

# PRIVACY POLICY – **GDPR**

## CURIOSITY.space is a project of

## CURADEN AG

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# 1. An overview of data protection

## 1.1. General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

## 1.2. Data recording on this website

**Who is the responsible party for the recording of data on this website (i.e., the “controller”)?**

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the GDPR)” in this Privacy Policy.

**How do we record your data?**

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g., web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website.

**What are the purposes we use your data for?**

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyse your user patterns.

**What rights do you have as far as your information is concerned?**

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

**1.3. Analysis tools and tools provided by third parties**

There is a possibility that your browsing patterns will be statistically analysed when you visit this website. Such analyses are performed primarily with what we refer to as analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

## **2. General information and mandatory information**

### **2.1. Data protection**

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e., through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

## **2.2. Information about the responsible party (referred to as the “controller” in the GDPR)**

The data processing controller on this website is:

CURIOSITY.space is a project of  
Curaden AG  
Amlehnstrasse 22  
6010 Kriens  
Switzerland

Phone: +41 41 319 45 00

E-mail: [hello@curiosity.space](mailto:hello@curiosity.space)

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

## **2.3. Storage duration**

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

## **2.4. General information on the legal basis for the data processing on this website**

If you have consented to data processing, we process your personal data on the basis of Art. 6 (1)(a) GDPR or Art. 9 (2)(a) GDPR, if special categories of data are processed according to Art. 9 (1) GDPR. In the case of explicit consent to the transfer of personal data to third



countries, the data processing is also based on Art. 49 (1)(a) GDPR. If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based on § 25 (1) TTDSG. The consent can be revoked at any time. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1)(b) GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(f) GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

## **2.5. Designation of a data protection officer**

We have appointed a data protection officer for our company.

Curaden AG

Amlehnstrasse 22

6010 Kriens

Switzerland

Phone: +41 79 458 18 33

E-mail: [gdpr@curaden.ch](mailto:gdpr@curaden.ch)

## **2.6. Information on data transfer to the USA and other non-EU countries**

Among other things, we use tools of companies domiciled in the United States or other from a data protection perspective non-secure non-EU countries. If these tools are active, your personal data may potentially be transferred to these non-EU countries and may be processed there. We must point out that in these countries, a data protection level that is comparable to that in the EU cannot be guaranteed. For instance, U.S. enterprises are under a mandate to release personal data to the security agencies and you as the data subject do not have any litigation options to defend yourself in court. Hence, it cannot be ruled out that U.S. agencies (e.g., the Secret Service) may process, analyse, and permanently archive

your personal data for surveillance purposes. We have no control over these processing activities.

## **2.7. Revocation of your consent to the processing of data**

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

## **2.8. Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)**

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6(1)(E) OR (F) GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21(1) GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING AT ANY TIME. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21(2) GDPR).

## **2.9. Right to log a complaint with the competent supervisory agency**

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

## **2.10. Right to data portability**

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

## **2.11. SSL and/or TLS encryption**

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognise an encrypted connection by checking whether the address line of the browser switches from "http://" to "https://" and also by the appearance of the lock icon in the browser line.

## **2.12. Encrypted payment transactions on this website**

If there is an obligation to transmit your payment data (e.g. account number in the case of direct debit authorisation) to us after the conclusion of a contract with costs, this data will be required for payment processing.

Payment transactions via the common means of payment (Visa/MasterCard, direct debit) are made exclusively via an encrypted SSL or TLS connection. You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

With encrypted communication, your payment data that you transmit to us cannot be read by third parties.

### **2.13. Information about, rectification and eradication of data**

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

### **2.14. Right to demand processing restrictions**

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.

If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.

If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.

If you have raised an objection pursuant to Art. 21(1) GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

## 3. General Recording of data on this website

### 3.1. Cookies

Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser.

In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third-party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g., cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g., the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions, or for the provision of certain functions you want to use (e.g., for the shopping cart function) or those that are necessary for the optimisation (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6(1)(f) GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error free and optimised provision of the operator’s services. If your consent to the storage of the cookies and similar recognition technologies has been requested, processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TTDSG); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the

delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third-party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

### **3.2. Consent with Cookiebot**

Our website uses consent technology from Cookiebot to obtain your consent to the storage of certain cookies on your end device or for the use of certain technologies and to document this in a data protection-compliant manner. The provider of this technology is Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark (hereinafter “Cookiebot”).

When you enter our website, a connection is established with the Cookiebot servers to obtain your consent and provide you with other explanations regarding the use of cookies. Cookiebot will then store a cookie in your browser to identify the consent you have given or its revocation. The data collected in this way is stored until you request us to delete it, delete the Cookiebot cookie itself or the purpose for which the data is stored no longer applies. Mandatory legal storage obligations remain unaffected.

Cookiebot is used to obtain the legally required consent for the use of cookies. The legal basis for this is Art. 6(1)(c) GDPR.

#### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

### **3.3. Contact form**

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6(1)(b) GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6(1)(f) GDPR) or on your agreement (Art. 6(1)(a) GDPR) if this has been requested; the consent can be revoked at any time.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g., after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

### **3.4. Request by e-mail, telephone, or fax**

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6(1)(b) GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6(1)(f) GDPR) or on the basis of your consent (Art. 6(1)(a) GDPR) if it has been obtained; the consent can be revoked at any time.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

### **3.5. Typeform**

We have integrated Typeform on this website. The provider is TYPEFORM S.L., Carrer Bac de Roda, 163, 08018 Barcelona, Spain (hereinafter “Typeform”).

Typeform enables us to create online forms and integrate them into our website. The data you enter in our Typeform forms is stored on Typeform’s servers until you ask us to delete it, revoke any consent you have given to store it, or the purpose for storing the data no longer applies (e.g., after we have finished processing your request). Mandatory legal provisions – in particular, retention periods – remain unaffected by this.

The use of Typeform is based on Art. 6(1)(f) GDPR. The website operator has a legitimate interest in functioning online forms. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user’s end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

#### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.



### **3.6. Hubspot CRM**

We use Hubspot CRM on this website. The provider is Hubspot Inc. 25 Street, Cambridge, MA 02141 USA (hereafter Hubspot CRM).

Hubspot CRM enables us, among other things, to manage existing and potential customers and customer contacts, to communicate with you and to plan and execute marketing activities in line with your interests. Hubspot CRM enables us to capture, sort and analyse customer interactions via email, social media, or phone across multiple channels. The personal data collected in this way can be evaluated and used for communication with the potential customer or marketing measures (e.g., newsletter mailings). Hubspot CRM also enables us to collect and analyse the user behaviour of our contacts on our website.

The use of Hubspot CRM is based on Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the most efficient customer management and customer communication. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time. For details, please refer to Hubspot's privacy policy: <https://legal.hubspot.com/de/privacy-policy>.

Data transmission to the US is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://www.hubspot.de/data-privacy/privacy-shield>.

#### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

### **3.7. Registration on this website**

You have the option to register on this website to be able to use additional website functions. We shall use the data you enter only for the purpose of using the respective offer or service you have registered for. The required information we request at the time of registration must be entered in full. Otherwise, we shall reject the registration.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use the e-mail address provided during the registration process.

We shall process the data entered during the registration process on the basis of your consent (Art. 6(1)(a) GDPR).

The data recorded during the registration process shall be stored by us as long as you are registered on this website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

### **3.8. Registration with Google**

Instead of registering directly on this website, you can register with Google. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

To register with Google, you must only enter your Google name and password. Google will identify you and confirm your identity to our website.

When you sign in with Google, we may be able to use certain information in your account to complete your profile with us. You decide whether you want this information to be used and if so, which information it is, within the framework of your Google security settings, which you can find here: <https://myaccount.google.com/security> and <https://myaccount.google.com/permissions>.

The data processing associated with Google's registration is based on our legitimate interest in making the registration process as simple as possible for our users (Art. 6(1)(f) GDPR). Since the use of the registration function is voluntary and the users themselves can decide on the respective access options, no conflicting predominant rights of the data subjects are apparent.

### **3.9. Registration with Facebook Connect**

Instead of registering directly on this website, you also have the option to register using Facebook Connect. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too.

If you decide to register via Facebook Connect and click on the "Login with Facebook"/„Connect with Facebook" button, you will be automatically connected to the Facebook platform. There, you can log in using your username and password. As a result, your Facebook profile will be linked to this website or our services. This link gives us access to the data you have archived with Facebook. These data comprise primarily the following:

- Facebook name
- Facebook profile photo and cover photo
- Facebook cover photo
- E-mail address archived with Facebook
- Facebook-ID
- Facebook friends lists
- Facebook Likes ("Likes" information)
- Date of birth
- Gender
- Country
- Language

This information will be used to set up, provide and customise your account.

The registration via Facebook Connect and the affiliated data processing transactions are implemented on the basis of your consent (Art. 6(1)(a) GDPR). You may revoke this consent at any time, which shall affect all future transactions thereafter.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 GDPR). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward

transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our website. Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum), <https://de-de.facebook.com/help/566994660333381> and <https://www.facebook.com/policy.php>.

