

# **Privacy Policy**

#### Preamble

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

The terms used are not gender-specific.

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### Controller

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Legal Notice: gaulhofer.com

# Overview of processing operations

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

### Categories of Processed Data

- Inventory data.
- Employee Data.
- Payment Data.
- Location data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.
- Job applicant details.
- Event Data (Facebook).
- Log data.

# Categories of Data Subjects

- Service recipients and clients.
- Employees.
- Prospective customers.
- Communication partner.
- Users.



- Job applicants.
- Participants in sweepstakes and competitions.
- Business and contractual partners.
- Customers.

### **Purposes of Processing**

- Provision of contractual services and fulfillment of contractual obligations.
- Communication.
- Security measures.
- Web Analytics.
- Targeting.
- Office and organisational procedures.
- Remarketing.
- Conversion tracking.
- Affiliate Tracking.
- Organisational and Administrative Procedures.
- Job Application Process.
- Conducting sweepstakes and contests.
- Feedback.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Establishment and execution of employment relationships.
- Information technology infrastructure.
- Public relations.
- Business processes and management procedures.

### Relevant legal bases

Relevant legal bases according to the GDPR: In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- Consent (Article 6 (1) (a) GDPR) The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Performance of a contract and prior requests (Article 6 (1) (b) GDPR) Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Compliance with a legal obligation (Article 6 (1) (c) GDPR) Processing is necessary for compliance with a legal obligation to which the controller is subject.



- Legitimate Interests (Article 6 (1) (f) GDPR) the processing is necessary for the protection of the legitimate interests of the controller or a third party, provided that the interests, fundamental rights, and freedoms of the data subject, which require the protection of personal data, do not prevail.
- Job application process as a pre-contractual or contractual relationship (Article 6 (1) (b) GDPR) If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, their processing shall be carried out in accordance with Article 9 (2)(b) GDPR, in the case of the protection of vital interests of applicants or other persons on the basis of Article 9 (2)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (2)(d) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (2)(a) GDPR.
- Healthcare, occupational and social security processing of special categories of personal data (Article 9 (2)(h) GDPR) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional.

National data protection regulations in Austria: In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Austria. This includes in particular the Federal Act on the Protection of Individuals with regard to the Processing of Personal Data (Data Protection Act - DSG). In particular, the Data Protection Act contains special provisions on the right of access, rectification or cancellation, processing of special categories of personal data, processing for other purposes and transmission and automated decision making in individual cases.

Reference to the applicability of the GDPR and the Swiss DPA: These privacy policy serves both to provide information pursuant to the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the broader spatial application and comprehensibility, the terms used in the GDPR are applied. In particular, instead of the terms used in the Swiss FADP such as "processing" of "personal data", "predominant interest", and "particularly sensitive personal data", the terms used in the GDPR, namely "processing" of "personal data", as well as "legitimate interest" and "special categories of data" are used. However, the legal meaning of these terms will continue to be determined according to the Swiss FADP within its scope of application.

### Security Precautions

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

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

Securing online connections through TLS/SSL encryption technology (HTTPS): To protect the data of users transmitted via our online services from unauthorized access, we employ TLS/SSL encryption technology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are the cornerstones of secure data transmission on the internet. These technologies encrypt the information that is transferred between the website or app and the user's browser (or between two servers), thereby safeguarding the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions conform to the highest security standards. When a website is secured with an SSL/TLS certificate, this is indicated by the display of HTTPS in the URL. This serves as an indicator to users that their data is being securely and encryptedly transmitted.

#### Transmission of Personal Data

In the course of processing personal data, it may happen that this data is transmitted to or disclosed to other entities, companies, legally independent organizational units, or individuals. Recipients of this data may include service providers tasked with IT duties or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and particularly conclude relevant contracts or agreements that serve to protect your data with the recipients of your data.

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



Data Transfer within the Organization: Data Transfer within the Corporate Group: We may transfer personal data to other companies within our corporate group or grant them access to it. If the data is shared for administrative purposes, it is based on our legitimate business and commercial interests or occurs if necessary to fulfil our contractual obligations, or when consent from the individuals concerned has been obtained or a legal permission exists.

#### International data transfers

Data Processing in Third Countries: If we process data in a third country (i.e., outside the European Union (EU) or the European Economic Area (EEA)), or if the processing is done within the context of using third-party services or the disclosure or transfer of data to other individuals, entities, or companies, this is only done in accordance with legal requirements. If the data protection level in the third country has been recognized by an adequacy decision (Article 45 GDPR), this serves as the basis for data transfer. Otherwise, data transfers only occur if the data protection level is otherwise ensured, especially through standard contractual clauses (Article 46 (2)(c) GDPR), explicit consent, or in cases of contractual or legally required transfers (Article 49 (1) GDPR). Furthermore, we provide you with the basis of third-country transfers from individual third-country providers, with adequacy decisions primarily serving as the foundation. "Information regarding third-country transfers and existing adequacy decisions can be obtained from the information provided by the EU Commission: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection\_en.

EU-US Trans-Atlantic Data Privacy Framework: Within the context of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the data protection level for certain companies from the USA as secure within the adequacy decision of 10th July 2023. The list of certified companies as well as additional information about the DPF can be found on the website of the US Department of Commerce at https://www.dataprivacyframework.gov/s/. We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

#### General Information on Data Retention and Deletion

We delete personal data that we process in accordance with legal regulations as soon as the underlying consents are revoked or no further legal bases for processing exist. This applies to cases where the original purpose of processing is no longer applicable or the data is no longer needed. Exceptions to this rule exist if statutory obligations or special interests require a longer retention or archiving of the data.

In particular, data that must be retained for commercial or tax law reasons, or whose storage is necessary for legal prosecution or protection of the rights of other natural or legal persons, must be archived accordingly.

Our privacy notices contain additional information on the retention and deletion of data specifically applicable to certain processing processes.

In cases where multiple retention periods or deletion deadlines for a date are specified, the longest period always prevails.

If a period does not expressly start on a specific date and lasts at least one year, it automatically begins at the end of the calendar year in which the event triggering the period occurred. In the case of ongoing contractual relationships in the context of which data is stored, the event triggering the deadline is the time at which the termination or other termination of the legal relationship takes effect.

Data that is no longer stored for its originally intended purpose but due to legal requirements or other reasons are processed exclusively for the reasons justifying their retention.

