

*Its important to notice, that The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) and his Partners are using the EU valid Data Privacy Policy whixh ist he most strict worldwide and provide the beste data security to our Clients. Please note that The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) is not required by law to fullfill the following requirements. The UK Data Protection Act applies to The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) and is executed with a yearly reporting and payment oft he data protection fee oft he United Kingdome.*

## **Privacy Policy**

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA). The use of the Internet pages of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA). By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

## **1. Definitions**

The data protection declaration of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

- **a) Personal data**

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **b) Data subject**

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

- **c) Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **d) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

- **e) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

- **f) Pseudonymisation**

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

- **g) Controller or controller responsible for the processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means

of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- **h) Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

- **i) Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

- **j) Third party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

- **k) Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## **2. Name and Address of the controller**

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA)

is an international business partnership with licence number

**OC452722**

**124 City Road**

**London, EC1V 2NX**

**England, United Kingdom**

Email: [info@bapartners\(T/A DBA\).com](mailto:info@bapartners(T/A DBA).com)

### **3. Cookies**

The Internet pages of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

### **4. Collection of general data and information**

The website of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the

content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

## **5. Registration on our website**

The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. The entirety of the controller's employees are available to the data subject in this respect as contact persons.

## **6. Subscription to our newsletters**

On the website of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA), users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) informs its customers and business partners regularly by means of a newsletter about enterprise offers. The enterprise's newsletter may only be received

by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

## **7. Newsletter-Tracking**

The newsletter of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the controller in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. The The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **8. Contact possibility via the website**

The website of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also

includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

## **9. Comments function in the blog on the website**

The The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) offers users the possibility to leave individual comments on individual blog contributions on a blog, which is on the website of the controller. A blog is a web-based, publicly-accessible portal, through which one or more people called bloggers or web-bloggers may post articles or write down thoughts in so-called blogposts. Blogposts may usually be commented by third parties.

If a data subject leaves a comment on the blog published on this website, the comments made by the data subject are also stored and published, as well as information on the date of the commentary and on the user's (pseudonym) chosen by the data subject. In addition, the IP address assigned by the Internet service provider (ISP) to the data subject is also logged. This storage of the IP address takes place for security reasons, and in case the data subject violates the rights of third parties, or posts illegal content through a given comment. The storage of these personal data is, therefore, in the own interest of the data controller, so that he can exculpate in the event of an infringement. This collected personal data will not be passed to third parties, unless such a transfer is required by law or serves the aim of the defense of the data controller.

## **10. Subscription to comments in the blog on the website**

The comments made in the blog of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) may be subscribed to by third parties. In particular, there is the possibility that a commenter subscribes to the comments following his comments on a particular blog post.

If a data subject decides to subscribe to the option, the controller will send an automatic confirmation e-mail to check the double opt-in procedure as to whether the owner of the specified e-mail address decided in favor of this option. The option to subscribe to comments may be terminated at any time.

## **11. Routine erasure and blocking of personal data**

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## **12. Rights of the data subject**

- **a) Right of confirmation**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

- **b) Right of access**

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

- **c) Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.



If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

- **d) Right to erasure (Right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA), he or she may, at any time, contact any employee of the controller. An employee of The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) will arrange the necessary measures in individual cases.

- **e) Right of restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.

- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA), he or she may at any time contact any employee of the controller. The employee of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) will arrange the restriction of the processing.

#### • **f) Right to data portability**

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA).

#### • **g) Right to object**

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

The The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) to the processing for direct marketing purposes, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA). In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

- **h) Automated individual decision-making, including profiling**

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA).

- **i) Right to withdraw data protection consent**

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of the The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA).

### **13. Data protection for applications and the application procedures**

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by e-mail or by means of a web form on the website to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

### **14. Data Protection provisions about the application and use of AddThis**

On this website, the data controller has integrated components of the enterprise AddThis. AddThis is a so-called bookmarking provider. The service allows for simplified bookmarking of Internet pages via buttons. By clicking on the AddThis component with the mouse, or by clicking on it, a list of bookmarking and sharing services is displayed. AddThis is used on over 15 million websites, and the buttons are displayed, according to the information of the operating enterprise, over 20 billion times a year.

The operating company of AddThis is Oracle Corporation, 10 Van de Graaff Drive, Burlington, MA 01803, USA.

By calling up one of the individual pages of the website, which is operated by the controller, and on which an AddThis component has been integrated, the Internet browser of the data subject is automatically prompted by the respective AddThis component to download data from the website [www.addthis.com](http://www.addthis.com). Within the framework of this technical procedure, AddThis is informed of the visit and the specific individual page of this website that was used by the data subject with the help of information technology. In addition, AddThis is informed about the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject, the browser type and language, the web page accessed before our website, the date and the time of the visit to our website. AddThis uses this data to create anonymous user profiles. The data and information transmitted to AddThis in this way will enable the enterprise AddThis, as well as affiliates or their partner-enterprises, to contact visitors of the web pages of the controller with personalized and interest-based advertising.

AddThis displays personalized and interest-based advertising on the basis of a cookie set by the enterprise. This cookie analyzes the individual surfing behavior of the computer system used by the data subject. The cookie saves the computer-based outgoing visits to Internet pages.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent AddThis from setting a cookie on the information technology system of the data subject. Cookies may also be deleted by AddThis at any time via an Internet browser or other software programs.

The data subject also has the possibility of objecting permanently to the processing of personal data by AddThis. For this purpose, the data subject must click on the opt-out button under the link <http://www.addthis.com/privacy/opt-out>, which sets an opt-out cookie. The opt-out cookie used for this purpose is placed on the information technology system used by the data subject. If the data subject deletes the cookies from his system, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of AddThis may be accessed under <http://www.addthis.com/privacy/privacy-policy>.

## **15. Data protection provisions about the application and use of Adobe Analytics (Omniure) / Adobe marketing cloud**

On this website, the controller has integrated components of the enterprise Adobe. Adobe Analytics (Omniure) and Adobe Marketing Cloud (hereinafter referred to as "Omniure") is an instrument that allows for more efficient online marketing and web analysis. Omniure is part of Adobe Marketing Cloud. Adobe Marketing Cloud enables real-time analysis of visitor flows on Internet sites. The real-time analysis includes project reports and allows an ad-hoc analysis of site visitors. Customer interactions are presented in such a way as to give the controller a better overview of users' online activities of this website by displaying the data in simple and interactive dashboards and converting them into reports. This enables the controller to obtain information in real-time and to identify problems that occur more quickly.

The operating company for these services is Adobe Systems Software Ireland Limited, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland.

Omniure sets a cookie on the information technology system of the data subject (cookies have already been explained in advance, which may be read above). The controller ensures that the tracking data transferred to the Adobe data center is anonymized prior to geolocation. The anonymization is implemented by replacing the last part of the IP address. The controller has made server-sided settings, which are used to anonymize the IP address of the data subject prior to processing for geolocation and range measurement. Adobe will use the data and information obtained via our website to analyze the user behavior of the data subject on behalf of the controller. Adobe will also use the data to create reports on user activity on our behalf, as well as provide other services to our enterprise related to the use of our website. The IP address of the data subject is not merged with other personal data by Adobe.

As stated above, the data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Omniure from setting a cookie on the information technology system of the data subject.

Cookies may also be deleted by Omniture at any time via an Internet browser or other software programs.

The data subject also has the possibility of objecting to and preventing the collection of data generated by the Adobe cookie on the use of this website and the processing of this data by Adobe. For this purpose, the data subject must click on the opt-out button under the link <http://www.adobe.com/de/privacy/opt-out.html>, which sets an opt-out cookie. The opt-out cookie used for this purpose is placed on the information technology system used by the data subject. If the data subject deletes the cookies from his system, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of Adobe may be accessed under <http://www.adobe.com/privacy.html>.

## **16. Data protection provisions about the application and use of Affilinet**

On this website, the controller has integrated components of the enterprise Affilinet. Affilinet is a German affiliate network, which offers affiliate marketing.

Affiliate marketing is a web-based form of distribution, which allows commercial operators of Internet sites, the so-called merchants or advertisers, to show advertising, which will be paid mostly through click or sale commissions, on third-party Internet sites that are also called affiliates or publishers. The Merchant provides through the affiliate network an advertising medium, such as an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on its own Internet pages or via other channels such as keyword advertising or e-mail marketing.

The operating company of Affilinet is the affilinet GmbH, Sapporobogen 6-8, 80637 München, Germany.

Affilinet sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie by Affilinet stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of this data storage is the processing of commission payments between a merchant and affiliate, which are processed through the affiliate network, that is Affilinet.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the Internet browser used and, thus, permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Affilinet from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Affilinet may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of Affilinet may be accessed under <https://www.affili.net/uk/footeritem/privacy-policy>.

## **17. Data protection provisions about the application and use of Econda**

On this website, the controller has integrated components of the enterprise Econda. Econda is a web analytics service. Web analytics is the collection, gathering and analysis of data about the behavior of visitors of the websites. A web analysis service captures, among other things, data pertaining to which website a person has arrived on via another website (the so-called referrer), which sub-site of the website was visited, or how often and for what duration a sub-site was viewed. Web analytics are mainly used for the optimization of a website in order to carry out a cost-benefit analysis of Internet advertising.

