

# Privacy Policy

## Preamble

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

The terms used are not gender-specific.

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## Controller

KUKLA LIFESTYLE GmbH

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1070 Wien

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Legal Notice: <https://www.madamekukla.com/pages/imprint>.

# Overview of processing operations

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

## Categories of Processed Data

- Event Data (Facebook) ("Event Data" is data that can be transmitted from us to Facebook, e.g. via Facebook pixels (via apps or other means) and relates to persons or their actions; the data includes, for example, information about visits to websites, interactions with content, functions, installations of apps, purchases of products, etc.; Event data is processed for the purpose of creating target groups for content and advertising information (Custom Audiences); Event Data does not include the actual content (such as written comments), login information, and Contact Information (such as names, email addresses, and phone numbers). Event Data is deleted by Facebook after a maximum of two years, the Custom Audiences created from them with the deletion of our Facebook account).
- Inventory data (e.g. names, addresses).
- Content data (e.g. text input, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Contract data (e.g. contract object, duration, customer category).
- Payment Data (e.g. bank details, invoices, payment history).

## Categories of Data Subjects

- Employees (e.g. Employees, job applicants).
- Business and contractual partners.
- Prospective customers.
- Communication partner (Recipients of e-mails, letters, etc.).
- Customers.
- Users (e.g. website visitors, users of online services).
- Participants in sweepstakes and competitions.

## Purposes of Processing

- A/B Tests.
- Affiliate Tracking.
- Provision of our online services and usability.
- Conversion tracking (Measurement of the effectiveness of marketing activities).
- Office and organisational procedures.
- Clicktracking.
- Direct marketing (e.g. by e-mail or postal).
- Conducting sweepstakes and contests.
- Affiliate Tracking.
- Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.).
- Marketing.
- Contact requests and communication.
- Profiles with user-related information (Creating user profiles).
- Remarketing.
- Web Analytics (e.g. access statistics, recognition of returning visitors).
- Security measures.
- Polls and Questionnaires (e.g. surveys with input options, multiple choice questions).
- Provision of contractual services and customer support.
- Managing and responding to inquiries.
- Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content).

## Legal Bases for the Processing

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.

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

## Security Precautions

We take appropriate technical and organizational 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.

**Masking of the IP address:** If IP addresses are processed by us or by the service providers and technologies used and the processing of a complete IP address is not necessary, the IP address is shortened (also referred to as "IP masking"). In this process, the last two digits or the last part of the IP address after a full stop are removed or replaced by wildcards. The masking of the IP address is intended to prevent the identification of a person by means of their IP address or to make such identification significantly more difficult.

**SSL encryption (https):** In order to protect your data transmitted via our online services in the best possible way, we use SSL encryption. You can recognize such encrypted connections by the prefix https:// in the address bar of your browser.

## Data Processing in Third Countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third party services or disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of 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)).

Transmission of data only takes place in compliance with the statutory provisions. Thus, we only pass on data, if this is necessary, for instance, to fulfill the contract on the basis of Art. 6 section 1 lit b DSGVO or based on our overriding justified interest in an economic and effective operation according to Art. 6 section 1 lit f DSGVO.

In case we have to engage subcontractors for fulfilling our services and for efficient and effective maintenance of our company, they shall be exclusively located in countries that provide an adequate level of data protection (e.g. EU, EEA, Switzerland, companies certified within the EU-US Privacy Shield Frameworks or on the basis of officially recognized special contractual obligations – so-called “standard contractual clauses”) according to the arrangements of the European Commission (Art. 45 DSGVO). Where necessary or required, we have additional contractual agreements with our service providers for being able to guarantee an adequate level of data protection.

We pass on personal data to the following recipients or rather categories of recipients for the above-mentioned purposes unless there are further categories mentioned at the various topics:

IT service provider; Logistics company; External payment service providers Service provider for support at invoicing; Newsletter service provider

Your stored personal data will be deleted as soon as it is not necessary anymore for the purposes it serves and if no legal obligation exists to keep it.

We are bound by law, e.g. according to §132 of the Federal Fiscal Law (BAO), to keep accounting documents (e.g. invoices, receipts) for at least seven years (in the case of a legal dispute even longer).

Since the legal basis or our services incl. the associated data processing may change, we reserve the right to adjust this privacy statement accordingly. However, this only applies to data processing declarations. In case we need your consent for data processing or if parts of this privacy statement contain provisions of the contractual relationship with the users, the changes may only take place with your permission.

Please make sure you are always up-to-date when it comes to the current content of our privacy statement. In the event of any conflict or inconsistency between the English and the German version of this privacy statement, the German original shall prevail.

## Use of Cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after his visit within an online service. The information stored can include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was viewed. The term "cookies" also includes other technologies that fulfil the same functions as cookies (e.g. if user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

The following types and functions of cookies are distinguished:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed his browser.
- **Permanent cookies:** Permanent cookies remain stored even after closing the browser. For example, the login status can be saved or preferred content can be displayed directly when the user visits a website again. The interests of users who are used for range measurement or marketing purposes can also be stored in such a cookie.
- **First-Party-Cookies:** First-Party-Cookies are set by ourselves.
- **Third party cookies:** Third party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential) cookies:** Cookies can be necessary for the operation of a website (e.g. to save logins or other user inputs or for security reasons).
- **Statistics, marketing and personalization cookies:** Cookies are also generally used to measure a website's reach and when a user's interests or behavior (e.g. viewing certain content, using functions, etc.) are stored on individual websites in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This procedure is also referred to as "tracking", i.e. tracking the potential interests of users. If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or in the context of obtaining consent.

**Information on legal basis:** The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this applies and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies will be

processed on the basis of our legitimate interests (e.g. in a business operation of our online service and its improvement) or, if the use of cookies is necessary to fulfill our contractual obligations.

**Retention period:** Unless we provide you with explicit information on the retention period of permanent cookies (e.g. within the scope of a so-called cookie opt-in), please assume that the retention period can be as long as two years.

**General information on Withdrawal of consent and objection (Opt-Out):** Respective of whether processing is based on consent or legal permission, you have the option at any time to object to the processing of your data using cookie technologies or to revoke consent (collectively referred to as "opt-out"). You can initially explain your objection using the settings of your browser, e.g. by deactivating the use of cookies (which may also restrict the functionality of our online services). An objection to the use of cookies for online marketing purposes can be raised for a large number of services, especially in the case of tracking, via the websites <https://www.aboutads.info/choices/> and <https://www.youronlinechoices.com>. In addition, you can receive further information on objections in the context of the information on the used service providers and cookies.

