

Privacy Policy

This Privacy Policy applies to the Internet offer of easyname GmbH (hereinafter referred to as easyname) which can be accessed under the domains www.easyname.at and www.easyname.de as well as the various subdomains and connected domains (hereinafter referred to as 'our websites').

Table of content

GENERAL
RESPONSIBILITY
DATA PROTECTION OFFICER
CATEGORIES OF DATA SUBJECTS
PURPOSES OF PROCESSING
APPLICABLE LEGAL BASES
DEFINITIONS
DATA TRANSFER WITHIN THE DOGADO GROUP
DATA PROCESSING IN THIRD COUNTRIES 10
WEBSITE VISITORS
COLLECTION OF GENERAL DATA AND INFORMATION
SUMMARY
ERROR LOGGING WITH SENTRY
CONSENTMANAGER.NET 12
SECURITY MEASURES
SSL / TLS ENCRYPTION
<u>CONTACT</u>
CONTACT & E-MAIL
PHONE CALLS

easyname GmbH | Canettistraße 5/10, A-1100 Vienna | www.easyname.com | office@easyname.com | +43 1 353 2222 | UID ATU68122177 | Company register number 402196s, Commercial Court Vienna

NEWSLETTER	
DEPLOYMENT OF DISPATCHERS - MAILCHIMP	
SUMMARY	
APPLICATION PROCEDURE	
USE OF RECRUITEE	
TRACKING	
WHAT DATA IS PROCESSED BY TRACKING?	20
PURPOSE OF TRACKING:	
SECURITY MEASURES:	
ON WHAT LEGAL BASIS DOES THE TRACKING TAKE PLACE?	
BASIS FUNCTIONALITY	
TECHNICALLY UNNECESSARY COOKIES	
TRACKING METHODS/SERVICE PROVIDERS USED IN DETAIL	
GOOGLE ANALYTICS	
GOOGLE TAG MANAGER	
GOOGLE ADS	
GOOGLE RECAPTCHA	
TWITTER ANALYTICS & ADVERTISING	
FACEBOOK PIXEL	
FACEBOOK CUSTOM AUDIENCES	
WISEPOPS	
AFFILIATE MARKETING	
Adform	
AD4MAT	
AWIN	
EASY.MARKETING	
GOOGLE (DOUBLECLICK)	
MediaMath	
TARGETING 360	
THE REACH GROUP	
SOCIAL NETWORKS	
LINKS TO OTHER WEBSITES	
Social Media Icons	
SOCIAL NETWORKS	
FACEBOOK	

easyname GmbH | Canettistraße 5/10, A-1100 Vienna | www.easyname.com | office@easyname.com | +43 1 353 2222 | UID ATU68122177 | Company register number 402196s, Commercial Court Vienna

OPPOSITION OPTIONS	
Social Plugins	
FACEBOOK	
INSTAGRAM	
THIRD PARTY EMBEDDED CONTENT	
YouTube	
MS BOOKING FOR HEROLD COUNSELLING APPOINTMENT BOOKINGS	



General

For easyname, data protection has a high priority. Ultimately, however, it is unfortunately the case that hardly anyone is likely to read through all this 'data protection stuff'. It's really all about trust. You don't want to be surprised unexpectedly. We make this need, along with your other goals that you want to achieve with our products, the starting point of our actions. It is one of our three credos to focus on the customer, i.e. you.

Another of our three credos is 'Personal' by which we mean personal attention and personality. You may have already noticed - we use the 'respectful you' here. We find this simply more pleasant and it fits better to us and our second credo.

Our third credo is 'Simple'. In this sense, we also try to keep this privacy policy as simple and easy to understand as possible so that you will not be unpleasantly surprised in the end. Unfortunately, it is difficult to do without technical terms in data protection notices, which is why we have defined them in an extra section of this data protection notice. If you are still unclear about any point in our privacy policy, please feel free to contact our data protection officer at datenschutz@easyname.com.

With that in mind:

The use of the websites of easyname is generally possible without any indication of personal data. Only your IP address is processed by the web server for the duration of your visit. This is a technical necessity and therefore unavoidable. The processing of personal data becomes necessary when services are used via our websites.

For the processing of all other personal data, we generally obtain your consent if there is no other legal basis for such processing.

The processing of personal data is always in accordance with the Data Protection Regulation (GDPR) and in accordance with the applicable country-specific data protection provisions. By means of this privacy policy, we would like to inform you about the type, scope and purpose of the personal data we process. Furthermore, you will be informed in this privacy policy about your rights under the GDPR.

easyname has implemented numerous technical and organizational measures to ensure the most complete protection of your personal data. Nevertheless, Internet-based data transmissions can have security gaps, so that absolute protection cannot be guaranteed. For this reason, you are free to transmit personal data to us by alternative means, such as by telephone.



Responsibility

The responsible party within the meaning of the GDPR and other national data protection laws of the Member States and other data protection provisions is:

easyname GmbH Canettistraße 5/10 1100 Wien phone: 01 353 2222

Managing Directors: Stephanie Anderson, Uwe Stadelbauer, Marcel Chorengel

E-Mail: <u>office@easyname.com</u> Webseite: <u>www.easyname.at</u>

Data Protection Officer

If you have any questions or suggestions regarding data protection, write them directly to our data protection officer.

You can reach them by mail at:

Alfahosting GmbH -Datenschutzbeauftragte-Ankerstraße 3b 06108 Halle (Saale)

or also by e-mail at <u>datenschutz@easyname.com</u>

Types of data processed

We process the following types of data:

- Inventory data (e.g., names, addresses).
- Content data (e.g. text input, photographs).
- Contact information (e.g., email, phone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Location data (information about the geographical position of a computer or person).
- Contract data (e.g. subject matter of the contract, term, customer category).
- Payment data (e.g. bank details, invoices, payment history).
- (Payment) card data (card number, card type, expiration date).

easyname GmbH | Canettistraße 5/10, A-1100 Vienna | www.easyname.com | office@easyname.com | +43 1 353 2222 | UID ATU68122177 | Company register number 402196s, Commercial Court Vienna



We do not process any special categories of data, according to Art. 9 (1) GDPR, unless they are processed by you as our customer under your own responsibility. For example, if you let us host a server, then we are not responsible for what data you store there.

Categories of data subjects

We process the data of the following circles of data subjects:

- Customers
- Interested parties
- Visitors and users of the online offer
- business partners
- Communication partners (callers, webinar participants, etc.)

In the following, we also refer to the persons concerned as users.

Purposes of processing

Among other things, we process data for the following purposes:

- Provision & optimization of the online offer, its contents and functions
- Providing contractual services, services and customer care.
- Responding to contact requests and communicating with users
- Marketing, advertising and market research
- Security measures

Applicable legal bases

In accordance with Art. 13 GDPR, we inform you about the legal basis of our data processing.

