

## **Data Protection**

Thank you for your interest in our company. Data protection is of a particularly high priority for the management of the A.S. PRESTIGE GROUP d.o.o . Use of the A.S. PRESTIGE GROUP d.o.o is basically possible without any indication of personal data. However, if a data subject wishes to make use of our company's special services via our website, it may be necessary to process personal data. If the processing of personal data is necessary and there is no legal basis for such processing, we generally obtain the consent of the person concerned.

The processing of personal data, for example the name, address, email address or telephone number of a data subject, is always carried out in accordance with the General Data Protection Regulation and in accordance with the A.S. PRESTIGE GROUP d.o.o applicable country-specific data protection regulations. By means of this data protection declaration, our company would like to inform the public about the type, scope and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed about their rights by means of this data protection declaration.

The A.S. PRESTIGE GROUP d.o.o as the controller, A.S. PRESTIGE GROUP d.o.o has implemented numerous technical and organizational measures to ensure the most complete protection possible for personal data processed via this website. Nevertheless, internet-based data transmissions can generally have security gaps, so that absolute protection cannot be guaranteed. For this reason, every person concerned is free to transmit personal data to us in alternative ways, for example by telephone.

### **1. Definitions**

The data protection declaration of the A.S. PRESTIGE GROUP d.o.o is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terminology used in advance.

We use the following terms in this data protection declaration:

#### **a) personal data**

Personal data is all information that relates to an identified or identifiable natural person (hereinafter "data subject"). A natural person is regarded as identifiable who, directly or indirectly, in particular by means of assignment to an identifier such as a name, an identification number, location data, an online identifier or one or more special features that express the physical, physiological, genetic, psychological, economic, cultural or social identity of this natural person can be identified.

#### **b) data subject**

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

### **c) Processing**

Processing is any process carried out with or without the help of automated procedures or any such series of processes in connection with personal data such as the collection, recording, organization, ordering, storage, adaptation or change, reading, querying, use, Disclosure through transmission, distribution or any other form of provision, comparison or linking, restriction, deletion or destruction.

### **d) Restriction of processing**

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

### **e) Profiling**

Profiling is any type of automated processing of personal data that consists of using this personal data to evaluate certain personal aspects relating to a natural person, in particular aspects relating to work performance, economic situation, health, personal To analyze or predict the preferences, interests, reliability, behavior, whereabouts or relocation of this natural person.

### **f) pseudonymization**

Pseudonymization is the processing of personal data in a way in which the personal data can no longer be assigned to a specific data subject without the use of additional information, provided that this additional information is stored separately and is subject to technical and organizational measures that guarantee that the personal data cannot be assigned to an identified or identifiable natural person.

### **g) Responsible person or person responsible for processing**

The person responsible or the person responsible for the processing is the natural or legal person, authority, institution or other body that alone or jointly with others decides on the purposes and means of processing personal data. If the purposes and means of this processing are specified by Union law or the law of the member states, the person responsible or the specific criteria for his appointment can be provided for in accordance with Union law or the law of the member states.

### **h) Processors**

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

### **i) Recipient**

Recipient is a natural or legal person, authority, institution or other body to which personal data is disclosed, regardless of whether it is a third party or not. However, authorities that may receive personal data as part of a specific investigation under Union law or the law of the member states are not considered recipients.

### **j) third party**

A third party is a natural or legal person, public authority, agency or body other than the data subject, the person responsible, the processor and the persons who are authorized to process the personal data under the direct responsibility of the person responsible or the processor.

### **k) Consent**

Consent is any declaration of intent voluntarily given by the data subject in an informed manner and unequivocally in the form of a declaration or other unequivocal affirmative action with which the data subject indicates that they consent to the processing of their personal data is.

## **2. Name and address of the person responsible for processing**

The person responsible within the meaning of the General Data Protection Regulation, other data protection laws applicable in the member states of the European Union and other provisions of a data protection nature is

**A.S. PRESTIGE GROUP d.o.o**

**Krvavica 60 a**

**21320 Krvavica**

**Croatia**

**Tel .: +41 76 817 18 87**

**Email: [info@adriaville.com](mailto:info@adriaville.com)**

**Website: [www.adriaville.com](http://www.adriaville.com)**

## **3. Cookies**

The website of the A.S. PRESTIGE GROUP d.o.o use cookies. Cookies are text files that are filed and saved on a computer system via an internet browser.

Numerous websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier for the cookie. It consists of a string of characters through which websites and servers can be assigned to the specific Internet browser in which the cookie was stored. This enables the websites and servers visited to distinguish the individual

browser of the person concerned from other Internet browsers that contain other cookies. A specific internet browser can be recognized and identified via the unique cookie ID. Through the use of cookies, the A.S. PRESTIGE GROUP d.o.o can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

A cookie can be used to optimize the information and offers on our website in the interests of the user. As already mentioned, cookies enable us to recognize the users of our website. The purpose of this recognition is to make it easier for users to use our website. For example, the user of a website that uses cookies does not have to re-enter their access data every time they visit the website, because this is done by the website and the cookie stored on the user's computer system. Another example is the cookie of a shopping cart in the online shop. The online shop uses a cookie to remember the items that a customer has placed in the virtual shopping cart.

