



General Information on Processing Your Data

We are legally required to inform you of how your personal data (hereinafter "data") are processed when you use our websites. We take the protection of your personal data very seriously. These Data Protection Guidelines provide you with detailed information on the processing of your data and on your legal rights in this respect. Terms such as "personal data" or "processing" are used here in the sense of the legal definitions under Art. 4 GDPR. We reserve the right to adjust our Data Protection Policy with effect for the future, in particular in the event that our websites are further developed, that we use new technologies, or that the legal basis or corresponding legal practice is amended. We recommend that you read through the Data Protection Policy from time to time and make a copy or print-out for your records.

Scope of application

This Data Protection Policy is valid for the following websites of the controller:

- <https://www.pszczynskirower.pl/>
- <https://www.nextbike.at/>
- <https://www.nextbike.cz/>
- <https://www.nextbike.co.uk/>
- <https://www.nextbike.net/>
- <https://www.wupsirad.de/>
- <https://www.nextbike.de/>
- <https://www.nextbike.bg/>
- <https://www.deezernextbike.de/>
- <https://www.nextbike.ch/>
- <https://www.porecbikeshare.com/>
- <https://www.e-bike-stationen.de/>
- <https://www.facherrad.de/>
- <https://www.nextbike.hr/>
- <https://www.nextbike.hu/>
- <https://www.kvb-rad.de/>
- <https://www.metropolradruhr.de/>
- <https://www.nextbike.nl/>
- <http://www.nextbike.com/>
- <https://www.sz-bike.de/>
- <http://www.nextbikeinc.com/>
- <https://www.vrnnextbike.de/>
- <https://www.kvv-nextbike.de/de/>

It does not cover any websites that may be linked from these pages or the online presences of other providers.

Controller

The controller responsible for processing personal data within the scope of application of this Data Protection Policy is:

nextbike GmbH
Erich-Zeigner-Allee 69-73
04229 Leipzig
E-mail: info@nextbike.de
Tel.: +49 (0)341 / 3089889-0
Fax: +49 (0)341 / 3089889-13



Questions on data protection

Should you have questions regarding data protection with respect to our company or our websites, you can contact our Data Protection Officer:

Spirit Legal LLP Rechtsanwälte
Solicitor and Data Protection Officer

Peter Hense

Postal address:

Data Protection Officer

c/o nextbike GmbH, Erich-Zeigner-Allee 69 – 73, 04229 Leipzig

Get in touch via the encrypted online form:

[Contact Data Protection Officer](#)

Security

We have undertaken comprehensive technical and organisational precautions in order to protect your personal data against unauthorised access, misuse, loss, and other external interference. In this regard, we regularly review our security measures and adjust them to meet the state of the art.

Your rights

You have the following rights with respect to personal information concerning you which you may enforce against us:

- **Right to information:** According to Art. 15 GDPR, you can demand information on the personal data which we process.
- **Right to rectification:** Should the information in question not (no longer) be correct, you can demand rectification according to Art. 16 GDPR. Should your data be incomplete, you can demand that your data be completed.
- **Right to erasure:** According to Art. 17 GDPR, you can demand erasure of your personal data.
- **Right to restriction of processing:** According to Art. 18 GDPR, you have the right to demand restriction of your personal data.
- **Right to object:** According to Art. 21(1) GDPR, you have the right at all times to object to the processing of your personal data as performed on the basis Art. 6(1)(1) point e) or point f) for reasons relating to your particular situation. In this instance, we will not continue processing your data unless we can demonstrate mandatory grounds for processing that require protection and which are superior to your interests, rights, and freedoms, including if such processing is being undertaken to establish, exercise or defend legal claims (Art. 21(1) GDPR). According to Art. 21(2) GDPR, you are furthermore entitled to the right to object to the processing of personal data relating to your person for the purposes of direct marketing at any time; this also applies in the event of any profiling insofar as such is directly connected to such direct marketing. We refer you to the right to object in this Data Protection Policy with regards to the respective processing.
- **Right to withdraw your consent:** Insofar as you have given your consent to processing, you have the right to withdraw such according to Art. 7(3) GDPR.
- **Right to data portability:** You have the right to receive such personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format (“data portability”), and the right to have these data transmitted to a further controller, provided the prerequisite under Art. 20(1) point a), b) GDPR has been fulfilled (Art. 20 GDPR).

You may enforce your rights by sending communication using the contact details named under “Controller”, or the Data Protection Officer we have named.

If you are of the opinion that the processing of your personal data breaches data protection law, you also have the right to lodge a complaint with a data supervisory authority of your choice according to Art. 77 GDPR.



Use of our websites.

In principle, you can use our websites for purely informative purposes without revealing your identity. When you access individual pages of the respective websites in this sense, only log data are transmitted to our web-space provider in order that the website can be displayed. The following data are processed in this regard:

- browser type/version;
- operating system;
- language and version of browser software;
- host name of accessing device;
- IP address;
- website where the request originated;
- content of the request (concrete site);
- date and time of server query
- access status/HTTP status code;
- referrer URL (the site visited before);
- data volume transferred;
- time zone difference with regards to Greenwich Mean Time (GMT).