**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.

Cookie Settings/ Opt-Out:

We use a Cookie Manager by iSenseLab, [iSense LLC, 855 Maude Avemountain View, CA, 94043-4021, USA]. Two kinds of cookies are used with this Cookie Manager (for details please see [https://gdpr.apps.isenselabs.com/pages/privacy\\_policy](https://gdpr.apps.isenselabs.com/pages/privacy_policy)):

Cookie name: cookieconsent\_status

This cookie will be set as soon as one of the Accept or Close buttons is pressed. It holds information about which exact button is pressed. Here is a list of all of the available options for the cookie's contents:

- dismiss - When the 'Close' button is pressed
- allow - When the 'Accept' button from the Consent Bar is pressed



- accept\_selected - When the 'Accept Selected' button is pressed ( from the Preferences popup )

- accept\_all - When the 'Accept all' button is pressed ( from Preferences popup )

Cookie name: cookieconsent\_preferences\_disabled

This cookie will be set based on the selected option from the app setting the Initial state of the cookie consent bar. It holds information about the cookie groups, which are currently blocked. The blocking can be either based on the initial state or when the customer manually opts out of a certain cookie group.

The information, which this cookie contains, will be changed every time when the customer changes his preferences. Based on this cookie, the blocking of the cookies is maintained.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) 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 fulfil our contractual obligations, safeguard our rights and for the purposes of the administrative tasks associated with this data and the business-related organisation. We will only pass on the data of the contractual partners within the scope of the applicable law to third parties insofar as this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of data subjects concerned (e.g. telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further processing, e.g. for marketing purposes, as part 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 (e.g., as a rule 10 years for tax purposes). In the case of data disclosed to us by the contractual partner within the context of an

assignment, we delete the data in accordance with the specifications of the assignment, in general after the end of the assignment.

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.

**Economic Analyses and Market Research:** For economic reasons and in order to be able to recognize market trends, wishes of contractual partners and users, we analyze the data available to us on business transactions, contracts, enquiries, etc., whereby the persons concerned may include contractual partners, interested parties, customers, visitors and users of our online service.

The analyses are carried out for the purpose of business evaluations, marketing and market research (for example, to determine customer groups with different characteristics). If available, we can take into account the profiles of registered users with information, e.g. on the services they have used. The analyses serve us alone and are not disclosed externally unless they are anonymous analyses with summarized, i.e. anonymized values. Furthermore, we respect the privacy of the users and process the data for analysis purposes as pseudonymously as possible and if possible anonymously (e.g. as summarized data).

**Online Shop and E-Commerce:** We process the data of our customers in order to enable them to select, purchase or order the selected products, goods and related services, as well as their payment and delivery, or performance of other services. If necessary for the execution of an order, we use service providers, in particular postal, freight and shipping companies, in order to carry out the delivery or execution to our customers. For the processing of payment transactions we use the services of banks and payment service providers. The required details are identified as such in the course of the ordering or comparable purchasing process and include the details required for delivery, or other way of making the product available and invoicing as well as contact information in order to be able to hold any consultation.

**Customer Account:** As part of our online offer, customers are able to set up their own customer account. The account is private and inaccessible for indexing by search engines. Your IP-Address and login timestamp are collected during registration, login or usage of your customer account in order to verify the registration and to protect your account from potential abuse. As a subject of customer data protection, all customer data is deleted upon account cancellation. Customers are responsible for their personal information during the account cancellation.

- **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 data (e.g. device information, IP addresses).
- **Data subjects:** Prospective customers, Business and contractual partners, Customers.

- **Purposes of Processing:** Provision of contractual services and customer support, Contact requests and communication, Office and organisational procedures, Managing and responding to inquiries, Conversion tracking (Measurement of the effectiveness of marketing activities), Profiles with user-related information (Creating user profiles), Security measures.
- **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).

## Use of Online Marketplaces for E-Commerce

We offer our services on online platforms operated by other service providers. In addition to our privacy policy, the privacy policies of the respective platforms apply. This is particularly true with regard to the methods used on the platforms for performance measuring and behaviour-related marketing.

- **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 data (e.g. device information, IP addresses).
- **Data subjects:** Customers.
- **Purposes of Processing:** Provision of contractual services and customer support.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:

- **Amazon:** Online marketplace for e-commerce; Service provider: Amazon Europe Core S.à.r.l., Amazon EU S.à.r.l., Amazon Services Europe S.à.r.l. and Amazon Media EU S.à.r.l., all four located at 38, avenue John F. Kennedy, L-1855 Luxembourg, and Amazon Instant Video Germany GmbH, Domagkstr. 28, 80807 Munich (together "Amazon Europe"), parent company: Amazon.com, Inc., 2021 Seventh Ave, Seattle, Washington 98121, USA;

Website: <https://www.amazon.de/>;

Privacy Policy: <https://www.amazon.com/gp/help/customer/display.html?nodeId=201909010>.

- **shopify:** E-Commerce Platform and Cloud Services; Service provider: Shopify International Limited, Victoria Buildings, 2, Etage, 1-2 Haddington Road, Dublin 4, D04 XN32, Ireland;

Website: <https://www.shopify.com/>;

Privacy Policy: <https://www.shopify.com/legal/privacy>.

## 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 data (e.g. device information, IP addresses), Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Customers, Prospective customers.
- **Purposes of Processing:** Provision of contractual services and customer support.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:

- **American Express:** Payment service provider; Service provider: American Express Europe S.A., Theodor-Heuss-Allee 112, 60486 Frankfurt am Main, Germany;  
Website: <https://www.mastercard.co.uk>;  
Privacy Policy: <https://www.americanexpress.com/de/legal/online-datenschutzerklarung.html>.
- **Apple Pay:** Payment services provider; Service provider: Apple Inc., Infinite Loop, Cupertino, CA 95014, USA;

Website: <https://www.apple.com/apple-pay/>;

Privacy Policy: <https://www.apple.com/privacy/privacy-policy/>.

- **EPS (Electronic Payment Standard):** Payment service provider; Service provider: Firma Studiengesellschaft für Zusammenarbeit im Zahlungsverkehr GmbH, Frankgasse 10/8, 1090 Wien, Austria;

Website: <https://www.eps-ueberweisung.at/>;

Privacy Policy: <https://eservice.stuzza.at/de/datenschutzerklaerung.html>.

