

# Data Protection Declaration

## 1) Information on the Collection of Personal Data and Contact Details of the Controller

**1.1** We are pleased that you are visiting our website and thank you for your interest. On the following pages, we inform you about the handling of your personal data when using our website. Personal data is all data with which you can be personally identified.

**1.2** The controller in charge of data processing on this website, within the meaning of the General Data Protection Regulation (GDPR), is ZOÉ LU GmbH, Osterwaldstraße 10, Haus H, 80805 München, Deutschland, Tel.: +49 (0) 1731709247, E-Mail: info@zoelu.com. The controller in charge of the processing of personal data is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data.

## 2) Data Collection When You Visit Our Website

**2.1** When using our website for information only, i.e. if you do not register or otherwise provide us with information, we only collect data that your browser transmits to our server (so-called "server log files"). When you visit our website, we collect the following data that is technically necessary for us to display the website to you:

- Our visited website
- Date and time at the moment of access
- Amount of data sent in bytes
- Source/reference from which you came to the page
- Browser used
- Operating system used
- IP address used (if applicable: in anonymized form)

Data processing is carried out in accordance with Art. 6 (1) point f GDPR on the basis of our legitimate interest in improving the stability and functionality of our website. The data will not be passed on or used in any other way. However, we reserve the right to check the server log files subsequently, if there are any concrete indications of illegal use.

**2.2** This website uses SSL or TLS encryption for security reasons and to protect the transmission of personal data and other confidential content (e.g. orders or inquiries to the controller). You can recognize an encrypted connection by the character string https:// and the lock symbol in your browser line.

## 3) Cookies

In order to make your visit to our website more attractive and to enable the use of certain functions, we use cookies, i.e. small text files that are stored on your end device. In some cases, these cookies are automatically deleted again after the browser is closed

(so-called "session cookies"), in other cases, these cookies remain on your end device for longer and allow page settings to be saved (so-called "persistent cookies"). In the latter case, you can find the duration of the storage in the overview of the cookie settings of your web browser.

If personal data is also processed by individual cookies set by us, the processing is carried out either in accordance with Art. 6 (1) point b GDPR for the performance of the contract, in accordance with Art. 6 (1) point a GDPR in the case of consent given or in accordance with Art. 6 (1) point f GDPR to safeguard our legitimate interests in the best possible functionality of the website as well as a customer-friendly and effective design of the page visit.

You can set your browser in such a way that you are informed about the setting of cookies and you can decide individually about their acceptance or exclude the acceptance of cookies for certain cases or in general.

Please note that the functionality of our website may be limited if cookies are not accepted.

## **4) Contacting Us**

### **4.1 WhatsApp Business**

We offer visitors to our website the opportunity to contact us via the WhatsApp news service of WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. For this purpose, we use the so-called "Business Version" of WhatsApp.

If you contact us via WhatsApp in connection with a specific business transaction (e.g. an order placed), we will store and use the mobile telephone number you use at WhatsApp and - if provided - your first name and surname in accordance with Art. 6 para. 1 lit. b. GDPR to process and answer your request. Based on the same legal basis, we will ask you via WhatsApp to provide further data (order number, customer number, address or e-mail address), if necessary, in order to be able to allocate your enquiry to a specific transaction.

If you use our WhatsApp contact for general enquiries (e.g. about the range of services, availability or our website), we will store and use the mobile phone number you use at WhatsApp and - if provided - your first and last name in accordance with Art. 6 Para. 1 lit. f GDPR based on our justified interest in the efficient and prompt provision of the requested information.

Your data will always be used only to answer your request via WhatsApp. Your data will not be passed on to third parties.

Please note that WhatsApp Business gains access to the address book of the mobile device we use for this purpose and automatically transfers telephone numbers stored in the address book to a server of the parent company Meta Platforms Inc. in the USA. To operate our WhatsApp Business account, we use a mobile device whose address book saves only the WhatsApp contact data of those users who have also contacted us via

WhatsApp.

This ensures that each person whose WhatsApp contact data is stored in our address book has already consented to the transmission of his WhatsApp telephone number from the address books of his chat contacts in accordance with Art. 6 Para. 1 lit. a GDPR when using the app on his device for the first time by accepting the WhatsApp terms of use. The transmission of data of such users who do not use WhatsApp and/or have not contacted us via WhatsApp is therefore excluded.