The person concerned can prevent the setting of cookies by our website at any time by means of a corresponding setting in the Internet browser used and thus permanently object to the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programs. This is possible in all common internet browsers. If the person concerned deactivates the setting of cookies in the internet browser used, not all functions of our website may be fully usable.

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

The website of the A.S. PRESTIGE GROUP d.o.o collects a series of general data and information each time the website is accessed by a data subject or an automated system. These general data and information are stored in the server's log files. The (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrer), (4) the sub-websites that are accessed via an accessing system on our website can be controlled, (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 that serve to avert danger in the event of attacks on our information technology systems.

When using these general data and information, A.S. PRESTIGE GROUP d.o.o does not draw any conclusions about the data subject. Rather, this information is required to (1) correctly deliver the content of our website, (2) optimize the content of our website and the advertising for it, (3) ensure the long-term functionality of our information technology systems and the technology of our website and (4) to provide law enforcement authorities with the information necessary for law enforcement in the event of a cyber attack. These anonymously collected data and information are used by A.S. PRESTIGE GROUP d.o.o therefore statistically and furthermore evaluated with the aim of increasing data protection and data security in our company in order to ultimately ensure an optimal level of protection for the personal data processed by us. The anonymous data in the server log files are stored separately from all personal data provided by a data subject.

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

The data subject has the option of registering on the website of the controller by providing personal data. Which personal data is transmitted to the person responsible for processing results from the respective input mask that is used for registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the person responsible for processing and for their own purposes. The person responsible for processing can arrange for the data to be passed on to one or more processors, for example a parcel service provider, who also uses the personal data exclusively for internal use attributable to the person responsible for processing.

By registering on the website of the person responsible for processing, the IP address assigned by the Internet service provider (ISP) to the person concerned, the date and time of registration are also saved. This data is stored against the background that this is the only way to prevent misuse of our services and, if necessary, to enable criminal offenses to be committed to enlighten. In this respect, the storage of this data is necessary to protect the person responsible for processing. This data is generally not passed on to third parties unless there is a legal obligation to pass it on or it is used for criminal prosecution.

The registration of the data subject with the voluntary provision of personal data enables the data controller to offer the data subject content or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have them completely deleted from the database of the person responsible for processing.

The person responsible for processing provides information to each person concerned at any time upon request about which personal data is stored about the person concerned. Furthermore, the person responsible for processing corrects or deletes personal data at the request or advice of the person concerned, provided that there are no statutory retention requirements. All of the employees of the person responsible for processing are available to the data subject as contact persons in this context.

## **6. Subscription to our newsletter**

On the website of the A.S. PRESTIGE GROUP d.o.o gives users the opportunity to subscribe to our company's newsletter. Which personal data is transmitted to the person responsible for processing when the newsletter is ordered results from the input mask used for this purpose.

The A.S. PRESTIGE GROUP d.o.o informs its customers and business partners at regular intervals by means of a newsletter about company offers. Our company's newsletter can only be received by the person concerned if (1) the person concerned has a valid e-mail address and (2) the person concerned registers to receive the newsletter. For legal reasons, a confirmation E-Mail will be sent to the e-mail address entered by a person concerned for the first time for sending the newsletter using the double opt-in procedure. This confirmation email is used to check whether the owner of the email address, as the person concerned, has authorized the receipt of the newsletter.

When registering for the newsletter, we also save the IP address assigned by the Internet service provider (ISP) of the computer system used by the person concerned at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of the e-mail address of a data subject at a later point in time and therefore serves as a legal safeguard for the person responsible for processing.

The personal data collected when registering for the newsletter will only be used to send our newsletter. Furthermore, subscribers to the newsletter could be informed by e-E-Mail if this is necessary for the operation of the newsletter service or a relevant registration, as in the case of changes to the newsletter offer or changes in the technical conditions could be the case. The personal data collected as part of the newsletter service will not be passed on to third parties. The data subject can cancel the subscription to our newsletter at any time. The consent to the storage of personal data that the data subject has given us for sending the newsletter can be revoked at any time. There is a corresponding link in every newsletter for the purpose of withdrawing consent. Furthermore, there is the option of unsubscribing from the newsletter dispatch directly on the website of the person responsible for processing or to inform the person responsible for processing of this in another way.

## **7. Newsletter tracking**

The A.S. PRESTIGE GROUP d.o.o contain so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in E-Mails that are sent in HTML format to enable log file recording and log file analysis. This enables a statistical evaluation of the success or failure of online marketing campaigns to be carried out. Using the embedded tracking pixel, the A.S. PRESTIGE GROUP d.o.o recognize whether and when an E-Mail was opened by a data subject and which links in the E-Mail were called up by the data subject.