For more information, please consult the Facebook Terms of Use and the Facebook Data Privacy Policies. Use these links to access this information:

<https://www.facebook.com/about/privacy/> and <https://www.facebook.com/legal/terms/>.

### **3.10. AirTable**

We use the AirTable database service in our online offering as buyer management for our online shop. This is a service provided by Formagrid Inc, 769 Dolores Street San Francisco, CA 94110 USA ("AirTable").

We use AirTable to make purchased courses visible in our log-in area.

AirTable processes the following data:

1. first and last name
2. webflow ID (an internal number to clearly assign customers in our CMS)
3. Purchased products

In principle, AirTable does not pass on any collected data to third parties.

After deletion of your customer account, your data will be blocked with regard to retention periods under tax and commercial law and deleted after these periods have expired, unless you have expressly consented to further use of your data or we have reserved the right to further use of your data as permitted by law, about which we will inform you accordingly. If you are registered with us as a customer, we will block all details of purchases made more than three years ago in the purchase history and delete them no later than 10 years after the date of purchase. You can give us your consent to show you data in your purchase history for purchases made more than three years ago, but no more than 10 years ago. We will delete your data at the latest on expiry of the statutory retention period, i.e. after 10 years, starting from the conclusion of the contract. We will delete your data at the latest upon expiry of the statutory retention period, i.e. after 10 years, starting from the conclusion of the contract. Once this retention period has expired, we will delete this data immediately without you having to request us to do so.

We have concluded an order processing contract with AirTable for the aforementioned purposes, in which we oblige AirTable to protect our customers' data and not to pass it on to third parties. We have concluded a contract with AirTable in accordance with the standard data protection clauses of the EU. You can find AirTable's privacy policy at <https://www.airtable.com/privacy>

### **3.11. Adform**

When you visit this website, personal data is processed by our processor Adform. The categories of data processed are: data on the use of the website and the logging of clicks on individual elements. Purpose of processing: Analysis of user behaviour, analysis of the effectiveness of online marketing measures and selection of online advertising on other platforms that are automatically selected by means of real-time bidding based on user behaviour. Legal basis for the processing: Your consent in accordance with Article 6 (1) a GDPR. Data is transmitted: to the independent data controller Adform A/S, Silkegade 3B, Copenhagen, DK-1113, Denmark. The legal basis for the transmission of data to Adform A/S is your consent in accordance with Art. 6 (1) a GDPR.

### **3.12. Floodlight activities / DV360**

Information/purpose:

This website uses the DV360 Floodlight tag to measure the effectiveness of our advertising campaigns, limit the number of times you see a particular ad, and display ads that are relevant to you and your interests. In particular, information about the advertising you have clicked on and your previous user behaviour on third-party websites is collected and stored. Google uses a cookie ID to record which ads are displayed in which browser and to prevent them from being displayed multiple times. In addition, Google can use cookie IDs to capture so-called conversions that are related to ad requests. This is the case, for example, when a user sees a Google ad and later visits our website with the same browser and buys something there. The cookies do not contain any personal information such as email addresses, names or addresses.

Due to the marketing tools used, your browser automatically establishes a direct connection with the Google server. Through the integration of the Floodlight tag, Google receives the information that you have accessed the corresponding part of our website or clicked on one of our ads.

In addition, the floodlight tags used enable us to understand whether you are performing certain actions on our website after you have viewed one of our display/video ads on another platform or clicked on it (conversion tracking). Google uses this cookie to

understand the content you have interacted with on our websites so that we can send you targeted advertising later.

We forward the collected data to the relevant internal departments for processing, as well as to other affiliated companies within Curaden AG or to external service providers, processors (e.g. hosting, support, analysis service providers) for the required purposes (to carry out the desired ad campaign). The main service provider is Google Ireland Ltd, Ireland. Platform/hosting service providers are granted access to personal data from a third country (countries outside the European Economic Area). We have concluded standard contractual clauses with these service providers as suitable guarantees in accordance with Art. 46 GDPR. Further information can be found here:

Deletion/revocation:

You can prevent participation in this tracking process in various ways: a) by adjusting your browser software settings accordingly; in particular, suppressing third-party cookies will prevent you from receiving ads from third-party providers; b) by installing the plug-in provided by Google at the following link: ; c) by disabling the interest-based ads of the providers that are part of the 'About Ads' self-regulation campaign via the link , although this setting will be deleted if you delete your cookies; d) by means of the corresponding cookie setting.

Lifespan of cookies: up to 180 days (this only applies to cookies set by this website).

Legal basis:

Art. 6 (1) a GDPR (consent)

### **3.13. GoFlow**

We use GoFlow CRM on this website. The provider is GoFlow LLC, 35 Journal Square Plaza #1104, Jersey City, NJ 07306, USA.

GoFlow is a cloud-based SaaS platform that helps e-commerce companies manage their multi-channel sales across different marketplaces. GoFlow provides a central interface for order processing, inventory management, shipping, quote management, purchasing and analytics and is able to capture, sort and analyse customer interactions via email, social media or phone across multiple channels. The personal data collected in this way can be analysed and used for communication with potential customers or for marketing measures (e.g. newsletter mailings). GoFlow also enables us to record and analyse the user behaviour of our contacts on our website.

GoFlow is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient process handling, customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's end device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

Details can be found in GoFlow's privacy policy: <https://goflow.com/privacy>

Data transfer to the USA is based on the standard contractual clauses of the EU Commission.

Details can also be found in the privacy policy.



### **3.14. EasyPost**

We use EasyPost on this website. The provider is EasyPost, 2889 Ashton Boulevard Suite 325, Lehi, UT 84043, USA. EasyPost is a shipping API (application programming interface) that allows us to simplify and automate the shipping process. It connects to multiple carriers and offers features such as shipping label creation, parcel tracking, address validation and the ability to compare rates from different carriers.

EasyPost is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient process handling, customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's end device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

Details can be found in EasyPost's privacy policy: <https://www.easypost.com/privacy>.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can also be found in the privacy policy.

### 3.15. Ghost

We use Ghost to host the Curiosity.space platform. The provider is Ghost Foundation, 160 Robinson Road, #14-04 SBF Center, Singapore, 068914, Singapore (hereinafter “Ghost”). Ghost enables us to publish content on the web (e.g. blog posts, expert articles, courses), manage newsletter subscriptions and send email updates, and collect limited personal data (e.g. email addresses) for newsletter delivery. When you subscribe to Curiosity.space or access content powered by Ghost, the following data may be processed: Your email address, your name, usage data such as page views, email open/click rates. This data is processed solely for sending you requested communications (e.g., newsletters), improving our content and services, managing your subscription and user preferences. We do **not** sell or share this data for advertising purposes.

We have a Stripe integration on Ghost to process payments for subscriptions. When you choose a paid plan, your payment information is securely handled by Stripe. We do not store your payment card details. Stripe may collect personal information such as: Full name, email address, billing address, payment method details. Stripe is GDPR-compliant and certified to PCI-DSS standards. Find more information on Stripe in chapter 8.7 (number to be confirmed after including new chapters or just linked!) of this Privacy Policy.

Ghost complies with GDPR and provides encrypted connections (HTTPS), admin access controls, secure data storage practices. For details on the Ghost Privacy Policy, please refer to this link: <https://ghost.org/privacy/>

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR. More details can be found here: <https://ghost.org/dpa/>

This Application is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient process handling, customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's end device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

### **3.16. Facebook Lead Ads and Email Communication**

We use Facebook Lead Ads to reach new users and offer sign-up opportunities for content, events, or services directly through Facebook and Instagram. The provider of this service is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland (hereinafter “Meta”).

When you submit your information through our Facebook Lead Ads forms, we collect and process your personal data (such as your name and email address) for the purpose of providing you with the information, updates, or offers you requested.

The data collected via Facebook Lead Ads is securely transferred to our email communication platforms, Ghost and/or Hubspot. We use these platforms to manage our communications, including sending newsletters, educational content, updates, and promotional offers related to our services and products.

We ensure that all data is handled in accordance with applicable data protection laws and that appropriate security measures are in place during the transfer and storage of your data.

You can unsubscribe from our communications at any time by using the link provided in each email.

For further information on Meta’s privacy policy, please consult:

<https://www.meta.com/legal/privacy-policy/>

<https://www.facebook.com/business/help/479266960559326>

This Application is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient process handling, customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user’s end device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

### **3.17. LinkedIn Lead Ads and Email Communication**

We use LinkedIn Lead Ads to reach new users and offer sign-up opportunities for content, events, or services. The provider of this service is LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (hereinafter “LinkedIn”). (Address on other LinkedIn chapters should be updated!)

When you submit your information through our LinkedIn Lead Ads forms, we collect and process your personal data (such as your name and email address) for the purpose of providing you with the information, updates, or offers you requested.