For the purpose and scope of data collection and the further processing and use of data by WhatsApp, as well as your rights and setting options for protecting your privacy, please refer to WhatsApp's data protection information:

<https://www.whatsapp.com/legal/?eea=1#privacy-policy>

In the course of the above-mentioned processing, data may be transferred to servers of Meta Platforms Inc. in the USA.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

**4.2** When you contact us (e.g. via contact form or e-mail), personal data is collected. Which data is collected in the case of a contact form can be seen from the respective contact form. This data is stored and used exclusively for the purpose of responding to your request or for establishing contact and for the associated technical administration.

The legal basis for processing data is our legitimate interest in responding to your request in accordance with Art. 6 (1) point f GDPR. If your contact is aimed at concluding a contract, the additional legal basis for the processing is Art. 6 (1) point b GDPR. Your data will be deleted after final processing of your enquiry; this is the case if it can be inferred from the circumstances that the facts in question have been finally clarified, provided there are no legal storage obligations to the contrary.

## **5) Data Processing When Opening a Customer Account and for Contract Processing**

Pursuant to Art. 6 (1) point b GDPR, personal data will continue to be collected and processed to the extent required in each case if you provide us with this data when opening a customer account. The data required for opening an account can be found in the input mask of the corresponding form on our website. Deletion of your customer account is possible at any time and can be done by sending a message to the above address of the person responsible. After deletion of your customer account, your data will be deleted, provided that all contracts concluded via it have been fully processed, no legal retention periods are opposed and no legitimate interest on our part in the continued storage exists.

## **6) Commentary Function**

Within the scope of the commentary function on this website, in addition to your comment, information on the time of writing the comment and the name of the commentator you have chosen is stored and published on the website. Furthermore, your IP address is logged and stored. This IP address is stored for security reasons, in case the person concerned violates the rights of third parties or posts illegal content by submitting a comment. We need your e-mail address to contact you if a third party should object to your published content as unlawful. The legal basis for the storage of your data is Art. 6 (1) point b and f GDPR. We reserve the right to delete comments if they are objected to as unlawful by third parties.

## **7) Use of Client Data for Direct Advertising**

### **7.1 Subscribe to our e-mail newsletter**

If you register for our e-mail newsletter, we will regularly send you information about our offers. The only mandatory data for sending the newsletter is your e-mail address. The provision of further data is voluntary and will be used to address you personally. We use the so-called double opt-in procedure for sending the newsletter. This means that we will only send you an e-mail newsletter once you have expressly confirmed that you consent to receiving newsletters. We will then send you a confirmation e-mail asking you to confirm that you wish to receive the newsletter in future by clicking on an appropriate link.

By activating the confirmation link, you give us your consent for the use of your personal data pursuant to Art. 6 (1) point a GPPR. When you register for the newsletter, we store your IP address entered by your Internet service provider (ISP) as well as the date and time of registration for the purpose of tracing any possible misuse of your e-mail address at a later date. The data collected by us when you register for the newsletter is used exclusively for the promotional purposes by way of the newsletter. You can unsubscribe from the newsletter at any time via the link provided for this purpose in the newsletter or by sending a corresponding message to the responsible person named at the beginning. After unsubscribing, your e-mail address will be deleted from our newsletter distribution list immediately, unless you have expressly consented to further use of your data, or we reserve the right to a more extensive use your data which is permitted by law and about which we inform you in this declaration.

### **7.2 Klaviyo**

Our e-mail newsletters are sent via this provider: Klaviyo", 225 Franklin St, Boston, MA 02110, USA

On the basis of our legitimate interest in effective and user-friendly newsletter marketing, we pass on the data you provided when registering for the newsletter to this provider in accordance with Art. 6 (1) point f GDPR so that they can send the newsletter on our behalf.

Subject to your express consent pursuant to Art. 6 (1) point a GDPR, the provider also carries out a statistical analysis of the success of newsletter campaigns by means of web beacons or tracking pixels in the emails sent, which can measure opening rates and specific interactions with the newsletter content. In the process, end device information (e.g. time of page view, IP address, browser type and operating system) is also collected and analysed, but not combined with other data records.

You can revoke your consent to newsletter tracking at any time with effect for the future.