Such personal data collected via the tracking pixels contained in the newsletters are stored and evaluated by the person responsible for processing in order to optimize the newsletter dispatch and to better adapt the content of future newsletters to the interests of the person concerned. These personal data will not be passed on to third parties. Affected persons are entitled at any time to revoke the relevant separate declaration of consent given via the double opt-in procedure. After a revocation, this personal data will be deleted by the person responsible for processing. The A.S. PRESTIGE GROUP d.o.o automatically as a revocation.

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

The website of the A.S. PRESTIGE GROUP d.o.o Due to legal regulations, A.S. PRESTIGE GROUP d.o.o contains information that enables quick electronic contact to our company and direct communication with us, which also includes a general address for so-called electronic mail (e-mail address). If a data subject contacts the person responsible for processing by email or a contact form, the personal data transmitted by the data subject will be automatically saved. Such personal data transmitted on a voluntary basis by a data subject to the person responsible for processing are stored for the purposes of processing or contacting the data subject. This personal data is not passed on to third parties.

## **9. Routine deletion and blocking of personal data**

The person responsible for the processing processes and stores personal data of the data subject only for the period of time that is necessary to achieve the storage purpose or if this is specified by the European directives and regulations or another legislator in laws or regulations, which the person responsible for the processing is subject to, was provided. If the purpose of storage no longer applies or if a storage period prescribed by the European directives and regulations or another responsible legislator expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

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

### **a) Right to confirmation**

Every person concerned has the right granted by the European directive and regulation giver to request confirmation from the person responsible for the processing as to whether personal data concerning them are being processed. If a person concerned wishes to exercise this right to confirmation, they can contact an employee of the person responsible for processing at any time.

### **b) Right to information**

Every person affected by the processing of personal data has the right granted by the European directive and regulation giver to receive free information about the personal data stored about him and a copy of this information from the person responsible for the processing at any time. Furthermore, the European directives and regulations grant the data subject access to the following information:

the purposes of the processing  
the categories of personal data that are processed  
the recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular in the case of recipients in third countries or international organizations  
if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration  
the existence of a right to correction or deletion of the personal data concerning you or to restriction of processing by the person responsible or a right to object to this processing  
the right to lodge a complaint with a supervisory authority  
if the personal data are not collected from the data subject: All available information on the origin of the data  
the existence of automated decision-making including profiling in accordance with Article 22 (1) and (4) GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended effects of such processing for the data subject  
Furthermore, the data subject has the right to information as to whether personal data has been transmitted to a third country or to an international organization. If this is the case, the data subject also has the right to receive information about the appropriate guarantees in connection with the transmission.

If a data subject wishes to make use of this right to information, they can contact an employee of the person responsible for processing at any time.

### **c) Right to rectification**

Every person affected by the processing of personal data has the right granted by the European directives and regulations to request the immediate correction of incorrect personal data concerning them. Furthermore, the data subject has the right, taking into account the purposes of the processing, to request the completion of incomplete personal data - including by means of a supplementary declaration.

If a data subject wishes to exercise this right to rectification, they can contact an employee of the person responsible for processing at any time.

### **d) Right to erasure (right to be forgotten)**

Every person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to demand that the person responsible delete the personal data concerning them immediately, provided that one of the following reasons applies and insofar as the processing is not necessary:

The personal data were collected or otherwise processed for purposes for which they are no longer necessary.

The data subject revokes their consent, on which the processing was based in accordance with Art. 6 Paragraph 1 Letter a GDPR or Art. 9 Paragraph 2 Letter a GDPR, and there is no other legal basis for the processing.

The data subject objects to the processing in accordance with Art. 21 Paragraph 1 GDPR, and there are no overriding legitimate reasons for the processing, or the data subject objects in accordance with Art. 21 Paragraph 2 GDPR to the Processing a.

The 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 person responsible is subject.

The personal data was collected in relation to the information society services offered in accordance with Art. 8 Para. 1 GDPR.

If one of the above reasons applies and a data subject requests the deletion of personal data stored by A.S. PRESTIGE GROUP d.o.o. would like to have them stored, they can contact an employee of the person responsible for the processing at any time. The employee of the A.S. PRESTIGE GROUP d.o.o will arrange for the deletion request to be met immediately.

Has the personal data been processed by A.S. PRESTIGE GROUP d.o.o. and our company, as the person responsible, is obliged to delete personal data in accordance with Art. 17 Para. 1 GDPR, A.S. Media d.o.o, taking into account the available technology and the implementation costs, take appropriate measures, including technical ones, to inform other data controllers who process the published personal data that the data subject has



requested the deletion from these other data controllers has requested all links to this personal data or copies or replications of this personal data, insofar as the processing is not necessary. The employee of the A.S. PRESTIGE GROUP d.o.o will arrange the necessary in individual cases.