If the legal basis is not mentioned in the Privacy Policy, the following applies:

- Insofar as we obtain your consent for processing operations of personal data, Art. 6 para. 1 lit. a GDPR serves as the legal basis for the processing of the data.
- When processing personal data that is necessary for the performance of a contract with you as a contractual partner, Art. 6 (1) lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.
- Insofar as the processing of personal data is necessary for the fulfillment of a legal obligation, Art. 6 para. 1 lit. c GDPR serves as legal basis.
- In the event that vital interests of you or another natural person require the processing of personal data, Art. 6 (1) lit. d GDPR serves as the legal basis. We do not yet know how this might be the case in our business field but have included it for the sake of completeness.

• If the processing is necessary to protect a legitimate interest of our company or a third party and your interests, fundamental rights and freedoms do not override the former interest(s), Art. 6 (1) lit. f GDPR serves as the legal basis for the processing.

Changes and updates to the Privacy Policy

We ask you to regularly inform yourself about the content of our privacy policy. We adapt the data protection information as soon as changes in the data processing carried out by us or changes in the legal situation make this necessary. We try to implement changes in the law as quickly as possible, but hope for your understanding if the implementation should take a moment. Such implementations take time and we do not want to present you with half-finished solutions. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

Data subject rights

According to the provisions of the GDPR, you are generally entitled to the following rights:

- Right of access (Article 15 GDPR)
- Right of rectification (Articlel 16 GDPR)
- Right to erasure ("right to be forgotten") (Article 17 GDPR)
- Right to restriction of processing (Article 18 GDPR)
- Right to notification obligation to notify in connection with the rectification or erasure of personal data or the restriction of processing (Article 19 GDPR)
- Right to data portability (Article 20 GDPR)
- Right to object (Article 21 GDPR)
- Right not to be subject to a decision based solely on automated processing including profiling (Article 22 GDPR)

If you have given us consent, you can revoke this at any time with effect for the future.

If you believe that the processing of your data violates data protection law or your data protection rights have otherwise been violated in any way, you can contact datenschutz@easyname.at.

You can also contact the data protection supervisory authority at any time with a complaint - <u>https://www.dsb.gv.at/</u>.

Information about your right to object according to Art. 21 GDPR

You have the right to object at any time, on grounds relating to your particular situation to the processing of personal data concerning you which is carried out on the basis of Art. 6(1)(f) GDPR (data processing on the basis of a balance of interests); this also applies to profiling based on this provision within the meaning of Art. 4 No. 4 GDPR.



If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising, or defending legal claims.

You can make the objection to the responsible person.

Definitions

Title	Used terms
	"Personal data" means any information relating to an identified
	or identifiable natural person (hereinafter "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 (e.g. cookie) or to one or more factors specific to the
	physical, physiological, genetic, mental, economic, cultural or
Personal data	social identity of that natural person.
	"Processing" means any operation or set of operations which is
	performed upon personal data, whether by automatic means.
Processing	The term is broad and includes virtually any handling of data.
	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
Responsible	personal data.
	By computer, we mean any device, including tablets,
	smartphones, and whatever else is invented soon to open web
Computer	pages.
	Personal data revealing racial or ethnic origin, political opinions,
	religious or philosophical beliefs, or trade-union membership,
	and the processing of genetic data, biometric data uniquely
Special categories of	identifying a natural person, data concerning health or data
personal data	concerning a natural person's sex life or sexual orientation.
	A browser is a computer program. It is used to access the
	Internet. You are currently using a browser to view this web
Browser	page.



	An operating system is located on your computer or smart
	phone. It includes many 'computer' programs that have
	different tasks. Without the operating system, your computer
	can't start, can't run other programs. Examples of operating
Operating system	systems are 'Windows', 'Linux' or 'Android'.
	Telecommunications service provider that offers its customers
Internet service provider	access to the Internet and related services.
	IP ist die Abkürzung für Internetprotokoll. Jeder Computer,
	Server. Gerät, Mobiltelefon etc., die mit dem Internet verbunden
	sind, bekommen einen weltweit eindeutige IP-Adresse
IP-address	zugewiesen.
	IP is the abbreviation for Internet Protocol. Every computer,
	server. Device, smart phone, etc. connected to the Internet is
Logfile	assigned a globally unique IP address.

Data transmission to third parties

If, in the course of our processing, we disclose data to other persons and companies (processors or third parties), transmit it to them or otherwise grant them access to the data, this will only be done on the basis of a legal permission (e.g. if a transmission of the data to third parties, such as payment service providers, is necessary for the performance of the contract pursuant to Art. 6 (1) lit. b GDPR), you have consented, a legal obligation provides for this or on the basis of our legitimate interests (e.g. when using agents, etc.).

If we commission third parties with the processing of data based on a so-called "order processing agreement", this is done in accordance with Art. 28 GDPR.

Data transfer within the dogado group

Easyname is part of the dogado group of companies (dogado group; <u>https://dogado.group/</u>).

We may transfer personal data to other companies within our group of companies or grant them access to this data. If this transfer is for administrative purposes, the transfer of data is based on our legitimate corporate and business interests or, if it is necessary for the fulfillment of our contract-related obligations, if your consent or a legal permission has been obtained.



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 the disclosure or transfer of data to other persons, entities or companies, this is only done in accordance with the legal requirements.

Subject to express consent or contractually or legally required transfer, we only process or allow data to be processed in third countries with a recognized level of data protection, contractual obligation through so-called standard protection clauses of the EU Commission, in the presence of certifications or binding internal data protection regulations (Art. 44 to 49 GDPR, information page of the EU Commission: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-dataprotection_de).

Website visitors

Collection of general data and information

Our websites collect a series of general data and information with each call. This general data and information is stored in the server's log files. The following can be recorded:

- browser types and versions used,
- the operating system used by the accessing computer,
- the website from which an accessing computer arrives at our website (so-called referrer),
- the sub-websites which are accessed via an accessing computer on our website,
- the date and time of an access to the website,
- IP address,
- the Internet service provider of the accessing computer and
- other similar data and information that serve to avert danger in the event of attacks on our IT systems.

When using this general data and information, we do not draw any conclusions about you or other visitors. This information is rather needed to

- to deliver the contents of our website correctly,
- to optimize the content of our website as well as the advertising for it,
- to ensure the permanent operability of our IT systems and the technology of our website, and
- To provide law enforcement authorities with the information necessary to prosecute in the event of a cyberattack.



Therefore, these anonymously collected data and information are evaluated by us on the one hand statistically and on the other hand with the aim of increasing the data protection and data security of our enterprise, in order to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by you.

Summary

Types of data processed:

- Usage data (e.g. web pages visited, interest in content, access times),
- Meta/communication data (e.g. device information, IP addresses).

Persons concerned:

• Visitors and users of our websites

Purposes of processing:

- Provision of the online offer, its contents and functions,
- Security measures.

Legal basis:

- Legitimate interest (Art. 6 para. 1 p. 1 lit. f. GDPR);
- legal obligation (Art. 6 para. 1 lit. c GDPR).

Error logging with Sentry

For error logging, we use our own installation of Sentry (https.senztry.io) The software runs exclusively on our self-hosted web servers. There is no data transfer to Sentry as a service provider. It helps us to react on errors without the need to report them by the visitor.