Privacy Policy: <https://www.klarna.com/de/datenschutz>.

- **Shopify Payments:** Payment Service Provider; Service provider: Shopify International Ltd. Data Protection Officer c/o Intertrust Ireland 2nd Floor 1-2 Victoria Buildings Haddington Road Dublin 4, D04 XN32 Ireland

Website: <https://www.shopify.com/>;

Datenschutzerklärung: <https://www.shopify.com/legal/privacy>.

- **Mastercard:** Payment service provider; Service provider: Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium;

Website: <https://www.mastercard.co.uk>;

Privacy Policy: <https://www.mastercard.co.uk/en-gb/about-mastercard/what-we-do/privacy.html>.

- **PayPal:** Payment service provider (e.g. PayPal, PayPal Plus, Braintree, Braintree); Service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg;

Website: <https://www.paypal.com>;

Privacy Policy: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

- **Visa:** Payment service provider; Service provider: Visa Europe Services Inc., Zweigniederlassung London, 1 Sheldon Square, London W2 6TT, UK;

Website: <https://www.visa.de>;

Privacy Policy: <https://www.visa.de/datenschutz>.

- **Easybill:** Payment service provider; Service provider: easybill GmbH, Düsselstr.21, 41564 Kaarst, DE

Website: <https://www.easybill.de/#hero>

Datenschutzerklärung: <https://www.easybill.de/privacy>

## Contacting us

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the data of the inquiring persons are processed insofar as this is necessary to answer the contact enquiries and any requested activities.

The response to contact enquiries within the framework of contractual or pre-contractual relationships is made in order to fulfil our contractual obligations or to respond to (pre)contractual enquiries and otherwise on the basis of the legitimate interests in responding to the enquiries.

- **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), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Managing and responding to inquiries.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:

- **Zendesk:** Management of contact requests and communication; Service provider: Zendesk, Inc., 989 Market Street #300, San Francisco, CA 94102, USA;  
Website: <https://www.zendesk.com>;  
Privacy Policy: <https://www.zendesk.com/company/customers-partners/privacy-policy/>.

## Communication via Messenger

We use messenger services for communication purposes and therefore ask you to observe the following information regarding the functionality of the messenger services, encryption, use of the metadata of the communication and your objection options.

You can also contact us by alternative means, e.g. telephone or e-mail. Please use the contact options provided to you or use the contact options provided within our online services.

In the case of encryption of content (i.e. the content of your message and attachments), we point out that the communication content (i.e. the content of the message and attachments) is encrypted end-to-end. This means that the content of the messages is not visible, not even by the messenger service providers themselves. You should always use a current version of the messenger service with activated encryption, so that the encryption of the message contents is guaranteed.

However, we would like to point out to our communication partners that although messenger service providers do not see the content, they can find out that and when communication partners communicate with us and process technical information on the communication partner's device used and, depending on the settings of their device, also location information (so-called metadata).

**Information on Legal basis:** If we ask communication partners for permission before communicating with them via messenger services, the legal basis of our processing of their data is their consent. Otherwise, if we do not request consent and you contact us, for example, voluntarily, we use messenger services in our dealings with our contractual partners and as part of the contract initiation process as a contractual measure and in the case of other interested parties and communication partners on the basis of our legitimate interests in fast and efficient communication and meeting the needs of our communication partners for communication via messenger services. We would also like to point out that we do not transmit the contact data provided to us to the messenger service providers for the first time without your consent.

**Withdrawal, objection and deletion:** You can withdraw your consent or object to communication with us via messenger services at any time. In the case of communication via messenger services, we delete the messages in accordance with our general data retention policy (i.e. as described above after the end of contractual relationships, archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information provided by the communication partners, if no reference to a previous conversation is to be expected and there are no legal obligations to store the messages to prevent their deletion.

**Reservation of reference to other means of communication:** Finally, we would like to point out that we reserve the right, for reasons of your safety, not to answer inquiries about messenger services. This is the case if, for example, internal contractual matters require special secrecy or if an answer via the messenger services does not meet the formal requirements. In such cases we refer you to more appropriate communication channels.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication, Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

**Services and service providers being used:**

- **Facebook-Messenger:** Facebook-Messenger with end-to-end encryption (the end-to-end Facebook Messenger encryption requires activation, unless enabled by default); Service provider: <https://www.facebook.com>, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA;

Website: <https://www.facebook.com>;

Privacy Policy: <https://www.facebook.com/about/privacy>;

Opt-Out: <https://www.facebook.com/settings?tab=ads>.

## Cloud Services

We use Internet-accessible software services (so-called "cloud services", also referred to as "Software as a Service") provided on the servers of its providers for the following purposes: document storage and administration, calendar management, e-mail delivery, spreadsheets and presentations, exchange of documents, content and information with specific recipients or publication of websites, forms or other content and information, as well as chats and participation in audio and video conferences.

Within this framework, personal data may be processed and stored on the provider's servers insofar as this data is part of communication processes with us or is otherwise processed by us in accordance with this privacy policy. This data may include in particular master data and contact data of data subjects, data on processes, contracts, other proceedings and their contents. Cloud service providers also process usage data and metadata that they use for security and service optimization purposes.

If we use cloud services to provide documents and content to other users or publicly accessible websites, forms, etc., providers may store cookies on users' devices for web analysis or to remember user settings (e.g. in the case of media control).

**Information on legal basis** - If we ask for permission to use cloud services, the legal basis for processing data is consent. Furthermore, their use can be a component of our (pre)contractual services, provided that the use of cloud services has been agreed in this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient and secure administrative and collaboration processes).

- **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), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Employees (e.g. Employees, job applicants), Prospective customers, Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Office and organisational procedures.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).



#### Services and service providers being used:

- **Dropbox:** Cloud storage services; Service provider: Dropbox, Inc., 333 Brannan Street, San Francisco, California 94107, USA;  
Website: <https://www.dropbox.com>;  
Privacy Policy: <https://www.dropbox.com/privacy>;  
Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): <https://assets.dropbox.com/documents/en/legal/data-processing-agreement-dfb-013118.pdf>.
- **Google Cloud Services:** Cloud storage services; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
Website: <https://cloud.google.com/>;  
Privacy Policy: <https://www.google.com/policies/privacy>,  
Security information: <https://cloud.google.com/security/privacy>.