#### **e) Right to restriction of processing**

Every person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to demand that the controller restrict the processing if one of the following conditions is met:

The correctness of the personal data is contested by the data subject for a period that enables the person responsible to check the correctness of the personal data.

The processing is unlawful, the person concerned refuses to delete the personal data and instead requests that the use of the personal data be restricted.

The person responsible no longer needs the personal data for the purposes of processing, but the data subject needs them to assert, exercise or defend legal claims.

The person concerned has lodged an objection to the processing in accordance with Art. 21 Paragraph 1 GDPR and it has not yet been determined whether the legitimate reasons of the person responsible outweigh those of the person concerned.

If one of the above conditions is met and a data subject requests the restriction of personal data that A.S. Media d.o.o. would like to request that they are stored, they can contact an employee of the person responsible for processing at any time. The employee of the A.S. PRESTIGE GROUP d.o.o will arrange for the processing to be restricted.

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

Every person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to receive the personal data relating to them, which have been made available to a person responsible by the person concerned, in a structured, common and machine-readable format. You also have the right to transfer this data to another person responsible without hindrance from the person responsible to whom the personal data was provided, provided that the processing is based on the consent in accordance with Art. 6 Para. 1 Letter a GDPR or Art. 9 Para . 2 letter a DS-GVO or on a contract according to Art. 6 para. 1 letter b DS-GVO and the processing is carried out using automated procedures, unless the processing is necessary for the performance of a task that is in the public interest or takes place in the exercise of official authority, which has been assigned to the person responsible.

Furthermore, when exercising their right to data portability in accordance with Art. 20 (1) GDPR, the person concerned has the right to have the personal data transmitted directly from one person responsible to another, insofar as this is technically feasible and if this does not affect the rights and freedoms of other persons.

To assert the right to data portability, the person concerned can contact an employee of the A.S. PRESTIGE GROUP d.o.o

## **g) Right to object**

Any person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to object at any time to the processing of personal data relating to them, which is based on Art. 6 Paragraph 1 Letter e or f DS-GVO takes place to object. This also applies to profiling based on these provisions.

The A.S. PRESTIGE GROUP d.o.o will no longer process the personal data in the event of an objection, unless we can prove compelling legitimate reasons for the processing that outweigh the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend Legal claims.

If the A.S. PRESTIGE GROUP d.o.o personal data in order to operate direct mail, the data subject has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling insofar as it is associated with such direct advertising. If the data subject objects to the A.S. Media d.o.o. processing for direct marketing purposes, A.S. PRESTIGE GROUP d.o.o no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to their particular situation, to object to the processing of personal data relating to them that is carried out by A.S. PRESTIGE GROUP d.o.o for scientific or historical research purposes or for statistical purposes in accordance with Art. 89 Para. 1 GDPR, to object, unless such processing is necessary to fulfill a task in the public interest.

In order to exercise the right to object, the data subject can contact any employee of the A.S. PRESTIGE GROUP d.o.o or another employee. The data subject is also free, in connection with the use of information society services, regardless of Directive 2002/58 / EC, to exercise their right of objection by means of automated procedures in which technical specifications are used.

## **h) Automated decisions in individual cases including profiling**

Every person affected by the processing of personal data has the right granted by the European legislator of directives and regulations not to be subject to a decision based solely on automated processing - including profiling - which has legal effects on them or similarly significantly affects them, if the decision (1) is not necessary for the conclusion or performance of a contract between the data subject and the person responsible, or (2) is permissible on the basis of Union or Member State law to which the person responsible is subject and these legal provisions take appropriate measures to safeguard the rights and freedoms as well as the legitimate interests of the data subject or (3) is made with the express consent of the data subject.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and the data controller, or (2) it is based on the data subject's explicit consent, the A.S. PRESTIGE GROUP d.o.o take appropriate measures to protect the rights and freedoms as well as the legitimate interests of the data subject, including at least the

right to obtain the intervention of a person on the part of the person responsible, to express their own point of view and to contest the decision.

If the data subject wishes to assert rights with regard to automated decisions, they can contact an employee of the person responsible for processing at any time.

#### **i) Right to withdraw consent under data protection law**

Every person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to revoke their consent to the processing of personal data at any time.

If the person concerned wishes to assert their right to withdraw consent, they can contact an employee of the person responsible for processing at any time.

### **11. Data protection provisions on the application and use of Facebook**

The person responsible for the processing has integrated components of the company Facebook on this website. Facebook is a social network.

A social network is a social meeting point operated on the Internet, an online community that usually enables users to communicate with one another and interact in virtual space. A social network can serve as a platform for the exchange of opinions and experiences or enables the Internet community to provide personal or company-related information. Among other things, Facebook enables users of the social network to create private profiles, upload photos and network via friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. If a data subject lives outside the USA or Canada, the person responsible for processing personal data is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland.