What is logged:

- IP address
- Operating system/browser used
- possible steps that led to the error, incl. stack trace
- other http headers

Affected persons:

• Visitors and users of our websites

Processing purpose:

The software helps us to react on display errors of our website without the need to report them by the visitor. This helps us to constantly improve our website and its usability.



Legal basis:

The error logs are stored based on our legitimate interest. We have a legitimate interest in storing them for the technically error-free and optimized provision of our services. After 90 days this data is deleted.

Opposition options:

The provision of the personal data is neither legally nor contractually required. However, the storage of the data is mandatory for the operation of the website. Consequently, there is no possibility to object to this data collection.

Consentmanager.net

We have integrated the consent management tool "consentmanager" (www.consentmanager.net) of consentmanager AB (Håltgelvågen 1b, 72348 Västerås, Sweden, info@consentmanager.net) on our website to request consent for data processing or the use of cookies or comparable functions. You have the possibility with the help of "consentmanager" to give or refuse your consent for certain functionalities of our website, e.g. for the purpose of integration of external elements, integration of streaming content, statistical analysis, reach measurement and personalized advertising. You can use "consentmanager" to give or reject your consent for all functions as well as to give your consent for individual purposes or individual functions. The settings you have made can also be changed by you afterwards. The purpose of integrating "consentmanager" is to allow the users of our website to decide on the matters and, in the course of further use of our website, to offer the possibility of changing settings already made. In the course of using "consentmanager", personal data as well as information of the end devices used, such as the IP address, are processed.

The legal basis for the processing is Art. 6 para. 1 p. 1 lit. c) in conjunction with. Art. 6 para. 3 p. 1 lit. a) in conjunction with. Art. 7 para. 1 DSGVO and alternatively lit. f). Consentmanager helps us with the processing of data to fulfill our legal obligations (e.g. obligation to provide evidence). Our legitimate interests in the processing lie in the storage of user settings and preferences in relation to the use of cookies and other functionalities. Consentmanager stores your data as long as your user settings are active. 365 days after the user settings have been made, a new request for consent is made. The user settings made are then stored again for this period. The logs are deleted after 13 months.

The processing can be objected to. The right to object exists for reasons arising from the particular situation of the data subject(s). To object, please send an e-mail to <u>info@consentmanager.net</u>.

Security measures

We ensure an adequate level of protection for your data. To this end, we take appropriate technical and organizational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope and **easyname GmbH** | Canettistraße 5/10, A-1100 Vienna | www.easyname.com | office@easyname.com | +43 1 353 2222 | UID ATU68122177 | Company register number 402196s, Commercial Court Vienna



purposes of the processing, as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons.

SSL / TLS encryption

Our websites use SSL encryption. This encryption is used, for example, for requests that you send to us via our websites. Please make sure that SSL encryption is activated for corresponding activities on your side. The use of encryption is easy to recognize: the display in your browser address bar shows "https://". Data encrypted via SSL cannot be read by third parties.

Primarily, we try to establish an encrypted communication path according to current security standards (e.g. TLS encryption) when transmitting data, if supported by the other party.

For our internal communication we use communication channels according to current standards (e.g. TLS encryption, VPN).

In addition, the products booked by customers, hopefully you as well, must be explicitly activated via encrypted transmission.

Contact

If you wish to contact us (e.g. by contact form, e-mail, telephone or via social media), your information will be processed to the extent necessary to respond to your inquiry and any requested action.

The response to a contact request in the context of contractual or pre-contractual relationships is made to fulfill our contractual obligations or to respond to (pre)contractual inquiries and otherwise on the basis of our legitimate interest in responding to the inquiries.

We are a company of the dogado group and as such we use the customer support of dogado GmbH and alfahosting GmbH to answer customer support requests in addition to our own customer support. So, if you write e-mails to our service addresses or call our customer support, these requests will also be answered by our colleagues of dogado GmbH or alfahosting GmbH. Accordingly, the colleagues of dogado GmbH and alfahosting GmbH also have access to your data. Otherwise, the colleagues could not answer your request.

Contact & E-Mail

We offer a contact form on our website so that you can contact us with questions about us, our website and other inquiries. In addition, you can contact us via e-mail.

easyname GmbH | Canettistraße 5/10, A-1100 Vienna | www.easyname.com | office@easyname.com | +43 1 353 2222 | UID ATU68122177 | Company register number 402196s, Commercial Court Vienna



When you contact us via the contact form or by e-mail to one of our support addresses, the data you provide (in particular your e-mail address, your first and last name and the text of your request, as well as any other information you have provided in the contact form or by e-mail) will be stored by us in order to process your request and answer your questions. We therefore ask you to tell us only such things which are needed for the processing of your request.

The provision of the contact form is in our legitimate interest in successful customer and interest communication.

We delete your request if the storage is no longer necessary. We review the necessity every two years; if you have a customer account with us, we store your requests permanently and refer to the information on your customer account for deletion. Otherwise, the legal archiving obligations apply.

Types of processed data:

- Inventory data (e.g. name, organization, product),
- Contact details (e-mail address),
- Meta/communication data (IP address, country).

Affected persons:

- Customers,
- Interested,
- Visitors and
- User.

Processing purposes:

• Provision of contractual services and customer services.

Legal basis:

- Contract fulfillment and pre-contractual inquiries (Art. 6 para. 1 p. 1 lit. b. GDPR),
- Legitimate interests (Art. 6 para. 1 p. 1 lit. f. GDPR).

Provision of the data:

The provision of your personal data is voluntary. However, we can only process your request if you provide us with the corresponding data.



Phone calls

We use the cloud telephone system from Inopla in our customer service. We decided to do this in order to be able to meet the quality standards that we promised you in customer service. This way we can guarantee that you can reach us reliably at any time. The hosting of the telephony data is done by Inopla in a secure data center in Germany. The telephone connections are encrypted through a VPN tunnel. The contract with Inopla is held by our parent company dogado GmbH.

Service provider: Inopla GmbH, Reisholzer Werftstr. 31, 40589 Düsseldorf Website: https://www.inopla.de/; Privacy Policy: <u>https://www.inopla.de/kontakt/datenschutzerklaerung/</u>

Types of processed data:

• Meta/communication data (e.g. telephone number, data on telephone dial-up, duration of call)

Affected persons:

• Communication partners

Processing purposes:

• Carrying out service phone calls

Legal basis:

- Contractual relationship or pre-contractual relationship (Art. 6 Abs 1 lit. b. GDPR),
- legitimate interest (Art. 6 para. 1 lit. f. GDPR)

Newsletter

With the following information we inform you about the contents of our newsletter as well as the registration, dispatch and statistical evaluation procedure and your rights of objection. By subscribing to our newsletter, you agree to receive it and to the described procedures.