We have concluded an order processing agreement with the provider, which safeguards the data of our website visitors and prohibits a transfer to third parties.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

### **7.3 WhatsApp newsletter**

If you subscribe to our WhatsApp newsletter, we will regularly send you information about our offers via WhatsApp. Only your mobile phone number is required for sending the newsletter.

To send the newsletter, please add our mobile phone number to the address book of your mobile phone and send us the message "Start" via WhatsApp. By sending this WhatsApp message, you give us your consent to use your personal data in accordance with Art. 6 (1) point a GDPR for the purpose of sending the newsletter. We will then add you to our newsletter distribution list.

The data we collect when you subscribe to the newsletter will be processed exclusively for the purpose of addressing you in an advertising manner by the newsletter. You can unsubscribe from the newsletter at any time by sending us the message "Stop" via WhatsApp. After unsubscribing, your mobile phone number will be immediately deleted from our newsletter distribution list, unless you have expressly consented to further use of your data or we reserve the right to use data beyond this, which is legally permitted and about which we inform you in this policy.

Please note that WhatsApp obtains access to the address book of the mobile device used by us for sending the newsletter and automatically transfers telephone numbers stored in the address book to a Facebook server in the USA.

For sending our WhatsApp newsletter, we therefore use a mobile end device in whose address book only the WhatsApp contact data of our newsletter recipients are stored. This ensures that each person whose WhatsApp contact data is stored in our address book has already consented to the transfer of their WhatsApp telephone number from the address books of their chat contacts in accordance with Art. 6 (1) point a GDPR when using the app on their device for the first time by accepting the WhatsApp terms of use.

A transfer of data of such users who do not use WhatsApp and/or have not contacted us via WhatsApp is excluded in this respect.

For the purpose and scope of the data collection and the further processing and use of the data by WhatsApp, as well as your rights in this regard and setting options for protecting your privacy, please refer to the WhatsApp privacy policy:  
<https://www.whatsapp.com/legal/privacy-policy-eea?lang=en>

In the course of the above-mentioned processing, data may be transferred to servers of Meta Platforms Inc. in the USA.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **8) Processing of Data for the Purpose of Order Handling**

**8.1** Insofar as necessary for the processing of the contract for delivery and payment purposes, the personal data collected by us will be passed on to the commissioned transport company and the commissioned credit institution in accordance with Art. 6 (1) lit. b GDPR.

If we owe you updates for goods with digital elements or for digital products on the basis of a corresponding contract, we will process the contact data (name, address, e-mail address) provided by you when placing the order in order to inform you personally by suitable means of communication (e.g. by post or e-mail) about upcoming updates within the legally stipulated period of time within the framework of our statutory duty to inform pursuant to Art. 6 (1) lit. c GDPR. Your contact details will be used strictly for the purpose of informing you about updates owed by us and will only be processed by us for this purpose to the extent necessary for the respective information.

In order to process your order, we also work together with the following service provider(s), who support us in whole or in part in the execution of concluded contracts. Certain personal data is transmitted to these service providers in accordance with the following information.

### **8.2 Use of Payment Service Providers**

- Amazon Pay

Online payment methods from the following provider are available on this website:  
Amazon Payments Europe s.c.a., 38 avenue John F. Kennedy, L-1855 Luxembourg

If you select a payment method of the provider for which you make an advance payment (e.g. credit card payment), your payment data provided during the ordering process (including name, address, bank and payment card information, currency and transaction number) as well as information about the content of your order will be passed on to the provider in accordance with Art. 6 (1) point b GDPR. In this case, your data will only be passed on for the purpose of processing payment with the provider and

only to the extent necessary for this purpose.

#### - Apple Pay

If you choose the payment method "Apple Pay" of Apple Distribution International (Apple), Hollyhill Industrial Estate, Hollyhill, Cork, Ireland, the payment processing is carried out via the "Apple Pay" function of your terminal device operated with iOS, watchOS or macOS by debiting a payment card deposited with "Apple Pay". Apple Pay uses security features built into the hardware and software of your device to protect your transactions. In order to release a payment, it is therefore necessary to enter a code previously defined by you and to verify it using the "Face ID" or "Touch ID" function of your terminal.

For the purpose of payment processing, your information provided during the ordering process, along with information about your order, will be transmitted to Apple in encrypted form. Apple then encrypts this data again with a developer-specific key before the data is transmitted to the payment service provider of the payment card stored in Apple Pay for payment processing. The encryption ensures that only the website from which the purchase was made can access the payment information. After the payment is made, Apple sends your device account number and a transaction-specific dynamic security code to the originating website to confirm the payment.

