

**Updated: November 19, 2025**

## Privacy Policy

We are very pleased that you are interested in our organization. The protection of your Personal Data is particularly important to our management. As a rule, you can use our websites without disclosing any Personal Data to us. However, if you wish to use more specific services via our websites, including our other websites, applications and social media pages, we may have to process your Personal Data. If we wish to process data about you and we cannot rely on any other legal basis, we will always ask you for your Consent first (e.g. via a cookie banner).

We always comply with applicable data protection laws when handling your Personal Data (such as name, address, email or telephone number). With this Privacy Policy, we inform you about which data we process. This Privacy Policy also explains to you what rights you have as a Data Subject.

We have taken various technical and organizational measures to protect your data on our websites in the best possible way. Nevertheless, there are always risks on the internet and complete protection is not possible. For this reason, you can also transmit your Personal Data to us by other means, for example by telephone, if you prefer.

This Privacy Policy is not only intended to fulfill the obligations under GDPR and to comply with the law of the Member States of the European Union (EU) and the European Economic Area (EEA). This Privacy Policy is also intended to comply with legislation such as UK data protection laws (UK-GDPR), Swiss Federal Data Protection Act and Swiss Data Protection Ordinance (DSG, DSV), California Consumer Privacy Act (CCPA/CPRA), China's Personal Information Protection Law (PIPL), Delaware Personal Data Privacy Act (DPDPA), Tennessee Information Protection Act (TIPA), Minnesota Consumer Data Privacy Act (MCDPA), Iowa Act Relating to Consumer Data Protection (ICDPA), Maryland Online Data Privacy Act (MODPA), Nebraska Data Privacy Act (NDPA), New Hampshire Consumer Data Privacy Law (SB255), New Jersey Data Privacy Law (SB332), South Carolina Consumer Privacy Bill (House Bill 4696) and other global data protection regulations and shall be interpreted accordingly. The following Privacy Policy shall be interpreted for each country, state or federal state in such a way that the terms and legal bases used correspond to the terms and legal bases used in the respective state or federal state.

For reasons of better readability, the simultaneous use of the language forms male, female, diverse and other gender identities (m/f/d/other) is avoided on our websites, in publications, in communication and in our Privacy Policy. All formulations used apply equally to all genders.

If you have any suggestions for improving the texts in this Privacy Policy or if you want to hire an External Data Protection Officer, please contact the author of the text: [Prof. Dr. h.c. Heiko Jonny Maniero, LL.B., LL.M. mult., M.L.E.](#)

## 1. Definitions

In our Privacy Policy, we use special terms from various data protection laws. We want our statement to be easy to understand and therefore explain these terms in advance.

The following definitions shall be interpreted or expanded, as appropriate, based on the case law of the General Court of the European Union (EGC), the European Court of Justice (ECJ), the Swiss Federal Supreme Court (SFSC), the Supreme Court of the United Kingdom (UKSC) or on national data protection laws or national case law of a state or federal state, including but not limited to California, including case law, also under common law, if this is necessary for the application of the law in individual cases.

We use the following terms, among others, in this Privacy Policy:

a) Personal Data

Personal Data means any information relating to an identified or identifiable natural person. 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, or who must be regarded as such under national data protection legislation or national jurisdiction of a state or federal state, including under common law.

b) Data Subject

Data Subject is any identified or identifiable natural person whose Personal Data is processed by the Controller, a Processor, an international organization or another data recipient, and persons who must be regarded as such under national data protection laws or national jurisdiction of a state or federal state, including case law, also under common law.

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 is 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) Pseudonymization

Pseudonymization 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 organizational measures to ensure that the Personal Data are not attributed to an identified or identifiable natural person.

g) Controller

The Controller 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

A Processor is a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

i) Recipient

A 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.

j) Third Party

A 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 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**

The Controller within the meaning of the General Data Protection Regulation, other data protection laws applicable in the Member States of the European Union and the European Economic Area, British data protection laws, Swiss data protection laws (DSG, DSV), Californian data protection law (CCPA/CPRA), Chinese data protection law (PIPL), as well as international laws and provisions with a data protection nature is:

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

Our websites collect a range of general data and information each time the websites are accessed by a Data Subject or an automated system. This general data and information are stored in the log files of the respective server. Among other things, the (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system accesses our websites (so-called referrer), (4) the sub-websites which are accessed via an accessing system on our websites, (5) the date and time of access to the website, (6) an internet protocol address (IP address), (7) the internet service provider of the accessing system and (8) other similar data and information used for security purposes in the event of attacks on our information technology systems can be recorded.

