

# 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.

Last Update: 14. December 2023



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## Controller

KCS Kuhlmann Convention Service  
Rue des Chênes 12  
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Switzerland

E-mail address:

[mail@kcs-convention.com](mailto:mail@kcs-convention.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.
- Payment Data.
- Location data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.

### Categories of Data Subjects

- Customers.
- Prospective customers.
- Communication partner.
- Users.
- Business and contractual partners.

### Purposes of Processing

- Provision of contractual services and fulfillment of contractual obligations.
- Contact requests and communication.
- Security measures.
- Office and organisational procedures.

- Managing and responding to inquiries.
- Feedback.
- Provision of our online services and usability.
- Information technology infrastructure.

## 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)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

**Relevant legal basis according to the Swiss Data Protection Act:** If you are located in Switzerland, we process your data based on the Federal Data Protection Act

(abbreviated as "Swiss DPA"). This also applies if our processing of your data otherwise affects you in Switzerland and you are affected by the processing. The Swiss DPA does not generally provide that a legal basis for the processing of personal data must be stated (unlike, for example, the GDPR). We process personal data only when the processing is lawful, is conducted in good faith, and is proportionate (Article 6 (1) and (2) of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose that is recognisable to the person concerned and process it only in a manner that is compatible with these purposes (Article 6 (3) of the Swiss DPA).

**Reference to the applicability of the GDPR and the Swiss DPA:** These privacy notices serve both to provide information in accordance with the Swiss Federal Act on Data Protection (Swiss DPA) and the General Data Protection Regulation (GDPR).

## 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.

TLS/SSL encryption (https): To protect the data of users transmitted via our online services, we use TLS/SSL encryption. Secure Sockets Layer (SSL) is the standard technology for securing internet connections by encrypting the data transmitted between a website or app and a browser (or between two servers). Transport Layer Security (TLS) is an updated and more secure version of SSL. Hyper Text Transfer Protocol

Secure (HTTPS) is displayed in the URL when a website is secured by an SSL/TLS certificate.

## Transmission of Personal Data

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

## 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://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en).

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/>. We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

Disclosure of Personal Data Abroad: In accordance with the Swiss Data Protection Act (DSG), we only disclose personal data abroad when an appropriate level of protection for the affected persons is ensured (Art. 16 Swiss DSG). If the Federal Council does not determine that there is an adequate level of protection (list of states: <https://www.bj.admin.ch/bj/de/home/staat/datenschutz/internationales/anererkennung-staaten.html>), we implement alternative security measures. These measures may include international agreements, specific guarantees, data protection clauses in contracts, standard data protection clauses approved by the Federal Data Protection and Information Commissioner (FDPIC), or internal company data protection regulations previously recognised by the FDPIC or a competent data protection authority of another country.

Under Art. 16 of the Swiss DSG, exceptions can be made for the disclosure of data abroad if certain conditions are met, including the consent of the affected person, contract execution, public interest, protection of life or physical integrity, publicly made data or data from a legally provided register. Such disclosures always comply with the legal requirements.

## Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose). If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person. In the context of our information on data processing, we may

provide users with further information on the deletion and retention of data that is specific to the respective processing operation.

## 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 machine-readable



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.

Rights of the data subjects under the Swiss DPA:

As the data subject, you have the following rights in accordance with the provisions of the Swiss DPA:

- **Right to information:** You have the right to request confirmation as to whether personal data concerning you are being processed, and to receive the information necessary for you to assert your rights under the Swiss DPA and to ensure transparent data processing.
- **Right to data release or transfer:** You have the right to request the release of your personal data, which you have provided to us, in a common electronic format, as well as its transfer to another data controller, provided this does not require disproportionate effort.
- **Right to rectification:** You have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, deletion, and destruction:** You have the right to object to the processing of your data, as well as to request that personal data concerning you be deleted or destroyed.