## Privacy notice for the use of WhatsApp

You may use WhatsApp to contact us and start a conversation. We are the data controller within the meaning of Art. 4 No. 7 GDPR for subsequent data processing in connection with WhatsApp. For offering and using WhatsApp, we use the software solution of Charles GmbH, Gartensstr. 86-87, 10115 Berlin, under a data processing agreement. Charles stores all personal data in the EU. As an official WhatsApp partner, Charles uses the WhatsApp Business API with the consequence that within our responsibility no other third parties or WhatsApp gain access to your communication content.

Your use of WhatsApp is governed solely by the agreements you entered into with WhatsApp. According to the terms of use of WhatsApp, we have your phone number and username through your contact. We use this and other information you provide to recognize you and your preferences and to reply to your WhatsApp messages. The legal basis here is your consent to be contacted in accordance with Art. 6 (1) (a) GDPR. In addition, we will send you newsletters via WhatsApp, if you have given us your consent to do so.

You can revoke consent already given at any time, with future effect. According to the GDPR, you also have the right to information, correction, portability, and deletion of your personal data, as well as the right to restrict or object to certain processing. You also have the right to complain to the responsible supervisory authority.

For more information, please take a look at our data processors:

Charles GmbH: <https://www.hello-charles.com/c-com-blog/whatsapp-newsletters>

WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland:  
<https://www.whatsapp.com/legal/privacy-policy-eea>

## Newsletter and Electronic Communications

We send newsletters, e-mails and other electronic communications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

In order to subscribe to our newsletters, it is generally sufficient to enter your e-mail address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

**Double opt-in procedure:** The registration to our newsletter takes place in general in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external e-mail addresses.

The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

**Deletion and restriction of processing:** We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the e-mail address solely for this purpose in a blacklist.

**Information on legal bases:** The sending of the newsletter is based on the consent of the recipients or, if consent is not required, on the basis of our legitimate interests in direct marketing. Insofar as we engage a service provider for sending e-mails, this is done on the basis of our legitimate interests. The registration procedure is recorded on the basis of our legitimate interests for the purpose of demonstrating that it has been conducted in accordance with the law.

Contents: The newsletter contains information about our products, new developments concerning the products offered by us, product launches, special offers, raffles, and events of our company as well as our partner companies and suppliers.

**Measurement of opening rates and click rates:** The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file, which is retrieved from our server when the newsletter is opened or, if we use a mailing service provider, from its server. Within the scope of this retrieval, technical information such as information about the browser and your system, as well as your IP address and time of retrieval are first collected.

This information is used for the technical improvement of our newsletter on the basis of technical data or target groups and their reading behaviour on the basis of their retrieval points (which can be determined with the help of the IP address) or access times. This analysis also includes determining whether newsletters are opened, when they are opened and which links are clicked. This information is assigned to the individual newsletter recipients and stored in their profiles until the profiles are deleted. The evaluations serve us much more to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users.

The measurement of opening rates and click rates as well as the storage of the measurement results in the profiles of the users and their further processing are based on the consent of the users.

A separate objection to the performance measurement is unfortunately not possible, in this case the entire newsletter subscription must be cancelled or objected to. In this case, the stored profile information will be deleted.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Meta/communication data (e.g. device information, IP addresses), Usage data (e.g. websites visited, interest in content, access times).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.), Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal), Web Analytics (e.g. access statistics, recognition of returning visitors), Conversion tracking (Measurement of the effectiveness of marketing activities), Profiles with user-related information (Creating user profiles).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the contact options listed above, preferably e-mail.

#### Services and service providers being used:

- **Google Analytics:** Measuring the success of email campaigns and building user profiles with a storage period of up to two years; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
Website: <https://marketingplatform.google.com/intl/en/about/analytics/>;  
Privacy Policy: <https://policies.google.com/privacy>;  
Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>,  
Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **Mailchimp:** Email marketing platform; Service provider: "Mailchimp" - Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA;  
Website: <https://mailchimp.com>;  
Privacy Policy: <https://mailchimp.com/legal/privacy/>.
- **Zapier:** Email marketing platform; Service provider: Zapier, Inc., 548 Market St #62411, San Francisco, California 94104, USA;  
Website: <https://zapier.com>;  
Privacy Policy: <https://zapier.com/privacy>.

## Commercial communication by E-Mail, Postal Mail, Fax or Telephone

We process personal data for the purposes of promotional communication, which may be carried out via various channels, such as e-mail, telephone, post or fax, in accordance with the legal requirements.

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After withdrawal or objection, we may store the data required to prove consent for up to three years on the basis of our legitimate interests before we delete them. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is affirmed.

- **Processed data types:** Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Direct marketing (e.g. by e-mail or postal).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Sweepstakes and Contests

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

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

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

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

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

- **Processed data types:** Inventory data (e.g. names, addresses), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Participants in sweepstakes and competitions.
- **Purposes of Processing:** Conducting sweepstakes and contests.
- **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

## Web Analysis, Monitoring and Optimization

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

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

For these purposes, so-called user profiles can be created and stored in a file (so-called "cookie") or similar procedures in which the relevant user information for the aforementioned analyses is stored. This information may include, for example, content viewed, web pages visited and elements and technical data used there, such as the browser used, computer system used and information on times of use. If users have consented to the collection of their location data, these may also be processed, depending on the provider.

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

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

Settings/ Opt-Out:

- [Rivo], [Rivo Commerce Inc.], Privacy Policy: [<https://www.rivo.io/privacy>]
- [Back in Stock], [SURESWIFT Capital INC.], Privacy Policy: [<https://backinstock.org/privacy/>]
- [Facebook App], [Shopify International Ltd.], Privacy Policy: [<https://www.shopify.com/legal/privacy>]
- [Feed For Google Shopping], [Simpros Sys InfoMedia], Privacy Policy: [<https://support.simprosystech.com/faq/google-shopping-feed-privacy-policy>]
- [Metafields Editor], [Webify Technology Inc], Privacy Policy: [<https://docs.google.com/document/d/1MU8rgWTVgpTx8dJk7kXtebIVorEP6GbZwRvJVxyJOrGA/edit>]
- [Product Upsell], [Bold Innovation Group LTD.], Privacy Policy: [<https://boldcommerce.com/legal#our-privacy-policy>]
- [Cross Sell], [SURESWIFT CAPITAL INC..], Privacy Policy: [<https://csell.co/privacy-policy>]
- [Referral Candy], [Anafore Pte. Ltd.], Privacy Policy: [<https://www.referralcandy.com/privacy/>]
- [Shogun Page Builder], [Shogun Labs, Inc. ], Privacy Policy: [<https://getshogun.com/privacy>]
- [Seguno], [Seguno Software, Inc.], Privacy Policy: [<https://www.seguno.com/privacy>]
- [ShopSync], [ShopSync, LLC], Privacy Policy: [<https://shopsync.io/privacy-policy>]
- [Supermetrics], [Supermetrics Oy], Privacy Policy: [<https://supermetrics.com/privacy-policy>]
- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Web Analytics (e.g. access statistics, recognition of returning visitors), Profiles with user-related information (Creating user profiles), Clicktracking, A/B Tests, Feedback (e.g. collecting feedback via online form), Heatmaps ("Heatmaps" are mouse movements of the users, which are combined to an overall picture.), Polls and Questionnaires (e.g. surveys with input options, multiple choice questions), Marketing.
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Google Analytics:** web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
  