We send newsletters, e-mails and other electronic notifications with promotional information (hereinafter "newsletter") only with your consent (Art. 6 para 1 lit. a GDPR). Your name and email address will be stored to enable the delivery of the newsletter. In the case of our existing customers, we reserve the right to provide them with information on similar

products to those already sold in our newsletter, provided they have not objected to this procedure (§ 7 para 3 UWG). If the contents of the newsletter are specifically described during registration, these are decisive for your consent. In addition, our newsletters contain information about products and services in the area of domains, hosting and web presences.

For an effective registration we need a valid e-mail address. In order to verify that a registration is actually made by you as the owner of your e-mail address, we use the "double opt-in" procedure. For this purpose, we log the registration for the newsletter, the sending of a confirmation email and the receipt of the response requested herewith. Further data is not collected.

Deployment of dispatchers - Mailchimp

After this careful research, it quickly became clear to us that no European service provider was currently an option for us.

We have deliberately chosen the US provider Mailchimp -The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA-. Mailchimp's email newsletter service offers excellent technical features and has very well secured IT systems. The support is very good, and the company makes a good overall impression in terms of handling the data processed for us.

Legally, the use of Mailchimp constitutes a transfer of your personal data. Since the IT system that Mailchimp uses is in the USA - as is the company - this constitutes a transfer of data to third parties in a non-secure third country. In terms of data protection law, an appropriate level of data protection must be ensured when processing data in a non-EU member state, such as the USA. In the case of Mailchimp, this is ensured through the use of the EU standard contractual clauses that we have concluded with Mailchimp.

In the specific case, we currently have no reasonable cause to believe that Mailchimp cannot fulfill its contractual obligations under the agreed EU standard contractual clauses.

Types of data processed: inventory data (e.g. name, organization, product), contact data (e-mail address), meta/communication data (IP address, country).

Deletion period: 8 weeks after revocation of consent

Insofar as we use a dispatch service provider, the dispatch service provider may, according to its own information, use this data in pseudonymous form, i.e. without assigning it to a user, to optimize or improve its own services, e.g. to technically optimize the dispatch and presentation of the newsletter or for statistical purposes in order to determine which countries the recipients come from. However, the dispatch service provider does not use the data of our newsletter recipients to write to them itself or to pass them on to third parties.



Performance measurement - The newsletters contain a so-called "web beacon", i.e. a pixelsized file that is retrieved from the servers of the shipping service provider when the newsletter is opened. During this retrieval, technical information, such as information about the browser and your system, as well as your IP address and the time of the retrieval are collected. This information is used for the technical improvement of our services based on the technical data or the target groups and their reading behavior based on their retrieval locations (which can be determined with the help of the IP address) or the access times. Statistical surveys also include determining whether newsletters are opened, when they are opened, and which links are clicked. For technical reasons, this information can be assigned to the individual newsletter recipients. However, it is neither our intention nor that of the dispatch service provider to observe individual users. The analyses 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 logging of the registration process is based on our legitimate interests according to Art. 6 para. 1 lit. f GDPR and serves as proof of consent to receive the newsletter.

You can cancel the receipt of our newsletter at any time, i.e. revoke your consent. You will find a link to cancel the newsletter at the end of each newsletter.

Summary

Types of data processed:

- Inventory data (e.g. name, organization, product),
- Contact details (e-mail address),
- Meta/communication data (IP address, country).

Affected persons:

- Newsletter subscribers
- Existing customers

Processing purposes:

• Direct marketing (e.g. by e-mail or postal mail)

Legal basis:

- Consent (Art. 6 para. 1 p. 1 lit. a. GDPR),
- Legitimate interests (Art. 6 para. 1 p. 1 lit. f. GDPR).

Possibility of objection (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 use one of the above contact options, preferably e-mail, for this purpose.

Storage time:

Data will only be processed in this context if the corresponding consent is available or until you object to the sending of the newsletter. After that the data will be deleted.

Data provision:

The provision of your personal data is voluntary, based solely on your consent. Without existing consent, we cannot send you, our newsletter.

Application procedure

We are pleased that you would like to apply for a job with us or that you have already done so.

Within the dogado group, the People & Culture team is responsible for the application process. This is located at our parent company, dogado GmbH. The People & Culture team provides its services as a shared service for the entire group. This forwarding to dogado GmbH takes place based on Art. 6 Para. 1 lit. f GDPR in conjunction with EG 48.

In addition, we also use the reach of our sister company HEROLD Business Data GmbH (HEROLD) to address even more potential applicants. If you use this channel for your application, your data will be initially processed by HEROLD and then forwarded to the dogado People & Culture team.

Applications are possible via the websites of dogado GmbH, www.dogado.de, or HEROLD Business Data GmbH, www.job.herold.at. You will be informed there about the corresponding data processing.

Use of Recruitee

The dogado GmbH and thus also the dogado group uses the application management system of Recruitee B.V., Keizersgracht 313, 1016 EE Amsterdam, Netherlands, to guarantee its professional application management. The data is stored by recruitee in data centers within the EU.



After extensive examination, dogado GmbH has concluded an order processing contract with recruitee. The privacy policy of recruitee can be found at https://recruitee.com/de/privacy.

Tracking

We are engaged in online marketing. One activity of this is placing advertisements on the Internet to address new and existing customers. The advantage of online marketing over traditional advertising channels, such as TV or radio, is a more targeted approach to users and the more precise measurability of success. This is achieved through tracking. For this purpose, personal data may be processed by us as well as by our advertising partners. This includes location data, if you have consented to its use in your browser, as well as your IP address. As far as our advertising partners offer this, we use the so-called IP masking procedure, in which your IP address is shortened and thus anonymized. This is done to protect your data. Under no circumstances do we share clear data about you or other users with our advertising partners. Clear data is master data such as your name, your address or your e-mail address. However, our advertising partners usually create a pseudonymized advertising profile in which your surfing behavior and technical data such as your browser version and screen resolution are stored. Pseudonymized means that our advertising partners do not know your identity, but you are assigned an advertising identification number. This advertising identification number and other technical data are stored locally on your end device (for example, in a cookie, a small text file). With the help of this file, it is then possible for our advertising partner and us to recognize you again. Since our advertising partners now also work with many other companies, our advertising partners can thus gradually fill the pseudonymized advertising profiles with data from, for example, website visits, app usage and other sources, and thus assess your interests. In special cases, it is also possible for our advertising partners to link the pseudonymized profiles with clear data known to you. This is the case, for example, with social networks, because here you usually provide your clear data voluntarily. However, by using the advertising platform, we do not have access to this clear data in any case. We only gain access to information that helps us to assess the success of our advertisements. In the context of so-called conversion measurements, we can check which of the online marketing methods used has led to a contract being concluded. You can contact the provider of the social network to make any other arrangements or adjust the settings in your profile on the social network. We have no influence on this. We do not process your data without a legal basis. Therefore, we ask you for your consent before processing your data. This then represents the legal basis for the data processing. If we do not ask for your consent, your data will be processed based on our legitimate interest in effective, successful, and recipient-friendly services.



What data is processed by tracking?