The data collected via LinkedIn Lead Ads is securely transferred to our email communication platforms, Ghost and/or Hubspot. We use these platforms to manage our communications, including sending newsletters, educational content, updates, and promotional offers related to our services and products.

We ensure that all data is handled in accordance with applicable data protection laws and that appropriate security measures are in place during the transfer and storage of your data. You can unsubscribe from our communications at any time by using the link provided in each email.

For further information on LinkedIn’s privacy policy, please consult:

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

This Application is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient process handling, customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's end device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

### **3.18. Attentive**

We use Attentive for personalised communication. The provider is Attentive Mobile, Inc., 221 River Street, Suite 9047, Hoboken, NJ, 07030, United States (hereinafter “Attentive”). Attentive is a third-party marketing platform that enables us to engage with users through personalised text messaging and other direct communication channels. We use Attentive to manage opt-in messaging programs, deliver targeted campaigns, and track user interactions to improve customer engagement and marketing performance. We do not share or sell your phone number or messaging data to third parties for advertising.

For more information about Attentive and their privacy policy, please refer to:

<https://www.attentive.com/legal/privacy>

This Application is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient process handling, customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's end device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

## 4. Social media on this website

### 4.1. Social media elements with Shariff

We do use elements of social media networks on this website and its pages (e.g. Facebook, Twitter, Instagram, Pinterest, XING, LinkedIn, Tumblr).

As a rule, you will be able to recognise these social media elements because of the respective social media logos that appear. To warrant the protection of data on this website, we use these elements only in combination with the so-called “Shariff” solution. This application prevents the social media elements that have been integrated into this website from transferring personal data to the respective provider as soon as you enter our website. A direct connection to the provider’s server shall not be established until you have activated the respective social media element by clicking on the affiliated button (which indicates your consent). As soon as you activate the social media element, the respective provider receives the information that you have visited this website with your IP address. If you are simultaneously logged into your respective social media account (e.g. Facebook), the respective provider will be able to allocate your visit to this website to your user account. The activation of the plug-in constitutes a declaration of consent as defined in Art. 6(1)(a) GDPR and und § 25 (1) TTDSG. You have the option to revoke this consent at any time, which shall affect all future transactions.

This service is used to obtain the consent to the use of certain technologies required by law. The legal basis for this is Art. 6(1)(c) GDPR.

## 4.2. Facebook

We have integrated elements of the social network Facebook on this website. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too.

An overview of the Facebook social media elements is available under the following link:  
<https://developers.facebook.com/docs/plugins/>.

If the social media element has been activated, a direct connection between your device and the Facebook server will be established. As a result, Facebook will receive information confirming your visit to this website with your IP address. If you click on the Facebook Like button while you are logged into your Facebook account, you can link content of this website to your Facebook profile. Consequently, Facebook will be able to allocate your visit to this website to your user account. We have to emphasise that we as the provider of the website do not receive any information on the content of the transferred data and its use by Facebook. For more information, please consult the Data Privacy Policy of Facebook at:  
<https://de-de.facebook.com/privacy/explanation>.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6 Sect. 1 lit. a GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 GDPR). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this

agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our website. Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum), <https://de-de.facebook.com/help/566994660333381> and <https://www.facebook.com/policy.php>.



### **4.3. Twitter**

We have integrated functions of the social media platform Twitter into this website. These functions are provided by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland.

If the social media element has been activated, a direct connection between your device and Twitter's server will be established. As a result, Twitter will receive information on your visit to this website. While you use Twitter and the "Re-Tweet" function, websites you visit are linked to your Twitter account and disclosed to other users. We must point out, that we, the providers of the website and its pages do not know anything about the content of the data transferred and the use of this information by Twitter. For more details, please consult Twitter's Data Privacy Declaration at: <https://twitter.com/en/privacy>.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://gdpr.twitter.com/en/controller-to-controller-transfers.html>.

You have the option to reset your data protection settings on Twitter under the account settings at <https://twitter.com/account/settings>.

#### **4.4. Instagram**

We have integrated functions of the public media platform Instagram into this website.

These functions are being offered by Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

If the social media element has been activated, a direct connection between your device and Instagram's server will be established. As a result, Instagram will receive information on your visit to this website.

If you are logged into your Instagram account, you may click the Instagram button to link contents from this website to your Instagram profile. This enables Instagram to allocate your visit to this website to your user account. We have to point out that we as the provider of the website and its pages do not have any knowledge of the content of the data transferred and its use by Instagram.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook or Instagram, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 GDPR). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook or Instagram. The processing by Facebook or Instagram that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under:

[https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this agreement, we are responsible for providing the privacy information when using the Facebook or Instagram tool and for the privacy-secure implementation of the tool on our website. Facebook is responsible for the data security of Facebook or Instagram products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook or

Instagram directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum),

<https://help.instagram.com/519522125107875> and [\[de.facebook.com/help/566994660333381\]\(https://de.facebook.com/help/566994660333381\).](https://de-</a></p></div><div data-bbox=)

For more information on this subject, please consult Instagram's Data Privacy Declaration at: <https://instagram.com/about/legal/privacy/>.

#### **4.5. LinkedIn**

This website uses elements of the LinkedIn network. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

Any time you access a page of this website that contains elements of LinkedIn, a connection to LinkedIn's servers is established. LinkedIn is notified that you have visited this website with your IP address. If you click on LinkedIn's "Recommend" button and are logged into your LinkedIn account at the time, LinkedIn will be in a position to allocate your visit to this website to your user account. We have to point out that we as the provider of the websites do not have any knowledge of the content of the transferred data and its use by LinkedIn. If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6 (1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.linkedin.com/help/linkedin/answer/62538/datenubertragung-aus-der-eu-dem-ewr-und-der-schweiz?lang=en>.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at: <https://www.linkedin.com/legal/privacy-policy>.

#### **4.6. XING**

This website uses elements of the XING network. The provider is the New Work SE, Dammtorstraße 30, 20354 Hamburg, Germany.

Any time one of our sites/pages that contains elements of XING is accessed, a connection with XING's servers is established. As far as we know, this does not result in the archiving of any personal data. In particular, the service does not store any IP addresses or analyse user patterns.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6 (1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of our legitimate interest in making our information as comprehensively visible as possible on social media.

For more information on data protection and the XING share button please consult the Data Protection Declaration of Xing at: [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection).

#### **4.7. eKomi**

We use technology from eKomi Holding GmbH, Zimmerstraße 11, 10969 Berlin, Germany ("eKomi") for the purpose of provider and product reviews by our customers and for our own quality management. We have therefore integrated eKomi rating software on this website. You can use this evaluation software to submit an anonymous evaluation of your experience with us after we have provided our service. For this purpose, personal data is sent to eKomi. eKomi then sends you a rating request. If you submit a review, it will be checked and activated by eKomi. eKomi also collects, stores, and uses personal data in accordance with the provisions of the Data Protection Act. An order processing agreement has been concluded with eKomi for this technical implementation. eKomi takes all organisational and technical measures to protect this data. In accordance with the statutory retention periods, this data is stored and then deleted. You can find more detailed information on data protection at eKomi at <https://www.ekomi.co.uk/uk/privacy/>. As part of your review via eKomi, you can enter your email address, which we can use to contact you later regarding your review. In this way we can, for example, respond individually to your criticism, answer your questions, or provide other assistance. We would like to point

out that providing your e-mail address is voluntary. The legal basis for the use of your data for sending the evaluation e-mail is your consent in accordance with Art. 6 para. 1 lit. a GDPR.

#### **4.8. Pinterest**

On this website, we use elements of the social network Pinterest, which is operated by Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland. When you visit a page that contains such an element, your browser establishes a direct connection to the Pinterest servers. This social media element transmits log data to the Pinterest server in the USA. This log data may contain your IP address, the address of the websites visited that also contain Pinterest functions, the type and settings of the browser, the date and time of the request, your use of Pinterest and cookies. If consent has been obtained, the above-mentioned service is used on the basis of Art. 6 para. 1 lit. a GDPR and § 25 TTDSG. Consent can be revoked at any time. If no consent has been obtained, the service is used on the basis of our legitimate interest in the widest possible visibility in social media. Further information on the purpose, scope and further processing and use of the data by Pinterest as well as your rights and options for protecting your privacy in this regard can be found in Pinterest's privacy policy: <https://policy.pinterest.com/en-gb/privacy-policy>.

## 5. Analysis tools and advertising

### 5.1. Google Tag Manager

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create any user profiles, does not store cookies, and does not carry out any independent analyses. It only manages and runs the tools integrated via it. However, the Google Tag Manager does collect your IP address, which may also be transferred to Google's parent company in the United States.

The Google Tag Manager is used on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the quick and uncomplicated integration and administration of various tools on his website. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

## **5.2. Google Analytics**

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyse the behaviour patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilised operating system and the user's origin. This data is summarised in a user-ID and assigned to the respective end device of the website visitor.

