



# Privacy Policy

## Preamble

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

The terms used are not gender-specific.

Last update: 9 October 2020.

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## Controller

Blue Action Fund c/o Nature Trust Alliance  
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**Authorised Representative:** Markus Knigge (Executive Director); David Morrison

**Email Address:** [info@blueactionfund.org](mailto:info@blueactionfund.org)

**Legal Notice:** <https://www.blueactionfund.org/impressum/>

## Overview of Processing Operations

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

### Categories of Processed Data

- Inventory data (e.g. names, addresses).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. email, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).

- Location data (information on the geographical position of a device or person).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

### Categories of Data Subjects

- Employees (e.g. employees, job applicants).
- Business and contractual partners.
- Prospective donors.
- Communication partner (recipients of emails, letters, etc.).
- Donors.
- Members.
- Users (e.g. website visitors, users of online services).

### Purposes of Processing

- Provision of our online services and usability.
- Conversion tracking (measurement of the effectiveness of marketing activities).
- Office and organisational procedures.
- Direct marketing (e.g. by email or postal).
- Feedback (e.g. collecting feedback via online form).
- Interest-based and behavioural marketing.
- Contact requests and communication.
- Profiling (creating user profiles).
- Remarketing.
- Web analytics (e.g. access statistics, recognition of returning visitors).
- Targeting (e.g. profiling based on interests and behaviour, use of cookies).
- Provision of contractual services and customer support.
- Managing and responding to inquiries.

## Legal Bases for the Processing

In the following we inform you about the legal basis of the General Data Protection Regulation (GDPR), on the basis of which we process personal data. Please note that, in addition to the regulations of the GDPR, the national data protection regulations may apply in your country or in our country of residence or domicile. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

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

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act – BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, it regulates data processing for the purposes of the employment relationship (§ 26 BDSG), in particular with regard to the establishment, execution or termination of employment relationships as well as the consent of employees. Furthermore, data protection laws of the individual federal states may apply.

## Security Precautions

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

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

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

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

## Transmission and Disclosure of Personal Data

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

**Data transmission within the group of companies:** We may transfer personal data to other companies within our group of companies or otherwise grant them access to this data. Insofar as this disclosure is for administrative purposes, the disclosure of the data is based on our legitimate business and economic interests or otherwise, if it is necessary to fulfil our contractual obligations or if the consent of the data subjects or otherwise a legal permission is present.

**Data transfer within the organisation:** We may transfer or otherwise provide access to personal information to other locations within our organisation. Insofar as this disclosure is for administrative purposes, the disclosure of the data is based on our legitimate business and economic interests or otherwise, if it is necessary to fulfil our contractual obligations or if the consent of those concerned or otherwise a legal permission is present.

## Data Processing in Third Countries

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

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

## Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his or

her visit within an online service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term 'cookies' also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as 'user IDs').

**The following types and functions of cookies are distinguished:**

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

**Information on legal basis:** The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this applies and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies will be processed on the basis of our legitimate interests (e.g. in a business operation of our online service and its improvement) or if the use of cookies is necessary to fulfil our contractual obligations.

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

**General information on withdrawal of consent and objection ('opt-out')**: Respective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as 'opt-out'). You can initially explain your objection using the settings of your browser, e.g. by deactivating the

use of cookies (which may also restrict the functionality of our online services). An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via the websites <https://www.aboutads.info/choices/> and <https://www.youronlinechoices.com>. In addition, you can receive further information on objections in the information provided on the websites of the used service providers and cookies.

**Processing cookie data on the basis of consent:** Before we process or have processed data within the context of the usage of cookies, we ask or asked the users for their consent, which can be revoked at any time. Previous to the consent been given or not given, we may use cookies that are necessary for the operation of our online services.

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

## Performing Tasks in Accordance with Statutes or Rules of Procedure

We process the data of our members, supporters, prospects, business partners or other persons (collectively, 'data subjects') when we have a membership or other business relationship with them and perform our functions and are recipients of benefits and benefits. Otherwise, we process the data of data subjects on the basis of our legitimate interests, e.g. when it concerns administrative tasks or public relations.

The data processed, the type, scope and purpose and the necessity of their processing, are determined by the underlying membership or contractual relationship, from which the necessity of any data information arises (otherwise we refer to 'necessary data').