Each time one of the individual pages of this website is called up, which is operated by the person responsible for processing and on which a Facebook component (Facebook plug-in) has been integrated, the Internet browser on the information technology system of the person concerned is automatically activated by the respective Facebook Component causes a representation of the corresponding Facebook component to be downloaded from Facebook. A complete overview of all Facebook plug-ins can be found at [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE). As part of this technical process, Facebook receives information about which specific subpage of our website is visited by the person concerned.

If the person concerned is logged in to Facebook at the same time, Facebook recognizes which specific sub-page of our website the person concerned is visiting with each visit to our website by the person concerned and for the entire duration of the respective stay on our website. This information is collected by the Facebook component and assigned to the respective Facebook account of the person concerned by Facebook. If the person concerned activates one of the Facebook buttons integrated on our website, for example the

“Like” button, or if the person concerned makes a comment, Facebook assigns this information to the person's personal Facebook user account and saves this personal data. Facebook always receives information via the Facebook component that the person concerned has visited our website if the person concerned is logged into Facebook at the same time as accessing our website; this takes place regardless of whether the person concerned clicks on the Facebook component or not. If the data subject does not want this information to be transmitted to Facebook, they can prevent the transmission by logging out of their Facebook account before calling up our website.

The data guideline published by Facebook, which is available at <https://de-de.facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. It also explains which setting options Facebook offers to protect the privacy of the person concerned. In addition, various applications are available that make it possible to suppress data transmission to Facebook. Such applications can be used by the data subject to suppress data transmission to Facebook.

## **12. Data protection provisions on the application and use of Google AdSense**

The controller has integrated Google AdSense on this website. Google AdSense is an online service that enables advertising to be placed on third-party sites. Google AdSense is based on an algorithm that selects the advertisements displayed on third-party sites to match the content of the respective third-party site. Google AdSense allows interest-based targeting of the Internet user, which is implemented by generating individual user profiles. The operating company of the Google AdSense component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of the Google AdSense component is to include advertisements on our website. Google AdSense places a cookie on the information technology system of the person concerned. What cookies are has already been explained above. By setting the cookie, Alphabet Inc. is able to analyze the use of our website. Each time one of the individual pages of this website is called up, which is operated by the person responsible for processing and on which a Google AdSense component has been integrated, the Internet browser on the information technology system of the person concerned is automatically triggered by the respective Google AdSense component to transmit data to Alphabet Inc. for the purpose of online advertising and billing of commissions. As part of this technical process, Alphabet Inc. gains knowledge of personal data, such as the IP address of the person concerned, which Alphabet Inc. uses, among other things, to understand the origin of visitors and clicks and subsequently to enable commission accounting.

The person concerned can prevent the setting of cookies by our website, as already shown above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Alphabet Inc. from placing a cookie on the information technology system of the person concerned. In addition, a cookie already set by Alphabet Inc. can be deleted at any time via the Internet browser or other software programs. Google AdSense also uses so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in Internet pages in order to enable log file recording and log file analysis,

whereby a statistical evaluation can be carried out. Using the embedded tracking pixel, Alphabet Inc. can recognize whether and when a website was opened by a data subject and which links were clicked on by the data subject. Tracking pixels are used, among other things, to evaluate the flow of visitors to a website.

Via Google AdSense, personal data and information, which also includes the IP address and is necessary for the collection and billing of the displayed advertisements, is transmitted to Alphabet Inc. in the United States of America. These personal data are stored and processed in the United States of America. Alphabet Inc. may pass this personal data collected through the technical process on to third parties.

Google AdSense is explained in more detail under this link

<https://www.google.de/intl/de/adsense/start/>.

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

The person responsible for processing has integrated the Google Analytics component (with anonymization function) on this website. Google Analytics is a web analysis service. Web analysis is the collection, collection and evaluation of data on the behavior of visitors to Internet pages. A web analysis service collects, among other things, data on the website from which a person concerned came to a website (so-called referrer), which sub-pages of the website were accessed or how often and for how long a sub-page was viewed. A web analysis is mainly used to optimize a website and for a cost-benefit analysis of internet advertising.

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

The person responsible for processing uses the addition "\_gat.\_anonymizeIp" for web analysis via Google Analytics. By means of this addition, the IP address of the Internet connection of the person concerned is shortened and anonymized by Google if our Internet pages are accessed from a member state of the European Union or from another signatory to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the flow of visitors to our website. Google uses the data and information obtained, among other things, to evaluate the use of our website, to compile online reports for us that show the activities on our website, and to provide other services related to the use of our website.