- Usage data (e.g., web pages visited, interest in content, access times),
- Meta/communication data (e.g., device information, IP addresses),
- Location data (information about the geographic position of a device or a person),
- Event Data (Facebook) ("Event Data" is data that may be transmitted by us to Facebook, e.g. via Facebook Pixel (via apps or other means), and relates to individuals or their actions; the data includes, for example, information about visits to websites, interactions with content, functions, installations of apps, purchases of products, etc.; the Event Data is processed for the purpose of creating target groups for content and advertising information (Custom Audiences). 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), no login information and no contact information (i.e. no names, email addresses and phone numbers). Event data is deleted by Facebook after a maximum of two years, the target groups formed from them with the deletion of our Facebook account).

Purpose of Tracking:

- Tracking (e.g., interest/behavior-based profiling, use of cookies),
- Remarketing, conversion measurement (measuring the effectiveness of marketing measures),
- Interest-based and behavioral marketing, profiling (creation of user profiles),
- Reach measurement (e.g. access statistics, recognition of returning visitors),
- Target group formation (determination of target groups relevant for marketing purposes or other output of content),
- Cross-device tracking (processing of user data across devices for marketing purposes)).

Security measures:

• IP masking (pseudonymization of the IP address)

On what legal basis does the tracking take place?

Due to the described purposes of use, the legal basis for the processing of personal data using tracking cookies is Art. 6 (1) lit. f GDPR. If you have given us your consent to the use of tracking/cookies based on a notice given by us on the website ("cookie banner"), the lawfulness of the use is additionally based on Art. 6 para. 1 sentence 1 lit. a GDPR.



If you want more detailed information about cookies in general and the cookies we use, just take a look at <u>consentmanager.net</u> under Cookies.

Basis functionality

The cookies in the category "basic functionality" are so-called technically necessary cookies. These are necessary for the operation of our website. The use is based on our legitimate interest from Art. 6 para. 1 lit. f GDPR: Our legitimate interest here is to provide the most efficient attractive service possible. We pursue this by analyzing the information obtained through tracking about user behavior on our website.

The provision of the personal data is neither legally nor contractually required. However, without this data, the service and functionality of our website cannot be guaranteed. In addition, individual services and services may not be available or may be limited.

Technically unnecessary cookies

Finally, we may perform tracking based on your consent. This consent is voluntary. It is given, for example, by clicking the "OK" button on our services after a corresponding notice is displayed. You can revoke this consent at any time. You give your consent via our cookie tool. You can access the cookie tool at any time by clicking on the cookie symbol at the bottom left of the website.

We use the cookies in the category "Analytics & Usability" to:

- To statistically determine key data on the use of our services (reach, intensity of use, surfing behavior of users) based on uniform standard procedures and thus obtain values that can be compared across the market.
- Measure the success of advertising campaigns, optimize our ads for the future, and enable marketers and advertisers to optimize their ads accordingly as well.
- Enable correct commission accounting for transactions.

We use the cookies in the category "Advertising & Social Media" to:

• display optimized advertising and content tailored to your interests and thus to market our services optimally and to adapt them to the needs of the users.

However, we do not pursue any purposes on this basis for which the behavior of data subjects on the Internet must be made traceable or user profiles created.

Of course, you can also view our website without cookies. Internet browsers are regularly set to accept cookies. In general, you can disable the use of cookies at any time via the



settings in your browser. Please note that some functions of our website based on cookies may not work if you have deactivated the use of cookies or do not give your consent.

Tracking methods/service providers used in detail

Google Analytics

Google Analytics is a web analytics service that enables us to examine the origin of visitors, the time they spend on individual pages, and the use of search engines, and thus to monitor the success of our advertising campaigns. The data stored using the cookies is transferred and stored by Google in the USA for evaluation. Google transmits the data to third parties only within the scope of legal regulations or within the scope of commissioned data processing. Google will not combine the collected data with other data collected by Google. We use Google Analytics with the extension "_anonymizeIp()". As a result, your IP address is shortened by Google within member states of the EU or in other EEA contracting states before being transmitted to the USA. Only in exceptional cases will the complete IP address be transmitted to Google servers in the USA and shortened there. Google Inc. will use this information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage.

Opt-Out:	Beyond the browser setting, you can prevent the collection
	of data generated by the cookie and related to your use of
	the website to Google, as well as the processing of this data
	by Google, by downloading and installing the browser
	plugin available at the following link:
	http://tools.google.com/dlpage/gaoptout?hl=de.
	This plugin is provided by Google; we point out that we can
	neither check nor control its function.
	To prevent collection by Google Analytics across different
	devices, you must perform the opt-out on all systems used.
	Opt Out via <u>consentmanager</u> .net
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	not available for the USA
applicable:	
Guarantees:	EU standard contractual clauses
Privacy policy of the	https://policies.google.com/privacy?hl=de
provider:	

Google Tag Manager

Google Tag Manager is a solution that allows us to implement and manage code on our website without any development effort. The Tag Manager itself (which implements the code) does not process any personal data of the users. It acts as a mere 'manager' of the implemented code. Data is collected via the Tag Manager embedded tools, such as Google Analytics. The data is passed through to the individual solutions in the Google Tag Manager and is not stored.

Opt-Out:	Opt Out via <u>consentmanager</u> .net
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	liegt für die USA nicht vor
applicable:	
Guarantees:	EU standard contractual clauses
Privacy policy of the	https://policies.google.com/privacy?hl=de
provider:	

Google Ads

We use the Google Ads offer to draw attention to our offers with the help of advertising media on external websites and in Google products such as Google Search or YouTube. We can determine how successful the individual advertising measures are in relation to the data of the advertising campaigns. We pursue the interest to show you advertising that is of interest to you, to make our website more interesting for you and to achieve a fair calculation of advertising costs. These advertisements are delivered by Google via socalled "ad servers". For this purpose, we use ad server cookies, through which certain parameters for measuring success, such as display of the ads or clicks by users, can be measured. If you access our website via a Google ad, Google Ads will store a cookie on your end device. These cookies usually lose their validity after 30 days and are not intended to identify you personally. The unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) and opt-out information (marking that the user no longer wishes to be addressed) are usually stored as analysis values for this cookie. These cookies enable Google to recognize your internet browser. If a user visits certain pages of an Ads customer's website and the cookie stored on their device has not yet expired, Google and the customer can recognize that the user clicked on the ad and was redirected to that page. A different cookie is assigned to each Ads customer. Cookies can therefore not be tracked across Ads customers' websites. We ourselves do not collect or process any personal data in the advertising measures. We only receive statistical evaluations from Google. Based on these evaluations, we can see which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising tools; in particular, we cannot identify users based on this information. Due to the marketing tools used, your browser automatically establishes

a direct connection with Google's server. We have no influence on the scope and further use of the data collected by Google through the use of this tool and therefore inform you according to our state of knowledge: Through the integration of Google Ads, Google receives the information that you have called up the corresponding part of our website or clicked on an advertisement from us. If you are registered with a Google service, Google can assign the visit to your account. Even if you are not registered with Google or have not logged in, there is the possibility that the provider learns your IP address and stores it.