When using this general data and information, we generally do not draw any conclusions about the Data Subject. Rather, this information is required to (1) correctly deliver the content of our websites, (2) optimize the content of our websites and the advertising for them, (3) ensure the long-term functionality of our information technology systems and the technology of our websites and (4) provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber-attack. This anonymously collected data and information is therefore evaluated by us both statistically and with the aim of increasing data protection and data security in our organisation to ultimately ensure an optimal level of protection for the Personal Data processed by us. The data of the server log files are stored separately from all Personal Data provided by a Data Subject.

The purpose of processing is to avert danger and ensure IT security, as well as the aforementioned purposes. The legal basis is Art. 6 (1) (f) GDPR. Our legitimate interest is the protection of our information technology systems. The log files are deleted after the stated purposes have been achieved.

### **4. Contact possibility via the website and other data transfers and your Consent**

Our website contains information that enables quick electronic contact with our organisation as well as direct communication with us, which also includes a general address of the so-called electronic mail (email address) and possibly a telephone number. If a Data Subject contacts us by email, via a contact form, via an input form or in any other way, the Personal Data transmitted by the Data Subject will be stored automatically. This

Personal Data transmitted to us on a voluntary basis by a Data Subject is processed for the purposes of usage or contacting the Data Subject.

We obtain your Consent for the transmission, storage and Processing of your contact data and inquiries and for contacting you in accordance with Art. 6 (1) (a) GDPR and Art. 49 (1) (1) (a) GDPR as follows:

**By transmitting your Personal Data, you voluntarily consent to the Processing of the Personal Data you have entered or transmitted for the purposes of processing the inquiry and contacting you. By transmitting your data to us, you also voluntarily give your explicit Consent in accordance with Art. 49 (1) (1) (a) GDPR to data transfers to third countries to and by the companies named in this Privacy Policy and for the purposes stated, in particular for such transfers to third countries for which there is or is not an adequacy decision by the EU/EEA and to companies or other bodies that are not subject to an existing adequacy decision on the basis of self-certification or other accession criteria and in which or for which there are significant risks and no suitable guarantees for the protection of your Personal Data (e.g. due to Section 702 FISA, Executive Order EO12333 and the CloudAct in the USA). When you gave your voluntary and explicit Consent, you were aware that there may not be an adequate level of data protection in third countries and that your data subject rights may not be enforceable. You can withdraw your Consent under data protection law at any time with effect for the future. The withdrawal of Consent does not affect the lawfulness of Processing based on Consent before its withdrawal. With a single action (entry and transmission), you give several Consents. These are Consents under EU/EEA data protection law as well as those under the CCPA/CPRA, ePrivacy and telemedia law, and other international legislation, which are required, among other things, as a legal basis for any planned further Processing of your Personal Data. With your action, you also confirm that you have read and taken note of this Privacy Policy.**

## 5. Routine deletion and restriction of Personal Data

We process and store Personal Data for the period required to achieve the purpose of processing or if this has been provided for by the European legislator or another legislator in laws or regulations to which we are subject, or if a legal basis for the Processing exists.

If the purpose of processing no longer applies or if a storage period prescribed by the European legislator or another competent legislator expires, or if the legal basis for the Processing no longer applies, the Personal Data will be routinely restricted or deleted in accordance with the statutory provisions.

## 6. Rights of the Data Subject according to GDPR

### a) Right to confirmation

Each Data Subject has the right to obtain from the Controller confirmation as to whether or not Personal Data concerning him or her is being processed.