It is necessary to temporarily process these data in order to make a website visit and delivery of the website to your end device technically possible. The log data are not used to identify individual users, and are not collated together with other sources of data. Further saving in log files is performed in order to guarantee the functionality of the websites and the security of the IT systems. The legal basis for processing is Art. 6(1)(1) point f) GDPR. We have legitimate interests in ensuring the functionality of the websites, and in the integrity and security of the websites. The saving of log data in log files, in particular the IP address, for a longer period of time allows us to identify and prevent misuse. This includes, for example, the prevention of queries which overload the service or the potential use of bots. The log data are erased as soon as they are no longer necessary for achieving the purpose, for which they are processed. In the event that data are captured for provision of the website, this occurs when you leave the website. The log data are in principle stored such that they are accessible directly and exclusively for administrators, and erased no later than after seven days. They are subsequently only available by means of reconstructing back-ups, and are erased permanently after a maximum of four weeks.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

Cookies

As well as the aforementioned log data, so-called cookies are also stored in the internet browser of the end device you use whenever you use the websites. These are small text files with a sequence of numbers which are stored locally in the cache of the browser used. Cookies are not part of the PC system and cannot execute any programs. They help to make our websites user-friendly. The use of cookies may be technically necessary or performed for other purposes, e.g. to analyse website use.

a) Technically necessary cookies

Certain elements of our websites require that the accessing browser can still be identified after switching from one page to another. The following data are processed in the cookies:

- language settings;
- items in the shopping basket;
- log-in information.

The user data collected by technically necessary cookies are not processed for the purposes of creating user profiles. We also use so-called "session cookies" which store a Session ID which allows different queries from your browser to be attributed to the same session. "Session cookies" are necessary in order to make use of



the websites. In particular, we can use these to identify the end device used when you return to the websites. We use this cookie in order to identify you when you make subsequent visits to our websites if you have a customer account with us; without these, you would have to log in again each time you visit. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have legitimate interests in this processing in order to provide the special functionalities mentioned, and to thus make the website more attractive and effective to use. The “session cookies” are erased as soon as you log out or, depending on which browser you use and what your browser settings are, when you close your browser.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You may object to processing which uses cookies by making changes to your internet browser settings, namely by deactivating or restricting cookies. Cookies already stored can be erased at any time through your browser settings. You can prevent the use of cookies by opening your browser in “private browsing” mode.

a) Technically non-necessary cookies

On our website, we also use cookies which allow us to analyse the browsing behaviour of users. The following data, amongst others, are stored and processed in these cookies:

- search terms entered;
- frequency of site visits;
- use of website functions.

The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have legitimate interests in making our website more efficient and attractive. These technically non-necessary cookies are automatically erased after a set period which may differ from one cookie to the next. Below, you will find separate information on when and where we use third-party cookies on our websites.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You may object to processing which uses cookies by making changes to your internet browser settings, namely by deactivating or restricting cookies. Cookies already stored can be erased at any time through your browser settings. You can prevent the use of cookies by opening your browser in “private browsing” mode.

c) Cookie banner

When accessing the websites, you will be informed of the use of cookies and referred to this Data Protection Policy via an info banner. In this respect, you will also be informed of how to prohibit the storage of cookies using your browser settings.

Getting in touch with our company

When you get in touch with our company, e.g. via e-mail or using the contact form on the websites, we will process the personal data you provide in order to answer your enquiry. For processing enquiries sent via the contact form on the websites, you must provide us with a name or pseudonym, as well as a valid e-mail address and mobile phone number. Upon sending the message to us, the following data will also be processed:

- IP address;
- date/time of registration;
- browser type/version;
- operating system;
- language and version of browser software;
- host name of accessing device;
- website where the request originated;
- content of the request (concrete site);
- access status/HTTP status code;
- referrer URL (the site visited before);
- data volume transferred;



- time zone difference with regards to Greenwich Mean Time (GMT).

The legal basis for processing is Art. 6(1)(1) point f) GDPR or Art. 6(1)(1) point b) GDPR if contact is made with the intention of concluding a contract. Insofar as the enquiry is made with the intention of concluding a contract, the provision of your data is necessary and obligatory for conclusion of a contract. If you do not provide data, conclusion or performance of a contract in the form of making contact or processing the enquiry is not possible. The processing of personal data from the data entry mask is performed solely for processing the contact enquiry. In the event that you make contact via e-mail, we have a legitimate interest in processing the data here as well. The other data processed during the sending procedure help to prevent misuse of the contact form, and to ensure the security of our IT systems. Data are never forwarded to third parties in this regard. The data accumulated in this regard are erased once processing is no longer necessary - generally two years after end of communication - or processing is restricted, where applicable, to compliance with existing, legally mandatory retention obligations.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

Processing for contractual purposes

We process your personal data if and insofar as such is necessary for initiating, establishing, executing, and/or terminating a legal transaction with our company. The legal basis for this is Art. 6(1)(1) point b) GDPR. The provision of your data is necessary for conclusion of the contract, and you are contractually obliged to provide your data. If you fail to provide your data, conclusion and/or performance of contract is not possible. Once the purpose has been achieved (e.g. processing of contract), further processing of the personal data shall be blocked or the data erased unless we are authorised to conduct further processing on the grounds of consent given by you (e.g. consent to processing the e-mail address for sending advertising e-mails), a contractual agreement, a legal authorisation (e.g. authorisation to send direct marketing), or legitimate interests (e.g. retention for enforcing claims).

Your personal data will be transferred to third parties in this respect if:

- such is necessary for establishing, executing or terminating legal transactions with our company (e.g. when transferring data to a payment service provider/delivery company for performance of a contract with your person), (Art. 6(1)(1) point b) GDPR); or
- a sub-contractor or agent, whom we engage exclusively in the context of rendering the services or offers which you desire, requires these data (such ancillary persons are only entitled to process the data insofar as such is necessary for rendering the service or offer, unless otherwise explicitly stated); or
- there exists an enforceable order of a public authority (Art. 6(1)(1) point c) GDPR); or
- there exists an enforceable court order (Art. 6(1)(1) point c) GDPR); or
- we are obliged to do so by law (Art. 6(1)(1) point c) GDPR); or
- processing is necessary in order to protect vital interests of the data subject or another natural person (Art. 6(1)(1) point d) GDPR); or
- it is necessary for the performance of a duty which is in the public interest, or which is performed in exercise of public authority (Art. 6(1)(1) point e) GDPR); or
- we may invoke our superior legitimate interests, or those of a third party, in forwarding (Art. 6(1)(1) point f) GDPR).