The operating company of Econda is econda GmbH, Zimmerstraße 6, 76137 Karlsruhe, Germany.

Econda sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With each call up to one of the individual pages of this Internet site, which is operated by the controller and on which an Econda component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to transmit data for marketing and optimisation purposes to Econda through the Econda component. During the course of this technical procedure, Econda obtains data that is used to create pseudonymous user profiles. The user profiles created in such a way are used to analyze the behavior of the data subject who has accessed the website of the controller and are evaluated with the aim of improving and optimizing the website. The data collected via the Econda component is not used to identify the data subject without first obtaining separate and explicit consent from the data subject. These data will not be merged with personal data or with other data that contain the same pseudonym.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the Internet browser used, and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Econda from setting a cookie on the information technology system of the data subject. In addition, cookies already set by Econda may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the Econda cookie as well as the processing of these data by Econda and the chance to preclude any such. For this purpose, the data subject must press the 'submit' button under the link <http://www.econda.com/econda/enterprise/data-protection/revocation-of-data-storage/>, which sets the opt-out cookie. The opt-out cookie used for this purpose is placed on the information technology system used by the data subject. If the cookies are deleted from the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of Econda may be accessed under <http://www.econda.com/econda/enterprise/data-protection/data-privacy-statement/>.

## **18. Data protection provisions about the application and use of Etracker**

On this website, the controller has integrated components of the enterprise Etracker. Etracker is a Web analytics service. Web analytics is the collection, gathering and analysis of data about the behavior of visitors to websites. A web analysis service captures, among other things, data about from which website a person has arrived on another website (the so-called referrer), which sub-sites of the website were visited or how often and for what duration a sub-site was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operating company of Etracker is etracker GmbH, Erste Brunnenstraße 1, 20459 Hamburg, Germany.

Etracker sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which an Etracker component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to transmit data for marketing and optimisation purposes to Etracker through the Etracker component. During the course of this technical procedure Etracker receives data that is used to create pseudonymous user profiles. The user profiles created in such a way are used for the analysis of the behaviour of the data subject, which has accessed Internet page of the controller and are evaluated with the aim of improving and optimizing the website. The data collected through the Etracker component is not used without first obtaining of a separate and explicit consent of the data subject to identify the data subject. This data is not merged with personal data or other data which contain the same pseudonym.

The data subject may, as stated above, at any time prevent the setting of cookies through our website by means of a corresponding adjustment of the Internet browser used and, permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Etracker from setting a cookie on the information technology system of the data subject. In addition, cookies already set by Etracker may be deleted at any time via a Web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the Etracker cookie as well as the processing of these data by Etracker and the chance to preclude such. For this purpose, the data subject must press the 'cookie-set' button under the link <http://www.etracker.de/privacy?sid=58e31c864e66848984dfc79b8f6b51a9&id=privacy&et=V23Jbb&languageId=2>, which sets an opt-out cookie. The opt-out cookie used for this purpose is placed on the information technology system used by the data subject. If the cookies are deleted from the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of Etracker may be accessed under <https://www.etracker.com/de/datenschutz.html>.

## **19. Data protection provisions about the application and use of Facebook**



On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland (T/A DBA), 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the "Like" button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

## **20. Data protection provisions about the application and use of Flattr**

On this website, the controller has integrated components of the enterprise Flattr. Flattr is a social payment service from Sweden, which allows the user to distribute donations to media providers on the Internet through deposits on a credit account and by the provision of a monthly

budget. The users of the service may instruct Flatrr, by clicking on a Flatrr button that is integrated on the website of a media provider, to distribute its fixed monthly budget to this media provider.

The operating company of Flatrr is Flatrr AB, Box 4111, 203 12 Malmö, Sweden.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Flatrr component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Flatrr component from Flatrr through the Flatrr component. During the course of this technical procedure, Flatrr is made aware of what specific sub-sites of our website are visited by the data subject.

If the data subject is logged in at the same time at Flatrr, Flatrr detects with each call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—what specific sub-site of our Internet page was visited by the data subject. This information is collected by the Flatrr component and associated with the respective Flatrr account of the data subject. If the data subject clicks on the Flatrr button integrated into our website, then this information is transmitted to Flatrr for billing purposes. The data subject has already agreed to the transmission of such information towards Flatrr.

Further information and the applicable data protection provisions of Flatrr may be retrieved under <https://flatrr.com/privacy>.

## **21. Data protection provisions about the application and use of functions of the Amazon Partner program**

On this website, the controller has integrated Amazon components as a participant in the Amazon partner program. The Amazon components were created by Amazon with the aim to mediate customers through advertisements on various websites of the Amazon group, in particular Amazon.co.uk, Local.Amazon.co.uk, Amazon.de, BuyVIP.com, Amazon.fr, Amazon.it and Amazon.es in return for the payment of a commission. By using the Amazon components, the controller may generate advertising revenue.

The operating company of this Amazon component is Amazon EU S.à.r.l, 5 Rue Plaetis, L-2338 Luxembourg, Luxembourg.

Amazon sets a cookie the information technology system of the data subject. The definition of cookies is explained above. With each single call-up to one of the individual pages of this Internet website, which is operated by the controller and in which an Amazon component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data for the purpose of online advertising and the settlement of commissions to Amazon through the respective Amazon component. During the course of this technical procedure, Amazon receives personal information that is used to trace the origin of orders from Amazon, and as a result, to allow the accounting of a commission. Among other things, Amazon may understand that the data subject has clicked on an affiliate link on our website.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used, and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent

Amazon from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Amazon may be deleted at anytime via a web browser or other software programs.

Further information and the actual data protection provisions of Amazon may be retrieved under [https://www.amazon.de/gp/help/customer/display.html?nodeId=3312401&language=en\\_GB](https://www.amazon.de/gp/help/customer/display.html?nodeId=3312401&language=en_GB).

## **22. Data protection provisions about the application and use of functions pertaining to the collection society WORT (VG WORT)**

On this website, the controller has integrated a tracking pixel. A tracking pixel is a thumbnail image that is embedded in web pages to enable a log file recording and a log file analysis so that a statistical analysis may be performed. The integrated tracking pixels serve the Scalable Central Measurement System (SZMS) of the collecting society WORT (VG Wort).

The Scalable Central Measurement System is operated by INFOnline GmbH, Brühler Str. 9, 53119 Bonn, Germany.

The Scalable Central Measurement System is used to determine with statistical key figures, the probability of the copying of texts. The embedded tracking pixel ensures that the collecting society WORT may detect whether, when, and how various users (including the data subject) opened our website and what content was retrieved.

The data obtained using the Scalable Central Measurement System is collected anonymously. To capture the traffic, either a so-called session cookie is created for the purpose of recognition of the users of a website, that is a signature, which consists of various automatically transmitted information, or alternative methods are used. The IP address of the Internet connection used by the data subject is collected only in anonymised form and processed. The data subject is not identified at any time.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus contradict the setting of cookies permanently. Such an adjustment to the Internet browser used would also prevent VG Wort from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by VG Wort may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data generated by VG Wort related to the use of this website, as well as to the processing of these data through VG Wort and the chance to preclude any such. For this purpose, the data subject must press the 'opt-out' button under the link <http://optout.ioam.de>, which sets an opt-out cookie. The opt-out cookie used for this purpose is placed on the information technology system used by the data subject. If the cookies are deleted on the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of INFOnline may be accessed under <https://www.infonline.de/datenschutz/>.

### **23. Data protection provisions about the application and use of Getty Images Photos**

On this website, the controller has integrated components of the enterprise Getty Images. Getty Images is an American picture agency. A picture agency is an enterprise which provides images and other image material on the market. Generally, picture agencies market photographs, illustrations and footage. A picture agency licenses different customers, in particular Internet website operators, editors of print and television media and advertising agencies, the images used by them.

The operating company of the Getty Images components is Getty Images International, 1st floor, The Herbert Building, The Park, Carrickmines, Dublin 18, Ireland.

Getty Images allows the embedding of stock images (where possibly free of charge). Embedding is the inclusion or integration of any specific foreign content, e.g. text, video or image data provided by a foreign website, and then appears on the own website. A so-called embedded code is used to embed. An embedded code is an HTML code that is integrated into a website from a website owner. When an embedded code is integrated by a website owner, the external content of the other website is displayed by default immediately, as long as a website is visited. To display third-party content, the external content is loaded directly from the other Internet site. Getty Images provides further information about the embedded of content under <http://www.gettyimages.de/resources/embed>.

Through the technical implementation of the embedded code, which allows the image display of the images of Getty Images, the IP address of the Internet connection, through which the data subject accesses our website, is transmitted to Getty Images. Further, Getty Images collects our website, browser type, browser language, and time and length of access. In addition, Getty Images may collect navigation information, which is information about which of our subpages have been visited by the data subject and which links have been clicked on, as well as other interactions that the data subject has carried out when visiting our website. This data may be stored and analyzed by Getty Images.

Further information and the applicable data protection provisions of Getty Images may be retrieved under <https://www.gettyimages.de/company/privacy-policy>.

### **24. Data protection provisions about the application and use of Google AdSense**

On this website, the controller has integrated Google AdSense. Google AdSense is an online service which allows the placement of advertising on third-party sites. Google AdSense is based on an algorithm that selects advertisements displayed on third-party sites to match with the content of the respective third-party site. Google AdSense allows an interest-based targeting of the Internet user, which is implemented by means of generating individual user profiles.