If a Data Subject wishes to exercise this right, he or she may contact us at any time.

b) Right to information

Each Data Subject has the right to obtain from the Controller free information about the Personal Data stored about him/her and a copy of this data at any time. Furthermore, the European legislator has granted the Data Subject access to the following information:

- the purposes of processing,
- the categories of Personal Data that are processed,
- 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 organizations,
- 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 a right to lodge a complaint with a supervisory authority,
- if the Personal Data is not collected from the Data Subject: All available information about the origin of the data,
- the existence of automated decision-making, including Profiling, referred to in Art. 22 (1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.

Furthermore, the Data Subject has a right to information as to whether Personal Data has been transferred to a third country or to an international organization. If this is the case, the Data Subject also has the right to obtain information about the appropriate safeguards in connection with the transfer.

If a Data Subject wishes to exercise this right, he or she may contact us at any time.

c) Right to rectification

Each Data Subject has the right to demand the immediate correction of incorrect Personal Data concerning them. Furthermore, the Data Subject has the right to request the completion of incomplete Personal Data, including by means of a supplementary declaration, taking into account the purposes of the Processing.

If a Data Subject wishes to exercise this right, he or she may contact us at any time.

d) Right to erasure (right to be forgotten)

Each Data Subject has the right, 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:

- Personal Data was collected or otherwise processed for purposes for which it is no longer necessary.
- The Data Subject withdraws Consent on which the Processing is based according to Art. 6 (1) (a) GDPR, or Art. 9 (2) (a) GDPR, and where there is no other legal ground for the Processing.
- The Data Subject objects to the Processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the Processing, or the Data Subject objects to the Processing pursuant to Art. 21 (2) GDPR.
- Personal Data was processed unlawfully.
- The deletion of Personal Data is necessary to fulfill a legal obligation under Union law or the law of the Member States to which the Controller is subject.
- The Personal Data was collected in relation to information society services offered in accordance with Art. 8 (1) GDPR.

If one of the aforementioned reasons applies, and a Data Subject wishes to request the erasure of Personal Data stored by us, he or she may contact us at any time.

If we have made the Personal Data public and if our organisation is obliged to delete the Personal Data in accordance with Art. 17 (1) GDPR, we shall take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to inform other data Controllers who process the published Personal Data that the Data Subject has requested the deletion of all links to this Personal Data or of copies or replications of this Personal Data from these other data Controllers, insofar as the Processing is not necessary.

#### e) Right to Restriction of Processing

Each Data Subject has the right 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 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 defense of legal claims.
- The Data Subject has objected to Processing pursuant to Art. 21 (1) 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 us, he or she may contact us at any time.

f) Right to data portability

Each Data Subject has the right to receive the Personal Data concerning him or her, which he or she has provided to a Controller, in a structured, commonly used and machine-readable format. He or she also has the right to transmit those data to another Controller without hindrance from the Controller to which the Personal Data have been provided, where Processing is based on Consent pursuant to Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR or on a contract pursuant to Art. 6 (1) (b) GDPR and the Processing is carried out by automated means, unless the Processing is 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 their right to data portability pursuant to Art. 20 (1) GDPR, the Data Subject has the right to have the Personal Data transmitted directly from one Controller to another, where technically feasible and provided that this does not adversely affect the rights and freedoms of others.

If a Data Subject wishes to exercise this right, he or she may contact us at any time.

g) Right to object

Each Data Subject has the right 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.

In the event of an objection, we will no longer process the Personal Data 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 defense of legal claims.

If we process 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 also applies to Profiling insofar as it is associated with such direct advertising. If the Data Subject objects to us to the Processing for direct marketing purposes, we 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 us 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.

If a Data Subject wishes to exercise this right, he or she may contact us at any time. The Data Subject is also free, in the context of the use of information society services, and

notwithstanding Directive 2002/58/EC, to exercise his or her right to object by automated means using technical specifications.

h) Automated decisions in individual cases including Profiling

Each Data Subject has the right 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, provided that the decision (1) is not necessary for the conclusion or performance of a contract between the Data Subject and the Controller, or (2) is authorized 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 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, we 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 a Data Subject wishes to exercise this right, he or she may contact us at any time.

i) Right to withdraw Consent under data protection law

Each Data Subject has the right to withdraw Consent to the Processing of Personal Data at any time.

If a Data Subject wishes to exercise this right, he or she may contact us at any time.