We also use the remarketing function within the Google Ads service. With the remarketing function, we can address users of our website again with our products within the Google advertising network. For this purpose, the interaction of the users on our website is analyzed, e.g. which offers the user was interested in, in order to be able to display targeted advertising to the users on other pages even after they have visited our website. For this purpose, Google stores cookies on the end devices of users who visit certain Google services or websites in the Google display network. These cookies are used to record the visits of these users. The cookies are used to uniquely identify a web browser on a specific end device and not to identify a person.

Opt-Out:	Beyond the browser setting, you can prevent the collection
	of data generated by the cookie and related to your use of
	the website to Google, as well as the processing of this data
	by Google, by downloading and installing the browser plugin
	0
	https://www.google.com/settings/ads/plugin.
	This plusis is previded by Coopley we point out that we can
	This plugin is provided by Google; we point out that we can
	neither check nor control its function.
	To prevent collection by Google Analytics across different
	devices, you must perform the opt-out on all systems used.
	Opt Out via <u>consentmanager</u> .net
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	not available for the USA
applicable:	
Guarantees:	EU standard contractual clauses
Privacy policy of the	https://ads.google.com/intl/de_de/home/faq/gdpr/
provider:	

Google reCAPTCHA

We would like to secure and protect our website as best as possible. For this purpose, we use Google reCAPTCHA of the company Google Inc. In Europe, the company Google Ireland Limited -Gordon House, Barrow Street Dublin 4, Ireland- is responsible for this service.

Google reCAPTCHA allows us to determine whether you or another person is visiting our website or whether it is a robot or spam software.

Thanks to reCAPTCHA, we don't have to keep bugging you with picture puzzles to determine your humanity. We use Invisible reCAPTCHA to be precise. With it you don't even have to click on a checkmark or something.

The tool runs in the background and analyzes your user behavior. From your interaction with our site, the software calculates a so-called captcha score.

With this score Google calculates already before the captcha input how likely it is that the user is a human. reCAPTCHA is used when bots could manipulate or abuse actions like surveys and registrations.

We use reCAPTCHA because we want to remain a 'bot-free' website and to avoid the spread of spam on the net.

Your IP address is stored. This is also transmitted to the USA in shortened form. It will not be combined with other Google data as long as you are not logged into your Google account while visiting our website.

The following non-exhaustive list shows which browser and user data Google processes as part of reCAPTCHA:

- Referrer URL
- IP address
- Operating system information
- cookies
- Mouse and keyboard behavior
- Date and language settings
- screen resolution

It is undisputed that Google uses and analyzes this data. How much and which data Google stores exactly Google does not explain in detail.

Opt-Out	https://support.google.com/?hl=de&tid=331636125285
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	not available for the USA
applicable:	
Guarantees:	EU standard contractual clauses with Google
Privacy policy of the	https://policies.google.com/privacy?hl=de
provider:	



Twitter Analytics & Advertising

We use "Twitter Conversion Tracking" on our website, a service of Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland (hereinafter referred to as: "Twitter"). Twitter Conversion Tracking stores and processes information about your user behavior on our website. Twitter Conversion Tracking uses cookies, among other things, for this purpose.

We use Twitter Conversion Tracking for marketing and optimization purposes, in particular to analyze the use of our website and to continuously improve individual functions and offers as well as the user experience. Through the statistical evaluation of user behavior, we can improve our offer and make it more interesting for you as a user. The use is based on Art. 6 para. 1 lit. a GDPR -consent. You can revoke your consent at any time.

Users can find more information about the processing of their data by Twitter as well as about their rights of objection and other data subject rights in the privacy policy of Twitter https://twitter.com/de/privacy.

Opt-Out:	https://twitter.com/personalization
	http://optout.aboutads.info/?c=2#!/
	Opt Out via <u>consentmanager</u> .net
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	not available for the USA
applicable:	
Guarantees:	EU standard contractual clauses
Privacy policy of the	https://twitter.com/de/privacy
provider:	

Facebook Pixel

We use the so-called "Facebook Pixel" of Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland to create so-called "Custom Audiences". This serves the purpose of optimizing our advertisements on the Facebook social network, playing only relevant ads there and measuring the success of our Facebook advertising campaigns. With the Facebook Pixel, it is possible for Facebook to identify the users of our Service as a target group for the display of ads on the Facebook social network.

Via the Facebook Pixel implemented on our Services, a direct connection to the Facebook servers is established when our Services are called up. In the process, it is transmitted to

<u>easyname</u>

the Facebook server that you have called up our Services as well as which pages you have seen. In addition, individual information and parameters required for the optimization of our advertisements, for increasing the relevance as well as for measuring the success are transmitted. In particular, this includes information on so-called "conversion events" (e.g. whether a registration or a purchase has taken place).

	You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of our services.
	You can prevent the collection by Facebook by clicking on the link. An opt-out cookie will be set that prevents the future collection of your data when visiting the Services. The opt-out cookie is only valid in this browser and only for the respective website and is stored on your device. If you delete the cookie in this browser, you must set the opt-out cookie again.
Opt-Out	Opt Out via <u>consentmanager</u> .net
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	not available for the USA
applicable:	
Guarantees:	EU standard contractual clauses
Privacy policy of the provider:	https://www.facebook.com/about/privacy/

Facebook Custom Audiences

We use "Facebook Custom Audiences" on our website, a retargeting tool of Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (hereinafter referred to as "Facebook"). Facebook Custom Audiences enables us to display interest-based advertisements, so-called "Facebook Ads", to visitors to our website when they visit the Facebook social network or when they visit other websites that also use Facebook Custom Audiences. By using "Facebook Custom Audiences", your web browser automatically establishes a direct connection with the Facebook server. We have no influence on the scope and further use of the data collected by Facebook through the use of Facebook Custom Audiences. According to our knowledge, Facebook receives the information that you have called up the relevant part of our website or clicked on an ad of ours. If you have a user account with Facebook and are registered, Facebook can assign the visit to your user account. Even if you are not registered with Facebook or have

<u>easyname</u>

not logged in, there is a possibility that Facebook will learn and store your IP address and possibly other identifiers.

We use Facebook Custom Audiences for marketing and optimization purposes, in particular to display ads that are relevant and interesting to you and thus improve our offer and make it more interesting for you as a user. The legal basis is Art. 6 para. 1 p. 1 lit. a) GDPR - consent. You can revoke your consent at any time

Opt-Out	http://optout.networkadvertising.org/
	http://optout.aboutads.info
	http://www.youronlinechoices.com/uk/your-ad-choices/
	Opt Out via <u>consentmanager</u> .net
Data transfer to third	Yes, to the USA.
countries:	The transfer takes place with your consent.
Adequacy decision, if	not available for the USA
applicable:	
Guarantees:	EU standard contractual clauses
Privacy policy of the	https://www.facebook.com/about/privacy/
provider:	

WisePops

We use "WisePops" on our website, a web analytics service provided by WisePops SAS, 87 Boulevard Suchet, 75016 Paris, France. Thanks to WisePops, we are able to embed popups based on your browsing behavior on our site. Cookies are set for this purpose.