We will not forward your personal data beyond this to other persons, companies, or bodies, unless you have given effective consent to such forwarding. The legal basis for such processing is Art. 6(1)(1) point a) GDPR. In



the context of this data protection information, please refer to each respective recipient for details on the respective processing.

Website registration/log-in area

If you would like to use the password-protected area of our websites, you must register, generally by providing the following information:

- address;
- e-mail address;
- first name/surname;
- telephone number;
- PESEL no. (only for Polish citizens/Poland);
- gender (Spain);
- town/city/post code;
- RFID chip no. (optional);
- where applicable, information of co-user/partner (optional);
- payment method;
- where applicable, ticket number;
- birth name (Budapest).

When registering to use Nextbike in different cities and countries, you will be asked to provide various data which are necessary for registering in the respective cities/countries. You are not obliged to provide your real name, and are at liberty to use a pseudonym. Furthermore, at time of registration your IP address as well as the time and date of registration will also be processed. We use the double opt-in process for registration on the websites. Once you have transmitted the data necessary for registration, you will receive a text message with a personalised PIN code for activating your customer account. Registration is only successfully completed and access granted to the customer account once the account has been activated by entering the PIN code. When logging in subsequently, you will have to enter the log-in data (username, password) which you chose when you first logged in. If you do not activate the account by entering the PIN code sent within 24 hours, we will block the information transmitted to us and erase such automatically no later than after one month. We will also erase your data as soon as they are no longer necessary for achieving the purpose, for which they are processed. For data collected during the registration process, this occurs if registration on the website is cancelled or amended and your customer account is cancelled.

The log-in area of the websites offers the following functions:

You can:

- check your Nextbike account balance;
- edit your profile data (enter and amend names, contact details, PIN code);
- amend payment methods;
- close your customer account;
- view and manage tariff options;
- manage, amend or terminate your newsletter subscription;
- connect your user account to your accounts with selected partner companies; or
- redeem vouchers.

If you use the password-protected area of the website, e.g. in order to edit your profile data, we will also process those data concerning your person, in particular your address and information on payment method, that are required for initiating or fulfilling a contract. The legal basis for such processing is Art. 6(1)(1) point b) GDPR. The provision of your data is necessary and mandatory for conclusion or performance of the contract. If you fail to provide your data, you will not be able to register or use the log-in area, i.e. conclusion and/or performance of a contract is not possible. The data are erased as soon as they are no longer required for the purpose, for which they are processed, or processing is restricted, in the event that there exist legal retention periods. Due to compulsory regulations of commercial and tax law, we are obliged to store your



address, payment, and order data for a period of ten years. We will restrict processing and reduce such to compliance with the existing legal obligations 6 months after termination of contract.

Partner programme

As part of using our customer account, we offer you the opportunity to profit from customer benefits and special offers, such as free journeys, through our partner programme. You can pick out different partner companies/associations in your user account on our websites by confirming the corresponding fields. So that we can offer you the respective customer benefits and special offers, we process the following data from you depending on the settings of the partner company's customer account:

- code;
- customer number;
- subscription number.

Moreover, in user settings you can enter the e-mail addresses you have registered with the respective partner companies or which your customer account with these companies is listed under. The legal basis for processing is Art. 6(1) point b GDPR. The provision of your data is necessary for performance of the contract, and you are contractually obliged to provide your data. If you do not provide your data, conclusion and/or performance of the contract, in the form of providing you with customer benefits and special offers, is not possible. The personal customer data you provide is never forwarded to the respective partner companies. Where applicable, the respective partner companies will receive anonymised statistics regarding the number of customers who have taken advantage of a customer benefit or special offer by providing their customer data.

Renting bicycles

When you rent bicycles through our websites, we process the data which you provide as part of the registration process, such as your billing information (payment method), your first name and surname, your address, your e-mail address, and your telephone number, as well as other data where applicable, e.g. time of renting and time of return for billing purposes. We will also forward, in particular, your payment data to your selected payment service provider or our bank. The provision of your data is necessary for performance of the contract, and you are contractually obliged to provide your data. If you fail to provide your data, conclusion and/or performance of contract is not possible. The legal basis for processing is Art. 6(1)(1) point b) GDPR. We erase the data collected in this regard as soon as storage is no longer necessary, or alternatively we restrict processing in the event that there exist legal retention periods. Due to compulsory stipulations of commercial and tax law, we are obliged to store your address, payment, and order data for a period of ten years. We will restrict processing and reduce such to compliance with the existing legal obligations two years after termination of contract.

Ticket subscription/season tickets

On the websites, you can select different tariff options and season tickets, manage your selected options, and purchase our annual and monthly passes. After selecting ticket options and completing payment via the payment method registered on your customer account, you can make an unlimited number of journeys within the time period specified on the ticket. You register for season tickets via our online form in your user account. We process the data you provide as part of the registration process, e.g. first name and surname, address etc. for performance of the contract. The provision of your data is necessary for performance of the contract, and you are contractually obliged to provide your data. If you fail to provide your data, conclusion and/or performance of contract is not possible. The legal basis for this is Art. 6(1)(1) point b) GDPR. We erase the data collected in this regard as soon as storage is no longer necessary, or alternatively we restrict processing in the event that there exist legal retention periods. Due to compulsory stipulations of commercial and tax law, we are obliged to store your address, payment, and order data for a period of ten years. We will restrict processing and reduce such to compliance with the existing legal obligations two years after termination of contract.