## **7. General purpose of Processing, categories of processed data and categories of recipients**

The general purpose of processing of Personal Data is the handling of all activities relating to the Controller, customers, interested parties, business partners or other contractual or pre-contractual relationships between the aforementioned groups (in the broadest sense) or legal obligations of the Controller. This general purpose applies if no more specific purposes for specific Processing are specified.

The categories of Personal Data that we process are customer data, prospective customer data, employee data (including applicant data) and supplier data. The categories of recipients of Personal Data are public bodies, external bodies, internal processing, intragroup processing and other bodies.

A list of our Processors and data recipients in third countries and, if applicable, international organizations is either published on our website or can be requested from us free of charge.

## 8. Legal basis for the Processing

Art. 6 (1) (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 or consideration, Processing is based on Art. 6 (1) (b) GDPR. The same applies to such Processing operations that are necessary to carry out pre-contractual measures, for example in cases of inquiries about our products or services. If we are subject to a legal obligation which requires the Processing of Personal Data, such as for the fulfillment of tax obligations, Processing is based on Art. 6 (1) (c) GDPR.

In rare cases, it may be necessary to process Personal Data to protect the vital interests of the Data Subject or another natural person. This would be the case, for example, if a visitor were injured in our organisation and their name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other Third Party. The Processing would then be based on Art. 6 (1) (d) GDPR.

If the Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, the legal basis is Art. 6 (1) (e) GDPR.

Ultimately, Processing operations could be based on Art. 6 (1) (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 organisation 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. We are permitted to carry out such Processing operations in particular because they have been specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed, for example, if the Data Subject is a customer of the Controller (Recital 47 Sentence 2 GDPR).

## 9. Legitimate interests in Processing pursued by the Controller or a Third Party and direct marketing

If the Processing of Personal Data is based on Art. 6 (1) (f) GDPR and no more specific legitimate interests are stated, our legitimate interest is the performance of our business activities for the benefit of the well-being of our staff and our shareholders.

We may send you direct advertising about our own goods or services that are similar to the goods or services you have requested, commissioned or purchased. You may object to direct advertising at any time (e.g. by email). You will not incur any costs other than the transmission costs according to the basic rates. The Processing of Personal Data for direct marketing purposes is based on Art. 6 (1) (f) GDPR. The legitimate interest is direct marketing.

## **10. Duration for which the Personal Data is stored**

The criterion for the duration of the storage of Personal Data is the respective statutory retention period. If there is no statutory retention period, the criterion is the contractual or internal retention period. After this period has expired, the corresponding data is routinely deleted if it is no longer required to fulfill or initiate a contract. This applies in particular to all Processing operations for which no more specific criteria have been defined.

## **11. Legal or contractual provisions for the provision of Personal Data; necessity for the conclusion of the contract; obligation of the Data Subject to provide the Personal Data; possible consequences of non-provision**

We would like to inform you that the provision of Personal Data is partly required by law (e.g. tax regulations) or may also result from contractual obligations (e.g. information on the contractual partner). Sometimes it may be necessary for a contract to be concluded for a Data Subject to provide us with Personal Data that must subsequently be processed by us. For example, Data Subjects are obliged to provide us with Personal Data if our organisation concludes a contract with them. Failure to provide Personal Data would mean that the contract with the Data Subject could not be concluded. The Data Subject must contact us before providing Personal Data. We will inform the Data Subject on a case-by-case basis 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 what the consequences would be if the Personal Data were not provided.

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

As a responsible company, we do not normally use automated decision-making or Profiling. If, in exceptional cases, we carry out automated decision-making or Profiling, we will inform the Data Subject either separately or via a sub-item in our Privacy Policy (here on our website). In this case, the following applies:

Automated decision-making, including Profiling, may take place if (1) this is necessary for the conclusion or performance of a contract between the Data Subject and us, or (2) this is permissible on the basis of Union or Member State legislation to which we are subject and this legislation contains appropriate measures to safeguard the rights and freedoms and legitimate interests of the Data Subject, or (3) this takes place with the explicit Consent of the Data Subject.