We delete data that is no longer required for the performance of our statutory and business purposes. This is determined according to the respective tasks and contractual relationships. We retain the data for as long as it may be relevant for the purpose of conducting business and with regard to any warranty or liability obligations on the basis of our legitimate interest in their regulation. The necessity of storing the data is checked regularly; otherwise the statutory storage obligations apply.

- **Processed data types:** Inventory data (e.g. names, addresses), Payment data (e.g. bank details, invoices, payment history), Contact data (e.g. email, telephone numbers), Contract data (e.g. contract object, duration, customer category).
- **Data subjects:** Users (e.g. website visitors, users of online services), Members, Business and contractual partners.
- **Purposes of processing:** Provision of contractual services and customer support, Contact requests and communication, Managing and responding to inquiries.

- **Legal basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Provision of Online Services and Web Hosting

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

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

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

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

- **Processed data types:** Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal basis:** Legitimate interests (Article 6 (1) (f) GDPR).

## Contacting Us

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

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

- **Processed data types:** Inventory data (e.g. names, addresses), contact data (e.g. email, telephone numbers), content data (e.g. text input, photographs, videos).

- **Data subjects:** Communication partner (recipients of emails, letters, etc.).
- **Purposes of processing:** Contact requests and communication.
- **Legal basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Video Conferences, Online Meetings, Webinars and Screen-Sharing

We use third-party platforms and applications (hereinafter referred to as 'third-party providers') for the purposes of conducting video and audio conferences, webinars and other types of video and audio meetings. When selecting third-party providers and their services, we observe the legal requirements.

In this context, data of the communication participants will be processed and stored on the servers of third parties, as far as these are part of communication processes with us. This data may include, but is not limited to, registration and contact details, visual and voice contributions, chat entries and shared screen content.

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

**Information on legal basis:** If we ask the users for their consent to the use of third-party providers or certain functions (e.g. permission to record conversations), the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interest in efficient and secure communication with our communication partners. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. email, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (recipients of emails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures, Direct marketing (e.g. by email or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Services and service providers being used:

- **Microsoft Teams:** Messenger and conference software; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://products.office.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>.
- **Skype:** Messenger and conference software; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://www.skype.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>.
- **Zoom:** Video Conferencing, Web Conferencing and Webinars; Service provider: Zoom Video Communications, Inc., 55 Almaden Blvd., Suite 600, San Jose, CA 95113, USA; Website: <https://zoom.us>; Privacy Policy: <https://zoom.us/docs/de-de/privacy-and-legal.html>; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): <https://zoom.us/docs/de-de/privacy-and-legal.html> (referred to as Global DPA).

## Cloud Services

We use internet-accessible software services (so-called cloud services, also referred to as 'Software as a Service') provided on the servers of its providers for the following purposes: document storage and administration, calendar management, email delivery, spreadsheets and presentations, exchange of documents, content and information with specific recipients or publication of websites, forms or other content and information, as well as chats and participation in audio and video conferences.

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimisation purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

**Information on legal basis:** If we ask for permission to use cloud services, the legal basis for processing data is consent. Furthermore, their use can be a component of our (pre)contractual services, provided that the use of cloud services has been agreed in this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient and secure administrative and collaboration processes).

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

websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).

- **Data subjects:** Customers, Employees (e.g. employees, job applicants), Prospective customers, Communication partner (recipients of emails, letters, etc.).
- **Purposes of Processing:** Office and organisational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Dropbox:** Cloud storage services; Service provider: Dropbox, Inc., 333 Brannan Street, San Francisco, California 94107, USA; Website: <https://www.dropbox.com>; Privacy Policy: <https://www.dropbox.com/privacy>; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): <https://assets.dropbox.com/documents/en/legal/data-processing-agreement-dfb-013118.pdf>.
- **Microsoft Cloud Services:** Cloud Services; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA; Website: <https://microsoft.com>; Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>, Security information: <https://www.microsoft.com/de-de/trustcenter>.

## Newsletter and Electronic Communications

We send newsletters, emails and other electronic communications (hereinafter referred to as 'newsletters') only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

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

**Double opt-in procedure:** The registration to our newsletter takes place in general in a so-called double-opt-in procedure. This means that you will receive an email after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external email addresses.

The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise, the changes of your data stored with the dispatch service provider are logged.