Website: <https://marketingplatform.google.com/intl/en/about/analytics/>;  
  
Privacy Policy: <https://policies.google.com/privacy>.
- **Hotjar:** Testing and Optimization; Service provider: Hotjar Ltd., 3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta ;

Website: <https://www.hotjar.com>;

Privacy Policy: <https://www.hotjar.com/legal/policies/privacy>.

Cookie Policy: <https://www.hotjar.com/legal/policies/cookie-information>; Retention period: The cookies that Hotjar uses have a different "lifetime"; some last up to 365 days, some only last during the current visit;

Opt-Out: <https://www.hotjar.com/legal/compliance/opt-out>.

## Onlinemarketing

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

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

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

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

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

As a matter of principle, we only gain access to summarised information about the performance of our advertisements. However, within the framework of so-called conversion measurement, we can check which of our online marketing



processes have led to a so-called conversion, i.e. to the conclusion of a contract with us. The conversion measurement is used alone for the performance analysis of our marketing activities.

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

**Information on legal basis:** If we ask users for their consent (e.g. in the context of a so-called "cookie banner consent"), the legal basis for processing data for online marketing purposes is this consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

**Google Analytics Audiences:** We use Google Analytics to display ads placed by Google and its partners only to users who have shown an interest in our online services or who have specific characteristics (e.g. interests in specific topics or products determined on the basis of the websites visited) that we transmit to Google (so-called "Remarketing Audiences" or "Google Analytics Audiences"). With the help of remarketing audiences, we also want to ensure that our ads match the potential interest of users.

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

We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or transmission (but not the further processing) of "event data" that Facebook collects or receives as part of a transmission for the following purposes using the Facebook pixel and comparable functions (e.g. APIs) that are implemented in our online services: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)), which specifically addresses the security measures that

Facebook must take ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", <https://www.facebook.com/legal/terms/dataprocessing>), the "Data Security Conditions" ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum", [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Event Data (Facebook) ("Event Data" is data that can be transmitted from us to Facebook, e.g. via Facebook pixels (via apps or other means) and relates to persons or their actions; the data includes, for example, information about visits to websites, interactions with content, functions, installations of apps, purchases of products, etc.; Event data is processed for the purpose of creating target groups for content and advertising information (Custom Audiences); Event Data does not include the actual content (such as written comments), login information, and Contact Information (such as names, email addresses, and phone numbers). Event Data is deleted by Facebook after a maximum of two years, the Custom Audiences created from them with the deletion of our Facebook account).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Marketing, Profiles with user-related information (Creating user profiles), Remarketing, Custom Audiences (Selection of relevant target groups for marketing purposes or other output of content), Conversion tracking (Measurement of the effectiveness of marketing activities), Affiliate Tracking.
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).
- **Opt-Out:** We refer to the privacy policies of the respective service providers and the possibilities for objection (so-called "opt-out"). If no explicit opt-out option has been specified, it is possible to deactivate cookies in the settings of your browser. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered collectively for each area:
  - a) Europe: <https://www.youronlinechoices.eu>. b) Canada: <https://www.youradchoices.ca/choices>. c) USA: <https://www.aboutads.info/choices>. d) Cross-regional: <https://optout.aboutads.info>.

**TikTok Pixel:** Within our online offer, the so-called "TikTok pixel" of the social network TikTok, which is operated by TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland ("TikTok"), is used. A TikTok pixel is a snippet of HTML code that is loaded when a user visits a website. With the help of the TikTok pixel, it is possible for TikTok, on the one hand, to determine you as a visitor to our online offer as a target group for the display of advertisements (so-called "TikTok ads"). Accordingly, we use the TikTok pixel to display the TikTok ads placed by us only to those TikTok users who have also shown an interest in our online offer or who have certain characteristics (e.g. interests in certain topics or products determined on the basis of the websites visited) that we transmit to TikTok (so-called "Custom Audiences"). With the help of the TikTok pixel, we also want to ensure that our TikTok ads correspond to the potential interest of users and are not harassing. The TikTok pixel also allows us to track the effectiveness of the TikTok ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a TikTok ad (so-called "conversion").

- **Privacy Policy of TikTok:** The processing of data by TikTok takes place within the framework of [TikTok's data use policy](#). Accordingly, general information on the display of TikTok ads, in the data use policy of TikTok. For specific information and details about the TikTok Pixel and how it works, please visit [TikTok's help section](#).
- **Legal Basis:** The use of the TikTok Pixel as well as the storage of "conversion cookies" is based on Art. 6 (1) lit. a DSGVO.
- **Commissioned data processing contract:** For the processing of data where TikTok acts as commissioned data processor, we have concluded a commissioned data processing contract with TikTok, in which we oblige TikTok to protect our customers' data and not to pass it on to third parties.
- **Objection:** You can object to the collection by the TikTok pixel and use of your data to display TikTok ads. You can find an opt-out option in our [Cookie Statement](#) [<https://www.madamekukla.com/pages/datenschutzerklaerung>]

#### Services and service providers being used:

- **Google Analytics:** Online marketing and web analytics; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
  
Website: <https://marketingplatform.google.com/intl/en/about/analytics/>;  
  
Privacy Policy: <https://policies.google.com/privacy>;  
  
Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>,  
  
Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.
- **Google Analytics Audiences:** Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
  
Website: <https://marketingplatform.google.com>;  
  
Privacy Policy: <https://policies.google.com/privacy>.
- **Google Ads and Conversion Tracking:** We use the Google "Ads" online marketing method to place ads on the Google advertising network (e.g., in search results, videos, websites, etc.) so that they are displayed to users who have an alleged interest in the ads. We also measure the conversion of the ads. However, we only know the anonymous total number of users who clicked on our ad and were redirected to a page tagged with a conversion tracking tag. However, we ourselves do not receive any information that can be used to identify users. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
  