In the cases referred to in Art. 22 (2) (a) and (c) GDPR, we shall implement suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests. In these cases, you have the right to obtain human intervention on the part of the Controller, to express your point of view and to contest the decision.

Meaningful information on the logic involved and the scope and intended effects of such Processing for the Data Subject will be provided in this Privacy Policy where applicable.

## **13. Recipients in a third country and appropriate or adequate safeguards and how to obtain a copy of them or where they are available.**

According to Art. 46 (1) GDPR, the Controller or Processor may only transfer Personal Data to a third country if the Controller or Processor has provided appropriate safeguards and if enforceable rights and effective legal remedies are available to the Data Subjects.

Appropriate safeguards can be provided by standard contractual clauses without the need for special approval from a supervisory authority, Art. 46 (2) (c) GDPR.

The EU standard contractual clauses or other appropriate safeguards are agreed with all recipients from third countries prior to the first transfer of Personal Data, or the transfers are based on adequacy decisions. Consequently, it is ensured that appropriate safeguards, enforceable rights and effective legal remedies are guaranteed for all Processing of Personal Data. Any Data Subject can obtain a copy of the standard contractual clauses or adequacy decisions from us. In addition, the standard contractual clauses and adequacy decisions are available in the Official Journal of the European Union.

Art. 45 (3) GDPR authorizes the European Commission to decide by means of an implementing decision that a non-EU country ensures an adequate level of protection. This means a level of protection for Personal Data that essentially corresponds to the level of protection within the EU. Adequacy decisions mean that Personal Data can flow from the EU (as well as from Norway, Liechtenstein and Iceland) to a third country without further obstacles. Similar regulations apply to the United Kingdom, Switzerland and some other countries.

In all cases where the European Commission, or a government or competent authority of another country, has decided that a third country ensures an adequate level of protection and/or a valid framework exists (e.g., EU-U.S. Data Privacy Framework, Swiss-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework), all transfers by us to the members of such frameworks (e.g. self-certified entities) are based solely on the membership of that entity in the respective framework or on the respective adequacy decisions. If we or one of our group companies is a member of such a framework, all transfers to us or our group company are based exclusively on the membership of the respective company in this framework. If we or one of our group companies is located in a third country with an adequate level of protection, all transfers to us or our group company are based solely on the respective adequacy decisions.

Any Data Subject can obtain a copy of the frameworks from us. In addition, the frameworks are also available in the Official Journal of the European Union or in the published legal materials or on the websites of data protection supervisory authorities or other authorities or institutions.

## **14. Right to lodge a complaint with a data protection supervisory authority**

As the Controller, we are obliged to inform the Data Subject of the existence of the right to lodge a complaint with a supervisory authority. The right to lodge a complaint is regulated in Art. 77 (1) GDPR. According to this provision, without prejudice to any other

administrative or judicial remedy, every Data Subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the Data Subject considers that the Processing of Personal Data relating to him or her infringes the General Data Protection Regulation. The right to lodge a complaint has been restricted by the EU legislator to the effect that it can only be exercised with a single supervisory authority (Recital 141 Sentence 1 GDPR). This provision is intended to avoid duplicate complaints in the same matter by the same Data Subject. If a Data Subject wishes to complain about us, it is therefore requested that only one supervisory authority is contacted.

## **15. Blog and comment function**

A blog is a portal, usually open to the public, in which one or more people, called bloggers or web bloggers, post articles or publish thoughts in so-called blog posts. You can leave individual comments on blog posts in our blog.

If you leave your own comments on our blog, information about the time you entered the comments and your username (possibly a pseudonym) will be stored, published and distributed in addition to the comments. By submitting comments, you conclude a publication contract with us, which grants us free of charge and irrevocably all worldwide copyright usage rights that you are entitled to. This includes, in particular, the rights to reproduce, distribute and make publicly available all comments submitted by you. The legal basis for the Processing is therefore Art. 6 (1) (b) GDPR.

The purposes of Processing are the provision of a blog with a comment function and granting the opportunity to submit comments.