# Further information on processing methods, procedures and services used:

- Data Retention and Deletion: The following general deadlines apply to retention and archiving according to Austrian law:
  - 10 Years Retention period for books and records, annual financial statements, inventories, annual reports, opening balance sheets, booking receipts and invoices, as well as any necessary work instructions and other organisational documents (Austrian Federal Tax Code (BAO §132), Austrian Commercial Code (UGB §§190-212)).
  - 6 Years Remaining business documents: Received business or trading letters, copies of sent business or trading letters, and other documents, if they are relevant for taxation. These could be hourly wage sheets, operational accounting sheets, calculation documents, price tags, and payroll documents, as long as they aren't already booking receipts and cash register strips (Austrian Federal Tax Code (BAO §132), Austrian Commercial Code (UGB §§190-212)). .
  - 3 Years Data required to consider potential warranty and compensation claims or similar contractual claims and rights, as well as to process related inquiries, based on previous business experiences and common industry practices, will be stored for the duration of the regular statutory limitation period of three years (Sections 1478, 1480 of the Austrian Civil Code).



### Rights of Data Subjects

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

- Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- Right of access: You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- Right to rectification: You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- Right to Erasure and Right to Restriction of Processing: In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- Right to data portability: You have the right to receive data concerning you which you have provided to us in a structured, common and machinereadable format in accordance with the legal requirements, or to request its transmission to another controller.
- Complaint to the supervisory authority: In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

### **Business services**

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") within the context of contractual and comparable legal relationships as well as associated actions and communication with the contractual partners or pre-contractually, e.g. to answer inquiries.

We process this data in order to fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any update obligations and remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving. The statutory retention period for documents relevant under tax law as well as for commercial books. inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters and reproductions of sent commercial and business letters six years. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent, or the accounting document was created, furthermore the record was made or the other documents were created.



- Processed data types: Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers). Contract data (e.g. contract object, duration, customer category).
- Data subjects: Service recipients and clients; Prospective customers. Business and contractual partners.
- Purposes of processing: Provision of contractual services and fulfillment of contractual obligations; Communication; Office and organisational procedures; Organisational and Administrative Procedures. Business processes and management procedures.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

Craft Services: We process the data of our customers and clients (hereinafter uniformly referred to as "customers") in order to enable them to select, acquire or commission the selected services or works and related tasks, as well as their payment and delivery, or execution or provision. The required details are identified as such within the framework of the conclusion of the order, order or comparable contract and include the details required for delivery and invoicing as well as contact information in order to be able to hold any consultations; Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

#### Business processes and operations

Personal data of service recipients and clients - including customers, clients, or in specific cases, mandates, patients, or business partners as well as other third parties - are processed within the framework of contractual and comparable legal relationships and pre-contractual measures such as the initiation of business relations. This data processing supports and facilitates business processes in areas such as customer management, sales, payment transactions, accounting, and project management.

The collected data is used to fulfil contractual obligations and make business processes efficient. This includes the execution of business transactions, the management of customer relationships, the optimisation of sales strategies, and ensuring internal invoicing and financial processes. Additionally, the data supports the protection of the rights of the controller and promotes administrative tasks as well as the organisation of the company.

Personal data may be transferred to third parties if necessary for fulfilling the mentioned purposes or legal obligations. After legal retention periods expire or when the purpose of processing no longer applies, the data will be deleted. This also includes data that must be stored for longer periods due to tax law and legal obligations to provide evidence.

- Processed data types: Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- Data subjects: Service recipients and clients; Prospective customers; Communication partner (Recipients of e-mails, letters, etc.); Business and contractual partners. Customers.
- Purposes of processing: Provision of contractual services and fulfillment of contractual obligations; Office and organisational procedures; Business processes and management procedures; Security measures. Provision of our online services and usability.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

Customer Account: Customers can create an account within our online offer (e.g. customer or user account, "customer account" for short). If the registration of a customer account is required, customers will be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer



account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account. If the customer account has been terminated, the customer account data will be deleted after the termination date, unless it is retained for purposes other than provision in the customer account or must be retained for legal reasons (e.g. internal storage of customer data, order transactions or invoices). It is the customers' responsibility to back up their data when terminating the customer Account; Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

Economic Analyses and Market Research: To fulfill business management purposes and to identify market trends, desires of contractual partners, and users, the present data regarding business transactions, contracts, inquiries, etc., are analyzed. The group of affected individuals may include contractual partners, interested parties, customers, visitors, and users of the online service managed by the responsible entity. The execution of these analyses serves the purposes of business economic evaluations, marketing, and market research (e.g., to determine customer groups with different characteristics). Where available, profiles of registered users along with their information on services utilized are considered. The analyses are exclusively for the use of the responsible entity and are not disclosed externally unless they pertain to anonymous analyses with aggregated, thus anonymized values. Moreover, user privacy is accounted for; data is processed for analysis purposes in as pseudonymized a manner as possible and anonymized when feasible (e.g., as aggregated data); Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

## Provision of online services and web hosting

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- Processed data types: Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Log data (e.g. log files concerning logins or data retrieval or access times.).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).). Security measures.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

- Collection of Access Data and Log Files: Access to our online service is logged in the form of so-called "server log files". Server log files may include the address and name of the accessed web pages and files, date and time of access, transferred data volumes, notification of successful retrieval, browser type along with version, the user's operating system, referrer URL (the previously visited page), and typically IP addresses and the requesting provider. The server log files can be used for security purposes, e.g., to prevent server overload (especially in the case of abusive attacks, known as DDoS attacks), and to ensure server load management and stability; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR). Retention period: Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.
- ALL-INKL: Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); Service provider: ALL-INKL.COM - Neue Medien Münnich, Inhaber: René Münnich, Hauptstraße 68, 02742 Friedersdorf, Germany; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://all-inkl.com/; Privacy Policy: https://all-inkl.com/datenschutzinformationen/. Data Processing Agreement: Provided by the service provider.

### Use of Cookies

Cookies are small text files or other types of storage markers that store information on end devices and read information from them. For example, to save the login status in a user account, the contents of a shopping cart in an e-shop, the content accessed, or the functions used of an online offer. Furthermore, cookies can be used for various concerns, such as for the functionality, security, and comfort of online offers as well as the creation of analyses of visitor flows.

Notes on Consent: We use cookies in accordance with legal regulations. Therefore, we obtain prior consent from users, unless it is not required by law. Permission is particularly not necessary if the storage and reading of information, including cookies, are absolutely necessary to provide a telemedia service (i.e., our online offer) expressly requested by the users. The revocable consent is clearly communicated to them and contains information on the respective cookie usage.