Furthermore, Google Analytics allows us to record your mouse and scroll movements and clicks, among other things. Google Analytics uses various modelling approaches to augment the collected data sets and uses machine learning technologies in data analysis.

Google Analytics uses technologies that make the recognition of the user for the purpose of analysing the user behaviour patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/controllerterms/mccs/>.

### **Browser plug-in**

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

### **Google Signals**

We use Google Signals. Whenever you visit our website, Google Analytics records, among other things, your location, the progression of your search and YouTube progression as well

as demographic data (site visitor data). This data may be used for customised advertising with the assistance of Google Signal. If you have a Google account, your site visitor information will be linked to your Google account by Google Signal and used to send you customised promotional messages. The data is also used to compile anonymised statistics of our users' online patterns.

#### **Contract data processing**

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

#### **Google Analytics E-Commerce-Tracking**

This website uses the "E-Commerce Tracking" function of Google Analytics. With the assistance of E-Commerce Tracking, the website operator is in a position to analyse the purchasing patterns of website visitors with the aim of improving the operator's online marketing campaigns. In this context, information, such as the orders placed, the average order values, shipping costs and the time from viewing the product to making the purchasing decision are tracked. These data may be consolidated by Google under a transaction ID, which is allocated to the respective user or the user's device.



### 5.3. Hotjar

This website utilises Hotjar. The provider is Hotjar Ltd., Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe (website: <https://www.hotjar.com>).

Hotjar is a tool used to analyse your user patterns on this website. Hotjar allows us to for instance record your mouse and scroll movements as well as your click. During this process, Hotjar also has the capability to determine how long your cursor remained in a certain position. Based on this information, Hotjar compiles so-called Heatmaps, that make possible to determine which parts of the website the website visitor reviews with preference.

We are also able to determine how long you have stayed on a page of this website and when you left. We can also determine at which point you suspended making entries into a contact form (so-called conversion funnels).

Furthermore, Hotjar can be deployed to obtain direct feedback from website visitors. This function aims at the improvement of the website offerings of the website operator.

Hotjar uses technologies that make it possible to recognise the user for the purpose of analysing the user patterns (e.g., cookies or the deployment of device fingerprinting).

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR; the website operator has a legitimate interest in the analysis of user patterns to optimise both, the web presentation and the operator's advertising activities.

#### **Deactivation of Hotjar**

If you would like to deactivate the recording of data by Hotjar, please click on the link below and follow the instructions provided under the link: <https://www.hotjar.com/policies/do-not-track/>.

Please keep in mind that you will have to separately deactivate Hotjar for every browser and every device.

For more detailed information about Hotjar and the data to be recorded, please consult the Data Privacy Declaration of Hotjar under the following link:

<https://www.hotjar.com/privacy>.

## **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

### **5.4. WP Statistics**

This website uses the WP Statistics analysis tool to evaluate visitor accesses statistically. The provider is Veronalabs, ARENCO Tower, 27th Floor, Dubai Media City, Dubai, Dubai 23816, UAE (<https://veronalabs.com>).

WP Statistics can be used to analyse the use of our website. In doing so, WP Statistics records, among other things, log files (IP address, referrer, browser used, origin of the user, search engine used) and actions that the website visitors have taken on the site (e.g. clicks and views).

The data collected with WP Statistics is stored exclusively on our own server.

The use of this analysis tool is based on Art. 6(1)(f) GDPR. We have a legitimate interest in the anonymised analysis of user behaviour in order to optimise both our websites and our advertising. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

## **5.5. Google Ads**

The website operator uses Google Ads. Google Ads is an online promotional program of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display ads in the Google search engine or on third-party websites, if the user enters certain search terms into Google (keyword targeting). It is also possible to place targeted ads based on the user data Google has in its possession (e.g., location data and interests; target group targeting). As the website operator, we can analyse these data quantitatively, for instance by analysing which search terms resulted in the display of our ads and how many ads led to respective clicks.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://policies.google.com/privacy/frameworks> and  
<https://privacy.google.com/businesses/controllerterms/mccs/>.

## **5.6. Google AdSense (not personalised)**

This website uses Google AdSense, an ad embedding service provided by Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

We use Google AdSense in the “non-personalised” mode. Contrary to the personalised mode, the ads are not based on your previous user patterns and the service does not generate a user profile for you. Instead, the service uses so-called “context information” to choose the ads that are posted for you to view. The selected ads are thus based e.g. on your location, the content of the website you are visiting at the time, or the search terms you are using. To learn more about the distinct differences between personalised targeting and targeting that has not been personalised by Google AdSense, please click on the following link: <https://support.google.com/adsense/answer/9007336>.

Please keep in mind that if Google AdSense is used in the non-personalised mode, it is possible that cookies are stored or comparable recognition technologies (e.g., device fingerprinting) are used.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/controllerterms/mccs/>.

You have the option to autonomously adjust the advertising settings in your user account.

To do so, please click on the link provided below and log in:

<https://adssettings.google.com/authenticated>.

For more information about Google’s advertising technologies, please click here:

<https://policies.google.com/technologies/ads> and

<https://www.google.de/intl/de/policies/privacy/>.

## **5.7. Google Remarketing**

This website uses the functions of Google Analytics Remarketing. The provider of these solutions is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Remarketing analyses your user patterns on our website (e.g., clicks on specific products), to allocate a certain advertising target groups to you and to subsequently display matching online offers to you when you visit other online offers (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Remarketing to device encompassing functions of Google. This makes it possible to display interest-based customised advertising messages, depending on your prior usage and browsing patterns on a device (e.g., cell phone) in a manner tailored to you as well as on any of your devices (e.g., tablet or PC).

If you have a Google account, you have the option to object to personalised advertising under the following link: <https://www.google.com/settings/ads/onweb/>.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

For further information and the pertinent data protection regulations, please consult the Data Privacy Policies of Google at: <https://policies.google.com/technologies/ads?hl=en>.

### **Formation of Target Groups with Customer Reconciliation**

For the formation of target groups, we use, among other things, the Google Remarketing customer reconciliation feature. To achieve this, we transfer certain customer data (e.g., email addresses) from our customer lists to Google. If the respective customers are Google users and are logged into their Google accounts, matching advertising messages within the Google network (e.g., YouTube, Gmail or in a search engine) are displayed for them to view.

## **5.8. Google Conversion-Tracking**

This website uses Google Conversion Tracking. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google Conversion Tracking, we are in a position to recognise whether the user has completed certain actions. For instance, we can analyse the how

frequently which buttons on our website have been clicked and which products are reviewed or purchased with particular frequency. The purpose of this information is to compile conversion statistics. We learn how many users have clicked on our ads and which actions they have completed. We do not receive any information that would allow us to personally identify the users. Google as such uses cookies or comparable recognition technologies for identification purposes.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

For more information about Google Conversion Tracking, please review Google's data protection policy at: <https://policies.google.com/privacy?hl=en>

## **5.9. Google DoubleClick**

This website uses features of Google DoubleClick. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland, (hereinafter "DoubleClick").

DoubleClick is used to show you interest-based ads across the Google Network.

Advertisements can be tailored to the interests of the viewer using DoubleClick. For example, our ads may appear in Google search results or in banners associated with DoubleClick.

To be able to display interest adequate promotional content to users, DoubleClick must recognise the respective visitor so that it can allocate the websites visited, the clicks and other user pattern information to the user. To do this, DoubleClick deploys cookies or comparable recognition technologies (e.g., device fingerprinting). The recorded information is consolidated into a pseudonym user profile so that the respective user can be shown interest adequate advertising.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

For further information on how to object to the advertisements displayed by Google, please see the following links: <https://policies.google.com/technologies/ads> and <https://adssettings.google.com/authenticated>.

## 5.10. Facebook Pixel

To measure conversion rates, this website uses the visitor activity pixel of Facebook. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too.

This tool allows the tracking of page visitors after they have been linked to the website of the provider after clicking on a Facebook ad. This makes it possible to analyse the effectiveness of Facebook ads for statistical and market research purposes and to optimise future advertising campaigns.

For us as the operators of this website, the collected data is anonymous. We are not in a position to arrive at any conclusions as to the identity of users. However, Facebook archives the information and processes it, so that it is possible to make a connection to the respective user profile and Facebook is in a position to use the data for its own promotional purposes in compliance with the [Facebook Data Usage Policy](#). This enables Facebook to display ads on Facebook pages as well as in locations outside of Facebook. We as the operator of this website have no control over the use of such data.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) and <https://de-de.facebook.com/help/566994660333381>.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this agreement, we are responsible for providing the privacy information when using the

Facebook tool and for the privacy-secure implementation of the tool on our website.

Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

In Facebook's Data Privacy Policies, you will find additional information about the protection of your privacy at: <https://www.facebook.com/about/privacy/>.

You also have the option to deactivate the remarketing function "Custom Audiences" in the ad settings section under

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). To do this, you first have to log into Facebook.