The following information is collected when you visit the site:

- the last time you visited the website
- the pop-up campaigns you interacted with (ad, click or sign-up)
- additional information that we associate with your visit (e.g. date of your last purchase).

This information is stored in a cookie and saved on your computer. This cookie expires after two years and helps us to ensure that you do not see the same message twice. To delete this data, you can simply empty your cookie.

Opt-Out	Opt Out via <u>consentmanager</u> .net
Data transfer to third	-
countries:	
Adequacy decision, if	-
applicable:	
Guarantees:	-



Privacy policy of the provider:	https://support.wisepops.com/more-info/data-and-
	cookie-policy.

Affiliate Marketing

In this section you will find information about the data processing we carry out for the purpose of optimizing our marketing and market research services.

Within our online offer, we use industry-standard tracking measures with your consent, insofar as these are necessary for the operation of the affiliate system. We will explain the technical background to this below.

The services offered by our contractual partners may also be advertised and linked on thirdparty websites (so-called affiliate links or after-buy systems, if, for example, links or thirdparty services are offered after a contract has been concluded). The operators of the respective websites receive a commission when users follow the affiliate links and subsequently take advantage of the offers.

In summary, it is necessary for our online offer that we can track whether users who are interested in affiliate links and/or the offers available from us subsequently take advantage of the offers at the instigation of the affiliate links or our online platform. For this purpose, the affiliate links and our offers are supplemented by certain values, which may be part of the link or otherwise set, e.g. in a cookie. The values 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, an online identifier of the user, as well as tracking-specific values such as e.g. advertising material ID, affiliate ID and categorizations.

The online identifiers we use from you are pseudonymous values. That is, the online identifiers do not themselves contain any personal data such as names or email addresses. They only help us to determine whether the same user who clicked on an affiliate link or became interested in an offer via our online offer has taken advantage of the offer, i.e., for example, concluded a contract with the provider. However, the online identifier is personal to the extent that the partner company and also us, the online identifier together with other user data. Only in this way can the partner company inform us whether the user has taken up the offer and we can pay out the bonus, for example.

The legal basis for the data processing is your consent, according to Art. 6 para. 1 lit. a GDPR.

We use the affiliate cookies of the following providers:



Adform	
Adform Germany GmbH	
Großer Burstah 50-52	
20457 Hamburg	
Opt-Out	https://site.adform.com/privacy-policy-opt-out
	Opt Out via <u>consentmanager</u> .net
Data transfer to third countries:	The company itself is not located in a third country
	but may cooperate with companies in a third
	country. For more information, please see the
	company's privacy policy.
Adequacy decision, if applicable:	-
Privacy policy of the provider:	https://site.adform.com/privacy-center/overview

ad4mat	
dvanced store GmbH (ad4mat)	
Alte Jakobstraße 79 / 80	
10179 Berlin	
Opt-Out	https://www.ad4mat.com/de/adchoices/
	Opt Out via <u>consentmanager</u> .net
Data transfer to third countries:	The company itself is not located in a third country
	but may cooperate with companies in a third
	country. For more information, please see the
	company's privacy policy.
Adequacy decision, if applicable:	-
Privacy policy of the provider:	http://www.advanced-store.com/de/datenschutz/

AWIN		
AWIN AG (Digital Window)		
Eichhornstraße 3		
10785 Berlin		
Opt-Out	https://www.awin.com/de/rechtliches/cookieoptout	
	Opt Out via <u>consentmanager.net</u>	
Data transfer to third countries:	The company itself is not located in a third country	
	but may cooperate with companies in a third country.	

	For more information, please see the company's
	privacy policy.
Adequacy decision, if applicable:	-
Privacy policy of the provider:	https://www.awin.com/de/rechtliches/privacy-
	policy

easy.Marketing		
Easy Marketing GmbH		
Asselner Hellweg 124		
44319 Dortmund		
Opt-Out	Opt Out via <u>consentmanager.net</u>	
Data transfer to third countries:	The company itself is not located in a third country	
	but may cooperate with companies in a third	
	country. For more information, please see the	
	company's privacy policy.	
Adequacy decision, if applicable:	-	
Privacy policy of the provider:	https://easy-m.de/datenschutz	

Google (DoubleClick)		
Google LLC		
1600 Amphitheatre Parkway		
Mountain View		
CA 94043, USA ("Google")		
Opt-Out	http://www.aboutads.info/choices	
	Opt Out via <u>consentmanager.net</u>	
Data transfer to third countries:	Yes, to the USA. The transfer takes place with your	
	consent.	
Adequacy decision, if	Not available for the USA.	
applicable:		
Garantien:	EU standard contractual clauses	
Privacy policy of the provider:	https://policies.google.com/privacy?hl=en≷=us	

MediaMath	
MediaMath Germany GmbH	
Dorotheenstraße 35	
10117 Berlin;	
Opt-Out	Opt Out via <u>consentmanager.net</u>

<u>easyname</u>

Data	transfer	to	third	The company itself is not located in a third country but
countri	es:			may cooperate with companies in a third country. For
				more information, please see the company's privacy
				policy.
Adequa	acy de	cision,	if	-
applica	ıble:			
Privacy policy of the provider:			vider:	http://www.mediamath.com/de/datenschutzrichtlinie/

Targeting 360		
Targeting 360 GmbH		
Gredinger Straße 24a		
90453 Nürnberg		
Opt-Out	Opt Out via <u>consentmanager.net</u> (NEORY)	
Data transfer to third countries:	The company itself is not located in a third country	
	but may cooperate with companies in a third	
	country. For more information, please see the	
	company's privacy policy.	
Adequacy decision, if applicable:	-	
Privacy policy of the provider:	https://targeting360.de/datenschutz/	

The Reach Group	
The Reach Group GmbH	
Am Karlsbad 16	
10785 Berlin	
Opt-Out	https://www.reachgroup.com/it/opt-out/
	Opt Out via <u>consentmanager.net</u>
Data transfer to third countries:	The company itself is not located in a third country
	but may cooperate with companies in a third
	country. For more information, please see the
	company's privacy policy.
Adequacy decision, if applicable:	-
Privacy policy of the provider:	https://www.reachgroup.com/datenschutz/



Social Networks

Links to other Websites

Our website also contains clearly recognizable links to websites of other companies. We have no influence on the content of the websites of these other companies. Therefore, we cannot assume any guarantee or liability for the content of these websites. The respective providers or operators are responsible for the content of these pages.

The linked pages are checked for any legal violations and recognizable infringements at the time of linking. At the time of linking, no illegal content was recognizable. It would cost us an enormous amount of effort to permanently check the contents of the linked pages without any concrete indications. This would not be reasonable. As soon as we become aware of an infringement, such links will be checked immediately.