If personal data is processed in the described transmissions, the processing is carried out exclusively for the purpose of payment processing in accordance with Art. 6 Para. 1 lit. b GDPR.

Apple retains anonymised transaction data, including the approximate amount of the purchase, the approximate date and time and whether the transaction was completed successfully. Anonymisation completely excludes any personal reference. Apple uses the anonymised data to improve Apple Pay and other Apple products and services.

When you use Apple Pay on iPhone or the Apple Watch to complete a purchase made through Safari on Mac, the Mac and the authorization device communicate through an encrypted channel on Apple's servers. Apple does not process or store this information in any format that can identify you personally. You can disable the ability to use Apple Pay on your Mac in your iPhone preferences. Go to "Wallet & Apple Pay" and disable "Allow payments on Mac".

For more information about Apple Pay privacy, please visit the following web address:  
<https://support.apple.com/en-gb/HT203027>

#### - Paypal

Online payment methods from the following provider are available on this website:  
PayPal (Europe) S.a.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

If you select a payment method of the provider for which you make an advance payment, your payment data provided during the ordering process (including name, address, bank and payment card information, currency and transaction number) as well as information about the content of your order will be passed on to the provider in accordance with Art. 6 (1) point b GDPR. In this case, your data will only be passed on for the purpose of processing payment with the provider and only to the extent necessary for this purpose.

When selecting a payment method of the provider with which the provider makes advance payments, you will also be asked to provide certain personal data (first name and surname, street, house number, postcode, city, date of birth, e-mail address, telephone number, if applicable data on alternative means of payment) during the ordering process.

In order to safeguard our legitimate interest in determining the solvency of our customers, this data is passed on to the provider by us for the purpose of a credit check in accordance with Art. 6 (1) point f GDPR. On the basis of the personal data provided by you as well as further data (such as shopping cart, invoice total, order history, payment history), the provider checks whether the payment option selected by you can be granted with regard to payment and/or bad debt risks.

The credit report may contain probability values (so-called score values). Insofar as score values are included in the result of the credit report, they have their basis in a scientifically recognised mathematical-statistical procedure. The calculation of the score values includes, but is not limited to, address data.

You can object to this processing of your data at any time by sending a message to us or to the provider. However, the provider may still be entitled to process your personal data if this is necessary for the contractual processing of payments.

- Paypal Checkout

Online payment methods from the following provider are available on this website:  
PayPal (Europe) S.a.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

If you select a payment method of the provider for which you make an advance payment (e.g. credit card payment), your payment data provided during the ordering process (including name, address, bank and payment card information, currency and transaction number) as well as information about the content of your order will be passed on to the provider in accordance with Art. 6 (1) point b GDPR. In this case, your data will only be passed on for the purpose of processing payment with the provider and only to the extent necessary for this purpose.

- Shopify Payments

Online payment methods from the following provider are available on this website:  
Shopify International Limited, Victoria Buildings, 1-2 Haddington Road, Dublin 4, D04 XN32, Irland

If you select a payment method of the provider for which you make an advance payment (e.g. credit card payment), your payment data provided during the ordering process (including name, address, bank and payment card information, currency and transaction number) as well as information about the content of your order will be passed on to the provider in accordance with Art. 6 (1) point b GDPR. In this case, your data will only be passed on for the purpose of processing payment with the provider and only to the extent necessary for this purpose.

- SOFORT



Online payment methods from the following provider are available on this website:  
SOFORT GmbH, Theresienhöhe 12, 80339 Munich, Germany

If you select a payment method of the provider for which you make an advance payment (e.g. credit card payment), your payment data provided during the ordering process (including name, address, bank and payment card information, currency and transaction number) as well as information about the content of your order will be passed on to the provider in accordance with Art. 6 (1) point b GDPR. In this case, your data will only be passed on for the purpose of processing payment with the provider and only to the extent necessary for this purpose.

- Stripe

Online payment methods from the following provider are available on this website:  
Stripe Payments Europe Ltd., 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland

If you select a payment method of the provider for which you make an advance payment (e.g. credit card payment), your payment data provided during the ordering process (including name, address, bank and payment card information, currency and transaction number) as well as information about the content of your order will be passed on to the provider in accordance with Art. 6 (1) point b GDPR. In this case, your data will only be passed on for the purpose of processing payment with the provider and only to the extent necessary for this purpose.