If you do not have a Facebook account, you can deactivate any user-based advertising by Facebook on the website of the European Interactive Digital Advertising Alliance:

<http://www.youronlinechoices.com/de/praeferenzmanagement/>.



### **5.11. LinkedIn Insight Tag**

This website uses the Insight tag from LinkedIn. This service is provided by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

#### **Data processing by LinkedIn Insight tag**

We use the LinkedIn Insight tag to obtain information about visitors to our website. Once a website visitor is registered with LinkedIn, we can analyse the key occupational data (e.g., career level, company size, country, location, industry, job title) of our website visitors to help us better target our site to the relevant audience. We can also use LinkedIn Insight tags to measure whether visitors to our websites make a purchase or perform other actions (conversion measurement). Conversion measurement can also be carried out across devices (e.g. from PC to tablet). LinkedIn Insight Tag also features a retargeting function that allows us to display targeted advertising to visitors to our website outside of the website.

According to LinkedIn, no identification of the advertising addressee takes place.

LinkedIn itself also collects log files (URL, referrer URL, IP address, device and browser characteristics and time of access). The IP addresses are shortened or (if they are used to reach LinkedIn members across devices) hashed (pseudonymised). The direct identifiers of LinkedIn members are deleted by LinkedIn after seven days. The remaining pseudonymised data will then be deleted within 180 days.

The data collected by LinkedIn cannot be assigned by us as a website operator to specific individuals. LinkedIn will store the personal data collected from website visitors on its servers in the USA and use it for its own promotional activities. For details, please see LinkedIn's privacy policy at <https://www.linkedin.com/legal/privacy-policy#choices-oblig>.

#### **Legal basis**

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR; the website operator has a legitimate interest in effective advertising promotions that include the utilisation of social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.linkedin.com/legal/l/dpa> and <https://www.linkedin.com/legal/l/eu-sccs>.

### **Objection to the use of LinkedIn Insight Tag**

You can object to LinkedIn's analysis of user behaviour and targeted advertising at the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

In addition, LinkedIn members can control the use of their personal information for promotional purposes in the account settings. To prevent LinkedIn from linking information collected on our site to your LinkedIn account, you must log out of your LinkedIn account before you visit our site.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

### **Data Processing for advertising purposes**

On the basis of Article 6(1)(f) GDPR, the data controller has a legitimate interest in processing data for advertising purposes. For the use of a personalised customer approach, we also reserve the use of first name, last name, date of birth, street, zip code and the city, on this legal basis. The duration of the storage of personal data for advertising purposes is to be derived from the principle of whether the storage is necessary for the advertising approach. We follow the principle of deleting data no later than two years after it is no longer used for advertising purposes.

### **Own advertising purposes and advertising purposes of third parties**

Insofar as you have concluded a contract with us or have had advertising material sent to you, we manage you as an existing customer or interested party. In these cases, we process your name and address in order to send you information about new products and services. Within the scope of our legitimate interests, we reserve the right to transmit your postal contact data to companies of our group of companies and, if applicable, to selected contractual partners, so that they can also inform you about their products.

### **Interest-based advertising**

To ensure that you only receive advertising information that is of supposed interest to you, we categorise and add further information to your customer profile. Statistical information as well as information about you (e.g. basic data of your customer profile) is used for this

purpose. The aim is to send you advertising that is geared solely to your actual or perceived needs and accordingly not to bother you with uninteresting advertising.

#### **Processing of the advertising mailings**

The advertising mailings are processed on our behalf by a service provider, to whom we pass on your data for this purpose.

#### **Right of objection**

You can object to data processing for the aforementioned purposes at any time, free of charge, separately for the respective communication channel and with effect for the future. For this purpose, it is sufficient to send an e-mail or a postal letter to the above contact details.

If you object, the contact address concerned will be blocked for further data processing for advertising purposes. We would like to point out that in exceptional cases, advertising material may still be sent temporarily after receipt of your objection. This is technically due to the necessary lead time of advertisements and does not mean that we will not implement your objection.

## **5.12. Sentry**

We use the Sentry service of Functional Software, Inc., Sentry 45 Fremont Street, 8th Floor, San Francisco, CA 94105, USA (hereinafter "Sentry") for the logging of errors within the scope of our legitimate interest in a technically flawless online offering and its economically efficient design and optimisation pursuant to Art. 6 Par. 1 lit. f GDPR.

Sentry can be used to collect, log and analyse errors in the code for the purpose of system stability. For this purpose, Sentry also collects your usage data, such as your operating system, the software installed on your device, your IP address, your browser type, operating system or the previously visited website ('referring URL'). This data is collected by Sentry pseudonymously and does not allow us to identify you as a user.

This may result in a transfer of your data to the USA. We have concluded an order processing agreement with Sentry, according to which Sentry processes your data only in accordance with our instructions. This GCU also provides that the transfer of data to the USA by Sentry only takes place within the scope of the standard contractual clauses.

For more information on Sentry's use of your data, please refer to Sentry's privacy policy at <https://sentry.io/privacy/>.

### **5.13. Outbrain**

We have integrated Outbrain into this website. The provider is Outbrain Inc., 39 West 13th Street, 3rd floor, New York, NY 10011, USA (hereinafter referred to as “Outbrain”).

Whenever you access a website into which Outbrain has been integrated, Outbrain will generate as pseudonymous user profile (User ID) in which the content you have viewed or read is archived. As a result, our website, or other websites into which Outbrain has been integrated, can recommend other content appropriate to the shown interests or display advertisements. For this purpose, your device type, your IP address, the type of browser you use, visited websites, read articles, the time of access and the device ID are archived and consolidated under your User ID.

Furthermore, we use the Outbrain Pixel. Whenever you access our website, this Pixel allows us to determine whether you already have an Outbrain User ID. This solution enables advertisers from the Outbrain advertising network to measure the effectiveness of their campaigns.

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TTDSG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the analysis of user patterns to optimise both, the operator’s web presentation and advertising activities.

For more information, please consult the Data Privacy Policy of Outbrain under:

<https://www.outbrain.com/legal/privacy#privacy-policy>.

Moreover, if you click on the following link, you will receive a list of all utilized cookies:

<https://www.outbrain.com/privacy/cookies/>.

If you would like to view your Outbrain User Profile or make changes to it, please click on the following link: <https://my.outbrain.com/recommendations-settings/home>.

#### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **5.14. TikTok**

### **Description and scope of data processing**

The social media application TikTok is an international video portal. It is used for the so-called lip-syncing of music videos and other short video clips.

TikTok is operated by the Chinese company ByteDance.

TikTok's privacy policy forms the basis on which TikTok processes all data collected by TikTok from users or provided by users.

According to the Privacy Policy, the controller of personal data is TikTok Technology Limited ("TikTok Ireland"), and TikTok Information Technologies UK Limited ("TikTok UK"). The Privacy Policy usually refers to "TikTok", "we" or "us" for short.

If you have given advertising consent, TikTok will use your data to show you personalised advertising.

### **Legal basis**

The personalised advertising that TikTok displays to you is based on your consent. In all other respects, TikTok processes user data on the basis of a contract (Art. 6 para. 1 sentence 1 letter b GDPR), as a result of a balancing of interests (Art. 6 para. 1 sentence 1 letter f GDPR) or for the fulfillment of legal obligations (Art. 6 para. 1 sentence 1 letter c GDPR). Consents can be revoked by the user and the processing based on a balance of interests can be objected to in accordance with Art. 21 GDPR. For details, please refer to the privacy policy and terms of use of TikTok (link see below).

### **Purpose**

TikTok processes personal data for various purposes, including to provide its services, to be able to notify users of changes to the services, to provide support to users, to allow users to share user content with other users, for the development of new services or to comply with legal obligations.

TikTok collects, among other things, the following data about its users: profile data, user content and usage data, location data, information about the respective contacts/friends. For more information on how your data is used and what data is processed, please refer to TikTok's Privacy Policy and Terms of Use (link below).

### **Duration of storage**

TikTok retains Users' information for as long as necessary to provide the Service to Users, to fulfill its contractual obligations, and to exercise its rights with respect to the information in question. In the event that User information is not needed to provide the Service, User information will be retained by TikTok only for as long as TikTok has a legitimate business purpose in retaining such information.

When a User requests TikTok to delete their account, the account will initially be deactivated for a few weeks. Subsequently, the account will be deleted. In this process, the personal data of users regarding the in-app messaging function will also be deleted.

Messages which you have sent to other users of the TikTok service will remain stored on their devices.

In its privacy policy (see link below), TikTok also points out any longer deletion periods or retention periods.

### **Revocation, objection and end of processing**

TikTok offers its users the possibility to control and manage their own user data (personal data) via the settings options. TikTok also provides its users with automated information services that allow you to obtain information about how your data is processed. Within the framework of the legal requirements, you also have the right to have your data deleted and corrected, and you can object to the use of your data or have the use restricted, as well as revoke the consents you have declared at any time.