Furthermore, the IP address assigned to your internet connection by your internet service provider (ISP) is logged when you post a comment. The IP address is stored for security reasons and for the case you violate the rights of Third Parties or post illegal content by posting a comment. The storage of this Personal Data is therefore in our own interest so that we can exculpate ourselves in the event of an infringement. The above purposes are the legitimate interests pursued by the Controller (Art. 6 (1) (f) GDPR). This data will not be passed on to Third Parties unless there is a legal obligation to pass it on or the passing on serves the purpose of criminal prosecution or exculpation.

## **16. Subscription to comments**

The comments posted on our blog can be subscribed to by anyone. In particular, it is possible for a commentator to subscribe to the comments following their comment on a particular blog post.

For legal reasons, a confirmation email is sent to the email address entered by a Data Subject for the first time to subscribe to comments using the double opt-in procedure. This confirmation email is used to check whether the owner of the email address as the Data Subject has authorized the subscription to comments. The legal basis for sending this double opt-in confirmation email is Art. 6 (1) (c) GDPR, as there is a legal obligation to send

a subscription to comments only to reconfirmed recipients. The option to subscribe to comments can be canceled at any time.

The purposes of Processing are the provision of a blog with a comment function and the granting of the option to subscribe to comments. The legal basis for sending these comments is Art. 6 (1) (b) GDPR, due to the contract concluded with us for sending comments.

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

WordPress.com is a platform that offers blogging and website creation services. WordPress.com allows users to create and manage their own websites or blogs without any technical knowledge. WordPress.com offers a variety of plugins that allow users to customize the design and functionality of their websites.

When using WordPress.com, Personal Data such as names, email addresses, payment information (for premium services), as well as usage data such as website visits and interactions with the platform are processed. This information is required to provide the services offered, manage user accounts, provide support and ensure the security of the platform.

The company that operates the service and thus the recipient of personal data is: Automattic, Inc., 60 29th Street 343, San Francisco, CA 94110, USA. For data subjects in the EU and EEA, Automattic A8C Ireland Ltd., Grand Canal Dock, 25 Herbert Pl, Dublin, D02 AY86, Ireland, acts as contact and representative within the meaning of Art. 27 GDPR.

Purposes for which the Personal Data is to be processed and the legal basis for the Processing: The purpose of data processing is the use of blogging and website creation services. Processing is based on the performance of a contract pursuant to Art. 6 (1) (b) GDPR, to which the Data Subject is a party, and on legitimate interests pursuant to Art. 6 (1) (f) GDPR, such as the use of an efficient platform, the improvement of our services and ensuring platform security.

The company that operates the service is based in a third country, namely the USA. Transfers to third countries may be based on the conclusion of standard contractual clauses or other suitable or appropriate safeguards referred to in Art. 46 (2) GDPR. The company that operates the service may have concluded one of the EU standard contractual clauses with us. You can request a copy of the suitable or appropriate guarantees from us.

The criteria for determining the duration for which the Personal Data is processed are the contractual relationship between us and the company that operates the service or statutory or contractual retention periods. The provision of Personal Data is not required by law or contract, nor is it necessary for the conclusion of a contract. You are not obliged to provide us or the company that operates the service with Personal Data. However, if you do not provide it, you may not be able to use our services or those of the company operating the service.

Further information and the applicable data protection provisions of WordPress.com can be found at <https://automattic.com>.

## **18. Subscription to our newsletter and your Consent**

We inform our customers and business partners about offers and news at regular intervals by means of a newsletter. You are therefore given the opportunity to subscribe to our newsletter on our website. The Personal Data transmitted to us when you subscribe to the newsletter can be understood from the input mask used. You can only receive our newsletter if (1) you have a valid email address and (2) you have registered to receive the newsletter.

For legal reasons, a confirmation email is sent to the email address entered by a Data Subject for the first time for the newsletter using the double opt-in procedure. This confirmation email is used to check whether the owner of the email address as the Data Subject has authorized the receipt of the newsletter. The legal basis for sending this double opt-in confirmation email is Art. 6 (1) (c) GDPR, as there is a legal obligation to send a newsletter only to confirmed recipients.

When registering for the newsletter, we also store the IP address assigned by the internet service provider (ISP) of the internet connection used by the Data Subject at the time of registration, as well as the date and time of registration. The storage of this data is necessary to be able to trace the (possible) misuse of a Data Subject's email address at a later point in time and therefore serves as legal protection for the Controller. The legal basis for Processing is also Art. 6 (1) (c) GDPR.