The operating company of Google's AdSense component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of Google's AdSense component is the integration of advertisements on our website. Google AdSense places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Alphabet Inc. is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google AdSense

component is integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google AdSense component for the purpose of online advertising and the settlement of commissions to Alphabet Inc. During the course of this technical procedure, the enterprise Alphabet Inc. gains knowledge of personal data, such as the IP address of the data subject, which serves Alphabet Inc., inter alia, to understand the origin of visitors and clicks and subsequently create commission settlements.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Alphabet Inc. from setting a cookie on the information technology system of the data subject. Additionally, cookies already in use by Alphabet Inc. may be deleted at any time via a web browser or other software programs.

Furthermore, Google AdSense also uses so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in web pages to enable a log file recording and a log file analysis through which a statistical analysis may be performed. Based on the embedded tracking pixels, Alphabet Inc. is able to determine if and when a website was opened by a data subject, and which links were clicked on by the data subject. Tracking pixels serve, inter alia, to analyze the flow of visitors on a website.

Through Google AdSense, personal data and information—which also includes the IP address, and is necessary for the collection and accounting of the displayed advertisements—is transmitted to Alphabet Inc. in the United States of America. These personal data will be stored and processed in the United States of America. The Alphabet Inc. may disclose the collected personal data through this technical procedure to third parties.

Google AdSense is further explained under the following link  
<https://www.google.com/intl/en/adsense/start/>.

## **25. Data protection provisions about the application and use of Google Analytics (with anonymization function)**

On this website, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

For the web analytics through Google Analytics the controller uses the application "\_gat.\_anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

## **26. Data protection provisions about the application and use of Google Remarketing**

On this website, the controller has integrated Google Remarketing services. Google Remarketing is a feature of Google AdWords, which allows an enterprise to display advertising to Internet users who have previously resided on the enterprise's Internet site. The integration of Google Remarketing therefore allows an enterprise to create user-based advertising and thus shows relevant advertisements to interested Internet users.

The operating company of the Google Remarketing services is the Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of Google Remarketing is the insertion of interest-relevant advertising. Google Remarketing allows us to display ads on the Google network or on other websites, which are based on individual needs and matched to the interests of Internet users.

Google Remarketing sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google enables a recognition of the visitor of our website if he calls up consecutive web pages, which are also a member of the Google advertising network. With each call-up to an Internet site on which the service has been integrated by Google Remarketing, the web browser of the data subject identifies automatically with Google. During the course of this technical procedure, Google receives personal information, such as the IP address or the surfing behaviour of the user, which Google uses, inter alia, for the insertion of interest relevant advertising.

The cookie is used to store personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to the interest-based advertising by Google. For this purpose, the data subject must call up the link to [www.google.de/settings/ads](http://www.google.de/settings/ads) and make the desired settings on each Internet browser used by the data subject.

Further information and the actual data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

## **27. Data protection provisions about the application and use of Google+**

On this website, the controller has integrated the Google+ button as a component. Google+ is a so-called social network. A social network is a social meeting place on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Google+

allows users of the social network to include the creation of private profiles, upload photos and network through friend requests.

The operating company of Google+ is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

With each call-up to one of the individual pages of this website, which is operated by the controller and on which a Google+ button has been integrated, the Internet browser on the information technology system of the data subject automatically downloads a display of the corresponding Google+ button of Google through the respective Google+ button component. During the course of this technical procedure, Google is made aware of what specific sub-page of our website was visited by the data subject. More detailed information about Google+ is available under <https://developers.google.com/+/>.

If the data subject is logged in at the same time to Google+, Google recognizes with each call-up to our website by the data subject and for the entire duration of his or her stay on our Internet site, which specific sub-pages of our Internet page were visited by the data subject. This information is collected through the Google+ button and Google matches this with the respective Google+ account associated with the data subject.

If the data subject clicks on the Google+ button integrated on our website and thus gives a Google+ 1 recommendation, then Google assigns this information to the personal Google+ user account of the data subject and stores the personal data. Google stores the Google+ 1 recommendation of the data subject, making it publicly available in accordance with the terms and conditions accepted by the data subject in this regard. Subsequently, a Google+ 1 recommendation given by the data subject on this website together with other personal data, such as the Google+ account name used by the data subject and the stored photo, is stored and processed on other Google services, such as search-engine results of the Google search engine, the Google account of the data subject or in other places, e.g. on Internet pages, or in relation to advertisements. Google is also able to link the visit to this website with other personal data stored on Google. Google further records this personal information with the purpose of improving or optimizing the various Google services.

Through the Google+ button, Google receives information that the data subject visited our website, if the data subject at the time of the call-up to our website is logged in to Google+. This occurs regardless of whether the data subject clicks or doesn't click on the Google+ button.

If the data subject does not wish to transmit personal data to Google, he or she may prevent such transmission by logging out of his Google+ account before calling up our website.

Further information and the data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>. More references from Google about the Google+ 1 button may be obtained under <https://developers.google.com/+/web/buttons-policy>.

## **28. Data protection provisions about the application and use of Google-AdWords**

On this website, the controller has integrated Google AdWords. Google AdWords is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google AdWords allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the



user utilizes the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords.

The operating company of Google AdWords is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of Google AdWords is the promotion of our website by the inclusion of relevant advertising on the websites of third parties and in the search engine results of the search engine Google and an insertion of third-party advertising on our website.

If a data subject reaches our website via a Google ad, a conversion cookie is filed on the information technology system of the data subject through Google. The definition of cookies is explained above. A conversion cookie loses its validity after 30 days and is not used to identify the data subject. If the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g. the shopping cart from an online shop system, were called up on our website. Through the conversion cookie, both Google and the controller can understand whether a person who reached an AdWords ad on our website generated sales, that is, executed or canceled a sale of goods.

The data and information collected through the use of the conversion cookie is used by Google to create visit statistics for our website. These visit statistics are used in order to determine the total number of users who have been served through AdWords ads to ascertain the success or failure of each AdWords ad and to optimize our AdWords ads in the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, at any time, prevent the setting of cookies by our website, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a conversion cookie on the information technology system of the data subject. In addition, a cookie set by Google AdWords may be deleted at any time via the Internet browser or other software programs.

The data subject has a possibility of objecting to the interest based advertisement of Google. Therefore, the data subject must access from each of the browsers in use the link [www.google.de/settings/ads](http://www.google.de/settings/ads) and set the desired settings.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

## **29. Data protection provisions about the application and use of Instagram**

On this website, the controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audiovisual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

The operating company of the services offered by Instagram is Facebook Ireland (T/A DBA), 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram becomes aware of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on Instagram, Instagram detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Instagram component and is associated with the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, then Instagram matches this information with the personal Instagram user account of the data subject and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited our website provided that the data subject is logged in at Instagram at the time of the call to our website. This occurs regardless of whether the person clicks on the Instagram button or not. If such a transmission of information to Instagram is not desirable for the data subject, then he or she can prevent this by logging off from their Instagram account before a call-up to our website is made.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

### **30. Data protection provisions about the application and use of Jetpack for WordPress**

On this website, the controller has integrated Jetpack. Jetpack is a WordPress plug-in, which provides additional features to the operator of a website based on WordPress. Jetpack allows the Internet site operator, inter alia, an overview of the visitors of the site. By displaying related posts and publications, or the ability to share content on the page, it is also possible to increase visitor numbers. In addition, security features are integrated into Jetpack, so a Jetpack-using site is better protected against brute-force attacks. Jetpack also optimizes and accelerates the loading of images on the website.

The operating company of Jetpack Plug-Ins for WordPress is the Aut O'Mattic A8C Ireland (T/A DBA), Business Centre, No.1 Lower Mayor Street, International Financial Services Centre, Dublin 1, Ireland.

Jetpack sets a cookie on the information technology system used by the data subject. The definition of cookies is explained above. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Jetpack component was

integrated, the Internet browser on the information technology system of the data subject is automatically prompted to submit data through the Jetpack component for analysis purposes to Automattic. During the course of this technical procedure Automattic receives data that is used to create an overview of website visits. The data obtained in this way serves the analysis of the behaviour of the data subject, which has access to the Internet page of the controller and is analyzed with the aim to optimize the website. The data collected through the Jetpack component is not used to identify the data subject without a prior obtaining of a separate express consent of the data subject. The data comes also to the notice of Quantcast. Quantcast uses the data for the same purposes as Automattic.

The data subject can, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Automattic/Quantcast from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Automattic/Quantcast may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the Jetpack cookie as well as the processing of these data by Automattic/Quantcast and the chance to preclude any such. For this purpose, the data subject must press the 'opt-out' button under the link <https://www.quantcast.com/opt-out/> which sets an opt-out cookie. The opt-out cookie set with this purpose is placed on the information technology system used by the data subject. If the cookies are deleted on the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of Automattic may be accessed under <https://automattic.com/privacy/>. The applicable data protection provisions of Quantcast can be accessed under <https://www.quantcast.com/privacy/>.