Google Analytics places a cookie on the information technology system of the person concerned. What cookies are has already been explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. Each time one of the individual pages of this website is called up, which is operated by the person responsible for processing and on which a Google Analytics component has been integrated, the Internet browser on the information technology system of the person concerned is automatically triggered by the respective Google Analytics component To transmit data to Google for the purpose of online analysis. As part of this technical process, Google gains knowledge of personal data, such as the IP address of the person concerned, which Google uses, among other things, to trace the origin of visitors and clicks and subsequently to enable commission accounting.

The cookie is used to store personal information, such as the access time, the location from which access was made and the frequency of visits to our website by the person concerned. Each time you visit our website, this personal data, including the IP address of the Internet connection used by the person concerned, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass this personal data collected through the technical process on to third parties. The person concerned can prevent the setting of cookies by our website, as already shown above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the internet browser used would also prevent Google from setting a cookie on the information technology system of the person concerned. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Furthermore, the data subject has the option of objecting to the collection of the data generated by Google Analytics relating to the use of this website and the processing of this data by Google and to prevent this. To do this, the person concerned must download and install a browser add-on under the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data or information on visits to websites may be transmitted to Google Analytics. The installation of the browser add-on is considered an objection by Google. If the information technology system of the person concerned is deleted, formatted or reinstalled at a later point in time, the person concerned must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated by the person concerned or another person who is attributable to their sphere of influence, there is the option of reinstalling or reactivating the browser add-on.

Further information and the applicable data protection provisions of Google can be found at <https://www.google.de/intl/de/policies/privacy/> and at <http://www.google.com/analytics/terms/de.html>. Google Analytics is explained in more detail under this link [https://www.google.com/intl/de\\_de/analytics/](https://www.google.com/intl/de_de/analytics/).

#### **14. Data protection provisions on the application and use of Google Remarketing**

The person responsible for processing has integrated Google Remarketing services on this website. Google Remarketing is a function of Google AdWords that enables a company to show advertisements to Internet users who have previously been on the company's website. The integration of Google Remarketing therefore allows a company to create user-related advertising and consequently to show interest-relevant advertisements to the Internet user. The operating company for the services of Google Remarketing is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of Google Remarketing is to show interest-relevant advertising. Google Remarketing enables us to display advertisements via the Google advertising network or to have them displayed on other websites that are tailored to the individual needs and interests of Internet users.

Google Remarketing places a cookie on the information technology system of the person concerned. What cookies are has already been explained above. By setting the cookie,

Google is able to recognize the visitor to our website if they subsequently access websites that are also members of the Google advertising network. Every time a website is accessed on which the Google Remarketing service has been integrated, the data subject's internet browser automatically identifies itself to Google. As part of this technical process, Google gains knowledge of personal data, such as the IP address or the surfing behavior of the user, which Google uses, among other things, to display interest-relevant advertising. The cookie is used to store personal information, such as the websites visited by the person concerned. Every time you visit our website, personal data, including the IP address of the Internet connection used by the person concerned, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass this personal data collected through the technical process on to third parties.

The person concerned can prevent the setting of cookies by our website, as already shown above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the internet browser used would also prevent Google from setting a cookie on the information technology system of the person concerned. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

The data subject also has the option of objecting to interest-based advertising by Google. To do this, the person concerned must call up the link [www.google.de/settings/ads](http://www.google.de/settings/ads) from each of the internet browsers they use and make the desired settings there.

Further information and the applicable data protection provisions of Google can be found at <https://www.google.de/intl/de/policies/privacy/>.

## **15. Data protection provisions on the application and use of Google AdWords**

The person responsible for processing has integrated Google AdWords on this website. Google AdWords is an internet advertising service that allows advertisers to place advertisements in Google's search engine results as well as in the Google advertising network. Google AdWords enables an advertiser to define certain keywords in advance by means of which an advertisement is only displayed in Google's search engine results if the user calls up a keyword-relevant search result with the search engine. In the Google advertising network, the ads are distributed to topic-related websites using an automatic algorithm and taking into account the previously defined keywords.

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

The purpose of Google AdWords is to advertise our website by displaying interest-relevant advertising on the websites of third-party companies and in the search engine results of the Google search engine and by displaying third-party advertising on our website.

If a person concerned reaches our website via a Google ad, a so-called conversion cookie is stored on the information technology system of the person concerned by Google. What cookies are has already been explained above. A conversion cookie loses its validity after



thirty days and is not used to identify the person concerned. If the cookie has not yet expired, the conversion cookie is used to determine whether certain sub-pages, for example the shopping cart from an online shop system, have been accessed on our website. The conversion cookie enables both we and Google to understand whether a person concerned who came to our website via an AdWords ad generated sales, i.e. completed or canceled a purchase.

The data and information collected through the use of the conversion cookie are used by Google to create visit statistics for our website. These visit statistics are in turn used by us to determine the total number of users who were referred to us via AdWords advertisements, i.e. to determine the success or failure of the respective AdWords advertisement and to optimize our AdWords advertisements for the future. Neither our company nor others Google AdWords advertisers receive information from Google that could be used to identify the person concerned.