Collection and processing of GPS data

In order to make it quicker to locate bicycles and to speed up billing, we fix the location of the bicycles within our business areas whenever any bicycle is rented out and returned. The journeys taken during the period, in which the bicycle was rented, are not tracked. Where we use GPS data for billing purposes, the legal basis for this is Art. 6(1) point b GDPR. We also process GPS data on the basis of Art. 6(1) point f) GDPR since we are pursuing the aim of improving the service for our customers by being able to distribute the bicycles evenly within a city. GPS locations also help us to avoid and to prove criminal offences related to the use of the bicycles. Once the purpose has been achieved (e.g. return of the bicycle), further processing of the GPS data is blocked or the data erased unless we are authorised to conduct further processing on the grounds of consent given by you, a contractual agreement, a legal authorisation (e.g. authorisation to send direct marketing), or legitimate interests (e.g. retention for enforcing claims) in further retention and the processing required in this respect.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

Push notifications: Location query

When you register on our websites as a new customer, a (push) notification will generally be sent to you asking to use your current location. In the event that you permit access to your location, we will process this information for analysing the usage of our websites, and in order to make our online presence more attractive and to offer you an additional level of service. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We store these data for a maximum of 2 years after the site is visited. Your data are not forwarded to third parties.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

E-mail marketing

Newsletter

On our websites, you can subscribe to our e-mail newsletter in which we give you regular updates on the following:

- system news;
- price changes/limited-time offers;
- company promotions.

In order to receive the newsletter, you must provide a valid e-mail address. Registering for our e-mail newsletter is normally performed as part of a double opt-in process. After you submit the data indicated as mandatory, we will send an e-mail to the address you provided, in which we will ask you to explicitly confirm subscription to the newsletter (by clicking on a confirmation link). This way, we can make sure that you actually want to receive our e-mail newsletter. If you do not confirm within 6 months, we will lock the information transmitted to us and erase it automatically after a maximum of six months. Once you have confirmed, we process the e-mail address and name/pseudonym of the respective recipient for the purpose of sending out our e-mail newsletter. The legal basis for this processing is Art. 6(1)(1) point a) GDPR. We erase these data when you cancel your newsletter subscription. We process these data for up to two years after termination of contract. If registration for the newsletter is performed outside of conclusion of a contract, we process these data for up to two years after termination of usage. We erase these data when the newsletter subscription ends.

You may withdraw your consent to processing of your e-mail address for the purposes of receiving the newsletter at any time, either by sending us a message (see the contact details under "Controller"), or by clicking the unsubscribe link contained in the newsletter itself. This will not affect the lawfulness of processing performed on the basis of the consent up until such time as this consent is revoked.

Furthermore, the following data are also processed at time of subscription:



- IP address;
- date/time of subscribing to the newsletter;
- time of clicking the confirmation link.

We also process your IP address, the time of registration to the newsletter, and the time at which you confirm such in order to document your newsletter subscription, and to prohibit the misuse of your personal data. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have a legitimate interest in this processing in order to prevent fraud. We erase these data at the latest when the newsletter subscription ends.

Furthermore, we evaluate the opening/click rates of our newsletters whenever we send these out. For the purposes of this evaluation, the e-mails sent out contain so-called web beacons or tracking pixels which comprise single-pixel image files and which are simultaneously incorporated into our websites. Processing is performed for the purposes of analysing reading behaviour with regards to our newsletters. In doing so, we record when you read our newsletter and which links in the newsletter you click on, from which we infer the interests of our customers. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have legitimate interests in this processing in order to measure the reach and compile statistical analyses of our newsletters, and to optimise our e-mail marketing. This information is processed for as long as you are subscribed to the newsletter. After you unsubscribe, we process the data in a purely statistical and anonymous manner.

Please note that you can object to the receipt of direct marketing and processing for the purposes of direct marketing at any time without incurring any costs beyond the transfer costs according to the basic tariffs. In this regard, you have a general right to object without stating grounds (Art. 21(2) GDPR). To enforce this right, click on the unsubscribe link in the relevant e-mail, or notify us of your objection using the contact details given under "Controller".

"MailChimp" e-mail marketing service

We use the "MailChimp" e-mail marketing service provided by Rocket Science Group, LLC (675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA, Website: <https://mailchimp.com/>; hereinafter: "MailChimp").

If you have subscribed to the newsletter, the data you disclose with your registration will be stored and processed on the servers of MailChimp in the USA. Mailchimp has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. You can view Rocket Science Group's certification at <https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG>. MailChimp processes this information on our behalf for the purposes of sending and evaluating the newsletter. The newsletters contain so-called "web beacons", pixel-sized files which are retrieved from the MailChimp server when the newsletter is opened. Within the context of this retrieval, technical information such as the browser used, the time at which the page was accessed, and the IP address is collected. This information is processed in order to evaluate our service and undertake technical improvements. We also evaluate if and when newsletters are opened, and which links readers click on. This information can in theory be attributed to individual newsletter recipients. However, neither we nor MailChimp intend to monitor individual recipients; rather, the evaluation of the information named helps us to identify the reading habits of recipients so that we can optimise and manage the content of our newsletters, and better adapt this accordingly. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have legitimate interests in measuring the reach and compiling statistical analyses of our newsletters, and in adapting, optimising and selectively managing the content of our newsletters. More information, including on the retention period, can be found in the data protection guidelines of "MailChimp" at <https://mailchimp.com/legal/privacy/#1.TheBasics>.

