more details on this in the respective email marketing tool used.
- **Storage duration:** for the duration of the subscription
- Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

What is Email-Marketing?

We use email marketing to keep you up to date. If you have agreed to receive our emails or newsletters, your data will be processed and stored. Email marketing is a part of online marketing. In this type of marketing, news or general information about a company, product or service are emailed to a specific group of people who are interested in it.

If you want to participate in our email marketing (usually via newsletter), you usually just have to register with your email address. To do this, you have to fill in and submit an online form. However, we may also ask you for your title and name, so we can address you personally in our emails.

The registration for newsletters generally works with the help of the so-called "double opt-in procedure". After you have registered for our newsletter on our website, you will receive an email, via which you can confirm the newsletter registration. This ensures that you own the email address you signed up with, and prevents anyone to register with a third-party email address. We or a notification tool we use, will log every single registration. This is necessary so we can ensure and prove, that registration processes are done legally and correctly. In general, the time of registration and registration confirmation are stored, as well as your IP address. Moreover, any change you make to your data that we have on file is also logged.

Why do we use Email-Marketing?

Of course, we want to stay in contact with you and keep you in the loop of the most important news about our company. For this, we use email marketing – often just referred to as "newsletters" – as an essential part of our online marketing. If you agree to this or if it is permitted by law, we will send you newsletters, system emails or other notifications via email. Whenever the term "newsletter" is used in the following text, it mainly refers to emails that are sent regularly. We of course don't want to bother you with our newsletter in any way. Thus, we genuinely strive to offer only relevant and interesting content. In our emails you can e.g. find out more about our company and our services or products. Since we are continuously improving our offer, our newsletter will always give you the latest news, or special, lucrative promotions. Should we commission a service provider for our email marketing, who offers a professional mailing tool, we do this in order to offer you fast and secure newsletters. The purpose of our email marketing is to inform you about new offers and also to get closer to our business goals.

Which data are processed?

If you subscribe to our newsletter via our website, you then have to confirm your membership in our email list via an email that we will send to you. In addition to your IP and email address, your name, address and telephone number may also be stored. However, this will only be done if you agree to this data retention. Any data marked as such are necessary so you can participate in the offered service. Giving this information is voluntary, but failure to provide it will prevent you from using this service. Moreover, information about your device or the type of content you prefer on our website may also be stored. In the section "Automatic data storage" you can find out more about how your data is stored when you visit a website. We record your informed consent, so we can always prove that it complies with our laws.

Duration of data processing

If you unsubscribe from our e-mail/newsletter distribution list, we may store your address for up to three years on the basis of our legitimate interests, so we can keep proof your consent at the time. We are only allowed to process this data if we have to defend ourselves against any claims.

However, if you confirm that you have given us your consent to subscribe to the newsletter, you can submit an individual request for erasure at any time. Furthermore, if you permanently object to your consent, we reserve the right to store your email address in a blacklist. But as long as you have voluntarily subscribed to our newsletter, we will of course keep your email address on file.

Withdrawal – how can I cancel my subscription?

You have the option to cancel your newsletter subscription at any time. All you have to do is revoke your consent to the newsletter subscription. This usually only takes a few seconds or a few clicks. Most of the time you will find a link at the end of every email, via which you will be able to cancel the subscription. Should you not be able to find the link in the newsletter, you can contact us by email and we will immediately cancel your newsletter subscription for you.

Legal basis

Our newsletter is sent on the basis of your **consent** (Article 6 (1) (a) GDPR). This means that we are only allowed to send you a newsletter if you have actively registered for it beforehand. Moreover, we may also send you advertising messages on the basis of Section 7 (3) UWG (Unfair Competition Act), provided you have become our customer and have not objected to the use of your email address for direct mail.

If available – you can find information on special email marketing services and how they process personal data, in the following sections.