**Deletion and restriction of processing:** We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them in order to provide evidence of prior

consent. The processing of these data is limited to the purpose of a possible defence against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the email address solely for this purpose in a 'blocklist'.

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

**Contents:** Information about our Calls for Proposals – so called Funding Alerts.

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

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

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

A separate objection to the performance measurement is unfortunately not possible; in this case the entire newsletter subscription must be cancelled or objected to.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. email, telephone numbers), Meta/communication data (e.g. device information, IP addresses), Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Communication partner (recipients of emails, letters, etc.).
- **Purposes of processing:** Direct marketing (e.g. by email or postal).
- **Legal basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably email.

**Services and service providers being used:**

- **Mailjet:** Email marketing platform; Service provider: Mailjet SAS,13-13 bis, rue de l'Aubrac, 75012 Paris, France; Website: <https://www.mailjet.com>; Privacy Policy: <https://www.mailjet.com/privacy-policy/>.

## Online marketing

We process personal data for the purposes of online marketing, which may include in particular the marketing of advertising space or the display of advertising and other content (collectively referred to as 'content') based on the potential interests of users and the measurement of their effectiveness.

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

The IP addresses of the users are also stored. However, we use provided IP masking procedures (i.e. pseudonymisation by shortening the IP address) to ensure the protection of the user's IP address by using a pseudonym. In general, within the framework of the online marketing process, no clear user data (such as email addresses or names) is secured, rather pseudonyms. This means that we, as well as the providers of online marketing procedures, do not know the actual identity of the users, but only the information stored in their profiles.

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

Exceptionally, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing technology we use and the network links the profiles of the users in the aforementioned data. Please note that users may enter into additional agreements with the social network providers or other service providers, e.g. by consenting as part of a registration process.

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

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

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

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services), Prospective customers.
- **Purposes of Processing:** Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion tracking (measurement of the effectiveness of marketing activities), Interest-based and behavioural marketing, Profiling (creating user profiles), Web analytics (e.g. access statistics, recognition of returning visitors).
- **Security measures:** IP masking (pseudonymisation of the IP address).
- **Legal basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-out:** We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called opt-out). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area: a) Europe: <https://www.youronlinechoices.eu>; b) Canada: <https://www.youradchoices.ca/choices>; c) USA: <https://www.aboutads.info/choices>; d) Cross-regional: <https://optout.aboutads.info>.

#### Services and service providers being used:

- **Google Analytics:** Online marketing and web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://marketingplatform.google.com/intl/en/about/analytics/>; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

#### Profiles in Social Networks (Social Media)

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

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

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created on the basis of user behaviour and the associated

interests of users. The user profiles can then be used, for example, to place advertisements within and outside the networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

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

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

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. email, telephone numbers), Content data (e.g. text input, photographs, videos), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Contact requests and communication, Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing.
- **Legal basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **LinkedIn:** Social network; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **Twitter:** Social network; Service provider: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Policy: <https://twitter.com/de/privacy>, (Settings) <https://twitter.com/personalization>.

#### Plugins and Embedded Functions and Content

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

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

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

**Integration of third-party software, scripts or frameworks:** We incorporate into our online services software that we retrieve from servers of other providers (e.g. function libraries which we use for the purpose of displaying or user-friendliness of our online services). The respective providers collect the user's IP address and can process it for the purposes of transferring the software to the user's browser as well as for security purposes and for the evaluation and optimisation of their services.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Location data (Information on the geographical position of a device or person), Contact data (e.g. email, telephone numbers), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services), Communication partner (recipients of emails, letters, etc.).
- **Purposes of processing:** Provision of our online services and usability, Provision of contractual services and customer support, Contact requests and communication, Direct marketing (e.g. by email or postal), Targeting (e.g. profiling based on interests and behaviour, use of cookies), Interest-based and behavioural marketing, Profiling (creating user profiles), Feedback (e.g. collecting feedback via online form).
- **Legal basis:** Legitimate Interests (Article 6 (1) (f) GDPR), Consent (Article 6 (1) (a) GDPR).

**Services and service providers being used:**

- **Google Maps APIs and SDKs:** Interfaces to the map and location services provided by Google, which, for example, allow the addition of address entries, location determinations, distance calculations or the provision of supplementary information on locations and other places;  
Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent

company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://cloud.google.com/maps-platform>; Privacy Policy: <https://policies.google.com/privacy>.