## **9) Web Analysis Services**

### **9.1 Hotjar**

This website uses the web analytics service provided by the following provider: Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta

Using cookies and/or comparable technologies (tracking pixels, web beacons, algorithms for reading end device and browser information), the service collects and stores pseudonymised visitor data, including information on the end device used such as the IP address and browser information, in order to evaluate it for statistical analyses of user behaviour on our website and to create pseudonymised user profiles. Among other things, this enables the analysis of movement patterns (so-called heat maps), which show the duration of page visits and interactions with page content (e.g. text entries, scrolling, clicks and mouse-overs). Pseudonymisation generally excludes the possibility of direct personal reference. Your personal data will not be combined with data collected in any other way.

All processing described above, in particular the reading or saving of information on the end device used, is only carried out if you have given us your express consent in accordance with Art. 6 (1) point a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service in the "cookie consent tool" provided on the website.

We have concluded an order processing agreement with the provider, which ensures the protection of our website visitors' data and prohibits unauthorised disclosure to third parties.

## **9.2 Optimizely**

This website uses the web analytics service provided by the following provider: Optimizely, Inc., 631 Howard Street, Suite 100, San Francisco, CA 94105, USA

Using cookies and/or comparable technologies (tracking pixels, web beacons, algorithms for reading end device and browser information), the service collects and stores pseudonymised visitor data, including information on the end device used such as the IP address and browser information, in order to evaluate it for statistical analyses of user behaviour on our website and to create pseudonymised user profiles. Among other things, this enables the analysis of movement patterns (so-called heat maps), which show the duration of page visits and interactions with page content (e.g. text entries, scrolling, clicks and mouse-overs). Pseudonymisation generally excludes the possibility of direct personal reference. Your personal data will not be combined with data collected in any other way.

All processing described above, in particular the reading or saving of information on the end device used, is only carried out if you have given us your express consent in accordance with Art. 6 (1) point a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service in the "cookie consent tool" provided on the website.

We have concluded an order processing agreement with the provider, which ensures the protection of our website visitors' data and prohibits unauthorised disclosure to third parties.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **10) Site Functionalities**

### **10.1 YouTube Videos**

This website uses plugins to display and play videos from the following provider: Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 ESW5, Ireland

Data may also be transmitted to: Google LLC., USA.

When you call up a page of our website that contains such a plugin, your browser establishes a direct connection to the provider's servers to load the plugin. This involves certain information, including your IP address, being transmitted to the provider.

If the playback of embedded videos is started via the plugin, the provider also uses cookies to collect information about user behavior, to create playback statistics and to

prevent abusive behavior.

If you are logged into a user account maintained by the provider during your visit to the site, your data will be directly assigned to your account when you click on a video. If you do not wish to have your data assigned to your account, you must log out before clicking on the play button.

All the above-mentioned processing, in particular the setting of cookies for reading out information on the end device used, only takes place if you have given us your express consent in accordance with Art. 6 (1) point a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service via the "cookie consent tool" provided on the website.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **10.2 reCAPTCHA**

On this website, we use the CAPTCHA service of the following provider: Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland

Data may also be transmitted to: Google LLC, USA. For the visual design of the CAPTCHA window, the provider uses "Google Fonts", i.e., fonts loaded from the Internet by Google. No further information is processed except that mentioned above, which is already transmitted to Google via the functionality of ReCaptcha.

The service checks whether an input is made by a natural person or abusively by machine and automated processing with the aim of blocking spam, DDoS attacks and similar automated malicious attacks. To ensure whether an action is performed by a human being and not by an automated bot, Cloudflare Turnstile collects the IP address of the end device used, the recognition data of the browser, the operating system type and the date and duration of the visit and transmits these data to the provider's servers to be evaluated.

This process is based on our legitimate interest in determining individual responsibility when using the Internet and in preventing abuse and spam in accordance with Art. 6 Para. 1 lit. f GDPR.

We have concluded an order processing contract with the provider, ensuring the protection of our site visitors' data and prohibiting unauthorized disclosure to third parties.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **10.3 Google Meet**

We use this provider to conduct online meetings, video conferences and/or webinars:

Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Irland

This may also result in a transmission to the servers of Google LLC. in the USA.