Ascend by Wix Privacy Policy

We use Ascend by Wix on our website, which is a service for our email marketing. The service provider is the Israeli company Wix.com Ltd., 40 Namal Tel Aviv Street, Tel Aviv, 6350671 Israel. You can find out more about the data that is processed through the use of Ascend by Wix in the privacy policy at https://www.wix.com/about/privacy.

Google Ads (Google AdWords) Conversion Tracking Privacy Policy

We use Google Ads (previously Google AdWords) as an online marketing measure, to advertise our products and services. Thus, we want to draw more people's attention on the internet to the high quality of our offers. As part of our advertising measures with Google Ads, we use the conversion tracking of Google LLC., 1600 Amphitheatre Parkway, Mountain View, CA 94043,

USA ("Google") on our website. With the aid of this free tracking tool we can tailor our advertising offer better to your interests and needs. In the following article we will explain, why we use conversion tracking, what data gets saved and how you can prevent this data retention.

What is Google Ads conversion tracking?

Google Ads (previously Google AdWords) is the internal online advertising system of the company Google LLC. We are convinced of our offer's quality and would like as many people as possible to discover our website. For this, Google Ads offers the best platform within the online environment. Of course, we also want to get an overview of the cost-benefit factor of our advertising campaigns. Thence, we use Google Ads' conversion tracking tool.

But what is a conversion actually? A conversion occurs, when you turn from an interested visitor into an acting website visitor. This happens every time you click on our ad and then make another action, such as paying a visit to our website. With Google's conversion tracking tool, we can understand what happens after a user clicks our Google ad. It shows us for instance if products get bought, services are used or whether users have subscribed to our newsletter.

Why do we use Google Ads conversion tracking on our website?

We use Google Ads to show our offer also across other websites. Our aim is for our advertising campaigns to reach only those people, who are interested in our offers. With the conversion tracking tool, we see what keywords, ads, ad groups and campaigns lead to the desired customer actions. We see how many customers interact with our ads on a device, to then convert. With this data we can calculate our cost-benefit-factor, measure the success of individual ad campaigns and therefore optimise our online marketing measures. With the help of the obtained data we can give our website a more interesting design and customise our advertising offer better to your needs.

What data is stored with Google Ads conversion tracking?

For a better analysis of certain user actions, we have integrated a conversion tracking tag, or code snippet to our website. Therefore, if you click one of our Google ads, a Google domain stores the cookie "conversion" on your computer (usually in the browser) or on your mobile device. Cookies are little text files that save information on your computer.

Here are data of the most significant cookies for Google's conversion tracking:

Name: Conversion

Value: EhMI aySuoyv4gIVled3Ch0IlweVGAEgt-mr6aXd7dYISAGQ111784085-3

Purpose: This cookie saves every conversion you make on our website after you came to us via a

Google ad.

Expiry date: after 3 months

Name: gac

Value: 1.1558695989.EAlalQobChMliOmEgYO04glVj5AYCh2CBAPrEAAYASAAEglYQfD_BwE **Purpose:** This is a classic Google Analytics Cookie that records various actions on our website.

Expiry date: after 3 months

Note: The cookie _gac only appears in connection with Google Analytics. The above list does not claim to be exhaustive, as Google repeatedly change the cookies they use for analytical evaluation.

As soon as you complete an action on our website, Google identifies the cookie and saves your action as a so-called conversion. For as long as you surf our website, provided the cookie has not expired, both Google and us can determine that you found your way to us via a Google ad. Then,

the cookie is read and sent back to Google Ads, together with the conversion data. Moreover, other cookies may also be used for measuring conversions. Google Ads' conversion tracking can be fine-tuned and improved with the aid of Google Analytics. Furthermore, ads which Google displays in various places across the web, might be placed under our domain with the name "gads" or "gac".