Notes on the legal basis for data protection: The legal basis on which we process users' personal data with the help of cookies depends on whether we ask them for consent. If users accept, the legal basis for processing their data is the declared consent. Otherwise, the data processed with the help of cookies are based on our legitimate interests (e.g., in a commercial operation of our online offer and its usability improvement) or, if this occurs within the fulfillment of our contractual obligations, when the use of cookies is necessary to fulfill our contractual obligations. We clarify the purposes for which the cookies are used by us in the course of this data protection declaration or within the scope of our consent and processing processes.

Storage Duration: Regarding the storage duration, the following types of cookies are distinguished:

- Temporary cookies (also: session or session cookies): Temporary cookies are deleted at the latest after a user has left an online offer and closed his end device (e.g., browser or mobile application).
- Permanent cookies: Permanent cookies remain stored even after closing the end device. For example, the login status can be saved and preferred content can be displayed directly when the user revisits a site. Similarly, user data collected via cookies can be used for reach measurement. Unless we provide users with explicit information about the nature and storage duration of cookies (e.g., when obtaining consent), they should assume that they are permanent and the storage duration can be up to two years.

General notes on revocation and objection (Opt-out): Users can revoke the consents they have given at any time and also declare an objection to the processing according to legal requirements, also via the privacy settings of their browser.

- Processed data types: Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR). Consent (Article 6 (1) (a) GDPR).

#### Further information on processing methods, procedures and services used:

Processing Cookie Data on the Basis of Consent: We implement a consent management solution that obtains users' consent for the use of cookies or for the processes and providers mentioned within the consent management framework. This procedure is designed to solicit, log, manage, and revoke consents, particularly regarding the use of cookies and similar technologies employed to store, read from, and process information on users' devices. As part of this procedure, user consents are obtained for the use of cookies and the associated processing of information, including specific processing and providers named in the consent management process. Users also have the option to manage and withdraw their consents. Consent declarations are stored to avoid repeated queries and to provide proof of consent according to legal requirements. The storage is carried out server-side and/or in a cookie (so-called opt-in cookie) or by means of comparable technologies in order to associate the consent with a specific user or their device. If no specific details about the providers of consent management services are provided, the following general notes apply: The duration of consent storage is up to two years. A pseudonymous user identifier is created, which is stored along with the time of consent, details on the scope of consent (e.g., relevant categories of cookies and/or service providers), as well as information about the browser, system, and device used; Legal Basis: Consent (Article 6 (1) (a) GDPR).

#### Contact and Inquiry Management

When contacting us (e.g. via mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested measures.

- Processed data types: Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- Purposes of processing: Communication; Organisational and Administrative Procedures; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).



#### Chatbots and chat functions

We provide online chats and chatbot functions as a means of communication (together referred to as "Chat Services"). A chat is an online conversation that is conducted with a certain degree of immediacy. A chatbot is software that answers users' questions or informs them about messages. If you use our chat functions, we may process your personal data.

If you use our Chat Services within an online platform, your identification number is also stored within the respective platform. We may also collect information about which users interact with our Chat Services and when. Furthermore, we store the content of your conversations via the Chat Services and log registration and consent processes in order to be able to prove these in accordance with legal requirements.

We would like to inform users that the respective platform provider can find out that and when users communicate with our Chat Services and can collect technical information about the user's device used and, depending on the settings of their device, also location information (so-called metadata) for the purpose of optimising the respective services and for security purposes. Likewise, the metadata of communication via Chat Services (i.e., information about who has communicated with whom) could be used by the respective platform providers for marketing purposes or to display advertising tailored to users in accordance with their regulations, to which we refer for further information.

If users agree to activate information with regular messages to a chatbot, they have the possibility to unsubscribe from the information for the future at any time. The chatbot points out to users how and with which terms they can unsubscribe the messages. By unsubscribing from the chatbot messages, Users' data is deleted from the directory of message recipients.

We use the aforementioned information to operate our Chat Services, e.g. to address users personally, to answer their inquiries, to transmit any requested content and also to improve our Chat Services (e.g. to "teach" chatbots answers to frequently asked questions or to identify unanswered inquiries).

Information on Legal basis: We use the Chat Services on the basis of a consent if we first obtain the permission of the users to process their data by the Chat Services (this applies in cases where users are asked for consent, e.g. so that a chatbot regularly sends them messages). If we use Chat Services to answer user queries about our services or our company, this is done for contractual and pre-contractual communication. In addition, we use Chat Services based on our legitimate interests in optimizing the Chat Services, its operating efficiency and enhancing the positive user experience.

Withdrawal, objection and deletion: You can revoke a given consent at any time or contradict the processing of your data in the context of our chatbot use.

- Processed data types: Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- Purposes of processing: Communication.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- Legal Basis: Consent (Article 6 (1) (a) GDPR); Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

# Further information on processing methods, procedures and services used:

Services and service providers being used:

Baufragen.de: Chatbot and assistance software and related services; Service provider: Baufragen Software GmbH, Am Mitterfeld 7, 83024 Rosenheim; Website: https://https://www.baufragen.de. Privacy Policy: https://www.baufragen.de/datenschutz.

#### Sweepstakes and Contests

We process the personal data of participants in We process personal data of participants in competitions, contents, raffles, prize-draws or sweepstakes (hereinafter referred to as "competitions") only in compliance with the relevant data protection regulations and if the processing is contractually necessary for the provision, execution and handling of the competition, the participants have consented to the processing or the processing serves our legitimate interests (e.g. in the security of the competition or the protection of our interests against misuse by possible recording of IP addresses when submitting entries to the competition.

In the event that entries are published as part of the competitions (e.g. as part of a vote or presentation of the competition entries, or the winner or reporting on the competition), we would like to point out that the names of participants may also be published in this context. The participants can object to this at any time.



If the competitions take place within an online platform or a social network (e.g. Facebook or Instagram, hereinafter referred to as "online platform"), the usage and data protection provisions of the respective online platforms also apply. In such cases, we would like to point out that we are responsible for the information provided by the participants as part of the competition and that we must be contacted with regard to the competitions.

The data of the participants will be deleted as soon as the competition has ended and the data is no longer required to inform the winners or because questions about the competition can be expected. In general, the data of the participants will be deleted at the latest 6 months after the end of the competition. Winners' data can be retained for a longer period of time, e.g. in order to answer questions about the prizes or to fulfil the prizes; in this case, the retention period depends on the type of prize and is up to three years for items or services, e.g. in order to be able to process warranty claims. Furthermore, the participants' data may be stored for longer, e.g. in the form of coverage of the competition in online and offline media.