Please note that you can object to the receipt of direct marketing and processing for the purposes of direct marketing at any time without incurring any costs beyond the transfer costs according to the basic tariffs. In this regard, you have a general right to object without stating grounds (Art. 21(2) GDPR). To enforce this right, click on the unsubscribe link in the relevant e-mail, or notify us of your objection using the contact details given under "Controller".

Furthermore, MailChimp may use the data transferred to optimise and improve its own services, e.g. for undertaking technical improvements to the sending and presentation of the newsletters, according to its own



information. According to its own information, MailChimp does not process data in order to approach you with its own advertising, nor does it forward the data to third parties.

It may happen that as a recipient of the newsletter you are directed to the website of MailChimp, for example if you follow the link in the newsletter to display the newsletter in an internet browser in the event that you have issues displaying the newsletter in your e-mail program. In this respect, please note that there may be other analytical services and cookies in use on MailChimp's website and that these may process your personal data on behalf of MailChimp. We have no influence over this processing.

"CleverReach" e-mail marketing service

We use the "CleverReach" e-mail marketing service provided by CleverReach GmbH & Co. KG (Mühlenstr. 43, 26180 Rastede; hereinafter: "CleverReach"). CleverReach is a service which can be used to organise and analyse the sending of newsletters. If you have subscribed to the newsletter, the data you provide when registering to receive the newsletter (e.g. e-mail address) are stored on the servers of CleverReach in Germany or Ireland. "CleverReach" processes the necessary data on our behalf for the purposes of sending and evaluating the newsletters. The newsletters we send with "CleverReach" allow us to analyse the behaviour of newsletter recipients. The newsletters contain so-called web beacons", pixel-sized files which are retrieved from the "CleverReach" server when the newsletter is opened. Within the context of this retrieval, technical information such as the browser used, the time at which the page was accessed, and the IP address is processed. This information is processed in order to evaluate our service and undertake technical improvements. In this respect, we may analyse, amongst others, whether and how many recipients have opened the newsletter message, which devices (e.g. PC, phone, tablet) have been used to do this, how often each link in the newsletter was clicked on, and what the global distribution of people opening the newsletter is.

Using so-called conversion tracking, we can also analyse whether a pre-defined action (e.g. buying a product on our websites) was actually performed after a link in the newsletter was clicked on in order to analyse the success of our campaigns. To do this, we convert each hyperlink in an e-mail into a so-called tracking link. Measurement is performed using a cookie which the recipient sets by clicking on a link. Neither we nor "CleverReach" intend to monitor individual recipients; rather, the evaluation of the information mentioned helps us to identify the reading habits, and open and click rates of all recipients. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have legitimate interests in measuring the reach and compiling statistical analyses of our newsletters, and in adapting, optimising and selectively managing the content of our newsletters. We process these data for up to two years after termination of contract. If registration for the newsletter is performed outside of conclusion of a contract, we process these data for up to two years after termination of usage. We erase these data when the newsletter subscription ends. "CleverReach" erases the data as soon as it is requested to erase recipient data, though no later than after 30 days, see <https://www.cleverreach.com/de/funktionen/datenschutz-sicherheit/dsgvo-sprechstunde/>.

More information, including on retention periods, can be found in the data protection guidelines of "CleverReach" at <https://www.cleverreach.com/de/datenschutz/> and <https://www.cleverreach.com/de/funktionen/reporting-und-tracking/>.

Please note that you can object to the receipt of direct marketing and processing for the purposes of direct marketing at any time without incurring any costs beyond the transfer costs according to the basic tariffs. In this regard, you have a general right to object without stating grounds (Art. 21(2) GDPR). To enforce this right, click on the unsubscribe link in the relevant e-mail, or notify us of your objection using the contact details given under "Controller".

Payment service provider (PSP)

PayPal

On our websites, we offer payment via PayPal. This payment service is provided by PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter: "PayPal"). If



you choose to pay via “PayPal”, the payment information you provide will be transmitted to “PayPal”. Processing of your data by “PayPal” is performed on the basis of Art. 6(1)(1) point b) GDPR (processing for performance of a contract). The provision of your payment data is necessary and mandatory for conclusion or performance of the contract. If you fail to provide your data, conclusion and/or performance of contract with the “PayPal” payment method is not possible. The data necessary to process the payment are transmitted securely using the “SSL” procedure, and are processed exclusively for the purpose of processing the payment. We erase the data collected in this regard as soon as storage is no longer necessary, or alternatively we restrict processing in the event that there exist legal retention periods. Due to compulsory regulations of commercial and tax law, we are obliged to store your address, payment, and order data for a period of up to ten years. We will restrict processing and reduce such to compliance with the existing legal obligations two years after termination of contract. Further information on data protection and retention periods at “PayPal” can be found at <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

Forwarding of personal data when making credit card payments

For the purposes of processing payments, we forward the payment data required for credit card payments to the financial institute commissioned with the payment, or where applicable to our payment and billing service provider, Worldpay (Worldpay, The Walbrook building, 25 Walbrook, London EC4N 8AF) in encrypted form. This provider then records and reviews the data entered. Processing is performed on the basis of Art. 6(1)(1) point b) GDPR. The provision of your payment data is necessary and mandatory for conclusion or performance of the contract. If you fail to provide your payment data, conclusion and/or performance of contract by means of a credit card payment is not possible. The data necessary to process the payment are transmitted securely using the “SSL” procedure, and are processed exclusively for the purpose of processing the payment. We erase the data collected in this regard as soon as storage is no longer necessary, or alternatively we restrict processing in the event that there exist legal retention periods. Due to compulsory regulations of commercial and tax law, we are obliged to store your address, payment, and order data for a period of up to ten years. We will restrict processing and reduce such to compliance with the existing legal obligations two years after termination of contract.