Since September 2017, analytics.js retains various campaign information with the _gac cookie. This cookie stores data, as soon as you open one of our sites that has been set up for Google Ads' auto-tagging. In contrast to cookies that are placed for Google domains, Google can only read these conversion cookies when you are on our website. We do neither collect nor receive any personal data. We do obtain a report with statistical evaluations by Google. With the help thereof, we can not only see the total number of users who clicked our ad, but also what advertising measures were well received.

How long and where is the data stored?

At this point we want to reiterate, that we have no influence on how Google use the collected data. According to Google, the data are encrypted and saved on a secure server. In most cases, conversion cookies expire after 30 days, and do not transmit any personalised data. The cookies named "conversion" and "_gac" (which is used with Google Analytics) have an expiry date of 3 months.

How can I delete my data or prevent data retention?

You have the possibility to opt out of Google Ads' conversion tracking. The conversion tracking can be blocked by deactivating the conversion tracking cookie via your browser. If you do this, you will not be considered for the statistic of the tracking tool. You can change the cookie settings in your browser anytime. Doing so, works a little different in every browser. Hence, in the following you will find an instruction on how to manage cookies in your browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want to allow any cookies at all, you can set up your browser to notify you whenever a potential cookie is about to be set. This lets you decide upon permitting or denying the cookie's placement. By downloading and installing the browser plugin at https://support.google.com/ads/answer/7395996 you can also deactivate all "advertising cookies". Please consider that by deactivating these cookies, you cannot prevent all advertisements, only personalised ads.

Due to the certification for the American-European data protection convention "Privacy Shield", the American corporation Google LLC must comply to the EU's applicable data protection laws. If you want to find out more on data protection at Google, we recommend Google's general Privacy Policy: https://policies.google.com/privacy?hl=en-GB.

Facebook Data Policy

We use selected Facebook tools on our website. Facebook is a social media network of the company Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland.

With the aid of this tool we can provide the best possible offers to you and anyone interested in our products and services. In the following we will give you an overview on the different Facebook tools, as well as on what data is sent to Facebook and how you can delete these data.

What are Facebook tools?

Along with many other products, Facebook also offers so called "Facebook Business Tools". This is Facebook's official name for the tools, but it is not very common. Therefore, we decided to merely call them "Facebook tools". They include the following:

- Facebook-Pixel
- social plugins (e.g. the "Like" or "Share" button)
- Facebook Login
- Account Kit
- APIs (application programming interface)
- SDKs (Softwart development kits)
- Plattform-integrations
- Plugins
- Codes
- Specifications
- Documentations
- Technologies and Services

With these tools Facebook can extend its services and is able to receive information on user activities outside of Facebook.

Why do we use Facebook tools on our website?

We only want to show our services and products to people who are genuinely interested in them. With the help of advertisements (Facebook Ads) we can reach exactly these people. However, to be able to show suitable adverts to users, Facebook requires additional information on people's needs and wishes. Therefore, information on the user behaviour (and contact details) on our website, are provided to Facebook. Consequently, Facebook can collect better user data and is able to display suitable adverts for our products or services. Thanks to the tools it is possible to create targeted, customised ad campaigns of Facebook.

Facebook calls data about your behaviour on our website "event data" and uses them for analytics services. That way, Facebook can create "campaign reports" about our ad campaigns' effectiveness on our behalf. Moreover, by analyses we can get a better insight in how you use our services, our website or our products. Therefore, some of these tools help us optimise your user experience on our website. With the social plugins for instance, you can share our site's contents directly on Facebook.

What data is saved by the Facebook tools?

With the use of the Facebook tools, personal data (customer data) may be sent to Facebook. Depending on the tools used, customer data such as name, address, telephone number and IP address may be transmitted.

Facebook uses this information to match the data with the data it has on you (if you are a Facebook member). However, before the customer data is transferred to Facebook, a so called "Hashing" takes place. This means, that a data record of any size is transformed into a string of characters, which also has the purpose of encrypting data.