### **31. Data protection provisions about the application and use of LinkedIn**

The controller has integrated components of the LinkedIn Corporation on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries use LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in may be accessed under

<https://developer.linkedin.com/plugins>. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the LinkedIn component and associated with the respective LinkedIn account of the data subject. If the data subject clicks on one of the LinkedIn buttons integrated on our website, then LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data.

LinkedIn receives information via the LinkedIn component that the data subject has visited our website, provided that the data subject is logged in at LinkedIn at the time of the call-up to our website. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the data subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our website is made.

LinkedIn provides under <https://www.linkedin.com/psettings/guest-controls> the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available under <https://www.linkedin.com/legal/cookie-policy>.

## **32. Data protection provisions about the application and use of LiveZilla**

On this website, the controller has integrated the LiveZilla component. LiveZilla is a live support help desk software that enables direct communication in real time (so-called live chat) with visitors of their own Internet page.

The developer of the LiveZilla component is LiveZilla GmbH, Byk-Gulden-Straße 18, 78224 Singen, Germany.

With each single call-up to our website, which is equipped with a LiveZilla component, this component collects data with the purpose of operating the live chat system and analyzing the operation of the system. Further information about LiveZilla may be retrieved under <http://www.livezilla.net/home/en/>.

The LiveZilla component sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. Pseudonymised user profiles may be created with the help of the LiveZilla cookie. Such pseudonymised usage profiles may be used by the controller to conduct an analysis of visitor behavior as well as analyze and maintain a proper operation of the live chat system. The analysis is also improving our offers. The data collected through the LiveZilla component is not used to identify the data subject without first obtaining of a separate express consent of the data subject. These data are not merged with personal data or other data which contain the same pseudonym.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent the LiveZilla component from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by the LiveZilla component may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of LiveZilla GmbH may be accessed under <https://www.livezilla.net/disclaimer/en/>.

### **33. Data protection provisions about the application and use of MySpace**

On this website, the controller has integrated components of MySpace (T/A DBA). MySpace is a so-called social network. A social network is an Internet social meeting place, an online community that allows users to communicate and interact with each other in a virtual space. A social network can serve as a platform for the exchange of opinions and experiences or allow the Internet community to provide personal or company-related information. MySpace allows users of the social network to create free blogs or groups of users, including photos and videos.

The operating company of MySpace is Myspace (T/A DBA), 6100 Center Drive, Suite 800, 90045 Los Angeles, USA.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a MySpace component (MySpace plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download through the respective MySpace component a display of the corresponding MySpace component of MySpace. Further information about MySpace is available under <https://myspace.com>. During the course of this technical procedure, MySpace gains knowledge of what specific sub-page of our website is visited by the data subject.

If the data subject is logged in at the same time on MySpace, MySpace detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the MySpace component and associated with the respective MySpace account of the data subject. If the data subject clicks on one of the MySpace buttons, integrated on our website, then MySpace assigns this information with the personal MySpace user account of the data subject and stores the personal data.

MySpace receives information via the MySpace component that the data subject has visited our website, provided that the data subject is logged in at MySpace at the time of the call to our website. This occurs regardless of whether the person clicks on the MySpace component or not. If such a transmission of information to MySpace is not desirable for the data subject, then he or she may prevent this by logging off from their MySpace account before a call-up to our website is made.

The data protection guideline published by MySpace, which is available under <https://myspace.com/pages/privacy>, provides information on the collection, processing and use of personal data by MySpace.

### **34. Data protection provisions about the application and use of Pinterest**

On this website, the controller has integrated components of Pinterest Inc. Pinterest is a so-called social network. A social network is an Internet social meeting place, an online community that allows users to communicate and interact with each other in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or allow the Internet community to provide personal or company-related information. Pinterest enables the users of the social network to publish, inter alia, picture collections and individual pictures as well as descriptions on virtual pinboards (so-called pins), which can then be shared by other user's (so-called re-pins) or commented on.

The operating company of Pinterest is Pinterest Europe (T/A DBA), Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Pinterest component (Pinterest plug-in) was integrated, the Internet browser on the information technology system of the data subject automatically prompted to download through the respective Pinterest component a display of the corresponding Pinterest component. Further information on Pinterest is available under <https://pinterest.com/>. During the course of this technical procedure, Pinterest gains knowledge of what specific sub-page of our website is visited by the data subject.

If the data subject is logged in at the same time on Pinterest, Pinterest detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Pinterest component and associated with the respective Pinterest account of the data subject. If the data subject clicks on one of the Pinterest buttons, integrated on our website, then Pinterest assigns this information to the personal Pinterest user account of the data subject and stores the personal data.

Pinterest receives information via the Pinterest component that the data subject has visited our website, provided that the data subject is logged in at Pinterest at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Pinterest component or not. If such a transmission of information to Pinterest is not desirable for the data subject, then he or she may prevent this by logging off from their Pinterest account before a call-up to our website is made.

The data protection guideline published by Pinterest, which is available under <https://about.pinterest.com/privacy-policy>, provides information on the collection, processing and use of personal data by Pinterest.

### **35. Data protection provisions about the application and use of Matomo**

On this website, the controller has integrated the Matomo component. Matomo is an open-source software tool for web analysis. Web analysis is the collection, gathering and evaluation of data on the behavior of visitors from Internet sites. A web analysis tool collects, inter alia, data on the website from which a data subject came to a website (so-called referrer), which pages of the website were accessed or how often and for which period of time a sub-page was viewed. A web analysis is mainly used for the optimization of a website and the cost-benefit analysis of Internet advertising.

The software is operated on the server of the controller, the data protection-sensitive log files are stored exclusively on this server.

The purpose of the Matomo component is the analysis of the visitor flows on our website. The controller uses the obtained data and information, inter alia, to evaluate the use of this website in order to compile online reports, which show the activities on our Internet pages.

Matomo sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, an analysis of the use of our website is enabled. With each call-up to one of the individual pages of this website, the Internet browser on the information technology system of the data subject is automatically through the Matomo component prompted to submit data for the purpose of online analysis to our server. During the course of this technical procedure, we obtain knowledge about personal information, such as the IP address of the data subject, which serves to understand the origin of visitors and clicks.

The cookie is used to store personal information, such as the access time, the location from which access was made, and the frequency of visits to our website. With each visit of our Internet pages, these personal data, including the IP address of the Internet access used by the data subject, are transferred to our server. These personal data will be stored by us. We do not forward this personal data to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the used Internet browser would also prevent Matomo from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Matomo may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by Matomo as well as the processing of these data by Matomo and the chance to preclude any such. For this, the data subject must set a "Do Not Track" option in the browser.

With each setting of the opt-out cookie, however, there is the possibility that the websites of the controller are no longer fully usable for the data subject.

Further information and the applicable data protection provisions of Matomo may be retrieved under <https://matomo.org/privacy/>.

### **36. Data protection provisions about the application and use of Shariff**

On this website, the controller has integrated the component of Shariff. The Shariff component provides social media buttons that are compliant with data protection. Shariff was developed for the German computer magazine c't and is published by GitHub, Inc.

The developers of the component is GitHub, Inc. 88 Colin P. Kelly Junior Street, San Francisco, CA 94107, United States.

Typically, the button solutions provided by the social networks already transmits personal data to the respective social network, when a user visits a website in which a social media button was

integrated. By using the Shariff component, personal data is only transferred to social networks, when the visitor actively activates one of the social media buttons. Further information on the Shariff component may be found in the computer magazine c't under <http://www.heise.de/newsticker/meldung/Datenschutz-und-Social-Media-Der-ct-Shariff-ist-im-Usatz-2470103>. HTML provided. The use of the Shariff component is intended to protect the personal data of the visitors of our website and to enable us to integrate a button solution for social networks on this website.

Further information and the applicable data protection provisions of GitHub are retrievable under <https://help.github.com/articles/github-privacy-policy/>.

### **37. Data protection provisions about the application and use of SlideShare**

On this website, the controller has integrated SlideShare components. LinkedIn SlideShare as a file hosting service allows you to exchange and archive presentations and other documents, such as PDF files, videos, and webinars. The file hosting service allows users to upload media content in all popular formats, with the documents either publicly-accessible or private-labeled.

The operating company of SlideShare is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

LinkedIn SlideShare provides so-called embedded codes for the media content (e.g. presentations, PDF files, videos, photos, etc.) stored there. Embedded codes are program codes that are embedded in the Internet pages to display external content on their own website. Embedded codes allow content to be reproduced on its own website without storing it on its own server, possibly violating the right of reproduction of the respective author of the content. A further advantage of the use of an embedded code is that the respective operator of a website does not use its own storage space and the own server is thereby relieved. An embedded code may be integrated at any point on another website so that an external content may also be inserted within the own text. The purpose of using LinkedIn SlideShare is to relieve our server and to avoid copyright infringements, while at the same time using third-party content.

With each call-up to our Internet site, which is equipped with a SlideShare component (embedded code), this component prompts the browser that you are using to download the according embedded data from SlideShare. During the course of this technical procedure, LinkedIn gains knowledge of which specific sub-page of our website is visited by the data subject.

If the data subject is logged in on SlideShare at the same time, SlideShare recognizes with each call-up to our website by the data subject and for the entire duration of their stay on our Internet site which specific sub-page was visited by the data subject. This information is collected by SlideShare and assigned to the respective SlideShare account of the data subject through LinkedIn.