Social Media Icons

Our website contains links to the social media services of various social networks. These links can be recognized by the respective company logo. When simply loading the website, no connection to the respective social media presence is established. By clicking on their logo, you will be redirected to our company presence on the respective social media service. This transmits to the social media service that you have visited our website. The following data is also transmitted to the social media service:

- Address of the web page where the activated link is located,
- Date and time when the website were called up or the link was activated,
- Information about the browser and operating system used,
- IP address.

If you click on the link of the social medium while you are logged in to it, the provider of the social medium may be able to determine your username and possibly your real name from the transmitted data and assign the information to your user account. You can prevent this if you log out of your user account with the social medium before you click on the link on our website.

The servers of the social media services are in the USA and other countries outside the EU. Your data may therefore also be processed in other countries outside the EU. These countries are subject to data protection laws that do not protect your data in the same way as they do within the EU.

<u>easyname</u>

We have no influence on the data processing by the provider of the social media service. If you want to learn more about the use of your data by the social media service, see the privacy policy of the respective social media service.

Social networks

As already mentioned above, we maintain online presences within social networks and platforms to be able to communicate with the customers, interested parties and users active there and to inform them about our services there. When calling up the respective networks and platforms, the terms and conditions and data processing guidelines of the respective operators apply.

Unless otherwise stated in our privacy policy, we process the data of users insofar as they communicate with us within the social networks and platforms, e.g. make posts on our online presences or send us messages.

Furthermore, user data is usually processed within social networks for market research and advertising purposes. For example, usage profiles can be created based on the usage behavior and resulting interests of the users. The usage profiles can in turn be used, for example, to place advertisements within and outside the networks that presumably correspond to the interests of the users. For these purposes, cookies are usually stored on the users' computers, in which the usage behavior and interests of the users are stored. Furthermore, data may also be stored in the usage profiles regardless of the devices used by the users (especially if the users are members of the respective platforms and are logged in to them).

n the case of requests for information and the assertion of data subject rights, we would also like to point out that these can be asserted most effectively with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information directly. If you still need help, you can contact us at.

Types of processed data:

- Inventory data (e.g., names, addresses),
- Contact details (e.g. e-mail, telephone numbers),
- Content data (e.g. entries in online forms),
- Usage data (e.g., web pages visited, interest in content, access times),
- Meta/communication data (e.g., device information, IP addresses).

Affected persons:

• Users (e.g., website visitors, users of online services).

Processing purpose:

- Contact requests and communication,
- Tracking (e.g., interest/behavior-based profiling, use of cookies),
- Remarketing,
- Reach measurement (e.g. access statistics, recognition of returning visitors).

Legal basis:

• Legitimate interests (Art. 6 para. 1 p. 1 lit. f. GDPR).

Facebook	Social network;
	Service Provider: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, Mother company: Meta, 1 Hacker Way, Menlo Park, CA 94025, USA;
	Website: https://www.facebook.com;
	Privacy Policy: <u>https://www.facebook.com/about/privacy;</u>
	Option to object (opt-out): Settings for advertisements: <u>https://www.facebook.com/settings?tab=ads;</u>
	Additional notes on data protection: Agreement on joint processing ofpersonaldataonFacebookpages:https://www.facebook.com/legal/terms/pagecontrolleraddendum,
	Privacy notice for Meta pages: https://www.facebook.com/legal/terms/information_about_page_insi ghts_data.
Instagram	Social network;
	Service Providerr: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, Mother company: Meta, 1 Hacker Way, Menlo Park, CA 94025, USA;
	Website: <u>https://www.instagram.com;</u>
	Privacy Policy: https://instagram.com/about/legal/privacy.



Opposition options

If you do not want a link to be created between the visit to our website and your social media profile, you must

- log out of the respective network before visiting our social media fan page
- delete the cookies stored on your computer
- Exit and restart your browser

As soon as you log in again, you will once more be recognizable to the network as a specific user.

You also have an opt-out option in the respective social media portal.

Facebook	https://www.facebook.com/settings?tab=ads	AND
	http://www.youronlinechoices.com	
Instagram	http://www.networkadvertising.org/managing/opt_out.asp	AND
	http://www.youronlinechoices.com	

Social Plugins

Functions of various social networks are integrated on our websites. If you visit our website while logged into their respective social media account, you can link our website to your social media account by clicking on the button of the respective social media service. This allows the social media provider to associate the visit to our website with your user account. We would like to point out that we, as the provider of the websites, have no knowledge of the content of the transmitted data or its use by the social media service provider. You can find more information on this in the privacy statements of the social media providers.

The following social media providers have a plug-in on our websites:

Faceboo	Social network;
k	
	Service Provider: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand
	Canal Harbour, Dublin 2, Ireland, Mother company: Meta, 1 Hacker Way,
	Menlo Park, CA 94025, USA;
	Website: https://www.facebook.com;
	Privacy Policy: <u>https://www.facebook.com/about/privacy;</u>
	Option to object (opt-out): Settings for advertisements:
	https://www.facebook.com/settings?tab=ads;
	Additional notes on data protection: Agreement on joint processing of
	personal data on Facebook pages:
	https://www.facebook.com/legal/terms/page_controller_addendum,
	Privacy notice for Meta pages:
	https://www.facebook.com/legal/terms/information_about_page_insights_
	data.
Instagra	Social network;
m	
	Service Providerr: Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand
	Canal Harbour, Dublin 2, Ireland, Mother company: Meta, 1 Hacker Way,
	Menlo Park, CA 94025, USA;
	Website: <u>https://www.instagram.com;</u>
	Privacy Policy: https://instagram.com/about/legal/privacy.

Third party embedded content

We partly integrate third party content on our website.

This content is integrated in "extended data protection mode", which means that no data about you as a user is transmitted if you do not play or click on the content. Only if you agree to the data transfer and play or click on the content, the data mentioned in the next paragraph will be transferred. We have no influence on this data transmission. The legal basis for the processing of data after your consent is Art. 6 para. 1 p. 1 lit. a GDPR.



YouTube

When playing YouTube videos, YouTube (YouTube LLC, 901 Cherry Ave. San Bruno, CA 94066, USA) receives the information that you have accessed the corresponding subpage of our website. In addition, the data that is collected during the informational visit to our website is transmitted. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the assignment to your YouTube profile, you must log out of your Google account before playing the YouTube videos. YouTube stores this data as usage profiles and uses it for the purposes of advertising, market research and/or needs-based design of its website. Such evaluation is carried out (even for users who are not logged in) for the provision of needs-based advertising and to inform other users of the social network about your activities on our website. For more information on the purpose and scope of data collection and processing by YouTube, please refer to YouTube's privacy policy. There you will also find further information about your rights and setting options for protecting your privacy: https://policies.google.com/privacy?hl=de&gl=de

Opt Out via consentmanager.net.

MS Booking for Herold counselling appointment Bookings

We have integrated the appointment booking service Microsoft Booking into our Website for appointment booking within the scope of the partner actions with Herold. Contractual partner of Microsoft Ireland and responsible for data collection for appointment bookings is our partner HEROLD Business Data GmbH. For further information, please refer to the data protection information of https://www.herold.at/datenschutzerklaerung

Date: 7th of March 2023