The conversion cookie is used to store personal information, such as the websites visited by the person concerned. Every time you visit our website, personal data, including the IP address of the Internet connection used by the person concerned, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass this personal data collected through the technical process on to third parties.

The person concerned can prevent the setting of cookies by our website, as already shown above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the internet browser used would also prevent Google from setting a conversion cookie on the information technology system of the person concerned. In addition, a cookie already set by Google AdWords can be deleted at any time via the Internet browser or other software programs.

The data subject also has the option of objecting to interest-based advertising by Google. To do this, the person concerned must call up the link [www.google.de/settings/ads](http://www.google.de/settings/ads) from each of the internet browsers they use and make the desired settings there.

Further information and the applicable data protection provisions of Google can be found at <https://www.google.de/intl/de/policies/privacy/>.

## **16. Data protection provisions on the application and use of Instagram**

The person responsible for processing has integrated components of the Instagram service on this website. Instagram is a service that qualifies as an audiovisual platform and enables users to share photos and videos and also to disseminate such data in other social networks.

The operating company for Instagram services is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2 Ireland.

Each time one of the individual pages of this website is called up, which is operated by the person responsible for processing and on which an Instagram component (Insta button) has been integrated, the Internet browser on the information technology system of the person concerned is automatically replaced by the respective Instagram component prompts you to



download a representation of the corresponding component from Instagram. As part of this technical process, Instagram receives information about which specific subpage of our website is visited by the person concerned.

If the person concerned is logged in to Instagram at the same time, Instagram recognizes each time our website is accessed by the person concerned and during the entire period Duration of the respective stay on our website, which specific subpage the person concerned visits. This information is collected by the Instagram component and assigned to the respective Instagram account of the person concerned. If the person concerned clicks one of the Instagram buttons integrated on our website, the data and information transferred are assigned to the personal Instagram user account of the person concerned and stored and processed by Instagram.

Instagram always receives information via the Instagram component that the person concerned has visited our website if the person concerned is logged in to Instagram at the same time as accessing our website; this takes place regardless of whether the person concerned clicks on the Instagram component or not. If the data subject does not want this information to be transmitted to Instagram, they can prevent the transmission by logging out of their Instagram account before visiting our website.

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

## **17. Data protection provisions on the application and use of YouTube**

The person responsible for processing has integrated components from YouTube on this website. YouTube is an Internet video portal that enables video publishers to post video clips free of charge and other users to view, rate and comment on them free of charge. YouTube allows the publication of all types of videos, which is why complete film and television programs, but also music videos, trailers or videos made by users themselves can be accessed via the Internet portal.

YouTube is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

Each time one of the individual pages of this website is accessed, which is operated by the person responsible for processing and on which a YouTube component (YouTube video) has been integrated, the Internet browser on the information technology system of the person concerned is automatically replaced by the respective YouTube component prompts you to download a representation of the corresponding YouTube component from YouTube. Further information about YouTube can be found at <https://www.youtube.com/yt/about/de/>. As part of this technical process, YouTube and Google gain knowledge of which specific subpage of our website is visited by the person concerned.

If the person concerned is logged in to YouTube at the same time, YouTube recognizes which specific sub-page of our website the person concerned is visiting by calling up a subpage that contains a YouTube video. This information is collected by YouTube and Google and assigned to the respective YouTube account of the person concerned.

YouTube and Google always receive information via the YouTube component that the person concerned has visited our website if the person concerned is logged into YouTube at the same time as accessing our website; this takes place regardless of whether the person concerned clicks on a YouTube video or not. If the data subject does not want this information to be transmitted to YouTube and Google, they can prevent the transmission by logging out of their YouTube account before calling up our website.

The data protection regulations published by YouTube, which are available at <https://www.google.de/intl/de/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

## **18. Payment method: Data protection provisions for PayPal as a payment method**

The person responsible for processing has integrated components from PayPal on this website. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which are virtual private or business accounts. PayPal also offers the option of processing virtual payments via credit cards if a user does not have a PayPal account. A PayPal account is managed via an email address, which is why there is no classic account number. PayPal makes it possible to initiate online payments to third parties or to receive payments. PayPal also acts as a trustee and offers buyer protection services.

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

If the person concerned selects "PayPal" as the payment option in our online shop during the ordering process, the data of the person concerned will be automatically transmitted to PayPal. By selecting this payment option, the person concerned consents to the transfer of personal data required for payment processing.

The personal data transmitted to PayPal are usually first name, last name, address, email address, IP address, telephone number, mobile phone number or other data that are necessary for payment processing. In order to process the purchase contract, personal data related to the respective order is also necessary.