Moreover, not only contact data, but also "event data" is transferred. These data are the information we receive about you on our website. To give an example, it allows us to see what subpages you visit or what products you buy from us. Facebook does not disclose the obtained information to third parties (such as advertisers), unless the company has an explicit permission or is legally obliged to do so. Also, "event data" can be linked to contact information, which helps Facebook to offer improved, customised adverts. Finally, after the previously mentioned matching process, Facebook deletes the contact data.

To deliver optimised advertisements, Facebook only uses event data, if they have been combined with other data (that have been collected by Facebook in other ways). Facebook also uses event data for the purposes of security, protection, development and research. Many of these data are transmitted to Facebook via cookies. Cookies are little text files, that are used for storing data or information in browsers. Depending on the tools used, and on whether you are a Facebook member, a different number of cookies are placed in your browser. In the descriptions of the individual Facebook tools we will go into more detail on Facebook cookies. You can also find general information about the use of Facebook cookies at https://www.facebook.com/policies/cookies/.

How long and where are the data saved?

Facebook fundamentally stores data, until they are no longer of use for their own services and products. Facebook has servers for storing their data all around the world. However, customer data is cleared within 48 hours after they have been matched with their own user data.

How can I delete my data or prevent data retention?

In accordance with the General Data Protection Regulation (GDPR) you have the right of information, rectification, transfer and deletion of your data.

The collected data is only fully deleted, when you delete your entire Facebook account. Deleting your Facebook account works as follows:

- 1) Click on settings in the top right side in Facebook.
- 2) Then, click "Your Facebook information" in the left column.
- 3) Now click on "Deactivation and deletion".
- 4) Choose "Permanently delete account" and then click on "Continue to account deletion".
- 5) Enter your password, click on "continue" and then on "Delete account".

The retention of data Facebook receives via our site is done via cookies (e.g. with social plugins), among others. You can deactivate, clear or manage both all and individual cookies in your browser. How this can be done differs depending on the browser you use. The following instructions show, how to manage cookies in your browser:

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

If you generally do not want to allow any cookies at all, you can set up your browser to notify you whenever a cookie is about to be set. This gives you the opportunity to decide upon the permission or deletion of every single cookie.

Facebook is an active participant in the EU-U.S. Privacy Shield Framework, which regulates correct and secure transfer of personal data. You can find more information at https://www.privacyshield.gov/participant?id=a2zt000000GnywAAC. We hope we could give you an understanding of the most important information about the use of Facebook tools and data processing. If you want to find out more on how Facebook use your data, we recommend reading the data policies at https://www.facebook.com/about/privacy/update.

Instagram Privacy Policy

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

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

What is Instagram?

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

Why do we use Instagram on our website?

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

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

What data is saved by Instagram?

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

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

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

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

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

The following cookies were used in our test:

Name: csrftoken

Value: ""

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

Expiry date: after one year

Name: mid Value: ""

Purpose: Instagram places this cookie to optimise its own offers and services in- and outside of

Instagram. The cookie allocates a unique user ID.

Expiry date: after end of session

Name: fbsr_111784085124024

Value: no information

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

Expiry date: after end of session

Name: rur Value: ATN

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

Expiry date: after end of session

Name: urlgen

Value: "{"194.96.75.33": 1901}:1iEtYv:Y833k2 UjKvXqYe111784085"

Purpose: This cookie serves Instagram's marketing purposes.

Expiry date: after end of session

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

How long and where are these data stored?

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

How can I delete my data or prevent data retention?

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

And this is how an Instagram account can be deleted:

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

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

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

Chrome: Clear, enable and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Clear cookies and site data in Firefox

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete cookies in Microsoft Edge

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

Instagram is a subsidiary company of Facebook Inc. and Facebook is an active participant in the EU-U.S. Privacy Shield Framework. This framework regulates correct transfer between the USA and the European Union. At https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC you can find out more about this. We gave our best to make you familiar with the most important information on data processing by Instagram. At https://help.instagram.com/519522125107875 you can find out more on Instagram's data policies.

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