## Use of Cookies

Cookies are small text files or other data records that store information on end devices and read information from the end devices. For example, to store the login status in a

user account, the contents of a shopping cart in an e-shop, the contents accessed or the functions used. Cookies can also be used for various purposes, e.g. for purposes of functionality, security and convenience of online offers as well as the creation of analyses of visitor flows.

**Information on consent:** We use cookies in accordance with the statutory provisions. Therefore, we obtain prior consent from users, except when it is not required by law. In particular, consent is not required if the storage and reading of information, including cookies, is strictly necessary in order to provide an information society service explicitly requested by the subscriber or user. Essential cookies usually include cookies with functions related to the display and operability of the onlineservice, load balancing, security, storage of users' preferences and choices or similar purposes related to the provision of the main and secondary functions of the onlineservice requested by users. The revocable consent will be clearly communicated to the user and will contain the information on the respective cookie use.

**Information on legal bases under data protection law:** The legal basis under data protection law on which we process users' personal data with the use of cookies depends on whether we ask users for consent. If users consent, the legal basis for processing their data is their declared consent. Otherwise, the data processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in a business operation of our online services and improvement of its usability) or, if this is done in the context of the fulfillment of our contractual obligations, if the use of cookies is necessary to fulfill our contractual obligations. For which purposes the cookies are processed by us, we do clarify in the course of this privacy policy or in the context of our consent and processing procedures.

**Retention period:** With regard to the retention period, a distinction is drawn between the following types of cookies:

- **Temporary cookies (also known as "session cookies"):** Temporary cookies are deleted at the latest after a user has left an online service and closed his or her end device (i.e. browser or mobile application).

- **Permanent cookies:** Permanent cookies remain stored even after the terminal device is closed. For example, the login status can be saved, or preferred content can be displayed directly when the user visits a website again. Likewise, user data collected with the help of cookies can be used for reach measurement. Unless we provide users with explicit information about the type and storage duration of cookies (e.g., as part of obtaining consent), users should assume that cookies are permanent and that the storage period can be up to two years.

**General notes on revocation and objection (so-called "Opt-Out"):** Users can revoke the consents they have given at any time and object to the processing in accordance with legal requirements. Users can restrict the use of cookies in their browser settings, among other options (although this may also limit the functionality of our online offering). A objection to the use of cookies for online marketing purposes can also be made through the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>.

- **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 use a cookie management solution in which users' consent to the use of cookies, or the procedures and providers mentioned in the cookie management solution, can be obtained, managed and revoked by the users. The declaration of consent is stored so that it does not have to be retrieved again and the consent can be proven in accordance with the legal obligation. Storage can take place server-sided and/or in a cookie (so-called opt-out cookie or with the aid of comparable technologies) in order to be able to assign the consent to a user or and/or his/her device. Subject to individual details of the providers of cookie management services, the following information applies: The duration of the storage of the consent can be up to two years. In this case, a pseudonymous user identifier is formed and stored with the date/time of consent, information on the scope of the consent (e.g. which categories of cookies and/or service providers) as well as the browser, system and used end device; **Legal Basis:** Consent (Article 6 (1) (a) 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.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

- **Processed data types:** Inventory data (e.g. names, addresses); Payment Data (e.g. bank details, invoices, payment history); Contact data (e.g. e-mail, telephone numbers); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Customers; Prospective customers. Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations; Security measures; Contact requests and communication; Office and organisational procedures. Managing and responding to inquiries.
- **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:**

- **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).

- **Events:** We process the data of the participants of the events, events and similar activities offered or organized by us (hereinafter uniformly referred to as "participants" and "events") in order to enable them to participate in the events and to make use of the services or actions associated with their participation.

Insofar as we process health-related data, religious, political or other special categories of data in this context, this is done within the framework of disclosure (e.g. for thematically oriented events or serves health care, security or is done with the consent of the data subjects).