LinkedIn obtains information via the SlideShare component that the data subject has visited our website, provided that the data subject is logged in at SlideShare at the time of the call-up to our website. This occurs regardless of whether the person clicks on the embedded media data or not. If such a transmission of information to SlideShare is not desirable for the data subject, then he or she may prevent this by logging off from their SlideShare account before a call-up to our website is made.



LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under <https://www.linkedin.com/legal/cookie-policy>. The applicable data protection provisions for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>.

### **38. Data protection provisions about the application and use of Tumblr**

On this website, the controller has integrated components of Tumblr. Tumblr is a platform that allows users to create and run a blog. A blog is a web-based, generally publicly-accessible portal on which one or more people called bloggers or web bloggers may post articles or write down thoughts in so-called blogposts. For example, in a Tumblr blog the user can publish text, images, links, and videos, and spread them in the digital space. Furthermore, Tumblr users may import content from other websites into their own blog.

The operating company of Tumblr is Oath (EMEA) Limited, 5-7 Point Square, North Wall Quay, Dublin 1, Ireland.

Through each call to one of the individual pages of this Internet site, which is operated by the controller and on which a Tumblr component (Tumblr button) has been integrated, the Internet browser on the information technology system of the data subject causes automatically the download of a display of the corresponding Tumblr component of Tumblr. Learn more about the Tumblr-buttons that are available under <https://www.tumblr.com/buttons>. During the course of this technical procedure, Tumblr becomes aware of what concrete sub-page of our website was visited by the data subject. The purpose of the integration of the Tumblr component is a retransmission of the contents of this website to allow our users to introduce this web page to the digital world and to increase our visitor numbers.

If the data subject is logged in at Tumblr, Tumblr detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Tumblr component and associated with the respective Tumblr account of the data subject. If the data subject clicks on one of the Tumblr buttons, integrated on our website, then Tumblr assigns this information to the personal Tumblr user account of the data subject and stores the personal data.

Tumblr receives information via the Tumblr component that the data subject has visited our website, provided that the data subject is logged in at Tumblr at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Tumblr component or not. If such a transfer of information to Tumblr is not desirable for the data subject, then he or she may prevent this by logging off from their Tumblr account before a call-up to our website is made.

The applicable data protection provisions of Tumblr may be accessed under <https://www.tumblr.com/policy/en/privacy>.

### **39. Data protection provisions about the application and use of Twitter**

On this website, the controller has integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 280 characters. These short messages are

available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets.

The operating company of Twitter is Twitter International Company, One Cumberland Place, Fenian Street Dublin 2, D02 AX07, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Twitter component (Twitter button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter component of Twitter. Further information about the Twitter buttons is available under <https://about.twitter.com/de/resources/buttons>. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of our website was visited by the data subject. The purpose of the integration of the Twitter component is a retransmission of the contents of this website to allow our users to introduce this web page to the digital world and increase our visitor numbers.

If the data subject is logged in at the same time on Twitter, Twitter detects with every call-up to our website by the data subject and for the entire duration of their stay on our Internet site which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Twitter component and associated with the respective Twitter account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on our website, then Twitter assigns this information to the personal Twitter user account of the data subject and stores the personal data.

Twitter receives information via the Twitter component that the data subject has visited our website, provided that the data subject is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made.

The applicable data protection provisions of Twitter may be accessed under <https://twitter.com/privacy?lang=en>.

#### **40. Data protection provisions about the application and use of Webtrekk**

On this website, the controller has integrated components by Webtrekk. Webtrekk is a combination of analysis and marketing solutions in one system. Webtrekk allows the site operator to collect data on the use of the website, as well as individualize marketing activities.

The operating company of Webtrekk is Webtrekk GmbH, Robert-Koch-Platz 4, 10115 Berlin, Germany.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller, Webtrekk collects data for marketing and optimisation purposes and stores them. The pseudonymized user profiles are used for the purpose of analyzing visitor behavior and enabling an improvement of our Internet offer. The data collected via the Webtrekk component are not used to identify the data subject without first obtaining a separate and explicit consent from the

data subject. These data will not be merged with personal data or with other data which contains the same pseudonym.

Webtrekk sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. Webtrekk uses the data collected from our website and information on behalf of the controller to analyze user behaviour of the data subject, who has visited our website. In addition, Webtrekk uses the data to create reports on user activities on our behalf and provide other services for our enterprise, which are in relation to the usage of our website. The IP address of the data subject is not merged by Webtrekk with other personal information.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the used Internet browser would also prevent Webtrekk from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Webtrekk may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by the Webtrekk cookie, relating to a use of this Internet site, as well as the processing of these data by Webtrekk and the chance to preclude any such. To do this, the data subject must click a link under <https://www.webtrekk.com/en/legal/opt-out-webtrekk/>, which is an opt-out cookie. The opt-out cookie is placed onto the information technology system used by the data subject. If the data subject deletes the cookies on his system, then the data subject must call-up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject.

The applicable data protection provisions of Webtrekk may be accessed under <https://www.webtrekk.com/en/why-webtrekk/data-protection/>.

## **41. Data protection provisions about the application and use of WiredMinds**

On this website, the controller has integrated components of WiredMinds. The WiredMinds components automatically recognize and qualify companies who visit a website. The WiredMinds component allows the operator of a website that uses the component to generate leads, thus qualifying potential new customers.

The operating company of WiredMinds is WiredMinds GmbH, Lindenspürstraße 32, 70176 Stuttgart, Germany.

We use a WiredMinds tracking pixel. A tracking pixel is a miniature graphic embedded in a web page to enable log file recording and log file analysis to subsequently perform a statistical analysis.

WiredMinds also sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The setting of the cookie enables us to analyze the usage of our website.

Using the data obtained, pseudonymized usage profiles are created. The pseudonymized usage profiles are used for the purpose of analyzing visitor behavior and enabling an improvement of our Internet offer. Data collected through the WiredMinds component are not used to identify the data subject without first obtaining a separate and explicit consent from the data subject. These data will not be merged with personal data or with other data which contains the same pseudonym.

With each call-up to one of the individual pages of this website, the Internet browser on the information technology system of the data subject is automatically prompted to submit data for the purpose of online analysis the WiredMinds component. During the course of this technical procedure, WiredMinds gains knowledge of personal information, such as the IP address, which inter alia, serves to understand the origin of visitors and clicks.

The cookie is used to store personal information, such as the access time, the location from which access was made, and the frequency of visits to our website. With each visit of our Internet pages, these personal data, including the IP address of the Internet access used by the data subject, are transferred to the WiredMinds server. These personal data are stored by WiredMinds, but are not forwarded to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent WiredMinds from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by WiredMinds may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to the collection of data relating to a use of this site that are generated by WiredMinds and the chance to preclude any such. For this purpose, the data subject must click the 'don't-track-my-visits' button under the link [https://wm.wiredminds.de/track/cookie\\_mgr.php?mode=dont\\_track\\_ask&website=el](https://wm.wiredminds.de/track/cookie_mgr.php?mode=dont_track_ask&website=el). If the information technology system of the data subject is later deleted, formatted or reinstalled, then the data subject must again set an opt-out cookie.

Further information and the applicable data protection provisions of WiredMinds may be retrieved under <https://www.wiredminds.de/1/data-protection-report/>.

## **42. Data protection provisions about the application and use of Xing**

On this website, the controller has integrated components of XING. XING is an Internet-based social network that enables users to connect with existing business contacts and to create new business contacts. The individual users can create a personal profile of themselves at XING. Companies may, e.g. create company profiles or publish jobs on XING.

The operating company of XING is XING SE, Dammtorstraße 30, 20354 Hamburg, Germany.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a XING component (XING plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding XING component of XING. Further information about the XING plug-in may be accessed under <https://dev.xing.com/plugins>. During the course of this

technical procedure, XING gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on XING, XING detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the XING component and associated with the respective XING account of the data subject. If the data subject clicks on the XING button integrated on our Internet site, e.g. the "Share"-button, then XING assigns this information to the personal XING user account of the data subject and stores the personal data.

XING receives information via the XING component that the data subject has visited our website, provided that the data subject is logged in at XING at the time of the call to our website. This occurs regardless of whether the person clicks on the XING component or not. If such a transmission of information to XING is not desirable for the data subject, then he or she can prevent this by logging off from their XING account before a call-up to our website is made.

The data protection provisions published by XING, which is available under <https://www.xing.com/privacy>, provide information on the collection, processing and use of personal data by XING. In addition, XING has published privacy notices for the XING share button under [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection).

### **43. Data protection provisions about the application and use of YouTube**

On this website, the controller has integrated components of YouTube. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them. YouTube allows you to publish all kinds of videos, so you can access both full movies and TV broadcasts, as well as music videos, trailers, and videos made by users via the Internet portal.

The operating company of YouTube is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a YouTube component (YouTube video) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding YouTube component. Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/en/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in on YouTube, YouTube recognizes with each call-up to a sub-page that contains a YouTube video, which specific sub-page of our Internet site was visited by the data subject. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject.

YouTube and Google will receive information through the YouTube component that the data subject has visited our website, if the data subject at the time of the call to our website is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data

subject, the delivery may be prevented if the data subject logs off from their own YouTube account before a call-up to our website is made.