Insofar as data was collected for other purposes as part of the competition, its processing and storage period shall be governed by the privacy information for this use (e.g. in the case of registration for a newsletter as part of a competition).

- Processed data types: Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- Data subjects: Participants in sweepstakes and competitions.
- Purposes of processing: Conducting sweepstakes and contests.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

### Web Analysis, Monitoring and Optimization

Web analysis is used to evaluate the visitor traffic on our website and may include the behaviour, interests or demographic information of users, such as age or gender, as pseudonymous values. With the help of web analysis we can e.g. recognize, at which time our online services or their functions or contents are most frequently used or requested for repeatedly, as well as which areas require optimization.

In addition to web analysis, we can also use test procedures, e.g. to test and optimize different versions of our online services or their components.

Unless otherwise stated below, profiles, i.e. data aggregated for a usage process, can be created for these purposes and information can be stored in a browser or in a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have agreed to the collection of their location data from us or from the providers of the services we use, location data may also be processed.

Unless otherwise stated below, profiles, that is data summarized for a usage process or user, may be created for these purposes and stored in a browser or terminal device (so-called "cookies") or similar processes may be used for the same purpose. The information collected includes, in particular, websites visited and elements used there as well as technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data or profiles to us or to the providers of the services we use, these may also be processed, depending on the provider.

The IP addresses of the users are also stored. However, we use any existing IP masking procedure (i.e. pseudonymisation by shortening the IP address) to protect the user. In general, within the framework of web analysis, A/B testing and optimisation, no user data (such as e-mail addresses or names) is stored, but pseudonyms. This means that we, as well as the providers of the software used, do not know the actual identity of the users, but only the information stored in their profiles for the purposes of the respective processes.

Notes on legal bases: If we ask users for their consent to use third-party providers, the legal basis for data processing is consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- Processed data types: Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- Data subjects: Users (e.g. website visitors, users of online services).



- Purposes of processing: Web Analytics (e.g. access statistics, recognition of returning visitors); Profiles with user-related information (Creating user profiles). Provision of our online services and usability.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- Security measures: IP Masking (Pseudonymization of the IP address).
- Legal Basis: Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

- Google Analytics: We use Google Analytics to perform measurement and analysis of the use of our online services by users based on a pseudonymous user identification number. This identification number does not contain any unique data, such as names or email addresses. It is used to assign analysis information to an end device in order to recognize which content users have accessed within one or various usage processes, which search terms they have used, have accessed again or have interacted with our online services. Likewise, the time of use and its duration are stored, as well as the sources of users referring to our online services and technical aspects of their end devices and browsers. In the process, pseudonymous profiles of users are created with information from the use of various devices, and cookies may be used. Google Analytics does not log or store individual IP addresses. Analytics does provide coarse geo-location data by deriving the following metadata from IP addresses: City (and the derived latitude, and longitude of the city), Continent, Country, Region, Subcontinent (and ID-based counterparts). For EUbased traffic, IP-address data is used solely for geo-location data derivation before being immediately discarded. It is not logged, accessible, or used for any additional use cases. When Analytics collects measurement data, all IP lookups are performed on EU-based servers before forwarding traffic to Analytics servers for processing; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://marketingplatform.google.com/intl/en/about/analytics/; Security measures: IP Masking (Pseudonymization of the IP address); Privacy Policy: https://policies.google.com/privacy; Data Processing Agreement: https://business.safety.google/adsprocessorterms/; Basis for third-country transfers: Data Privacy Framework (DPF); Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://myadcenter.google.com/personalizationoff. Further Information: https://business.safety.google/adsservices/ (Types of processing and data processed).
- Google Tag Manager: We use Google Tag Manager, a software provided by Google, which enables us to manage so-called website tags centrally via a user interface. Tags are small code elements on our website that serve to record and analyse visitor activities. This technology assists us in improving our website and the content offered on it. Google Tag Manager itself does not create user profiles, store cookies with user profiles, or perform any independent analyses. Its function is limited to simplifying and making the integration and management of tools and services we use on our website more efficient. Nevertheless, when using Google Tag Manager, users' IP addresses are transmitted to Google, which is technically necessary to implement the services we use. Cookies may also be set in this process. However, this data processing only occurs if services are integrated via the Tag Manager. For more detailed information about these services and their data processing, please refer to the further sections of this privacy policy; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy; Data Processing Agreement: https://business.safety.google/adsprocessorterms. Basis for third-country transfers: Data Privacy Framework (DPF).

### Online Marketing

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

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

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

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



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

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

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

#### Notes on revocation and objection:

We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called "opt-out"). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area:

a) Europe: <a href="https://www.youronlinechoices.eu">https://www.youronlinechoices.eu</a>.

b) Canada: https://www.vouradchoices.ca/choices.

c) USA: https://www.aboutads.info/choices.

d) Cross-regional: <a href="https://optout.aboutads.info.">https://optout.aboutads.info.</a>

- Processed data types: Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Event Data (Facebook) ("Event Data" is data that can be transmitted from us to Facebook, e.g. via Facebook pixels (via apps or other means) and relates to persons or their actions; the data includes, for example, information about visits to websites, interactions with content, functions, installations of apps, purchases of products, etc.; Event data is processed for the purpose of creating target groups for content and advertising information (Custom Audiences). Event Data does not include the actual content (such as written comments), login information, and Contact Information (such as names, email addresses, and phone numbers). Event Data is deleted by Facebook after a maximum of two years, the Custom Audiences created from them with the deletion of our Facebook account).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Web Analytics (e.g. access statistics, recognition of returning visitors); Targeting (e.g. profiling based on interests and behaviour, use of cookies); Conversion tracking (Measurement of the effectiveness of marketing activities); Affiliate Tracking; Marketing; Profiles with user-related information (Creating user profiles); Provision of our online services and usability. Remarketing.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- Legal Basis: Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

Meta Pixel and Custom Audiences (Custom Audiences): With the help of the Meta-Pixel (or equivalent functions, to transfer Event-Data or Contact Information via interfaces or other software in apps), Meta is on the one hand able to determine the visitors of our online services as a target group for the presentation of ads (so-called "Meta ads"). Accordingly, we use Meta-Pixels to display Meta ads placed by us only to Meta users and within the services of partners cooperating with Meta (so-called "audience network" https://www.facebook.com/audiencenetwork/) who have shown an interest in our online services or who have certain characteristics (e.g. interests in certain topics or products that are determined on the basis of the websites visited) that we transmit to Meta (so-called "custom audiences"). With the help of Meta-Pixels, we also want to ensure that our Meta ads correspond to the potential interest of users and do not appear annoying. The Meta-Pixel also enables us to track the effectiveness of Meta ads for statistical and market research purposes by showing whether users were referred to our website after clicking on a Meta ad (known as "conversion tracking"); Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal Basis: Consent (Article 6 (1) (a)