The necessary information is identified as such in the context of the conclusion of the agreement, booking or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any enquiries. Insofar as we gain access to information of end customers, employees or other persons, we process this in accordance with the legal and contractual requirements;

**Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

## Payment Procedure

Within the framework of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our legitimate interests, we offer data subjects efficient and secure payment options and use other service providers for this purpose in addition to banks and credit institutions (collectively referred to as "payment service providers").

The data processed by the payment service providers includes inventory data, such as the name and address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as the contract, total and recipient-related information. The information is required to carry out the transactions. However, the data entered is only processed by the payment service providers and stored with them. I.e. we do not receive any account or credit card related information, but only information with confirmation or negative information of the payment. Under certain circumstances, the data may be transmitted by the payment service providers to credit agencies. The purpose of this transmission is to check identity and creditworthiness. Please refer to the terms and conditions and data protection information of the payment service providers.

The terms and conditions and data protection information of the respective payment service providers apply to the payment transactions and can be accessed within the respective websites or transaction applications. We also refer to these for further information and the assertion of revocation, information and other data subject rights.

- **Processed data types:** Inventory data (e.g. names, addresses); Payment Data (e.g. bank details, invoices, payment history); Contract data (e.g. contract object, duration, customer category); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Customers. Prospective customers.
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

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

- **Saferpay:** Payment-Service-Provider (technical integration of online-payment-methods); **Service provider:** Worldline Suisse SA, Hardturmstrasse 201, 8021 Zürich, Switzerland; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR); **Website:** <https://worldline.com/de-ch/home/main-navigation/solutions/merchants/solutions-and-services/e-commerce/saferpay-payment-solution.html>.

**Privacy Policy:** <https://worldline.com/en-ch/compliancy/privacy.html>

## 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. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **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.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

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

- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).
- **Collection of Access Data and Log Files:** The access to our online services is logged in the form of so-called "server log files". Server log files may include the address and name of the web pages and files accessed, the date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a general rule, IP addresses and the requesting provider. The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and to ensure the stability and optimal load balancing of the servers; **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.

- **Profihost:** Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); **Service provider:** Profihost AG, Expo Plaza 1, 30539 Hannover, Germany; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.profihost.com/>; **Privacy Policy:** <https://www.profihost.com/datenschutzerklaerung>. **Data Processing Agreement:** Provided by the service provider.

## Registration, Login and User Account

Users can create a user account. Within the scope of registration, the required mandatory information is communicated to the users and processed for the purposes of providing the user account on the basis of contractual fulfilment of obligations. The processed data includes in particular the login information (name, password and an e-mail address).

Within the scope of using our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the user's protection against misuse and other unauthorized use. This data will not be passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so.

Users may be informed by e-mail of information relevant to their user account, such as technical changes.

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).

- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations; Security measures; Managing and responding to inquiries. Provision of our online services and usability.
- **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:**

- **Registration with a real name:** Due to the nature of our community, we ask users to use our services only with their real names. This means that the use of pseudonyms is not permitted; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- **Users' profiles are public:** The users' profiles are not publicly visible or accessible.
- **Deletion of data after termination:** If users have terminated their user account, their data relating to the user account will be deleted, subject to any legal permission, obligation or consent of the users; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) 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:** Contact data (e.g. e-mail, telephone numbers); Content data (e.g. text input, photographs, videos); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).

- **Purposes of Processing:** Contact requests and communication; Managing and responding to inquiries; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

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

- **Contact form:** When users contact us via our contact form, e-mail or other communication channels, we process the data provided to us in this context to process the communicated request; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

**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. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time

information, identification numbers, consent status). 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.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

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

- **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:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://mapsplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>. **Basis for third country transfer:** EU-US Data Privacy Framework (DPF).

## Changes and Updates to the Privacy Policy

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

If we provide addresses and contact information of companies and 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.

- **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.
- **Location data:** Location data is created when a mobile device (or another device with the technical requirements for a location determination) connects to a radio cell, a WLAN or similar technical means and functions of location determination. Location data serve to indicate the geographically determinable position of the earth at which the respective device is located. Location data can be used, for example, to display map functions or other information dependent on a location.
- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.