The provider processes different data, whereby the scope of the processed data depends on the data you provide before or during the participation in an online meeting, video conference or webinar. Your data as a communication participant is processed and stored on servers of the provider. This may include, in particular, your registration data (name, e-mail address, telephone number (optional) and password) and session data (topic, participant IP address, device information, description (optional)). In addition, participants' image and sound contributions as well as voice input in chats may be processed.

For the processing of personal data that is necessary for the performance of a contract with you (this also applies to processing operations that are necessary for the implementation of pre-contractual measures), Art. 6 (1) point b GDPR serves as the legal basis. If you have given us your consent to process your data, the processing is based on Art. 6 (1) point a GDPR. You can revoke your consent at any time with effect for the future.

In addition, the legal basis for data processing when conducting online meetings, video conferences or webinars is our legitimate interest pursuant to Art. 6 (1) point f GDPR in the effective conduct of the online meeting, webinar or video conference.

We have concluded an order processing agreement with the provider, which ensures the protection of our website visitors' data and prohibits unauthorised disclosure to third parties.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

#### **10.4 Microsoft Teams**

We use this provider to conduct online meetings, video conferences and/or webinars:  
Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399 USA

The provider processes different data, whereby the scope of the processed data depends on the data you provide before or during the participation in an online meeting, video conference or webinar. Your data as a communication participant is processed and stored on servers of the provider. This may include, in particular, your registration data (name, e-mail address, telephone number (optional) and password) and session data (topic, participant IP address, device information, description (optional)). In addition, participants' image and sound contributions as well as voice input in chats may be processed.

For the processing of personal data that is necessary for the performance of a contract with you (this also applies to processing operations that are necessary for the implementation of pre-contractual measures), Art. 6 (1) point b GDPR serves as the legal basis. If you have given us your consent to process your data, the processing is based

on Art. 6 (1) point a GDPR. You can revoke your consent at any time with effect for the future.

In addition, the legal basis for data processing when conducting online meetings, video conferences or webinars is our legitimate interest pursuant to Art. 6 (1) point f GDPR in the effective conduct of the online meeting, webinar or video conference.

We have concluded an order processing agreement with the provider, which ensures the protection of our website visitors' data and prohibits unauthorised disclosure to third parties.

For data transfers to the USA, the provider participates in the EU-US Data Privacy Framework, which ensures compliance with the European level of data protection on the basis of an adequacy decision by the European Commission.

## **10.5 Zoom**

We use this provider to conduct online meetings, video conferences and/or webinars: Zoom Video Communications Inc, 55 Almaden Blvd, Suite 600, San Jose, CA 95113, USA

The provider processes different data, whereby the scope of the processed data depends on the data you provide before or during the participation in an online meeting, video conference or webinar. Your data as a communication participant is processed and stored on servers of the provider. This may include, in particular, your registration data (name, e-mail address, telephone number (optional) and password) and session data (topic, participant IP address, device information, description (optional)). In addition, participants' image and sound contributions as well as voice input in chats may be processed.

For the processing of personal data that is necessary for the performance of a contract with you (this also applies to processing operations that are necessary for the implementation of pre-contractual measures), Art. 6 (1) point b GDPR serves as the legal basis. If you have given us your consent to process your data, the processing is based on Art. 6 (1) point a GDPR. You can revoke your consent at any time with effect for the future.

In addition, the legal basis for data processing when conducting online meetings, video conferences or webinars is our legitimate interest pursuant to Art. 6 (1) point f GDPR in the effective conduct of the online meeting, webinar or video conference.

We have concluded an order processing agreement with the provider, which ensures the protection of our website visitors' data and prohibits unauthorised disclosure to third parties.

For the transfer of data to the USA, the provider relies on standard contractual clauses of the European Commission, which are meant to ensure compliance with the European level of data protection.

## **11) Tools and Miscellaneous**

This website uses a so-called "cookie consent tool" to obtain effective user consent for cookies and cookie-based applications that require consent. The "cookie consent tool" is displayed to users in the form of an interactive user interface when they access the page, on which consent for certain cookies and/or cookie-based applications can be given by ticking the appropriate box. Using the tool, all cookies/services requiring consent are only loaded if the respective user provides the corresponding consent by ticking the corresponding box. This ensures that such cookies are only set on the respective end device of the user if consent has been granted.