We obtain your Consent for the transmission and storage of your email address for the subscription to our newsletter in accordance with Art. 6 (1) (a) GDPR and Art. 49 (1) (1) (a) GDPR as follows:

**By entering and transmitting your Personal Data, you voluntarily consent to the Processing of the Personal Data you have entered for the purpose of sending our newsletter. By entering and transmitting your data to us, you also voluntarily give your explicit Consent in accordance with Art. 49 (1) (1) (a) GDPR to data transfers to third countries to and by the companies named in this Privacy Policy and for the purposes mentioned, in particular for such transfers to third countries for which there is or is not an adequacy decision by the EU/EEA and to companies or other bodies that are not subject to an existing adequacy decision on the basis of self-certification or other accession criteria and in which or for which there are significant risks and no suitable guarantees for the protection of your Personal Data (e.g. due to Section 702 FISA, Executive Order EO12333 and the CloudAct in the USA). When you gave your voluntary and explicit Consent, you were aware that there may not be an adequate level of data protection in third countries and that your data subject rights may not be enforceable. You can withdraw your Consent under data protection law at any time with effect for the future. The withdrawal of Consent does not affect the lawfulness of Processing based on Consent before its withdrawal. With a single action (entry and transmission), you give several Consents. These are Consents under EU/EEA data protection law as well as those under the CCPA/CPRA, ePrivacy and telemedia law, and other international legislation, which are required, among other things, as a legal basis for any planned further Processing of your**

**Personal Data. With your action, you also confirm that you have read and taken note of this Privacy Policy.**

Your Consent to the Processing of Personal Data that you have given us for the storage of the email address for sending the newsletter can be revoked at any time. There is a corresponding link in every newsletter for the purpose of revoking Consent. It is also possible to inform us of your wish to unsubscribe by other means (e.g. by telephone).

The Personal Data collected when registering for the newsletter will be used exclusively to send our newsletter. Furthermore, subscribers to the newsletter may be informed by email if this is necessary for the operation of the newsletter service or a registration in this regard, as could be the case in the event of changes to the newsletter offer or changes to the technical circumstances. The Personal Data collected as part of the newsletter service will not be passed on to Third Parties.

By subscribing to our newsletter, you conclude a contract with us for the delivery of the newsletter, which is why the Processing in connection with the dispatch is based on Art. 6 (1) (b) GDPR as the legal basis. The contract can be terminated at any time.

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

Jetpack is a WordPress plugin that provides a variety of security, performance optimization, image and content optimization, and marketing tools for WordPress websites. Jetpack enables website owners to protect their sites against brute force attacks, create automatic content and design backups, speed up image and video loading times and get detailed analytics reports. It also supports social media automation and offers advanced SEO functionalities.

When using Jetpack, Personal Data such as IP addresses, usage data (e.g. pages visited, interaction times), browser and device information and, in some cases, email addresses are processed. This data helps to ensure the security of the website, optimize performance, analyze user interactions and improve the user experience.

The company that operates the service and thus the recipient of personal data is:

Automattic Inc., 60 29th Street 343, San Francisco, CA 94110, USA. For data subjects in the EU and EEA, Aut O'Mattic A8C Ireland Ltd., 25 Herbert Place, Dublin, D02 AY86, Ireland, acts as contact and representative within the meaning of Art. 27 GDPR.

Purposes for which the Personal Data is to be processed and the legal basis for the Processing: The purpose of processing is the use and optimization of the Jetpack services. Processing is based on Art. 6 (1) (f) GDPR, whereby our legitimate interest lies in improving the security, performance and marketing efficiency of websites.

The company that operates the service is based in a third country, namely the USA. Transfers to third countries may be based on the conclusion of standard contractual clauses or other suitable or appropriate safeguards referred to in Art. 46 (2) GDPR. Automattic Inc. may have concluded one of the EU standard contractual clauses with us. You can request a copy of the suitable or appropriate safeguards from us.