Forwarding of personal data for the purposes of enforcement or rights/address enquiry

In the event of failure to pay, we reserve the right to forward the data disclosed upon ordering/booking to a solicitor for the purposes of address enquiry and/or enforcement of rights. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. We have a legitimate interest in preventing fraud and avoiding default risks. Furthermore, we will forward your data, where necessary, in order to protect our rights and the rights of our affiliated companies, our cooperation partners, our employees, and/or those of the users of our websites, and to the extent that processing is necessary. We will never sell or lease your data to third parties. The legal basis for processing is Art. 6(1)(1) point f) GDPR. We have a legitimate interest in this processing for the purposes of enforcing rights. We erase the data collected as soon as storage is no longer necessary, or alternatively we restrict processing in the event that there exist legal retention periods. You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section “Controller”.

Content Delivery Network

Bootstrap CDN

On our websites, we use the services of “Bootstrap CDN”, a content delivery network (hereinafter “CDN”) from StackPath LLC (2021 McKKinney Avenue, Suite 1100 Dallas, Texas 75201) in order to display the content offered on different end devices, and to increase the loading speed of our websites. When you visit our website, a library from the “CDN” is stored on your end device temporarily in order that content does not have to be reloaded. In this regard, your IP address is transmitted to the service provider in the USA. In this regard, your IP address is transmitted to the service provider in the USA. Stackpath has committed to the EU-US-Privacy-Shield and is



thus obliged to comply with the European data protection standard (<https://www.privacyshield.gov/participant?id=a2zt0000000CbahAAC&status=Active>). The legal basis for processing is Art. 6(1)(1) point f) GDPR. By using Bootstrap, we are pursuing our legitimate interest in quicker retrieval and improved presentation of our content. We have no knowledge of or any influence on the retention period of the data. Further information on data protection can be found at: <https://www.bootstrapcdn.com/privacy-policy/>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

Cloudflare

On our websites, we also use the services of the content delivery network (hereinafter "CDN") of Cloudflare Inc. (101 Townsend St., San Francisco, CA 94107, United States; hereinafter "Cloudflare") for the purposes of making our online presence quicker to access. When you visit our website, a library from the "CDN" is stored on your end device temporarily in order that content does not have to be reloaded. In this regard, your IP address is transmitted to the service provider in the USA. "Cloudflare" has committed to the EU-US-Privacy-Shield (<https://www.privacyshield.gov/EU-US-Framework>) and is thus obliged to comply with the European data protection standard: <https://www.privacyshield.gov/participant?id=a2zt0000000GnZKAA0&status=Active>. The legal basis for this processing is Art. 6(1)(1) point f) GDPR. By using "Cloudflare", we are pursuing our legitimate interest in quicker retrieval, and improved and more efficient presentation of our online presence. More information on data protection and retention period at "Cloudflare" can be found at: <https://www.cloudflare.com/de-de/privacypolicy/>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

jQuery

On our websites, we use the services of the jQuery Foundation - a content delivery network from Stackpath LLC (2021 McKinney Ave, 1100 Dallas, TX 75201, USA). When accessing the sites, your browser loads the necessary program libraries in your browser cache in order to optimise loading speed. A connection to the servers in the USA must be established and your IP address transmitted for this purpose. Stackpath has committed to the EU-US-Privacy-Shield and is thus obliged to comply with the European data protection standard (<https://www.privacyshield.gov/participant?id=a2zt0000000CbahAAC&status=Active>). The legal basis for processing is Art. 6(1)(1) point f) GDPR. By using jQuery, we are pursuing our legitimate interest in quicker retrieval and improved presentation of our content. We have no knowledge of or any influence on the retention period of the data. Further information on data protection can be found at: <https://www.stackpath.com/legal/privacy-statement/>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section "Controller".

Embedding of third-party content

Third-party content, such as videos, maps, or graphics from other websites are embedded in our websites. This embedding requires that the providers of this content ("third-party providers") can detect users' IP addresses, since the content cannot be sent to the respective user's browser without the IP address. The IP address is therefore required to display this content. Below, you will find information on the services of external providers which are currently in use on our websites, as well as on the respective processing of each provider and your opportunities to object.

Google Maps

The websites use the "Goole Maps" service from "Google" (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001) for the purposes of displaying maps or map sections, thereby making



it easy for you to use the map function on the websites. When you visit the websites, "Google" is notified that you have accessed the corresponding sub-pages of our websites. Moreover, the data named under "Log data" and "Cookies" are also partially transmitted to "Google". This happens regardless of whether "Google" provides a user account which you are logged in to, or whether there is no user account. If you are logged in to "Google", your data will be directly attributed to your account. If you do not want these data to be attributed to your "Google" profile, you must log out before pressing the button. "Google" stores your data as usage profiles, and processes them, regardless of whether there exists a "Google" user account, for the purposes of advertising, market research, and/or to ensure the design of its websites meets peoples' needs. The legal basis for processing is Art. 6(1)(1) point f) GDPR. By using "Google Maps", we are following the legitimate interest in making our online presence more attractive, and offering you an extra level of service. "Google" also processes your data in the USA, and has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. You can view Google's certification at <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>. Further information on the scope and purpose of processing by the plug-in provider and the retention periods for "Google Maps" can be found at <https://policies.google.com/privacy?hl=de>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You may object to processing which uses cookies by making changes to your internet browser settings, namely by deactivating or restricting cookies. Cookies already stored can be erased at any time through your browser settings. You can prevent the use of cookies by opening your browser in "private browsing" mode.