The purpose of transmitting the data is to process payments and prevent fraud. The person responsible for processing will transmit personal data to PayPal in particular if there is a legitimate interest in the transmission. The personal data exchanged between PayPal and the person responsible for processing may be transmitted by PayPal to credit agencies. The purpose of this transmission is to check your identity and creditworthiness.

PayPal may pass on the personal data to affiliated companies and service providers or subcontractors, insofar as this is necessary to fulfill the contractual obligations is required or the data is to be processed on behalf of.

The data subject has the option of revoking their consent to the handling of personal data from PayPal at any time. A revocation does not affect personal data that must be processed, used or transmitted for (contractual) payment processing.

PayPal's current data protection regulations can be found at <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

## **19. Payment method: Data protection provisions for instant transfer as a payment method**

The person responsible for processing has integrated components of Sofortüberweisung on this website. Sofortüberweisung is a payment service that enables cashless payment for products and services on the Internet. Sofortüberweisung is a technical process through which the online retailer immediately receives a payment confirmation. This enables a retailer to deliver goods, services or downloads to the customer immediately after the order has been placed.

The operator of Sofortüberweisung is Klarna Bank AB, Sveavägen 46, 111 34 Stockholm, Sweden.

If the person concerned selects "Sofortüberweisung" as a payment option during the ordering process in our online shop, the data of the person concerned will be automatically transmitted to Sofortüberweisung. By selecting this payment option, the person concerned consents to the transfer of personal data required for payment processing.

When processing the purchase via Sofortüberweisung, the buyer transmits the PIN and TAN to Sofort GmbH. Sofortüberweisung then carries out a transfer to the online retailer after a technical check of the account balance and retrieval of further data to check the account coverage. The online retailer is then automatically informed that the financial transaction has been carried out.

The personal data exchanged with Sofortüberweisung are first name, last name, address, email address, IP address, telephone number, mobile phone number or other data that are necessary for payment processing. The purpose of transmitting the data is to process payments and prevent fraud. The person responsible for processing will transmit other personal data to Sofortüberweisung even if there is a legitimate interest in the transmission. The personal data exchanged between Sofortüberweisung and the person responsible for processing may be transmitted to credit agencies by Sofortüberweisung. The purpose of this transmission is to check your identity and creditworthiness.

Sofortüberweisung may pass on the personal data to affiliated companies and service providers or subcontractors, insofar as this is necessary for fulfillment the contractual obligations is necessary or the data is to be processed in the order.

The person concerned has the option of revoking their consent to the handling of personal data at any time by means of Sofortüberweisung. A revocation does not affect personal data that must be processed, used or transmitted for (contractual) payment processing.

The applicable data protection provisions of Sofortüberweisung can be found at <https://www.klarna.com/sofort/datenschutz/>.

## **20. Legal basis for processing**

Art. 6 I lit. a GDPR serves our company 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 to fulfill a contract to which the data subject is a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of other services or consideration, the processing is based on Art. 6 I lit. b GDPR. The same applies to processing operations that are required to carry out pre-contractual measures, for example in cases of inquiries about our products or services. If our company is subject to a legal obligation which requires the processing of personal data, for example to fulfill tax obligations, the processing is based on Art. 6 I lit. c GDPR. In rare cases, it may be necessary to process personal data in order to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor to our company were injured and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6 I lit. d GDPR. Ultimately, processing operations could be based on Art. 6 I lit. f GDPR. Processing operations that are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to safeguard a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the person concerned do not prevail. We are particularly permitted to carry out such processing operations because they have been specifically mentioned by the European legislator. In this respect, he took the view that a legitimate interest could be assumed if the person concerned is a customer of the person responsible (recital 47 sentence 2 GDPR).

## **21. Legitimate interests in processing that are being pursued by the controller or a third party**

If the processing of personal data is based on Article 6 I lit.f GDPR, our legitimate interest is the conduct of our business activities for the benefit of all our employees and our shareholders.

## **22. Duration for which the personal data will be stored**

The criterion for the duration of the storage of personal data is the respective statutory retention period. After the period has expired, the relevant data is routinely deleted, provided that it is no longer required for contract fulfillment or contract initiation.

## **23. 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 explain to you that the provision of personal data is in part required by law (e.g. tax regulations) or can also result from contractual regulations (e.g. information on the contractual partner). In order to conclude a contract, it may sometimes be necessary for a data subject to provide us with personal data that we subsequently have to process. For example, the data subject is obliged to provide us with personal data when our company concludes a contract with them. Failure to provide personal data would mean that the contract could not be concluded with the person concerned. Before the person concerned

provides personal data, the person concerned must contact one of our employees. Our employee explains to the person concerned 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 consequences the failure to provide the personal data would have.

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

As a responsible company, we do not use automatic decision-making or profiling. This data protection declaration was created by the data protection declaration generator of the DGD Deutsche Gesellschaft für Datenschutz GmbH, which works as the external data protection officer in Landshut, in cooperation with the lawyer for IT and data protection law Christian Solmecke.