YouTube's data protection provisions, available at <https://www.google.com/intl/en/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

#### **44. Data protection provisions about the application and use of the scalable and central measuring system of the INFOnline GmbH**

On this website, the data controller has integrated a tracking pixel for real-time measurement. A tracking pixel is a miniature graphic embedded in Internet pages to enable log file recording and log file analysis to subsequently perform a statistical analysis. The integrated tracking pixels are used for the Scalable Central Measurement System (SZMS) of INFOnline GmbH.

The Scalable Central Measurement System is operated by INFOnline GmbH, Forum Bonn Nord, Brühler Str. 9, 53119 Bonn, Germany.

The Scalable Central Measurement System is used to determine statistical ratios, that is, the realm range measurement. The embedded tracking pixel is used to determine if, when and by how many users (including the data subject) our website was opened and what content was retrieved.

The data obtained by means of the Scalable Central Measurement System are collected anonymously. In order to detect the access numbers, a so-called session cookie is set up for the purpose of the recognition of the website users, e.g. a signature is made which consists of various automatically-transmitted information, or uses alternative methods. The IP address of the Internet used by the data subject is collected and processed in an anonymous form only. The data subject is not identified at any time.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent INFOnline from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by INFOnline may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to the collection of data relating to a use of this site that are generated by INFOnline and the chance to preclude any such. For this purpose, the data subject must press the 'opt-out' button under the link <http://optout.ioam.de> which uses an opt-out cookie. If the cookies are deleted on the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not fully usable anymore by the data subject. The applicable data protection provisions of INFOnline may be accessed at <https://www.infonline.de/datenschutz/>.

#### **45. Data protection provisions about the application and use of DoubleClick**

On this website, the controller has integrated components of DoubleClick by Google. DoubleClick is a trademark of Google, under which predominantly special online marketing solutions are marketed to advertising agencies and publishers.

The operating company of DoubleClick by Google is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

DoubleClick by Google transmits data to the DoubleClick server with each impression, clicks, or other activity. Each of these data transfers triggers a cookie request to the data subject's browser. If the browser accepts this request, DoubleClick uses a cookie on the information technology system of the data subject. The definition of cookies is explained above. The purpose of the cookie is the optimization and display of advertising. The cookie is used, inter alia, to display and place user-relevant advertising as well as to create or improve reports on advertising campaigns. Furthermore, the cookie serves to avoid multiple display of the same advertisement.

DoubleClick uses a cookie ID that is required to execute the technical process. For example, the cookie ID is required to display an advertisement in a browser. DoubleClick may also use the Cookie ID to record which advertisements have already been displayed in a browser in order to avoid duplications. It is also possible for DoubleClick to track conversions through the cookie ID. For instance, conversions are captured, when a user has previously been shown a DoubleClick advertising ad, and he or she subsequently makes a purchase on the advertiser's website using the same Internet browser.

A cookie from DoubleClick does not contain any personal data. However, a DoubleClick cookie may contain additional campaign IDs. A campaign ID is used to identify campaigns that the user has already been in contact with.

With each call-up to one of the individual pages of this website, which is operated by the controller and on which a DoubleClick component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective DoubleClick component to send data for the purpose of online advertising and billing of commissions to Google. During the course of this technical procedure, Google gains knowledge of any data that Google may use to create commission calculations. Google may, inter alia, understand that the data subject has clicked on certain links on our website.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google may be deleted at any time via a web browser or other software programs.

Further information and the applicable data protection provisions of DoubleClick may be retrieved under DoubleClick by Google <https://www.google.com/intl/en/policies/>.

#### **46. Data protection provisions about the application and use of Awin**

On this website, the controller has integrated components by Awin. Awin is a German affiliate network that offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place

advertising that is usually paid via click or sale commissions on third-party websites, also called affiliates or publishers (e.g. sales partners). The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of Awin is Awin AG, Eichhornstraße 3, 10785 Berlin, Germany.

Awin sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie of Awin does not store any personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments between a merchant and affiliate, which are processed via the affiliate network, that is Awin.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Awin from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Awin may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of Awin may be retrieved under <http://www.Awin.com/us/about-Awin/privacy/>.

#### **47. Data protection provisions about the application and use of Adcell**

On this website, the controller has integrated components of AdCell. AdCell is a German affiliate network, which offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place advertising that is usually paid via click or sale commissions on third-party websites, e.g. sales partners, also called affiliates or publishers. The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of AdCell is Firstlead GmbH, Rosenfelder St. 15-16, 10315 Berlin, Germany.

AdCell sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie of AdCell stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments between a merchant and affiliate, which are processed via the affiliate network, that is AdCell.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser use and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent AdCell from setting a cookie on the information technology system of the data subject. In



addition, cookies already in use by AdCell may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of AdCell may be retrieved under <https://www.adcell.de/agb>.

#### **48. Data protection provisions about the application and use of Belboon**

On this website, the controller has integrated components by Belboon. Belboon is a German affiliate network, which offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place advertising that is usually paid via click or sale commissions on third-party websites, e.g. sales partners, also called affiliates or publishers. The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of AdCell is belboon GmbH, Weinmeisterstr. 12-14, 10178 Berlin, Germany.

Belboon sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie by Belboon stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments between a merchant and affiliate, which are processed via the affiliate network, that is Belboon

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Belboon from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Belboon may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of Belboon may be retrieved under <https://www.belboon.com/en/about-us/privacy/>.

#### **49. Data protection provisions about the application and use of TradeTracker**

On this website, the controller has integrated components of TradeTracker. TradeTracker is an affiliate network that offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place advertising that is usually paid via click or sale commissions on third-party websites (e.g. sales partners, also called affiliates or publishers). The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of TradeTracker is TradeTracker Deutschland GmbH, Eiffestraße 426, 20537 Hamburg, Germany.

TradeTracker sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie of TradeTracker stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments between a merchant and affiliate, which are processed via the affiliate network, that is TradeTracker.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent TradeTracker from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by TradeTracker may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of TradeTracker may be retrieved under <https://tradetracker.com/privacy-policy/>.

## **50. Data protection provisions about the application and use of Adgoal**

The controller has integrated components of Adgoal on this website. Adgoal is a German affiliate network, which offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place advertising that is usually paid via click or sale commissions on third-party websites, e.g. sales partners, also called affiliates or publishers. The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of Adgoal is adgoal GmbH, Schellengasse 2, 74072 Heilbronn, Germany.

Adgoal sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie of Adgoal stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments between a merchant and affiliate, which are processed via the affiliate network, that is Adgoal.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Adgoal from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Adgoal may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of Adgoal may be retrieved under <https://www.adgoal.de/en/privacy.html>.

## **51. Data protection provisions about the application and use of YieldKit**

On this website, the controller has integrated components of YieldKit. YieldKit is a German affiliate network, which offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place advertising that is usually paid via click or sale commissions on third-party websites, e.g. sales partners, also called affiliates or publishers. The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of YieldKit is YieldKit GmbH, Jarrestraße 44b, 22303 Hamburg, Germany.

YieldKit sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. The tracking cookie of YieldKit stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments between a merchant and affiliate, which are processed via the affiliate network, that is YieldKit.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent YieldKit from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by YieldKit may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of YieldKit may be retrieved under <http://yieldkit.com/legal-notes/privacy-policy/>.

## **52. Data protection provisions about the application and use of Tradedoubler**

On this website, the controller has integrated components of TradeDoubler. TradeDoubler is a German affiliate network, which offers affiliate marketing. Affiliate marketing is an Internet-based sales form that enables commercial operators of Internet sites, the so-called merchants or advertisers, to place advertising that is usually paid via click or sale commissions on third-party websites, e.g. sales partners, also called affiliates or publishers. The merchant provides, through the affiliate network, an advertising medium, e.g. an advertising banner or other suitable means of Internet advertising, which is subsequently integrated by an affiliate on their own Internet pages or promoted via other channels, such as keyword advertising or e-marketing.

The operating company of TradeDoubler is Tradedoubler GmbH, Herzog-Wilhelm-Straße 26, 80331 München, Germany.

TradeDoubler sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. TradeDoubler's tracking cookie stores no personal data. Only the identification number of the affiliate, that is, the partner mediating the potential customer, as well as the ordinal number of the visitor of a website and the clicked advertising medium are stored. The purpose of storing this data is the processing of commission payments

between a merchant and affiliate, which are processed via the affiliate network, that is TradeDoubler.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent TradeDoubler from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by TradeDoubler may be deleted at any time via a web browser or other software programs.

The applicable data protection provisions of TradeDoubler may be retrieved under <http://www.tradedoubler.com/en/privacy-policy/>.

### **53. Data protection provisions about the application and use of Oracle Eloqua / Oracle Marketing Cloud**

On this website, the controller has integrated components of Oracle Eloqua/Oracle Marketing Cloud (hereinafter referred to as the "Eloqua"). Eloqua compares relevant Internet content to data from prospective customers and their profiles, to enable Internet site operators to speak more effectively and specifically to prospects and customers. The purpose of Eloqua is to increase the conversion rate of prospective customers and thus increase the turnover of an Internet site operator.

The operating company of Eloqua is Oracle Corporation, 10 Van de Graaff Drive, Burlington, MA 01803, USA.