Open Street Map

Our websites also use the "OpenStreetMap" service from the OpenStreetMap Foundation (OSMF) in order to display maps or map sections, thereby making it easy for you to use the map function on the websites. When you visit the websites, OpenStreetMap receives information on the usage of our website, including your IP address, which is collected by cookies, where applicable, and forwarded to the OpenStreetMap servers in the Netherlands and United Kingdom (UK) where they are also stored. Further information on the scope and purpose of processing by "OpenStreetMap" and its retention periods can be found at https://wiki.osmfoundation.org/wiki/Privacy_Policy. The legal basis for processing is Art. 6(1)(1) point f) GDPR. This processing helps us to make our online presence more attractive, and to offer you an extra level of service.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You may object to processing which uses cookies by making changes to your internet browser settings, namely by deactivating or restricting cookies. Cookies already stored can be erased at any time through your browser settings. You can prevent the use of cookies by opening your browser in "private browsing" mode.

Google Tag Manager

On our websites, we use the "Google Tag Manager" from "Google" (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001). "Google Tag Manager" is a solution which can be used to manage website tags via an interface. The Tag Manager tool itself (which implements the tags) is a cookie-less domain and does not collect any personal data. The tool helps to activate other tags which for their part do collect data under certain circumstances; we provide a separate explanation of this in this Data Protection Policy. The "Google Tag Manager" does not have access to these data. If there is a deactivation in place at a domain or cookie level, this deactivation will remain for all tracking tags that are implemented with "Google Tag Manager".

Google Web Fonts

In order to achieve uniform display of fonts, we use so-called web fonts that are provided by "Google" (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001). When you access a website, your browser loads the necessary "Google" web fonts into your browser cache in order to display texts and fonts correctly and more quickly. For this purpose, your browser transmits your IP address to "Google" in



order to establish a connection with the “Google” servers. In doing so, “Google” is notified that you have accessed our websites. The legal basis for processing is Art. 6(1)(1) point f) GDPR. By using “Google Web Fonts”, we are following the legitimate interest in a uniform and appealing presentation of our online presence. “Google” also processes your data in the USA, and has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. You can view “Google’s” certification at <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>. Further information on the scope and purpose of processing by “Google” and the retention periods for “Google Web Fonts” can be found at <https://developers.google.com/fonts/faq> and in “Google’s” data protection policy: <https://policies.google.com/privacy>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can communicate your objection to us using the contact details provided under the section “Controller”.

YouTube videos

On our websites, we use plug-ins from the video platforms “YouTube.de” or “YouTube.com”, a service provided by YouTube LLC (headquarters in 901 Cherry Avenue, San Bruno, CA 94066, USA; hereinafter “YouTube”), for which “Google” (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001) is the controller in the sense of data protection law. By processing data using these plug-ins, we are following the aim of embedding visual content (“videos”) which we have published on “Youtube.de” or “Youtube.com” on our websites as well. The videos are all embedded in “expanded data protection mode”, i.e. no data concerning you as a user are transmitted to “YouTube” unless you play the videos. When you play videos on our websites, “YouTube” is notified that you have accessed the corresponding sub-pages of our websites. Moreover, the data named under “Log data” are also partially transmitted to “Google”. This happens regardless of whether “YouTube” provides a user account which you are logged in to, or whether there is no user account. If you are logged in to “Google”, your data will be directly attributed to your account. If you do not want these data to be attributed to your “YouTube” profile, you must log out before pressing the button. “YouTube” stores your data as usage profiles, and processes them, regardless of whether there exists a “Google” user account, for the purposes of advertising, market research, and/or to ensure the design of its websites meets peoples’ needs. The legal basis for processing is Art. 6(1)(1) point f) GDPR. With this processing, we are following the legitimate interest in making our online presence more attractive, and offering you an extra service. “Google” also processes your personal data in the USA, and has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. You can view Google’s certification at <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>. Further information on the scope and purpose of processing by “YouTube” and the retention periods for “YouTube” can be found in the data protection policy at <https://policies.google.com/privacy?hl=de>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can object to this processing in a number of ways: by deactivating cookies in your browser settings, or by opening the browser you use in “private browsing” mode in order to prohibit the use of cookies.

Services for statistical, analytical and marketing purposes

We use third-party services for statistical, analytical and marketing purposes. This allows us to offer you an optimised, user-friendly experience when using our websites. The third-party providers use cookies to manage their services (see section on “Cookies” above). Below, you will find information on the services of external providers which are currently in use on our websites, as well as on the respective processing of each provider and your opportunities to object.

Google Analytics

So that we can adapt our websites to best suit user interests, we use “Google Analytics”, a web analysis service from “Google” (Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001). “Google Analytics” uses so-called “cookies” (see section on “Cookies” above) which are stored on your end device. Using cookies, “Google” processes the information generated concerning the use of our websites by your end device, e.g. that you have accessed a certain page, and processes, amongst others, the data named



under “Log data”, in particular your IP address, browser information, the website you visited before, and the time and date of the server query for the purposes of conducting a statistical analysis of website use. These websites use “Google Analytics” with the “anonymizeIp()” add-on. As a result, IP addresses are processed in abbreviated form in order to make it significantly harder to identify individuals. According to information from “Google”, your IP address is abbreviated beforehand within the Member States of the European Union. The full IP address will be transferred to a “Google” server in the USA and abbreviated there in exceptional cases only. “Google” processes this information on our behalf in order to evaluate your use of our websites, to prepare reports for us concerning website activities and - where we explicitly inform you of such - to render further services associated with website use for us. The IP address transmitted by your browser for this purpose will not be collated together with other “Google” data. The legal basis for processing is Art. 6(1)(1) point f) GDPR. We have a legitimate interest in this process in order to conduct statistical analyses of website use, and to measure the reach of, and also to optimise and improve our online presence. Your data connected to “Google Analytics” are erased after a maximum of fourteen months. For exceptional cases where your data are transferred to the USA, “Google” has committed to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. You can view Google’s certification at <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>. Further information on data protection at “Google” can be found at: <http://www.google.de/intl/de/policies/privacy>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can object to processing in a number of ways: by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>; by deactivating cookies using your browser settings; or by opening your browser in “private browsing” mode in order to prohibit the use of cookies.