### **Supplementary note**

Please note that TikTok's terms of use and privacy policy may change at any time. Therefore, please inquire about the topicality of these texts at regular intervals. Curaden does not warrant the timeliness, accuracy or completeness of the aforementioned information, which relates to TikTok's Terms of Use and Privacy Policy. Our present privacy policy serves to provide the information required under Articles 12 et seq. GDPR to the extent that Curaden uses services of TikTok by embedding videos in one of our websites or TikTok is used by our employees for customers.

Terms of Use-TikTok:

<https://www.tiktok.com/legal/terms-of-use?lang=de>

Privacy Policy:

<https://www.tiktok.com/legal/privacy-policy?lang=de#section-1>

Questions about TikTok's privacy policy:

For users who have questions about TikTok's privacy policy or who wish to contact TikTok's privacy officer, TikTok provides a contact form linked through the privacy policy.



### **5.15      Brandwatch**

We use the services of Brandwatch Group - Runtime Collective Limited, Sovereign House, Church Street, 1st Floor, Brighton, BN1 1UJ, United Kingdom ("Brandwatch") to collect information from social media posts or product reviews published on consumer review platforms other than TrustPilot about our product or services that directly mention Curaden. The information collected by Brandwatch is publicly available and therefore directly controlled by the author or publisher. Brandwatch only receives and sends us the content of the post or review: no other personal data is processed by Brandwatch as part of these processing activities. For more information about Brandwatch's privacy practices, please see the company's privacy policy.

Brandwatch and ProductBoard may transfer personal data to a third country in the course of providing their services. Further information on such transfers can be found in this Privacy Policy.

### **5.16      UXCam**

We use UXCam, UXCam Inc, 814 Mission St, San Francisco, California, USA, to create heat maps, record sessions and how users browse multiple pages in order to make them more user-friendly, measure reach and conduct market research. We use the app analysis tool from UXCam for this purpose.

UXCam processes data only as a processor in accordance with our instructions and not for its own purposes. If the application uses tracking mechanisms or user profiles, we will only use this application if you have given us your prior consent to do so.

### **5.17      Windsor.ai**

We use Windsor.ai, a software from Windsor Group AG, headquartered in Baar, Switzerland, which enables us to retrieve generally or publicly available data as well as personal data from various data sources via an API interface. The data is stored and processed on physical servers located in the EU and made available to us for retrieval in a

standardised format. You can find more information on the subject of data protection on the Windsor.ai website: <https://windsor.ai/privacy-statement/>

This analysis tool is used on the basis of Art. 6 para. 1 lit. f GDPR. We have a legitimate interest in analysing user behaviour in order to optimise both our website and our advertising. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time.

## **5.18 AppsFlyer**

We use functions of AppsFlyer Inc, 100 1st Street, Floor 25, San Francisco, CA 94105, USA, for marketing and optimisation purposes, in particular to display ads that are relevant and interesting to you and to improve campaign performance reports. AppsFlyer provides marketing analytics services that allow us to measure and analyse the effectiveness of our marketing campaigns, AppsFlyer also helps us to detect and protect against abusive behaviour in connection with our marketing campaigns.

Further information on AppsFlyer's terms of use and data protection can be found at <https://www.appsflyer.com/legal/services-privacy-policy/>.

The evaluation of user behaviour on the website and app serves to safeguard the legitimate interests in the optimisation of our website and our app, which predominate in the context of a balancing of interests, in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR.

AppsFlyer also processes data in the United States of America. By using the EU Commission's standard contractual clauses, AppsFlyer ensures that data is processed with the same level of protection as in the EU. You have the right to object to the processing of your personal data at any time with effect for the future, for example by sending an email to [dpt@curaden.ch](mailto:dpt@curaden.ch).

## **6. Newsletter**

### **6.1. Newsletter data**

If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data is not collected or only on a voluntary basis. For the handling of the newsletter, we use newsletter service providers, which are described below.

### **6.2. Shared use of customer data of Curaden AG**

We are a contractual partner of the Curaden AG group of companies, Amlehnstrasse 22, 6010 Kriens, Switzerland. Curaden AG develops our products and services and makes them available to us. Together with Curaden AG we also design our advertising measures as well as newsletters and our websites. We collect customer data such as e-mail addresses for use for advertising purposes and general communication jointly with Curaden AG and are joint controllers within the meaning of Art. 26 GDPR. The collection and processing of the data is based on Art. 6 (1) f) GDPR. We and Curaden AG shall make the information required pursuant to Art. 13 and 14 GDPR available to the data subjects free of charge in a precise, transparent, comprehensible, and easily accessible form in a clear and simple language. In doing so, each party shall provide the other party with all necessary information from its sphere of influence.

### **6.3. Mailchimp**

This website uses the services of Mailchimp to send out its newsletters. The provider is the Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. Among other things, Mailchimp is a service that can be deployed to organise and analyse the sending of newsletters. Whenever you enter data for the purpose of subscribing to a newsletter (e.g. your e-mail address), the information is stored on Mailchimp servers in the United States.

With the assistance of the Mailchimp tool, we can analyse the performance of our newsletter campaigns. If you open an e-mail that has been sent through the Mailchimp tool, a file that has been integrated into the e-mail (a so-called web-beacon) connects to Mailchimp's servers in the United States. As a result, it can be determined whether a newsletter message has been opened and which links the recipient possibly clicked on. Technical information is also recorded at that time (e.g. the time of access, the IP address, type of browser and operating system). This information cannot be allocated to the respective newsletter recipient. Their sole purpose is the performance of statistical analyses of newsletter campaigns. The results of such analyses can be used to tailor future newsletters to the interests of their recipients more effectively.

If you do not want to permit an analysis by Mailchimp, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message.

The data is processed based on your consent (Art. 6(1)(a) GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://mailchimp.com/eu-us-data-transfer-statement/> and [https://mailchimp.com/legal/data-processing-addendum/#Annex C - Standard Contractual Clauses](https://mailchimp.com/legal/data-processing-addendum/#Annex_C_-_Standard_Contractual_Clauses).

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist, if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6(1)(f) GDPR). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

For more details, please consult the Data Privacy Policies of Mailchimp at:

<https://mailchimp.com/legal/terms/>.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **6.4. SendGrid/Twilio**

This website uses the cloud-based email marketing software SendGrid by Twilio for sending newsletters. The provider is Twilio Germany GmbH, Rosenheimer Str. 143C, 81671 Munich, Germany. SendGrid is a service with which newsletter dispatch can be organised and analysed. The data you enter for the purpose of receiving newsletters (e.g., e-mail address) is stored on SendGrid's servers.

The servers that SendGrid uses for data processing are located in the USA, among other places, which means that your e-mail address may be transmitted to their US servers. To learn what SendGrid does to comply with EU data protection regulations, please see their Privacy Policy at <https://www.twilio.com/legal/privacy> and <https://www.twilio.com/legal/data-protection-addendum>.

Our newsletters sent with SendGrid allow us to analyse the behaviour of newsletter recipients. Among other things, we can analyse how many recipients have opened the newsletter message and how often which link in the newsletter was clicked. With the help of so-called conversion tracking, it can also be analysed whether a predefined action (e.g., purchase of a product on our website) has taken place after clicking on the link in the newsletter.

The data processing is based on your consent (Art. 6 para. 1 lit. a GDPR). You can revoke this consent at any time by unsubscribing from the newsletter. The legality of the data processing operations already carried out remains unaffected by the revocation.

If you do not want any analysis by SendGrid, you must unsubscribe from the newsletter. For this purpose, we provide a corresponding link in each newsletter message. Furthermore, you can also unsubscribe from the newsletter directly on the website.

The data you provide for the purpose of receiving the newsletter will be stored by us until you unsubscribe from the newsletter and will be deleted from our servers as well as from the servers of SendGrid after you unsubscribe from the newsletter. Data that has been stored by us for other purposes remains unaffected by this.

For more details, please refer to the privacy policy of SendGrid at: <https://sendgrid.com/policies/privacy/>.

## 7. Plug-ins and Tools

### 7.1. YouTube with expanded data protection integration

Our website embeds videos of the website YouTube. The website operator is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

We use YouTube in the expanded data protection mode. According to YouTube, this mode ensures that YouTube does not store any information about visitors to this website before they watch the video. Nevertheless, this does not necessarily mean that the sharing of data with YouTube partners can be ruled out as a result of the expanded data protection mode. For instance, regardless of whether you are watching a video, YouTube will always establish a connection with the Google DoubleClick network.

As soon as you start to play a YouTube video on this website, a connection to YouTube's servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited. If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

Furthermore, after you have started to play a video, YouTube will be able to place various cookies on your device or comparable technologies for recognition (e.g. device fingerprinting). In this way YouTube will be able to obtain information about this website's visitors. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud.