The tool sets technically necessary cookies to save your cookie preferences. Personal user data is generally not processed.

If, in individual cases, personal data (such as the IP address) is processed for the purpose of storing, assigning or logging cookie settings, this is done in accordance with Art. 6 (1) point GDPR based on our legitimate interest in legally compliant, user-specific and user-friendly consent management for cookies and thus in a legally compliant design of our website.

Further legal basis for the processing is Art. 6 (1) point c GDPR. As the responsible party, we are subject to the legal obligation to make the use of technically unnecessary cookies dependent on the respective user consent.

Further information on the operator and the setting options of the cookie consent tool can be found directly in the corresponding user interface on our website.

## **12) Rights of the Data Subject**

**12.1** The applicable data protection law grants you the following comprehensive rights of data subjects (rights of information and intervention) vis-à-vis the data controller with regard to the processing of your personal data:

- Right of access by the data subject pursuant to Art. 15 GDPR;
- Right to rectification pursuant to Art. 16 GDPR;
- Right to erasure ("right to be forgotten") pursuant to Art. 17 GDPR;
- Right to restriction of processing pursuant to Art. 18 GDPR;
- Right to be informed pursuant to Art. 19 GDPR;
- Right to data portability pursuant to Art. 20 GDPR;
- Right to withdraw a given consent pursuant to Art. 7 (3) GDPR;
- Right to lodge a complaint pursuant to Art. 77 GDPR.

### **12.2 RIGHT TO OBJECT**

IF, WITHIN THE FRAMEWORK OF A CONSIDERATION OF INTERESTS, WE PROCESS YOUR PERSONAL DATA ON THE BASIS OF OUR PREDOMINANT LEGITIMATE INTEREST, YOU HAVE THE RIGHT AT ANY TIME TO OBJECT TO THIS PROCESSING WITH EFFECT FOR THE FUTURE ON THE GROUNDS THAT ARISE FROM YOUR PARTICULAR SITUATION.

IF YOU EXERCISE YOUR RIGHT TO OBJECT, WE WILL STOP PROCESSING THE DATA CONCERNED. HOWEVER, WE RESERVE THE RIGHT TO FURTHER PROCESSING IF WE CAN

PROVE COMPELLING REASONS WORTHY OF PROTECTION FOR PROCESSING WHICH OUTWEIGH YOUR INTERESTS, FUNDAMENTAL RIGHTS AND FREEDOMS, OR IF THE PROCESSING SERVES TO ASSERT, EXERCISE OR DEFEND LEGAL CLAIMS.

IF WE PROCESS YOUR PERSONAL DATA FOR DIRECT MARKETING PURPOSES, YOU HAVE THE RIGHT TO OBJECT AT ANY TIME TO THE PROCESSING OF YOUR PERSONAL DATA WHICH ARE USED FOR DIRECT MARKETING PURPOSES. YOU MAY EXERCISE THE OBJECTION AS DESCRIBED ABOVE.

IF YOU EXERCISE YOUR RIGHT TO OBJECT, WE WILL STOP PROCESSING THE DATA CONCERNED FOR DIRECT ADVERTISING PURPOSES.

### **13) Duration of Storage of Personal Data**

The duration of the storage of personal data is based on the respective legal basis, the purpose of processing and - if relevant - on the respective legal retention period (e.g. commercial and tax retention periods).

If personal data is processed basis on an express consent pursuant to Art. 6 (1) point a GDPR, this data is stored until the data subject revokes his consent.

If there are legal storage periods for data that is processed within the framework of legal or similar obligations on the basis of Art. 6 (1) point b GDPR, this data will be routinely deleted after expiry of the storage periods if it is no longer necessary for the fulfillment of the contract or the initiation of the contract and/or if we no longer have a justified interest in further storage.

When processing personal data on the basis of Art. 6 (1) point f GDPR, this data is stored until the data subject exercises his right of objection in accordance with Art. 21 (1) GDPR, unless we can provide compelling grounds for processing worthy of protection which outweigh the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

If personal data is processed for the purpose of direct marketing based on Art. 6 (1) point f GDPR, this data is stored until the data subject exercises his right of objection pursuant to Art. 21 (2) GDPR.

Unless otherwise stated in the information contained in this declaration on specific processing situations, stored personal data will be deleted if it is no longer necessary for the purposes for which it was collected or otherwise processed.