Facebook Custom Audiences

Our websites also use the “Website Custom Audiences” function from “Facebook”. This is provided by Facebook Ireland Limited (4 Grand Canal Square, Dublin 2, Ireland, e-mail: impressum-support@support.facebook.com; hereinafter: “Facebook”). Information on your usage behaviour on our websites is collected using so-called web beacons such as the “Facebook Pixel”. This information is then processed by “Facebook”. As a result, users of the websites and users of “Facebook” who belong to a comparable target group can be shown targeted adverts (“Facebook Ads”) as part of their visit to the social network “Facebook”. Using the “Facebook Pixels” (small graphics that are embedded in our websites, and which are automatically loaded when our websites are accessed and which allow user behaviour to be tracked), your browser automatically establishes a direct connection with the “Facebook” server. By embedding the “Facebook Pixels”, “Facebook” uses cookies to process the information generated concerning the use of our websites by your end device, e.g. that you have accessed a certain page, and processes, amongst others, the data named under “Log data”, in particular your IP address, browser information, the website you visited before, and the time and date of the server query for the purposes of conducting a statistical analysis of website use. If you are registered with a “Facebook” service, “Facebook” can attribute the information collected to your account. Even if you are not registered with or logged in to “Facebook”, it is possible that the provider will gain knowledge of and process your IP address and other identifying features. The legal basis for this processing of your data is Art. 6(1)(1) point f) GDPR. We are following the legitimate interests of identifying users of our websites on “Facebook”, showing you advertising that is of interest to you, and making our websites more interesting for our users. Insofar as “Facebook” processes the data in the USA, it has committed to the EU-US-Privacy-Shield (<https://www.privacyshield.gov/EU-US-Framework>) and thus guarantees that it will comply with European data protection law. You can view “Facebook’s” certification at <https://www.privacyshield.gov/participant?id=a2zt00000000GnywAAC&status=Active>. The retention period for information in Facebook cookies is three months. Further information on data protection and retention periods at “Facebook” can be found at: <https://www.facebook.com/privacy/explanation> and <https://www.facebook.com/policies/cookies/>.

You may object to this processing. You have a right to object for reasons that result from your particular situation. You can object to processing in a number of ways: by deactivating the function for logged-in users under



“Ad preferences” at <https://www.facebook.com/ads/preferences/>; by deactivating targeted adverts from “Facebook” which are part of the self-regulation campaign “About Ads” via the link <http://optout.aboutads.info/>, whereby this setting is reset when you erase your cookies; by deactivating cookies in your browser settings; or by opening your browser in “private browsing” mode in order to prohibit the use of cookies.

Facebook Analytics

We use the “Facebook Analytics” tool from “Facebook”. This is provided by Facebook Ireland Limited (4 Grand Canal Square, Dublin 2, Ireland, e-mail: impressum-support@support.facebook.com; hereinafter: “Facebook”). For the use of “Facebook Analytics”, we use the so-called “Facebook Pixel” to analyse the use of our websites and online presence, e.g. on the social networks “Facebook” and “Instagram”, and the interactions performed by the users on our websites and online presences, and to measure the reach of our advertising. Using the “Facebook Pixels” (small graphics that are embedded in our websites, which are automatically loaded when our websites are accessed and which allow user behaviour to be tracked), your browser automatically establishes a direct connection with the “Facebook” server. By embedding the “Facebook Pixels”, “Facebook” uses cookies to process the information generated concerning the use of our websites by your end device, e.g. that you have accessed a certain page, and processes, amongst others, the data named under “Log data”, in particular your IP address, browser information, the website you visited before, and the time and date of the server query for the purposes of analysing our websites and online presence, analysing user interactions, and measuring the reach of our advertising. We use the information gathered using the “Facebook Pixel” for statistical purposes only. It is transmitted to us by “Facebook” as anonymous statistics, and does not allow the person of the user to be identified. If you are registered with a “Facebook” service, “Facebook” can attribute the information collected to your account. Even if a user are not registered with or logged in to “Facebook”, it is possible that “Facebook” will gain knowledge of and process your IP address and other identifying features. The processing of your data is performed on the basis of Art. 6(1)(1) point f) GDPR. We have a legitimate interest in this process in order to conduct statistical analyses of website use, to measure the reach of advertising, and to optimise and improve our online presence. Insofar as “Facebook” processes the data in the USA, it has committed to the EU-US-Privacy-Shield (<https://www.privacyshield.gov/EU-US-Framework>) and thus guarantees that it will comply with European data protection law. You can view “Facebook’s” certification at <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>. The retention period for information in Facebook cookies is three months. Further information on data protection and retention periods at “Facebook” can be found at: <https://www.facebook.com/privacy/explanation> and <https://www.facebook.com/policies/cookies/>.

You may object to this processing. You have a right to object where there exists grounds related to your particular situation. You can object to processing in a number of ways: by deactivating the function for logged-in users under “Ad preferences” at <https://www.facebook.com/ads/preferences/>; by deactivating targeted adverts from “Facebook” which are part of the self-regulation campaign “About Ads” via the link <http://optout.aboutads.info/>, whereby this setting is reset when you erase your cookies; by deactivating cookies in your browser settings; or by opening your browser in “private browsing” mode in order to prohibit the use of cookies.

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