Under certain circumstances, additional data processing transactions may be triggered after you have started to play a YouTube video, which are beyond our control.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6(1)(f) GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under: <https://policies.google.com/privacy?hl=en>.

## **7.2. Vimeo Without Tracking (Do-Not-Track)**

This website uses plugins of the Vimeo video portal. The provider is Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

Whenever you visit one of our pages featuring Vimeo videos, a connection with the servers of Vimeo is established. In conjunction with this, the Vimeo server receives information about which of our sites you have visited. Vimeo also receives your IP address. However, we have set up Vimeo in such a way that Vimeo cannot track your user activities and does not place any cookies.

We use Vimeo to make our online presentation attractive for you. This is a legitimate interest on our part pursuant to Art. 6(1)(f) GDPR. If a respective declaration of consent was requested (e.g. concerning the storage of cookies), processing shall occur exclusively on the basis of Art. 6(1)(a) GDPR; the given consent may be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission and, according to Vimeo, on “legitimate business interests”. Details can be found here: <https://vimeo.com/privacy>.

For more information on the handling of user data, please consult Vimeo’s data privacy policy at: <https://vimeo.com/privacy>



### **7.3. Google Maps**

This website uses the mapping service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer. In case Google Maps has been activated, Google has the option to use Google web fonts for the purpose of the uniform depiction of fonts. When you access Google Maps, your browser will load the required web fonts into your browser cache, to correctly display text and fonts.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6(1)(f) GDPR. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/gdprcontrollerterms/> and

<https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>.

For more information on the handling of user data, please review Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

## **7.4. Google reCAPTCHA**

We use “Google reCAPTCHA” (hereinafter referred to as “reCAPTCHA”) on this website. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to determine whether data entered on this website (e.g., information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyses the behaviour of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g., IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google.

reCAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway.

Data are stored and analysed on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the protection of the operator’s websites against abusive automated spying and against SPAM. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user’s end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

For more information about Google reCAPTCHA please refer to the Google Data Privacy Declaration and Terms Of Use under the following links:

<https://policies.google.com/privacy?hl=en> and <https://policies.google.com/terms?hl=en>.

## **7.5. Wordfence**

We have included Wordfence on this website. The provider is Defiant Inc, Defiant, Inc, 800 5th Ave Ste 4100, Seattle, WA 98104, USA (hereinafter “Wordfence”).

Wordfence is designed to protect our website from unwanted access or malicious cyberattacks. To accomplish this, our website establishes a permanent connection with Wordfence’s servers, which check and block their databases against access to our website. The use of Wordfence is based on Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the most effective protection of his website against cyberattacks. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user’s end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

Data transmission to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://www.wordfence.com/help/general-data-protection-regulation/>.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **7.6. ManageWP**

We administrate this website with the assistance of the ManageWP tool. The provider is GoDaddy.com WP Europe, Trg republike 5, 11000 Belgrade, Serbia (hereinafter referred to as ManageWP).

Among other things, ManageWP ensures that we can monitor the security and performance of our website as well as generate automatic backups. Consequently, ManageWP has access to all of the website's content, including our databases. ManageWP is being hosted on the provider's servers.

The use of ManageWP is based on Art. 6 (1)(f) GDPR. The website operator has a legitimate interest in a website(s) that work(s) as effectively and securely as possible. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **7.7 Registration with Apple ID**

You can choose to register using your Apple ID. "Sign in with Apple" is a service offered by Apple Inc, One Apple Park Way, Cupertino, CA 95014, USA (hereinafter referred to as "Apple"). If you choose "Sign in with Apple", we process your data on the basis of your consent in accordance with Art. 6 para. 1, sentence 1 lit. a GDPR. You can find more information on data protection at Apple in this privacy policy.

If you use "Sign in with Apple", we will receive information about your name and email address.

Apple processes and transfers your data to the USA (see Section A. 2). We have concluded standard contractual clauses approved by the EU Commission with Apple in order to provide sufficient guarantees for the transfer in accordance with Art. 46 para. 2 lit. c GDPR.

## **8. eCommerce and payment service providers**

### **8.1. Processing of Customer and Contract Data**

We collect, process, and use personal customer and contract data for the establishment, content arrangement and modification of our contractual relationships. Data with personal references to the use of this website (usage data) will be collected, processed, and used only if this is necessary to enable the user to use our services or required for billing purposes.

The legal basis for these processes is Art. 6(1)(b) GDPR.

The collected customer data shall be deleted upon completion of the order or termination of the business relationship and upon expiration of any existing statutory archiving periods.

This shall be without prejudice to any statutory archiving periods.

### **8.2. Data transfer upon closing of contracts for online stores, retailers, and the shipment of merchandise**

Whenever you order merchandise from us, we will share your personal data with the transportation company entrusted with the delivery as well as the payment service commissioned to handle the payment transactions. Only the data these respective service providers require to meet their obligations will be shared. The legal basis for this sharing is Art. 6 (1)(b) GDPR, which permits the processing of data for the fulfillment of contractual or pre-contractual obligations. If you give us your respective consent pursuant to Art. 6 (1)(a) GDPR, we will share your email address with the transportation company entrusted with the delivery so that this company can notify you on the shipping status for your order via email. You have the option to revoke your consent at any time.

### **8.3. Data transfer upon closing of contracts for services and digital content**

We share personal data with third parties only if this is necessary in conjunction with the handling of the contract; for instance, with the financial institution tasked with the processing of payments.

Any further transfer of data shall not occur or shall only occur if you have expressly consented to the transfer. Any sharing of your data with third parties in the absence of your express consent, for instance for advertising purposes, shall not occur.

The basis for the processing of data is Art. 6(1)(b) GDPR, which permits the processing of data for the fulfilment of a contract or for pre-contractual actions.

### **8.4. Credit checks**

We may conduct a credit check in the event that purchases are made on account or based on other payment terms that require us to extend credit (scoring). For this purpose, we transmit the data you have entered (e.g., name, address, age, or banking information) to a credit information agency. Based on this data, the probability of non-payment is determined. If the likelihood of non-payment is excessive, we may reject the respective payment term.

The credit check is performed on the basis of contractual fulfillment (Art. 6(1)(b) GDPR) and to avert non-payment (justified interest pursuant to Art. 6(1)(f) GDPR). If consent has been obtained, the credit check shall be performed on the basis of this consent (Art. 6(1)(a) GDPR); the consent may be revoked at any time.

### **8.5. Payment services**

We integrate payment services of third-party companies on our website. When you make a purchase from us, your payment data (e.g. name, payment amount, bank account details, credit card number) are processed by the payment service provider for the purpose of payment processing. For these transactions, the respective contractual and data protection provisions of the respective providers apply. The use of the payment service providers is based on Art. 6(1)(b) GDPR (contract processing) and in the interest of a smooth,

convenient, and secure payment transaction (Art. 6(1)(f) GDPR). Insofar as your consent is requested for certain actions, Art. 6(1)(a) GDPR is the legal basis for data processing; consent may be revoked at any time for the future.

We use the following payment services / payment service providers within the scope of this website:

## **8.6. PayPal**

The provider of this payment service is PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter “PayPal”).

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.paypal.com/de/webapps/mpp/ua/pocpsa-full>.

Details can be found in PayPal’s privacy policy:

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

## **8.7. Stripe**

The provider for customers within the EU is Stripe Payments Europe, Ltd, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland (hereinafter “Stripe”).

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://stripe.com/de/privacy> and

<https://stripe.com/de/guides/general-data-protection-regulation>.

Details can be found in Stripe’s Privacy Policy at the following link:

<https://stripe.com/de/privacy>.

## **8.8. Instant transfer Sofort**

The provider of this payment service is Sofort GmbH, Theresienhöhe 12, 80339 Munich, Germany (hereinafter “Sofort GmbH”). With the help of the “Sofortüberweisung” procedure, we receive a payment confirmation from Sofort GmbH in real time and can immediately begin to fulfill our obligations. If you have chosen the payment method “Sofortüberweisung”, please send the PIN and a valid TAN to Sofort GmbH, with which it can log into your online banking account. Sofort GmbH automatically checks your account balance after logging in and carries out the transfer to us with the help of the TAN you have transmitted. Afterwards, it immediately sends us a transaction confirmation. After you log in, your turnover, the credit limit of the overdraft facility and the existence of other accounts and their balances are also checked automatically. In addition to the PIN and the TAN, the payment data entered by you as well as personal data will be transmitted to Sofort GmbH. The data about your person are first and last name, address, telephone number(s), email address, IP address and possibly other data required for payment processing. The transmission of this data is necessary to determine your identity beyond doubt and to prevent fraud attempts. For details on payment with immediate bank transfer, please refer to the following links: <https://www.sofort.de/datenschutz.html> and <https://www.klarna.com/sofort/>.

## **8.9. Unser**

The provider of this payment service is the Unser GmbH, Vangerowstraße 18, 69115 Heidelberg (hereinafter referred to as “Unzer”).