Website: <https://marketingplatform.google.com>;  
  
Privacy Policy: <https://policies.google.com/privacy>.
- **Google Signals:** Additional marketing options that apply only to users who have enabled personalized ads on Google (<https://support.google.com/ads/answer/2662856>) and include device-based and cross-device data processing; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
  
Website: <https://support.google.com/analytics/answer/7532985?hl=en>;  
  
Privacy Policy: <https://policies.google.com/privacy>;  
  
Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>,  
  
Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

- Facebook Pixel and Custom Audiences (Custom Audiences):** Service provider: <https://www.facebook.com>, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA;  
 Website: <https://www.facebook.com>;  
 Privacy Policy: <https://www.facebook.com/about/privacy>;  
 Opt-Out: <https://www.facebook.com/settings?tab=ads>.
- TikTok:** Service provider Social network / video platform; Service provider: [musical.ly](https://www.tiktok.com/), Inc, 10351 Santa Monica Blvd #310, Los Angeles, CA 90025 USA;  
 Website: <https://www.tiktok.com/>;  
 Privacy Policy: <https://www.tiktok.com/de/privacy-policy>;
- Amazon:** Marketing of advertising media and advertising spaces; Service provider: Amazon Europe Core S.à.r.l., Amazon EU S.à.r.l., Amazon Services Europe S.à.r.l. and Amazon Media EU S.à.r.l., all four located at 38, avenue John F. Kennedy, L-1855 Luxembourg, and Amazon Instant Video Germany GmbH, Domagkstr. 28, 80807 Munich (together "Amazon Europe"), parent company: Amazon.com, Inc., 2021 Seventh Ave, Seattle, Washington 98121, USA;  
 Website: <https://www.amazon.com>;  
 Privacy Policy: <https://www.amazon.com/gp/help/customer/display.html?nodeId=201909010>.
- Microsoft Advertising:** Remarketing / Conversion measurement; Service provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA;  
 Website: <https://about.ads.microsoft.com/de-de>;  
 Privacy Policy: <https://privacy.microsoft.com/de-de/privacystatement>;  
 Opt-Out: <https://choice.microsoft.com/de-DE/opt-out>.
- Pinterest Web Analytics:** Online marketing and web analytics; Service provider: Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA;;  
 Website: <https://analytics.pinterest.com/>;  
 Privacy Policy: <https://about.pinterest.com/de/privacy-policy>.
- Supermetrics:** Service to produce marketing reports and statistics for the purpose of monitoring, evaluating and planning marketing campaigns (including by incorporating and processing data provided or uploaded by other services). Service provider: Supermetrics Oy, Company ID: 2552282-5, Mikonkatu 700100 Helsinki, Finland;  
 Website: <https://supermetrics.com/>;

Privacy Policy: <https://supermetrics.com/privacy-policy>.

- **Taboola:** Integration of personalized content and content recommendations; Service provider: Taboola, Inc. 16 Madison Square West 7th Floor New York, New York 10010, USA;

Website: <https://www.taboola.com>;

Privacy Policy: <https://www.taboola.com/privacy-policy>; Standard Contractual Clauses (Safeguarding the level of data protection when processing data in third countries): Use in contracts with subcontractors; Retention period: Taboola stores user information collected directly for the purpose of ad placement for a maximum of eighteen (18) months after the user's last interaction with the Taboola Services and anonymizes it by removing personal identifiers or aggregating data. Taboola stores anonymous or aggregated data that cannot identify a person or device and is used for reporting and analysis purposes for as long as is commercially necessary.;

Opt-Out: <https://www.taboola.com/privacy-policy#user-choices-and-optout>.

- **Facebook Conversion API:** We use the tracking tool Facebook Conversion API of Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, a subsidiary of Facebook Inc. 1601, Willow Road Menlo Park, CA 94025, USA. This is a data interface through which we transmit data about your behavior as a user of our website to Facebook for evaluation. This allows us to show you advertisements that match your user behavior on our website. In connection with the Conversion API, we use the following data:
  - o Email address
  - o Telephone number
  - o Gender
  - o Date of birth
  - o City, state and country
  - o Postal code

We transmit the data to Facebook. In the process, the data is also transmitted to Facebook in the USA. This is done on the basis of EU standard contractual clauses, which ensure an adequate level of data protection ("Facebook EU Data Transfer Addendum", [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)). The legal basis for data processing is your consent (Article 6 (1) (lit. a) GDPR) or, if applicable, our legitimate interest (Article 6 (1) (lit f) GDPR). You can revoke your consent for data processing by Facebook Pixel for our web domain at any time with future effect by adjusting your preferences in our [cookie settings](#).

- **TikTok Pixel:** A TikTok pixel is a snippet of HTML code that is loaded when a user visits a website. When a user comes to our online offering, the pixel is triggered and tracks the user's behavior and conversions (possible uses: measuring campaign performance, optimizing ad delivery, building custom and lookalike audiences); Service Provider: musical.ly Inc, 10351 Santa Monica Blvd #310, Los Angeles, CA 90025 USA;  
Website: <https://ads.tiktok.com/help/article?aid=6669727593823993861>;  
Privacy Policy: <https://www.tiktok.com/de/privacy-policy>;

## Affiliate-Programms und Affiliate-Links

Within our online services, we include so-called affiliate links or other references (which for example may include search forms, widgets or discount codes) to the offers and services of third parties (collectively referred to as "affiliate links"). When users follow affiliate links or subsequently take advantage of offers, we may receive commission or other benefits (collectively referred to as "commission") from these third parties.

In order to be able to track whether the users have followed the offers of an affiliate link used by us, it is necessary for the respective third party to know that the users have followed an affiliate link used within our online services. The assignment of affiliate links to the respective business transactions or other actions (e.g., purchases) serves the sole purpose of commission settlement and is removed as soon as it is no longer required for this purpose.

For the purposes of the aforementioned affiliate link assignment, the affiliate links may be supplemented by certain values that may be a component of the link or otherwise stored, for example, in a cookie. The values may include in particular the source website (referrer), time, an online identifier of the operator of the website on which the affiliate link was located, an online identifier of the respective offer, the type of link used, the type of offer and an online identifier of the user.

**Information on legal basis:** If we ask the users for their consent to the use of third party providers, the legal basis of the processing is consent. Furthermore, the processing can be a component of our (pre)contractual services, provided that the use of the third party was agreed within this context. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

**Processed data types:** Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), User-information (e.g. name, city, state and country, postal code, payment method).

- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Affiliate Tracking.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

### Services and service providers being used:

- **Amazon Affiliate Program:** Amazon Affiliate Program - Amazon and the Amazon logo are trademarks of Amazon.com, Inc. or one of its affiliates. Service provider: Amazon Europe Core S.à.r.l., Amazon EU S.à.r.l., Amazon Services Europe S.à.r.l. and Amazon Media EU S.à.r.l., all four located at 38, avenue John F. Kennedy, L-1855 Luxembourg, and Amazon Instant Video Germany GmbH, Domagkstr. 28, 80807 Munich



(together "Amazon Europe"), parent company: Amazon.com, Inc., 2021 Seventh Ave, Seattle, Washington 98121, USA.;

Website: <https://www.amazon.com>;

Privacy Policy: <https://www.amazon.com/gp/help/customer/display.html?nodeId=201909010>.

- **Refersion – Affiliate Marketing** – Dienstleister: Refersion, Inc., 9696 Culver Blvd. Suite 308, Culver City CA 90232. Website: <https://www.refersion.com/>.

Privacy Policy: <https://www.refersion.com/privacy/>

## Rating Platforms

We participate in rating procedures to evaluate, optimise and advertise our performance. If users rate us via the participating rating platforms or methods or otherwise provide feedback, the General Terms and Conditions of Business or Use and the data protection information of the providers also apply. As a rule, the rating also requires registration with the respective provider.

In order to ensure that the evaluators have actually made use of our services, we transmit, with the consent of the customer, the necessary data relating to the customer and the service or products used to the respective rating platform (this includes the name, e-mail address, order number or article number). This data is used solely to verify the authenticity of the user.

**Rating Widget:** We include so-called " rating widgets " in our online services. A widget is a functional and content element integrated within our online services that displays variable information (e.g. a widget can be displayed in the form of a seal or a badge). Although the corresponding content of the widget is displayed within our online services, it is retrieved from the servers of the respective widget provider at this moment. This is the only way to always show the current content, especially the current rating. For this purpose, a data connection must be established from the website accessed within our online service to the widget provider's server and the widget provider receives certain technical data (access data, including the IP address) that is necessary for the content of the widget to be delivered to the user's browser.

In addition, the widget provider receives information that users have visited our online services. This information may be stored in a cookie and used by the widget provider to identify which online offerings participating in the rating process have been visited by the user. The information can be stored in a user profile and used for advertising or market research purposes.

- **Processed data types:** Contract data (e.g. contract object, duration, customer category), Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Feedback (e.g. collecting feedback via online form), Marketing.
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Trusted Shops (Trustedbadge):** Ratings and Widget (Trustedbadge); Service provider: Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Köln, Germany;

Website: <https://www.trustedshops.de>;

Privacy Policy: <https://www.trustedshops.de/impressum/#datenschutz>.

## Profiles in Social Networks (Social Media)

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

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

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

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

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

**Facebook:** We are jointly responsible (so called "joint controller") with Facebook Ireland Ltd. for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: <https://www.facebook.com/policy>). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site operators to help them understand how people interact with their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfill the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information about Page Insights" ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)).

- **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 data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Contact requests and communication, Feedback (e.g. collecting feedback via online form), Marketing.
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

#### Services and service providers being used:

- **Instagram:** Social network; Service provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA;  
Website: <https://www.instagram.com>;  
Privacy Policy: <https://instagram.com/about/legal/privacy>.
- **Facebook:** Social network; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA;  
Website: <https://www.facebook.com>;  
Privacy Policy: <https://www.facebook.com/about/privacy>;

Opt-Out: Settings for advertisements: <https://www.facebook.com/settings?tab=ads>.

- **LinkedIn:** Social network; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland;

Website: <https://www.linkedin.com>;

Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>;

Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

- **Pinterest:** Social network; Service provider: Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA,;

Website: <https://www.pinterest.com>;

Privacy Policy: <https://about.pinterest.com/de/privacy-policy>;

Opt-Out: <https://about.pinterest.com/de/privacy-policy>.

- **YouTube:** Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;

Privacy Policy: <https://policies.google.com/privacy>;

Opt-Out: <https://adssettings.google.com/authenticated>.

## 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.

**Information on legal basis:** If we ask users for their consent (e.g. in the context of a so-called "cookie banner consent"), the legal basis for processing is this consent. Otherwise, user data will be processed on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online services. We refer you to the note on the use of cookies in this privacy policy.

**Facebook plugins and contents:** We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or transmission (but not further processing) of "Event Data" that Facebook collects or receives as part of a transmission using the Facebook Social Plugins that run on our website for the following purposes: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)), which specifically addresses the security measures that Facebook must take ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", <https://www.facebook.com/legal/terms/dataprocessing/update>), the "Data Security Conditions" ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum", [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook.

**Instagram plugins and contents:** We are jointly responsible (so-called "joint-controllership") with Facebook Ireland Ltd. for the collection or transmission (but not further processing) of "Event Data" that Facebook collects or receives as part of a transmission using Instagram functions that run on our website for the following purposes: a) displaying content advertising information that matches users' presumed interests; b) delivering commercial and transactional messages (e.g. b) delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger); c) improving ad delivery and personalizing features and content (e.g., improving recognition of which content or advertising information is believed to be of interest to users). We have entered into a special agreement with Facebook ("Controller Addendum", [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)), which specifically addresses the security measures that Facebook must take ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and in which Facebook has agreed to comply with the rights of data subjects (i.e., users can, for example, submit information access or deletion requests directly to Facebook). Note: If Facebook provides us with measurements, analyses and reports (which are aggregated, i.e. do

not contain information on individual users and are anonymous to us), then this processing is not carried out within the scope of joint responsibility, but on the basis of a DPA ("Data Processing Terms", <https://www.facebook.com/legal/terms/dataprocessing/update>), the "Data Security Conditions" ([https://www.facebook.com/legal/terms/data\\_security\\_terms](https://www.facebook.com/legal/terms/data_security_terms)) and, with regard to processing in the USA, on the basis of Standard Contractual Clauses ("Facebook EU Data Transfer Addendum, [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), Meta/communication data (e.g. device information, IP addresses), Event Data (Facebook) ("Event Data" is data that can be transmitted from us to Facebook, e.g. via Facebook pixels (via apps or other means) and relates to persons or their actions; the data includes, for example, information about visits to websites, interactions with content, functions, installations of apps, purchases of products, etc.; Event data is processed for the purpose of creating target groups for content and advertising information (Custom Audiences); Event Data does not include the actual content (such as written comments), login information, and Contact Information (such as names, email addresses, and phone numbers). Event Data is deleted by Facebook after a maximum of two years, the Custom Audiences created from them with the deletion of our Facebook account), Inventory data (e.g. names, addresses), Contact data (e.g. e-mail, telephone numbers), Content data (e.g. text input, photographs, videos).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability, Provision of contractual services and customer support, Marketing, Profiles with user-related information (Creating user profiles).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR), Consent (Article 6 (1) (a) GDPR), Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