GDPR); Website: https://www.facebook.com; Privacy Policy: https://www.facebook.com/privacy/policy/; Data Processing Agreement: https://www.facebook.com/legal/terms/dataprocessing; Basis for third-country transfers: Data Privacy Framework (DPF). Further Information: User event data, i.e. behavioral and interest data, is processed for the purposes of targeted advertising and audience building on the basis of the joint controllership agreement ("Controller Addendum", https://www.facebook.com/legal/controller\_addendum). The joint controllership is limited to the collection and transfer of the data to Meta Platforms Ireland Limited, a company located in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which concerns in particular the transfer of the data to the parent company Meta Platforms, Inc. in the USA (on the basis of standard contractual clauses concluded between Meta Platforms Ireland Limited and Meta Platforms, Inc.).

- Google Ad Manager: We use the service "Google Ad Manager" to place ads in the Google advertising network (e.g. in search results, videos, websites, etc.). The Google Ad Manager stands out because ads are displayed in real time based on users' presumed interests. This allows us to display ads for our online offering to users who may have a potential interest in our offering or who have previously shown interest, and measure the success of the ads; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy; Basis for thirdcountry transfers: Data Privacy Framework (DPF); Further Information: Types of processing and data processed: https://business.safety.google/adsservices/; Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: https://business.safety.google/adscontrollerterms. where Google acts as processor, Data Processing Conditions for Google Advertising Products and standard contractual clauses for data transfers to third countries: https://business.safety.google/adsprocessorterms apply.
- Google Ads and Conversion Tracking: Online marketing process for purposes of placing content and advertisements within the provider's advertising network (e.g., in search results, in videos, on web pages, etc.) so that they are displayed to users who have a presumed interest in the ads. Furthermore, we measure the conversion of the ads, i.e. whether the users took them as a reason to interact with the ads and make use of the advertised offers (so-called conversion). However, we only receive anonymous information and no personal information about individual users; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy; Basis for third-country transfers: Data Privacy Framework (DPF); Further Information: Types of processing and data processed: https://business.safety.google/adsservices/. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: https://business.safety.google/adscontrollerterms.
- Google Ads Remarketing: Google Remarketing, also known as retargeting, is a technology that adds users who use an online service to a pseudonymous remarketing list so that users can be shown ads on other online services based on their visit to the online service ; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy; Basis for third-country transfers: Data Privacy Framework (DPF); Further Information: Types of processing and data processed: https://business.safety.google/adsservices/. Google Ads Controller-Controller Data Protection Terms and standard contractual clauses for data transfers to third countries: https://business.safety.google/adscontrollerterms.
- Enhanced Conversions for Google Ads: When users click on our Google ads and subsequently use the advertised service (so-called "conversion"), the data entered by the user, such as email address, name, residential address or telephone number, may be transmitted to Google. The hash values are then matched with existing Google accounts of the users to better evaluate and improve their interaction with the ads (e.g., clicks or views) and thus their performance; Legal Basis: Consent (Article 6 (1) (a) GDPR). Website: https://support.google.com/google-ads/answer/9888656.
- LinkedIn Insight Tag: Code that is loaded when a user visits our online offering and tracks the user's behavior and conversions, as well as stores it in a profile (possible use cases: measuring campaign performance, optimizing ad delivery, building custom and similar target groups); Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://www.linkedin.com; Privacy Policy: https://www.linkedin.com/legal/privacy-policy, cookie policy: https://www.linkedin.com/legal/cookie\_policy; Data Processing Agreement: https://www.linkedin.com/legal/l/dpa; Basis for third-country transfers: Data Privacy Framework (DPF). Opt-Out: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out.
- Google Tag Manager: We utilise the Google Tag Manager, a tool by Google, to manage website tags via a central user interface. Tags are small code elements on our website that serve, among other things, to measure and analyse visitor activities. This technology assists us in improving our website and the services offered on it. The Google Tag Manager itself does not create user profiles, store cookies, or perform any independent analyses. It is solely used to integrate the tools and services we use for our website more simply and efficiently. However, when using the Google Tag Manager, users' IP addresses are transmitted to Google, which is technically necessary to execute the various services we utilise. It is important to note that this data processing only occurs when services are integrated through the Tag Manager that require it. For details on these services and how they process data, we refer you to the subsequent sections of this privacy policy; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://marketingplatform.google.com; Privacy Policy: https://policies.google.com/privacy; Data Processing Agreement: https://business.safety.google/adsprocessorterms/; Basis for third-country transfers: Data Privacy Framework (DPF). Further Information: https://business.safety.google/adsservices/ (Types of processing and data processed).



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

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

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

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

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

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

- Processed data types: Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Communication; Feedback (e.g. collecting feedback via online form). Public relations.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

- Instagram: Social network, allows the sharing of photos and videos, commenting on and favouriting posts, messaging, subscribing to profiles and pages; Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://www.instagram.com; Privacy Policy: https://privacycenter.instagram.com/policy/. Basis for third-country transfers: Data Privacy Framework (DPF).
- Facebook Pages: Profiles within the social network Facebook We are jointly responsible (so called "joint controller") with Meta Platforms Ireland Limited for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: https://www.facebook.com/privacy/policy/), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: https://www.facebook.com/privacy/policy/). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site operators to help them understand how people interact with their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", https://www.facebook.com/legal/terms/page\_controller\_addendum), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfill the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information about Page Insights" (https://www.facebook.com/legal/terms/information about page insights data). The joint controllership is limited to the collection and transfer of the data to Meta Platforms Ireland Limited, a company located in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited; Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://www.facebook.com; Privacy Policy: https://www.facebook.com/privacy/policy/. Basis for thirdcountry transfers: Data Privacy Framework (DPF).