- **LinkedIn plugins and contents:** This can include content such as images, videos or text and buttons with which users can share content from this online service within LinkedIn. Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
- **Shariff:** We use the privacy-secure 'Shariff' buttons. Shariff was developed to provide more privacy on the net and to replace the usual 'share' buttons of social networks. It is not the browser of the user, but the server on which this online offer is located, which establishes a connection with the server of the respective social media platforms and queries, for example, the number of 'likes', etc. The user remains anonymous. More information about the Shariff project can be found at the developers of the magazine **c't**: <https://www.heise.de/ct/artikel/Shariff-Social-Media-Buttons-mit-Datenschutz-2467514.html>. Service provider: Heise Medien GmbH & Co. KG, Karl-Wiechert-Allee 10, 30625 Hannover, Germany; Website: <https://www.heise.de/ct/artikel/Shariff-Social-Media-Buttons-mit-Datenschutz-2467514.html>; Privacy Policy: <https://www.heise.de/Datenschutzerklaerung-der-Heise-Medien-GmbH-Co-KG-4860.html>.
- **Twitter plugins and contents:** This can include content such as images, videos or text and buttons with which users can share content from this online service within Twitter. Service provider: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Website: <https://twitter.com>; Privacy Policy: <https://twitter.com/en/privacy>.

## Planning, Organisation and Utilities

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

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

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

marketing purposes. We therefore ask you to read the data protection notices of the respective third-party providers.

**Information on legal basis:** If we ask the users for their consent to the use of third-party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

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

#### **Services and service providers being used:**

- **WeTransfer:** Transferring files over the Internet; Service provider: WeTransfer BV, Oostelijke Handelskade 751, Amsterdam, 1019 BW, Netherlands; Website: <https://wetransfer.com>; Privacy Policy: <https://wetransfer.com/legal/privacy>.

## Erasure of Data

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

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

Further information on the erasure of personal data can also be found in the individual data protection notices of this privacy policy.

## Changes and Updates to the Privacy Policy

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

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

## Rights of Data Subjects

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

- **Right to Object:** You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to erasure and right to restriction of processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.

- **Complaint to the supervisory authority:** You also have the right, under the conditions laid down by law, to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

#### **Supervisory authority competent for us:**

Der Hessische Beauftragte für Datenschutz und Informationsfreiheit  
Postfach 3163  
65021 Wiesbaden  
Germany

Details: <https://datenschutz.hessen.de/>

## Terminology and Definitions

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

- **Controller:** ‘Controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- **Interest-based and behavioural marketing:** Interest-related and/or behaviour-related marketing is the term used when potential user interest in advertisements and other content is predicted if possible. This is done on the basis of information on the previous behaviour of users (e.g. visiting and staying on certain websites, purchasing behaviour or interaction with other users), which is stored in a so-called profile. For these purposes cookies are usually used.
- **IP masking:** IP masking is a method by which the last octet, i.e. the last two numbers of an IP address, are deleted so that the IP address alone can no longer be used to uniquely identify a

person. IP masking is therefore a means of pseudonymising processing methods, particularly in online marketing.

- **Location data:** Location data is created when a mobile device (or another device with the technical requirements for a location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data serve to indicate the geographically determinable position of the earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- **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 by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term 'processing' covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- **Profiling:** 'Profiling' means any automated processing of personal data consisting of the use of such personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this includes information regarding age, gender, location and movement data, interaction with websites and their contents, shopping behaviour, social interactions with other people), e.g. interests in certain contents or products, click behaviour on a website or the location). Cookies and web beacons are often used for profiling purposes.
- **Remarketing:** 'Remarketing' (or 'retargeting') is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website in order to remind the user of these products on other websites, e.g. in advertisements.
- **Targeting/Tracking:** 'Tracking' is the term used when the behaviour of users can be traced across several websites. As a rule, behaviour and interest information with regard to the websites used is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users presumably corresponding to their interests.
- **Web analytics:** Web analytics serves the evaluation of visitor traffic of online services and can determine their behaviour or interests in certain information, such as content of websites. With

the help of web analytics, website owners, for example, can recognise at what time visitors visit their website and what content they are interested in. This allows them, for example, to optimise the content of the website to better meet the needs of their visitors. For purposes of web analytics, pseudonymous cookies and web beacons are frequently used in order to recognise returning visitors and thus obtain more precise analyses of the use of an online service.

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