Eloqua sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. Eloqua will use the data collected from our website and information on behalf of the controller to analyze user behaviour of the data subject, who has used our Internet page. In addition, Eloqua will use the data to create reports on user activities on our behalf, as well as to provide other services for our enterprise, which are in relation to the use of our website.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Oracle from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Oracle may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the Eloqua cookie as well as the processing of these data by Eloqua and the chance to preclude any such. For this, the data subject must press the 'click here' button under <https://www.oracle.com/marketingcloud/opt-status.html>, which sets an opt-out cookie. The opt-out cookie is placed on the information technology system used by the data subject. If the data subject deletes the cookies on his system, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not entirely usable anymore by the data subject.

The applicable data protection provisions of Oracle may be accessed under <https://www.oracle.com/legal/privacy/index.html>.

## **54. Data protection provisions about the application and use of Lotame**

On this website, the controller has integrated components of Lotame. Lotame is a platform for data management through which data is imported from third-party sources across devices, in order to subsequently personalize content, advertising and offers. Lotame is therefore also an analysis service. An analysis service performs a survey, collection and analysis of data. It is mainly used to optimize an Internet site, in order to plan costs and benefits of advertising activities.

The operating company of Lotame the Lotame Solutions, Inc. Suite 2000 8850 Stanford Blvd. Columbia, Maryland, 21045, UNITED STATES.

The purpose of Lotame is a cross-device approach of our customers and prospective customers. Device interception is a response by the customer if it takes place on a normal computer system as well as on mobile devices such as notebooks, tablets or mobile phones. Lotame uses so-called Unique Identifiers (UIDs) for this purpose. A unique identifier is a technology that can be used to determine which different technological systems are used by a particular person.

Lotame sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Lotame component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to transmit data through the Lotame component for optimization purposes to Lotame. During the course of this technical procedure, Lotame receives data that is used to create user profiles. The resulting usage profiles are used to determine which different information technology devices the respective user uses to optimize our advertising activities as a result.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the Internet browser used and thus permanently deny the setting of cookies. Such an adjustment to the used Internet browser would also prevent Lotame from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Lotame may be deleted at any time via a web browser or other software programs.

There is also the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the Lotame cookie as well as the processing of these data by Lotame and the chance to preclude any such. For this purpose, the data subject must press the 'opt-out' button under <https://www.lotame.com/opt-out-preference-manager/> through which an opt-out cookie is set. The opt-out cookie set for this purpose is placed on the information technology system used by the data subject. If the cookies are deleted on the system of the data subject, then the data subject must call the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not entirely usable anymore by the data subject.

The applicable data protection provisions of Lotame may be accessed at <https://www.lotame.com/legal/>.

## **55. Data protection provisions about the application and use of Bloglovin'**

On this website, the controller has integrated components of Bloglovin'. Bloglovin' is an online platform that allows users to organize their favorite blogs. A blog is a web-based, generally publicly-accessible portal, in which one or more people called bloggers or web bloggers can post articles or write down thoughts in so-called blogposts.

The operating company of Bloglovin' is Bloglovin' Inc., 25 Broadway, New York, NY 10004, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Bloglovin' component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Bloglovin' component, through the Bloglovin' component. During the course of this technical procedure, Bloglovin' gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time at Bloglovin', Bloglovin' recognizes with each call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Bloglovin' component and through Bloglovin' assigned to the respective Bloglovin' account of the data subject. If the data subject clicks on the Bloglovin' button that is integrated on our website, then this information is delivered to Bloglovin'. The data subject has already agreed to the transmission of such information to Bloglovin'.

Further information and the applicable data protection provisions of Bloglovin' may be retrieved under <https://www.bloglovin.com/tos>.

## **56. Data protection provisions about the application and use of Amobee**

On this website, the controller has integrated components of Amobee. Amobee is a technological advertising agency specializing in the delivery of advertising to mobile devices.

The operating company of Amobee is Amobee Inc., 950 Tower Lane, Suite 2000, Foster City, CA 94404, UNITED STATES.

The purpose of Amobee is to deliver advertising. Amobee uses a cookie on the information technology system of the data subject. The definition of cookies is explained above. With each call-up to the individual pages of this website, which operated by the controller and on which an Amobee component is integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Amobee component to transmit data to Amobee. During the course of this technical procedure, Amobee gains knowledge of the data that are subsequently used to create usage profiles. The resulting usage profiles serve advertising activities.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Amobee from setting a cookie on the information technology system of the data subject. In

addition, cookies already in use by Amobee may be deleted at any time via a web browser or other software programs.

There is also the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the Amobee cookie as well as the processing of these data by Amobee and the chance to preclude any such. For this purpose, the data subject must press the 'click-here-to-opt-out' button under <http://amobee.com/privacy/technology/> through which an opt-out cookie is set. The opt-out cookie set for this purpose is placed on the information technology system used by the data subject. If the cookies are deleted on the system of the data subject, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not entirely usable anymore by the data subject.

The applicable data protection provisions of Amobee may be accessed under <http://amobee.com/privacy/>.

## **57. Data protection provisions about the application and use of ADITION**

On this website, the controller has integrated components of ADITION. ADITION is a provider of data-based digital marketing that provides an advertising platform targeting advertisers and online marketing agencies.

The operating company of ADITION is ADITION technologies AG, Oststraße 55, 40211 Düsseldorf, Germany.

The purpose of ADITION is the insertion of digital advertising media. ADITION uses a cookie on the information technology system of the data subject. The definition of cookies has already been explained above. ADITION does not store personal data in the cookie. All information stored in the cookie is of a technical nature and enables controller, inter alia, to understand how frequently certain advertisements are displayed.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent ADITION from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by ADITION may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the ADITION cookie as well as the processing of these data by ADITION and the chance to preclude any such. For this purpose, the data subject must click a link under <https://www.adition.com/kontakt/datenschutz/>, which sets an opt-out cookie. The opt-out cookie is placed on the information technology system used by the data subject. If the data subject deletes the cookies on his system, then the data subject must call up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not entirely usable anymore by the data subject.

The applicable data protection provisions of ADITION may be accessed under <https://www.adition.com/en/kontakt/datenschutz/>.

## **58. Data protection provisions about the application and use of AdJug**

On this website, the controller has integrated components of AdJug. AdJug is an advertising exchange platform that provides online advertising (banner advertising).

The operating company of AdJug is AdJug (T/A DBA), 5th Floor Glen House, 200-208 Tottenham Court Road, London, W1T7PL, United Kingdom.

AdJug sets a cookie. Furthermore, with each call-up to a single page of this Internet site, which is operated by the controller and on which an AdJug component was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to submit data through the corresponding AdJug component for the purpose of displaying advertisements delivered by AdJug. In this technical procedure, AdJug gains information that our website was accessed by the information technology system used by the data subject. The data transmitted within the framework of the technical procedure of AdJug serve for billing purposes in relation to the displayed advertising.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent AdJug from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by AdJug may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data relating to a use of this Internet site that are generated by the AdJug cookie as well as the processing of these data by AdJug and the chance to preclude any such. For this purpose, the data subject must press the consumer cookie opt-out link under <http://www.de.adjug.com/datenschutz.html>, which sets an opt-out cookie. The opt-out cookie, set for this purpose, is placed on the information technology system used by the data subject. If the cookies on the system of the data subject are deleted, the data subject must call-up the link again and set a new opt-out cookie.

With the setting of the opt-out cookie, however, the possibility exists that the websites of the controller are not entirely usable anymore by the data subject.

The applicable data protection provisions of AdJug may be accessed under <http://www.adjug.com/info/privacy.asp>.

## **59. Payment Method: Data protection provisions about the use of Klarna as a payment processor**

On this website, the controller has integrated Klarna components. Klarna is an online payment service provider, which allows purchases on an account or a flexible installment payment. Klarna also offers other services, such as buyer protection and identity or creditworthiness checks.

The operating company of Klarna is Klarna Bank AB, Sveavägen 46, 111 34 Stockholm, Schweden.



If the data subject selects the "purchase on account" or "installment purchase" during the ordering process in our online shop as a payment option, the data of the data subject is automatically transmitted to Klarna. By selecting one of these payment options, the data subject agrees to this transmission of personal data required for the processing of the invoice or installment purchase, or identity and creditworthiness checks.

The personal data transmitted to Klarna is usually first name, surname, address, date of birth, sex, email address, IP address, telephone number, mobile phone number, as well as other data necessary for the processing of an invoice or installment purchase. The processing of the purchase contract also requires such personal data, which are in connection with the respective order. In particular, the exchange of payment information such as bank details, card number, date of validity and CVC code, cumulative number, item number, data on goods and services, prices and taxes, information on the previous purchase behavior or other details of the financial situation of the data subject.

The purpose of the transmission of the data is, in particular, the identification check, payment administration, and fraud prevention. The controller shall provide Klarna with personal data, in particular, if a legitimate interest in the transmission exists. The personal data exchanged between Klarna and the data subject for the data processing shall be transmitted by Klarna to economic agencies. This transmission is intended for identity and creditworthiness checks.

Klarna shall also pass on the personal data to affiliates (Klarna Group) and service providers or subcontractors as far as this is necessary to fulfill contractual obligations or to process the data in the order.