- LinkedIn: Social network We are jointly responsible with LinkedIn Ireland Unlimited Company for the collection (but not the further processing) of data from visitors for the purposes of creating "Page-Insights" (statistics) for our LinkedIn profiles. This data includes information about the types of content that users view or interact with, or the actions they take, as well as information about the devices used by the users (e.g., IP addresses, operating system, browser type, language settings, cookie data) and details from the users' profiles, such as job function, country, industry, seniority, company size, and employment status. Privacy information regarding the processing of user data by LinkedIn can be found in LinkedIn's privacy notices: https://www.linkedin.com/legal/privacy-policy
  - We have concluded a special agreement with LinkedIn Irland, the 'Page Insights Joint Controller Addendum (the 'Addendum')' (https://legal.linkedin.com/pages-joint-controller-addendum), which specifically regulates the security measures that LinkedIn must observe and wherein LinkedIn has agreed to fulfill the rights of the affected parties (i.e., users can, for example, direct requests for information or deletion directly to LinkedIn). The rights of the users (in particular to access to information, erasure, objection, and complaint to the competent supervisory authority) are not restricted by the agreements with LinkedIn. The joint responsibility is limited to the collection of data by and transmission to Ireland Unlimited Company, a company based in the EU. The further processing of the data is the sole responsibility of Ireland Unlimited Company, particularly regarding the transmission of data to the parent company LinkedIn Corporation in the USA; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://www.linkedin.com; Privacy Policy: https://www.linkedin.com/legal/privacy-policy; Basis for third-country transfers: Data Privacy Framework (DPF). Opt-Out: https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out.
- Pinterest: Social network, allows for the sharing of photos, commenting, favouriting and curating of posts, messaging, subscribing to profiles; Service provider: Pinterest Europe Limited, 2nd Floor, Palmerston House, Fenian Street, Dublin 2, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://www.pinterest.com. Privacy Policy: https://policy.pinterest.com/en/privacy-policy.
- YouTube: Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Privacy Policy: https://policies.google.com/privacy; Basis for third-country transfers: Data Privacy Framework (DPF). Opt-Out: <a href="https://myadcenter.google.com/personalizationoff">https://myadcenter.google.com/personalizationoff</a>.

### Plugins and embedded functions and content

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

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

- Processed data types: Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Location data (Information on the geographical position of a device or person).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of processing: Provision of our online services and usability. Provision of contractual services and fulfillment of contractual obligations.
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- Legal Basis: Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

Google Fonts (from Google Server): Obtaining fonts (and symbols) for the purpose of a technically secure, maintenance-free and efficient use of fonts and symbols with regard to timeliness and loading times, their uniform presentation and consideration of possible restrictions under licensing law. The provider of the fonts is informed of the user's IP address so that the fonts can be made available in the user's browser. In addition, technical



data (language settings, screen resolution, operating system, hardware used) are transmitted which are necessary for the provision of the fonts depending on the devices used and the technical environment. This data may be processed on a server of the provider of the fonts in the USA - When visiting our online services, users' browsers send their browser HTTP requests to the Google Fonts Web API. The Google Fonts Web API provides users with Google Fonts' cascading style sheets (CSS) and then with the fonts specified in the CCS. These HTTP requests include (1) the IP address used by each user to access the Internet, (2) the requested URL on the Google server, and (3) the HTTP headers, including the user agent describing the browser and operating system versions of the website visitors, as well as the referral URL (i.e., the web page where the Google font is to be displayed). IP addresses are not logged or stored on Google servers and they are not analyzed. The Google Fonts Web API logs details of HTTP requests (requested URL, user agent, and referring URL). Access to this data is restricted and strictly controlled. The requested URL identifies the font families for which the user wants to load fonts. This data is logged so that Google can determine how often a particular font family is requested. With the Google Fonts Web API, the user agent must match the font that is generated for the particular browser type. The user agent is logged primarily for debugging purposes and is used to generate aggregate usage statistics that measure the popularity of font families. These aggregate usage statistics are published on Google Fonts' Analytics page. Finally, the referral URL is logged so that the data can be used for production maintenance and to generate an aggregate report on top integrations based on the number of font requests. Google says it does not use any of the information collected by Google Fonts to profile end users or serve targeted ads; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://fonts.google.com/; Privacy Policy: https://policies.google.com/privacy; Basis for third-country transfers: Data Privacy Framework (DPF). Further Information: https://developers.google.com/fonts/fag/privacy?hl=en.

- Google Maps: We integrate the maps of the service "Google Maps" from the provider Google. The data processed may include, in particular, IP addresses and location data of users; Service provider: Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://mapsplatform.google.com/; Privacy Policy: https://policies.google.com/privacy. Basis for third-country transfers: Data Privacy Framework (DPF).
- reCAPTCHA: We integrate the "reCAPTCHA" function to be able to recognise whether entries (e.g. in online forms) are made by humans and not by automatically operating machines (so-called "bots"). The data processed may include IP addresses, information on operating systems, devices or browsers used, language settings, location, mouse movements, keystrokes, time spent on websites, previously visited websites, interactions with ReCaptcha on other websites, possibly cookies and results of manual recognition processes (e.g. answering questions asked or selecting objects in images). The data processing is based on our legitimate interest to protect our online services from abusive automated crawling and spam; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: https://www.google.com/recaptcha/; Privacy Policy: https://policies.google.com/privacy; Basis for third-country transfers: Data Privacy Framework (DPF). Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://myadcenter.google.com/personalizationoff.
- YouTube videos: Video contents; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Legal Basis: Consent (Article 6 (1) (a) GDPR); Website: https://www.youtube.com; Privacy Policy: https://policies.google.com/privacy; Basis for third-country transfers: Data Privacy Framework (DPF). Opt-Out: Opt-Out-Plugin: https://tools.google.com/dlpage/gaoptout?hl=en, Settings for the Display of Advertisements: https://myadcenter.google.com/personalizationoff.

#### Processing of data in the context of employment relationships

In the context of employment relationships, the processing of personal data aims to effectively manage the establishment, execution, and termination of such relationships. This data processing supports various operational and administrative functions necessary for managing employee relations.

The data processing covers various aspects ranging from contract initiation to termination. Included are the organization and management of daily working hours, management of access rights and permissions, as well as handling personnel development measures and staff appraisals. The processing also serves payroll accounting and management of wage and salary payments, which represent critical aspects of contract execution.

Additionally, the data processing considers legitimate interests of the responsible employer, such as ensuring workplace safety or capturing performance data for evaluating and optimizing operational processes. Moreover, the data processing includes disclosing employee data in external communication and publication processes where necessary for operational or legal purposes.

The processing of this data always takes place with due regard for the applicable legal frameworks, aiming always to create and maintain a fair and efficient working environment. This also includes considering the privacy of affected employees, anonymizing or deleting data after fulfilling the processing purpose or according to legal retention periods.

- Processed data types: Employee Data (Information about employees and other individuals in an employment relationship).
- Data subjects: Employees (e.g. employees, job applicants, temporary workers, and other personnel.).