#### Services and service providers being used:

- **Facebook plugins and contents:** Facebook Social Plugins and contents - This can include content such as images, videos or text and buttons with which users can share content from this online service within Facebook. The list and appearance of the Facebook Social Plugins can be viewed here: <https://developers.facebook.com/docs/plugins/>; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA;  
  
Website: <https://www.facebook.com>;  
  
Privacy Policy: <https://www.facebook.com/about/privacy>;

Opt-Out: Settings for advertisements: <https://www.facebook.com/settings?tab=ads>.

- **Google Fonts:** We integrate the fonts ("Google Fonts") of the provider Google, whereby the data of the users are used solely for purposes of the representation of the fonts in the browser of the users. The integration takes place on the basis of our legitimate interests in a technically secure, maintenance-free and efficient use of fonts, their uniform presentation and consideration of possible licensing restrictions for their integration. Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;

Website: <https://fonts.google.com/>;

Privacy Policy: <https://policies.google.com/privacy>.

- **Instagram plugins and contents:** Instagram plugins and contents - This can include content such as images, videos or text and buttons with which users can share content from this online service within Instagram . Service provider: <https://www.instagram.com>, Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA;

Website: <https://www.instagram.com>;

Privacy Policy: <https://instagram.com/about/legal/privacy>.

- **Pinterest plugins and contents:** Pinterest plugins and contents- This can include content such as images, videos or text and buttons with which users can share content from this online service within Pinterest. Service provider: Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA,;

Website: <https://www.pinterest.com>;

Privacy Policy: <https://about.pinterest.com/de/privacy-policy>.

- **YouTube videos:** Video contents; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, , parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;

Website: <https://www.youtube.com>;

Privacy Policy: <https://policies.google.com/privacy>;

Opt-Out: Opt-Out-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>,

Settings for the Display of Advertisements: <https://adssettings.google.com/authenticated>.

## 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.

## 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.

## Rights of Data Subjects

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.

Supervisory authority competent for us:

You always have the right to gain insight into your personal data or rather to get information about your personal data that was stored by us (right of access), to correct or rather complete incorrect or incompletely saved personal data (right of rectification), to delete your stored personal data (right of erasure), and to restrict it or rather transmit it to a third party if permitted (right of data transmission).

Furthermore, you may object to any submitted consent (e.g. when registering for the newsletter) at any time. The lawfulness of the data processing on the basis of your consent shall remain unaffected by the objection and is not unlawful due to the subsequent cease of your consent.

If you are of the opinion that the processing of your data violates data protection law or your data protection rights, please contact us (hello@madamekukla.com or 0043 650 490 7 490) and we will try to settle this. You also have the right to complain to the Austrian data protection authority (www.dsb.gv.at) directly at any time.

## Terminology and Definitions

This section provides an overview of the terms used in this privacy policy. Many of the terms are drawn from the law and defined mainly in Article 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are intended above all for the purpose of comprehension. The terms are sorted alphabetically.

- **A/B Tests:** A/B tests are designed to improve the usability and performance of online services. For example, users are presented with different versions of a website or its elements, such as input forms, on which the placement of the contents or labels of the navigation elements can differ. The behaviour of users, e.g. prolonged visits to the site or more frequent interaction with the elements, can then be used to determine which of these sites or elements are more responsive to users' needs.
- **Affiliate Tracking:** Custom Audiences refers to the process of determining target groups for advertising purposes, e.g. the display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to conclude that the user is interested in advertisements for similar products or the online store in which the user viewed the products. "Lookalike Audiences" is the term used to describe content that is viewed as suitable by users whose profiles or interests presumably correspond to the users for whom the profiles were created. For the purposes of creating custom audiences and lookalike audiences, cookies and web beacons are typically used.
- **Clicktracking:** Clicktracking allows users to keep track of their movements within an entire website. Since the results of these tests are more accurate if the interaction of the users can be followed over a certain period of time (e.g. if a user likes to return), cookies are usually stored on the computers of the users for these test purposes.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Conversion tracking:** Conversion tracking is a method used to evaluate the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the devices of the users within the websites on which the marketing measures take place and then called up again on the target website (e.g. we can thus trace whether the advertisements placed by us on other websites were successful).
- **Custom Audiences:** Target group formation (or "custom audiences") is the term used when target groups are determined for advertising purposes, e.g. display of advertisements. For example, a user's interest in certain products or topics on the Internet may be used to infer that that user is interested in advertisements for similar products or the online store in which they viewed the products. Lookalike Audiences" (or similar target groups) is the term used to describe content that is viewed as suitable by users whose profiles or interests presumably correspond to the users for whom the profiles were created. Cookies are generally used for the purposes of creating custom audiences and lookalike audiences. Target groups can be created by

processing visitors of an online service or can be uploaded to the provider of an online marketing technology by means of uploading (which is usually done pseudonymised).

- **Heatmaps:** "Heatmaps" are mouse movements of the users, which are combined to an overall picture, with the help of which it can be recognized, for example, which web page elements are preferred and which web page elements users prefer less.
- **IP Masking:** IP masking is a method by which the last octet, i.e. the last two numbers of an IP address, are deleted so that the IP address alone can no longer be used to uniquely identify a person. IP masking is therefore a means of pseudonymising processing methods, particularly in online marketing.
- **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.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Remarketing:** Remarketing" or "retargeting" is the term used, for example, to indicate for advertising purposes which products a user is interested in on a website in order to remind the user of these products on other websites, e.g. in advertisements.
- **Web Analytics:** Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize at what time visitors visit their website and what content they are interested in. This allows them, for example, to optimize the content of the website to better meet the needs of their visitors. For purposes of web analytics, pseudonymous cookies and web beacons are frequently used in order to recognise returning visitors and thus obtain more precise analyses of the use of an online service.