Klarna collects and uses data and information on the previous payment behavior of the data subject as well as probability values for their behavior in the future (so-called scoring) in order to decide on the reasoning, implementation or termination of a contractual relationship. The calculation of scoring is carried out on the basis of scientifically-recognized mathematical-statistical methods.

The data subject is able to revoke the consent to the handling of personal data at any time from Klarna. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of Klarna may be retrieved under [https://cdn.klarna.com/1.0/shared/content/policy/data/de\\_de/data\\_protection.pdf](https://cdn.klarna.com/1.0/shared/content/policy/data/de_de/data_protection.pdf).

## **60. Payment Method: Data protection provisions about the use of PayPal as a payment processor**

On this website, the controller has integrated components of PayPal. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which represent virtual private or business accounts. PayPal is also able to process virtual payments through credit cards when a user does not have a PayPal account. A PayPal account is managed via an e-mail address, which is why there are no classic account numbers. PayPal makes it possible to trigger online payments to third parties or to receive payments. PayPal also accepts trustee functions and offers buyer protection services.

The European operating company of PayPal is PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg.

If the data subject chooses "PayPal" as the payment option in the online shop during the ordering process, we automatically transmit the data of the data subject to PayPal. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing.

The personal data transmitted to PayPal is usually first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data, which are in connection with the respective order.

The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to PayPal, in particular, if a legitimate interest in the transmission is given. The personal data exchanged between PayPal and the controller for the processing of the data will be transmitted by PayPal to economic credit agencies. This transmission is intended for identity and creditworthiness checks.

PayPal will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfill contractual obligations or for data to be processed in the order.

The data subject has the possibility to revoke consent for the handling of personal data at any time from PayPal. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of PayPal may be retrieved under <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

## **61. Payment Method: Data protection provisions about the use of Skrill as a payment processor**

On this website, the controller has integrated components by Skrill. Skrill is an online payment service provider. Payments are made via the so-called Skrill wallet, which is a virtual electronic wallet. Skrill also offers the possibility to make virtual payments via credit cards. A Skrill wallet is managed via an e-mail address. Skrill makes it possible to trigger online payments to third parties or to receive payments.

The operating company of Skrill is Skrill Limited, 25 Canada Square, London E14 5LQ, United Kingdom.

If the data subject chooses "Skrill" as the payment option during the ordering process in our online-shop, the data will be transmitted automatically to Skrill. By selecting this payment option, the data subject agrees to the transmission of personal data required for payment processing.

The personal data exchanged with Skrill is the purchase sum and e-mail address, which are both necessary for payment processing. The transmission of data is aimed at payment processing and fraud prevention. The controller will also provide Skrill with other personal data in the case, if a legitimate interest in the transmission exists. The personal data exchanged between Skrill and

the data subject shall be transmitted by Skrill to the economic agencies. This transmission is intended for identity and creditworthiness checks.

If necessary, Skrill will pass on personal data to affiliates and service providers or subcontractors to the extent necessary to fulfill contractual obligations or to process the data in the order.

The data subject has the possibility to revoke the consent to the handling of personal data at any time from Skrill. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of Skrill may be retrieved under <https://www.skrill.com/en/footer/privacypolicy/>.

## **62. Payment Method: Data protection provisions about the use of Sofortüberweisung as a payment processor**

On this website, the controller has integrated components of Sofortüberweisung. Sofortüberweisung is a payment service that allows cashless payment of products and services on the Internet. Sofortüberweisung is a technical procedure by which the online dealer immediately receives a payment confirmation. This enables a trader to deliver goods, services or downloads to the customer immediately after ordering.

The operating company of Sofortüberweisung is Klarna Bank AB, Sveavägen 46, 111 34 Stockholm, Schweden.

If the data subject chooses "immediate transfer" as the payment option in our online shop during the ordering process, the data of the data subject will be transmitted to Sofortüberweisung. By selecting this payment option, the data subject agrees to the transmission of personal data required for payment processing.

In the case of purchase processing via direct transfer, the buyer sends the PIN and the TAN to Sofort GmbH. Sofortüberweisung then carries out a transfer to the online merchant after technical verification of the account status and retrieval of additional data to check the account assignment. The online trader is then automatically informed of the execution of the financial transaction.

The personal data exchanged with Sofortüberweisung is the first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The transmission of the data is aimed at payment processing and fraud prevention. The controller shall immediately transfer other personal data, even if a legitimate interest in the transmission exists. The personal data exchanged between Sofortüberweisung and the controller shall be transmitted by Sofortüberweisung to economic credit agencies. This transmission is intended for identity and creditworthiness checks.

Sofortüberweisung provides personal data to affiliated companies and service providers or subcontractors as far as this is necessary for the fulfillment of contractual obligations or data in order to be processed.

The data subject has the possibility to revoke the consent to the handling of personal data at any time from Sofortüberweisung. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of Sofortüberweisung may be retrieved under <https://www.klarna.com/sofort/datenschutz/>.

### **63. Legal basis for the processing**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company 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. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

### **64. The legitimate interests pursued by the controller or by a third party**

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

### **65. Period for which the personal data will be stored**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

### **66. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data**

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

## **67. Existence of automated decision-making**

As a responsible company, we do not use automatic decision-making or profiling.

## **68. Consent to International Data Transfer**

The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) and our partner companies take the protection of your personal data very seriously. To provide our services effectively, we require your explicit consent to transfer certain personal data to partner companies outside the European Union (EU) and the European Economic Area (EEA).

### **Purpose and Recipients of Data Transfer**

Your personal data provided as a customer to our German reseller may be transferred to The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA), a company based in the United Kingdom, and affiliated companies located outside the EEA, including an entity based in the Caribbean, for the following purposes:

- Administration and fulfillment of our contractual obligations to you,
- Provision of services and customer support,
- Optimization and development of our products and services,
- Compliance with legal and regulatory requirements.

### **Legal Basis for Data Transfer**

The transfer of your personal data is based on your explicit consent (according to Art. 6 (1) (a) GDPR). By agreeing to this privacy policy, you expressly consent to the international transfer of your data to recipients outside the EU/EEA.

### **Security Measures to Protect Your Data**

The transfer of your data to partners outside the EU/EEA will take place with appropriate safeguards to ensure the protection of your personal data. These measures include:

- Execution of Standard Contractual Clauses (SCCs) according to Art. 46 GDPR for recipients in third countries that do not guarantee an adequate level of data protection,

- Implementation of technical and organizational security measures to ensure that your data remains protected at all times.

#### Right to Withdraw Consent

You have the right to withdraw your consent to international data transfers at any time, effective for the future. Withdrawal of consent may restrict or terminate certain services, as specific processes can only be carried out with data transfer. To withdraw your consent, please contact us using the contact information provided in this privacy policy.

#### Additional Information

If you have any questions about the international transfer of data, including the recipient countries and the protective measures applied, please feel free to contact us at any time.

## **69. Responsibility and Data Protection Agreements**

To ensure the security and confidentiality of your personal data when transferred to affiliated companies outside the EU/EEA, The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) has implemented contractual measures and safeguards. These provisions ensure that all parties, particularly The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) (UK) and The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) Caribbean (T/A DBA). (Caribbean), adhere to EU and EEA data protection standards.

The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) takes primary responsibility for the proper processing of personal data transferred to affiliated entities, covering the collection and transfer of personal data from the German reseller to The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA), ensuring that data processing procedures comply with European data protection standards, and obtaining and managing consent for data transfer from EU customers.

The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) and its affiliated entities may engage third parties and subprocessors for specific services related to the provision and management of the product or service. These subprocessors are contractually obligated to protect personal data in compliance with GDPR requirements and the security standards of The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA).

To ensure an adequate level of protection for personal data, The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) has implemented specific safeguards. Standard Contractual Clauses (SCCs) are used in accordance with Art. 46 GDPR to ensure that data processing outside the EU meets EU data protection standards. Technical and organizational measures such as encryption, access controls, regular audits, and training programs are implemented to ensure that all personal data is protected against unauthorized access, loss, or misuse.

The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) is committed to conducting regular reviews and audits of data

processing practices of affiliated entities to ensure compliance with the established data protection policies and EU data protection requirements. In the event of an incident or complaint, The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) serves as the primary point of contact for all questions regarding data processing and data protection.

If there is a significant change in responsibilities or in the structure of data processing (such as a change in subprocessors or processing countries), The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) will promptly inform you and, if necessary, obtain new consent.

## **70. Standard Contractual Clauses and Security Measures**

To ensure an adequate level of protection for personal data transferred outside the EU or EEA, The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) has implemented appropriate contractual, organizational, and technical safeguards. These safeguards include standard contractual clauses in line with Article 46 GDPR for data recipients located in non-EU countries that do not guarantee an adequate level of data protection, ensuring that the data transfer complies with EU data protection standards. Technical and organizational security measures are also in place. The Trading Names Creative Financial Marketing Options (T/A DBA) & Thefunds Holding (T/A DBA) & smartscalpfxFx (T/A DBA) and its affiliated entities employ strict security standards to protect your data. These include encryption, access controls, regular audits, and employee training, all aimed at safeguarding your personal data against unauthorized access, loss, or misuse. By agreeing to this privacy policy, you consent to these security measures and contractual safeguards for the protection of your personal data when transferred to entities outside the EU or EEA.