- Purposes of processing: Establishment and execution of employment relationships (Processing of employee data in the context of the establishment and execution of employment relationships). Business processes and management procedures.
- Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR); Legitimate Interests (Article 6 (1) (f) GDPR). Healthcare, occupational and social security processing of special categories of personal data (Article 9 (2)(h) GDPR).

#### Further information on processing methods, procedures and services used:

- Deletion of Employee Data: Employee data are deleted under Austrian law when they are no longer necessary for the purpose for which they were collected, unless they must be retained or archived due to legal obligations or the employer's interests. The following retention and archiving obligations are observed:
  - Data regarding payroll tax and levy obligations under § 132 Abs 1 Federal Tax Code (BAO) 7 years. The period begins at the end of the calendar year relevant to the data.
  - Limitation of the obligation to pay social security contributions under § 68 Social Security Code (ASVG) 3 or 5 years. The period generally begins on the day the contributions are due, or from the day of reporting if no report was filed.
  - Retention periods in social insurance 7 years under the Commercial Code (UGB).
  - Entitlement to holiday under § 4 Abs 5 Holiday Act (UrlG) 2 years from the end of the holiday year in which the holiday entitlement arose. The period starts 2 years after the end of the holiday year.
  - Claims for holiday compensation under § 1486 Z 5 General Civil Code (ABGB) 3 years. The period begins from the date the final claims are due, i.e., the last working day.
  - Records and reports on workplace accidents under § 16 Worker Protection Act (ASchG) at least 5 years. The period begins from the day of the workplace accident.
  - Records on the provision of temporary workers under § 13 Abs 3 Act on Temporary Agency Work (AÜG) 5 years. The period begins on the day the last wage claim of the temporary worker is due.
  - Register of minors under § 26 Abs 2 Youth Employment Act (KJBG) 2 years. The period begins two years after the last entry in the new register.
  - Claims for compensation due to discriminatory termination of employment under §§ 15 Abs 1a and 29 Abs 1a Equal Treatment Act (GIBG) and § 7k Abs 1 in conjunction with Abs 2 Z 3 Employment of Disabled Persons Act (BEinstG) - 6 months. The period begins from the date of receipt of the termination.
  - Claims of the employer or employee from a premature termination of the employment relationship under § 34 Employees Act (AngG) or § 1162d General Civil Code (ABGB) - 6 months. The period begins from the date the claims are due, typically from the day the termination notice is received.
  - Entitlement to an employment reference under § 1478 General Civil Code (ABGB) 30 years. The period begins at the termination of the employment relationship.
  - Claims for compensation due to discriminatory rejection of an application under §§ 15 Abs 1 and 29 Abs 1 Equal Treatment Act (GIBG) and § 7k Abs 1 in conjunction with Abs 2 Z 1 Employment of Disabled Persons Act (BEinstG) - 6 months. The period begins from the day the rejection is received, or 7 months from the receipt of the application.
  - Claims for reimbursement of interview expenses under § 1486 Z 5 General Civil Code (ABGB) 3 years. The period begins on the day the expenses were incurred.
  - Liability for severance claims and company pensions after a business transfer under § 6 Abs 2 Company Pension Act (AVRAG) 5 years. The period begins at the time of the business transfer.



- Claims for compensation due to discriminatory rejection of a promotion under §§ 15 Abs 1 and 29 Abs 1 Equal Treatment Act (GIBG) and § 7k Abs 1 in conjunction with Abs 2 Z 1 Employment of Disabled Persons Act (BEinstG) - 6 months. The period begins from the day the promotion rejection is received.
- Claims for compensation due to discriminatory treatment in remuneration, voluntary social benefits, training and further education measures or other working conditions under §§ 15 Abs 1 and 29 Abs 1 Equal Treatment Act (GIBG) and § 7k Abs 1 in conjunction with Abs 2 Z 5 Employment of Disabled Persons Act (BEinstG) - 3 years. The period begins at the point the right could first have been exercised and the objective possibility to sue was given.
- Claims for compensation due to discriminatory harassment under §§ 15 Abs 1 and 29 Abs 1 Equal Treatment Act (GIBG) and § 7k Abs 1 in conjunction with Abs 2 Z 4 Employment of Disabled Persons Act (BEinstG) - 1 year. The period begins from the time the discrimination was recognized.
- Claims for compensation due to discriminatory rejection of an application under §§ 15 Abs 1 and 29 Abs 1 Equal Treatment Act (GIBG) and § 7k Abs 1 in conjunction with Abs 2 Z 1 Employment of Disabled Persons Act (BEinstG) - 6 months. The period begins from the day the rejection is received, or 7 months from the receipt of the application.
- Claims for compensation due to sexual harassment under § 15 Abs 1 Equal Treatment Act (GIBG) 3 years. The period begins from the time the discrimination was recognized.
- Claims for reimbursement of interview expenses under § 1486 Z 5 General Civil Code (ABGB) 3 years. The period begins on the day the expenses were incurred.
- Claims of the employee for wages or reimbursement of expenses as well as of the employer for advances made on these under § 1486 Z 5 General Civil Code (ABGB) - 3 years. The period begins upon the due date of the respective claims.
- Limitation of prosecution for underpayment under § 31 Abs 1 Administrative Penal Act (VStG) in conjunction with § 29 Abs 4 Wage and Social Dumping Prevention Act (LSD-BG) - 3 years. The period begins upon the due date of the wages.
- Damage claims of the employer against the employee from employee liability for slight negligence under § 6 Employee Liability Act (DHG) - 6 months. The period begins from the day they can be asserted.
- Damage claims of the employer against the employee from employee liability for gross negligence or intentional misconduct and other damage claims of the employer under § 1489 General Civil Code (ABGB) - 3 years or 30 years. The period begins with the shorter term from knowledge of damage and perpetrator, and with the longer term from the occurrence of damage.

#### **Job Application Process**

The application process requires applicants to provide us with the data necessary for their assessment and selection. The information required can be found in the job description or, in the case of online forms, in the information contained therein.

In principle, the required information includes personal information such as name, address, a contact option and proof of the qualifications required for a particular employment. Upon request, we will be happy to provide you with additional information.

Where available, applicants are welcome to submit their applications via our online form, which is securely encrypted to the latest standards. Alternatively, applications can also be sent to us by email. However, we kindly remind you that emails are not inherently encrypted over the Internet. While emails are usually encrypted in transit, they are not encrypted on the servers from which they are sent and received. Therefore, we cannot assume responsibility for the security of the application during its transmission from the sender to our server.