For details, please consult Unser’s data privacy policy at:

<https://www.unzer.com/de/datenschutz/>.



### **8.10. American Express**

The provider of this payment service is the American Express Europe S.A., Theodor-Heuss-Allee 112, 60486 Frankfurt am Main, Germany (hereinafter “American Express”).

American Express may transfer data to its parent company in the US. The data transfer to the US is based on the Binding Corporate Rules. Details can be found here:

<https://www.americanexpress.com/en-pl/company/legal/privacy-centre/european-implementing-principles/>.

For more information, please see the American Express privacy policy:

<https://www.americanexpress.com/de/legal/online-datenschutzerklarung.html>.

### **8.11. Mastercard**

The provider of this payment service is the Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium (hereinafter “Mastercard”).

Mastercard may transfer data to its parent company in the US. The data transfer to the US is based on Mastercard's Binding Corporate Rules. Details can be found here:

<https://www.mastercard.de/de-de/datenschutz.html> and

<https://www.mastercard.us/content/dam/mccom/global/documents/mastercard-bcrs.pdf>.

### **8.12. VISA**

The provider of this payment service is the Visa Europe Services Inc, London Branch, 1 Sheldon Square, London W2 6TT, United Kingdom (hereinafter “VISA”).

Great Britain is considered a secure non-EU country as far as data protection legislation is concerned. This means that the data protection level in Great Britain is equivalent to the data protection level of the European Union.

VISA may transfer data to its parent company in the US. The data transfer to the US is based on the standard contractual clauses of the EU Commission. Details can be found here:

<https://www.visa.de/nutzungsbedingungen/visa-globale-datenschutzmitteilung/mitteilung-zu-zustandigkeitsfragen-fur-den-ewr.html>.

For more information, please refer to VISA's privacy policy:

<https://www.visa.de/nutzungsbedingungen/visa-privacy-center.html>.

### **8.13. PayU**

Curaden offers the payment option via PayU, MIH PayU B.V. having its registered office in Amsterdam, the Netherlands, registration number 52117839 ("PayU"), such as prepayment, payment by credit card and payment on account. For this purpose, payment data may be transmitted to PayU. For more information about the processing of personal data by this payment service provider, please see PayU's privacy policy:

<https://corporate.payu.com/privacy/>

### **8.14. Payment services**

We integrate payment services from third-party companies on our website. When you make a purchase from us, your payment details (e.g. name, payment amount, account details, credit card number) are processed by the payment service provider for the purpose of processing the payment. The respective contractual and data protection provisions of the respective providers apply to these transactions. The payment service providers are used on the basis of Art. 6(1)(b) GDPR (contract processing) as well as in the interest of a smooth, convenient and secure payment process (Art. 6(1)(f) GDPR). Insofar as your consent is requested for certain actions, Art. 6 (1)(a) GDPR is the legal basis for data processing; consents can be revoked at any time for the future. We use the following payment services / payment service providers within the scope of this website:

### **8.15. Apple Pay**

The payment service provider is Apple Inc, Infinite Loop, Cupertino, CA 95014, USA. Apple's privacy policy can be found at: <https://www.apple.com/legal/privacy/en-ww/>

### **8.16. Google Pay**

The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. You can find Google's privacy policy here: <https://policies.google.com/privacy?hl=en-GB>

### **8.17. Amazon Pay**

The provider of this payment service is Amazon Payments Europe S.C.A., 38 Avenue J.F. Kennedy, L-1855 Luxembourg.

Details on the handling of your data can be found in the Amazon Pay privacy policy under the following link: <https://pay.amazon.co.uk/?ld=1>

### **8.18. Afterpay**

The provider of this payment service is Riverty GmbH, Gütersloher Straße 123, 33415 Verl, Germany.

Details can be found in the following privacy policy:

[https://documents.riverty.com/privacy\\_statement/checkout/en\\_de/default](https://documents.riverty.com/privacy_statement/checkout/en_de/default).

### **8.19. Taboola**

Our website uses native advertising technologies from Taboola Inc, Taboola Europe Limited Aldgate House, 2nd Floor, 33 Aldgate High Street, London EC3N 1DL, UK, for conversion tracking and remarketing. A cookie is placed on your computer by the provider. These cookies are not used for personal identification. If you visit certain of our pages and the cookie has not yet expired, we and the provider can recognise that someone has clicked on the ad and been redirected to our site.

The remarketing function is also used to present interest-based adverts to visitors to the website as part of the native advertising network. However, if you do not wish to use the remarketing function, you can always deactivate it by making the appropriate settings at <https://www.taboola.com/privacy-policy>.

The use of Taboola is based on Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient customer management and customer communication possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TTDSG, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TTDSG. Consent can be revoked at any time. Data transfer to third countries outside the European Union is

based on the standard contractual clauses of the EU Commission. Details can be found in Taboola's privacy policy: <https://www.taboola.com/privacy-policy>.

## **9. Online-based Audio and Video Conferences (Conference tools)**

### **9.1. Data processing**

We use online conference tools, among other things, for communication with our customers. The tools we use are listed in detail below. If you communicate with us by video or audio conference using the Internet, your personal data will be collected and processed by the provider of the respective conference tool and by us. The conferencing tools collect all information that you provide/access to use the tools (email address and/or your phone number). Furthermore, the conference tools process the duration of the conference, start and end (time) of participation in the conference, number of participants and other “context information” related to the communication process (metadata).

Furthermore, the provider of the tool processes all the technical data required for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Should content be exchanged, uploaded, or otherwise made available within the tool, it is also stored on the servers of the tool provider. Such content includes, but is not limited to, cloud recordings, chat/ instant messages, voicemail uploaded photos and videos, files, whiteboards, and other information shared while using the service.

Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

## **9.2. Purpose and legal bases**

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6(1)(b) GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art. 6(1)(f) GDPR). Insofar as consent has been requested, the tools in question will be used on the basis of this consent; the consent may be revoked at any time with effect from that date.

## **9.3. Duration of storage**

Data collected directly by us via the video and conference tools will be deleted from our systems immediately after you request us to delete it, revoke your consent to storage, or the reason for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the duration of storage of your data that is stored by the operators of the conference tools for their own purposes. For details, please directly contact the operators of the conference tools.

## **9.4. Conference tools used**

We employ the following conference tools:

## **9.5. Webex**

We use Webex. The provider of this service is the Webex Communications Deutschland GmbH, Hansaallee 249 c/o Cisco Systems GmbH, 40549 Düsseldorf, Germany.

It cannot be ruled out that data processed via Webex will be transferred to third-party countries (e.g. USA). Webex has Binding Corporate Rules (BCR) which have been approved by the Dutch, Polish, Spanish, and other relevant European Data Protection Authorities.

These are binding corporate rules that legitimise the transfer of data within the company to third countries outside the EU and EEA: [https://www.cisco.com/c/de\\_de/about/trust-center/data-protection-and-privacy-policy.html](https://www.cisco.com/c/de_de/about/trust-center/data-protection-and-privacy-policy.html) and

[https://konferenzen.telekom.de/fileadmin/Redaktion/conference/cisco-webex/Webex\\_Compliance\\_Deutsch\\_V1.0.pdf](https://konferenzen.telekom.de/fileadmin/Redaktion/conference/cisco-webex/Webex_Compliance_Deutsch_V1.0.pdf).

For details on data processing, please refer to Webex's privacy policy:

[https://www.cisco.com/c/de\\_de/about/legal/privacy-full.html](https://www.cisco.com/c/de_de/about/legal/privacy-full.html).

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **10. Custom Services**

### **10.1. Handling applicant data**

We offer website visitors the opportunity to submit job applications to us (e.g., via e-mail, via postal services or by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

### **10.2. Scope and purpose of the collection of data**

If you submit a job application to us, we will process any affiliated personal data (e.g., contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The legal grounds for the aforementioned are Art. 6(1)(b) GDPR (General Contract Negotiations) and – provided you have given us your consent – Art. 6(1)(a) GDPR. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application.

If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of Art. 26 GDPR and Art. 6(1)(b) GDPR for the purpose of implementing the employment relationship in our data processing system.



### 10.3. Data Archiving Period

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6(1)(f) GDPR) for up to six (6) months from the end of the application procedure (rejection or withdrawal of the application). Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g., due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your agreement (Article 6(1)(a) GDPR) or if statutory data retention requirements preclude the deletion.

### 10.4. Admission to the applicant pool

If we do not make you a job offer, you may be able to join our applicant pool. In case of admission, all documents and information from the application will be transferred to the applicant pool in order to contact you in case of suitable vacancies.

Admission to the applicant pool is based exclusively on your express agreement (Art. 6(1)(a) GDPR). The submission agreement is voluntary and has no relation to the ongoing application procedure. **The affected person can revoke his agreement at any time.** In this case, the data from the applicant pool will be irrevocably deleted, provided there are no legal reasons for storage.

The data from the applicant pool will be irrevocably deleted no later than two (2) years after consent has been granted.