The criteria for determining the duration for which the Personal Data is processed are the contractual relationship between us and the company that operates the service or statutory or contractual retention periods. The provision of Personal Data is not required by law or contract, nor is it necessary for the conclusion of a contract. You are not obliged to provide us or the company that operates the service with Personal Data. However, if you do not provide it, you may not be able to use our services or those of the company operating the service.

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

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

Instagram is a widely used social network that allows users to share photos and videos, post stories, and interact with followers and friends. Instagram offers a variety of features, including direct messages, IGTV for longer videos, Instagram Live for real-time broadcasts and a Discover page to find new content and users. When using Instagram, Personal Data such as names, email addresses, telephone numbers, user content (photos, videos, comments, etc.), location data, usage information and, in some cases, payment information is processed. This data helps to provide the service, ensure the security of the platform, offer personalized advertising and improve the user experience. The company that operates the service and thus the recipient of personal data is: Meta Platforms, Inc., 1 Meta Way, Menlo Park, CA 94025, USA. For data subjects in the EU and EEA, Meta Platforms Ireland Ltd., Merrion Road, Dublin D04 X2K5, Ireland, acts as contact and representative within the meaning of Art. 27 GDPR. The representative under national law in the United Kingdom is: Meta Platforms Technologies UK Ltd, 10 Brock Street, Regent's Place, London, NW1 3FG, United Kingdom. Purposes for which the Personal Data is to be processed and the legal basis for the Processing: The purpose of processing is the use and optimization of the social network functions. Processing is based on Art. 6 (1) (b) GDPR for the performance of a contract to which the Data Subject is party and Art. 6 (1) (f) GDPR, where our legitimate interest lies in the improvement and personalization of the user experience, the provision of customer support and ensuring the security and integrity of the platform, as well as in the use of the platform and marketing. The company that operates the service is based in a third country, namely the USA. Transfers to third countries may be based on the conclusion of standard contractual clauses or other suitable or appropriate safeguards referred to in Art. 46 (2) GDPR. The company that operates the service may be a certified member of one or more of the data privacy frameworks. You can find more information at <https://www.dataprivacyframework.gov/list>. You can request a copy of the suitable or appropriate guarantees from us. The criteria for determining the duration for which the Personal Data is processed are the contractual relationship between us and the company that operates the service or statutory or contractual retention periods. The provision of Personal Data is not required by law or contract, nor is it necessary for the conclusion of a contract. You are not obliged to provide us or the company that operates the service with Personal Data. However, if you do not provide it, you may not be able to use our services or those of the company operating the service. Further information and the applicable data protection provisions of Instagram can be viewed at <https://instagram.com>.

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

Pinterest is a platform for visual discoveries that allows us to share and save images, ideas and content. When using Pinterest, personal data such as usage data, search queries, IP addresses and interaction data with content are processed in order to personalize the user experience and suggest content. This data is used to improve recommendations, provide personalized advertising and optimize the use of the platform.

The company that operates the service and thus the recipient of personal data is: Pinterest, Inc., 651 Brannan Street, San Francisco, CA 94107, USA. For data subjects in the EU and EEA, Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland, acts as contact and representative within the meaning of Art. 27 GDPR.

Purposes for which personal data are to be processed and the legal basis for the processing: The purpose of the processing is to improve the user experience through personalized content and recommendations as well as advertising. The processing is based on Art. 6 (1) (f) GDPR, whereby the legitimate interest lies in the provision of relevant content and personalized advertising.

The company that operates the service is based in a third country, namely the USA. Transfers to third countries may be based on the conclusion of standard contractual clauses or other suitable or appropriate safeguards referred to in Art. 46 (2) GDPR. The company that operates the service may have concluded one of the EU standard contractual clauses with us. You can request a copy of the suitable or appropriate safeguards from us.

The criteria for determining the duration for which the personal data is processed are the contractual relationship between us and the company that operates the service or statutory or contractual retention periods. The provision of personal data is neither legally nor contractually required, nor is it necessary for the conclusion of a contract. You are not obliged to provide us or the company that operates the service with personal data. However, if you do not provide it, you may not be able to use our services or those of the company operating the service.

Further information and the applicable data protection provisions of Pinterest may be retrieved under <https://www.pinterest.com/>.

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