Processing of special categories of data: To the extent that special categories of personal data (Article 9(1) GDPR, e.g., health data, such as disability status or ethnic origin) are requested from applicants or communicated by them during the application process, their processing is carried out so that the controller or the data subject can exercise rights arising from employment law and the law of social security and social protection, in the case of protection of vital interests of the applicants or other persons, or for purposes of preventive or occupational medicine, for the assessment of the employee's work ability, for medical diagnosis, for the provision or treatment in the health or social sector, or for the management of systems and services in the health or social sector.

Ereasure of data: In the event of a successful application, the data provided by the applicants may be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicants' data will also be deleted if



an application is withdrawn, to which applicants are entitled at any time. Subject to a justified revocation by the applicant, the deletion will take place at the latest after the expiry of a period of six months, so that we can answer any follow-up questions regarding the application and comply with our duty of proof under the regulations on equal treatment of applicants. Invoices for any reimbursement of travel expenses are archived in accordance with tax regulations.

Admission to a talent pool - Admission to a talent pool, if offered, is based on consent. Applicants are informed that their consent to be included in the talent pool is voluntary, has no influence on the current application process and that they can revoke their consent at any time for the future.

- Processed data types: Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- Data subjects: Job applicants.
- Purposes of processing: Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- Retention and deletion: Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- Legal Basis: Job application process as a pre-contractual or contractual relationship (Article 6 (1) (b) GDPR).

#### Changes and Updates

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

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

### Terminology and Definitions

In this section, you will find an overview of the terminology used in this privacy policy. Where the terminology is legally defined, their legal definitions apply. The following explanations, however, are primarily intended to aid understanding.

- Affiliate Tracking: Custom Audiences refers to the process of determining target groups for advertising purposes, e.g. the display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to conclude that the user is interested in advertisements for similar products or the online store in which the user viewed the products. "Lookalike Audiences" is the term used to describe content that is viewed as suitable by users whose profiles or interests presumably correspond to the users for whom the profiles were created. For the purposes of creating custom audiences and lookalike audiences, cookies and web beacons are typically used.
- Contact data: Contact details are essential information that enables communication with individuals or organizations. They include, among others, phone numbers, postal addresses, and email addresses, as well as means of communication like social media handles and instant messaging identifiers.
- Content data: Content data comprise information generated in the process of creating, editing, and publishing content of all types. This category of data may include texts, images, videos, audio files, and other multimedia content published across various platforms and media. Content data are not limited to the content itself but also include metadata providing information about the content, such as tags, descriptions, authorship details, and publication dates.
- Contract data: Contract data are specific details pertaining to the formalisation of an agreement between two or more parties. They document the terms under which services or products are provided, exchanged, or sold. This category of data is essential for managing and fulfilling contractual obligations and includes both the identification of the contracting parties and the specific terms and conditions of the agreement. Contract data may encompass the start and end dates of the contract, the nature of the agreed-upon services or products, pricing arrangements, payment terms, termination rights, extension options, and special conditions or clauses. They serve as the legal foundation for the relationship between the parties and are crucial for clarifying rights and duties, enforcing claims, and resolving disputes.
- Controller: "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.



- Conversion tracking: Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- Employees: As employees, individuals are those who are engaged in an employment relationship, whether as staff, employees, or in similar positions. Employment refers to a legal relationship between an employer and an employee, established through an employment contract or agreement. It entails the obligation of the employer to pay the employee remuneration while the employee performs their work. The employment relationship encompasses various stages, including establishment, where the employment contract is concluded, execution, where the employee carries out their work activities, and termination, when the employment relationship ends, whether through termination, mutual agreement, or otherwise. Employee data encompasses all information pertaining to these individuals within the context of their employment. This includes aspects such as personal identification details, identification numbers, salary and banking information, working hours, holiday entitlements, health data, and performance assessments.
- Inventory data: Inventory data encompass essential information required for the identification and management of contractual partners, user accounts, profiles, and similar assignments. These data may include, among others, personal and demographic details such as names, contact information (addresses, phone numbers, email addresses), birth dates, and specific identifiers (user IDs). Inventory data form the foundation for any formal interaction between individuals and services, facilities, or systems, by enabling unique assignment and communication.
- Location data: Location data is created when a mobile device (or another device with the technical requirements for a location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data serve to indicate the geographically determinable position of the earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- Log data: Protocol data, or log data, refer to information regarding events or activities that have been logged within a system or network. These data typically include details such as timestamps, IP addresses, user actions, error messages, and other specifics about the usage or operation of a system. Protocol data is often used for analyzing system issues, monitoring security, or generating performance reports.
- Meta, communication and process data: Meta-, communication, and procedural data are categories that contain information about how data is processed, transmitted, and managed. Meta-data, also known as data about data, include information that describes the context, origin, and structure of other data. They can include details about file size, creation date, the author of a document, and modification histories. Communication data capture the exchange of information between users across various channels, such as email traffic, call logs, messages in social networks, and chat histories, including the involved parties, timestamps, and transmission paths. Procedural data describe the processes and operations within systems or organisations, including workflow documentations, logs of transactions and activities, and audit logs used for tracking and verifying procedures.
- Payment Data: Payment data comprise all information necessary for processing payment transactions between buyers and sellers. This data is crucial for e-commerce, online banking, and any other form of financial transaction. It includes details such as credit card numbers, bank account information, payment amounts, transaction dates, verification numbers, and billing information. Payment data may also contain information on payment status, chargebacks, authorizations, and fees.
- Personal Data: "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that
- Processing: The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.
- Profiles with user-related information: The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- Remarketing: Remarketing" or "retargeting" is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website in order to remind the user of these products on other websites, e.g. in advertisements.
- Targeting: "Tracking" is the term used when the behaviour of users can be traced across several websites. As a rule, behavior and interest information with regard to the websites used is stored in cookies or on the servers of the tracking technology providers (so-called profiling). This information can then be used, for example, to display advertisements to users presumably corresponding to their interests.



- Usage data: Usage data refer to information that captures how users interact with digital products, services, or platforms. These data encompass a wide range of information that demonstrates how users utilise applications, which features they prefer, how long they spend on specific pages, and through what paths they navigate an application. Usage data can also include the frequency of use, timestamps of activities, IP addresses, device information, and location data. They are particularly valuable for analysing user behaviour, optimising user experiences, personalising content, and improving products or services. Furthermore, usage data play a crucial role in identifying trends, preferences, and potential problem areas within digital offerings
- Web Analytics: Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This enables them, for example, to better adapt the content of their websites to the needs of their visitors. For the purposes of web analytics , pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online service.