

# Legal Notice

Information in accordance with the duty to inform pursuant to §5 of the E-Commerce Act, §14 of the Austrian Commercial Code, §63 of the Industrial Code and the duty to disclose pursuant to §25 of the Media Act.

superweb.at Manfred Scheucher  
Manfred Scheucher  
Berghamerstraße 60,  
4072 Alkoven,  
Österreich

**Object of the company:** Werbeagentur

**VAT-Number:** ATU45462100

**GLN:** 9110005175397

**GISA:** 15773944

**Phone:** +43-664 161 10 53

**Email:** [office@ms-creative.com](mailto:office@ms-creative.com)

**Member of:** WKO, FG Werbung und Marktkommunikation

**Laws re. professions:** Gewerbeordnung: [www.ris.bka.gv.at](http://www.ris.bka.gv.at)

**Supervisory/Trade authority:** Bezirkshauptmannschaft Eferding

**Job title:** Werbeagentur

**Awarding country:** Österreich

## Contact details of the data protection controller

If you have any question about data protection, please find the contact details of the body or person responsible for data protection below:

ms creative Manfred Scheucher

Berghamerstraße 60, 4072 Alkoven

Email: siehe oa.

E-Mail: [office@ms-creative.com](mailto:office@ms-creative.com)

Phone: +43 664 1611053

Company details: <https://www.ms-creative.com/v07/?sn=500>

## EU Dispute Resolution

We would like to inform you about the Online Dispute Resolution platform (ODR platform) in accordance with the regulation on Online Dispute Resolution in consumer matters (ODR Regulation).

Consumers have the option of submitting complaints to the European Commission's Online Dispute Resolution platform at

<https://ec.europa.eu/consumers/odr/main/?event=main.home2.show>. You will find the necessary

contact details in our imprint above.

However, we would like to note, that we are not willing or obliged to participate in dispute settlement procedures before a consumer arbitration board.

## **Liability for the Contents of this Website**

We are constantly developing the content of this website and strive to provide correct and up-to-date information. Unfortunately, we cannot accept liability for the accuracy of any content on this website. This especially includes content provided by third parties. As a service provider, we are neither obliged to monitor any information you transmit or store, nor to investigate any circumstances that indicate illegal activity.

Due to court- or official orders under the general law, our obligations to remove information or to block the use of information remain unaffected, even if we are not responsible.

If you notice any problematic or illegal content, please contact us immediately so we can remove the illegal content. You will find our contact details in the imprint.

## **Liability for Links on this Website**

Our website contains links to other websites for which we are not responsible. We are not liable for any linked websites, since we have had no knowledge of illegal activities. If we ever become aware of any illegal activity, we will remove any links in question immediately.

If you notice illegal links on our website, please contact us. You will find our contact details in the imprint.

## **Copyright Notice**

All contents of this website (pictures, images, photos, texts, videos) are subject to copyright. Please ask us before distributing, reproducing or using the contents of this website – such as republishing them on other websites. If necessary, we will prosecute the unauthorised use of our website's content.

If you find content on this website that violates copyright, please contact us.

## **Picture Credits**

The pictures, images and graphics on this website are protected by copyright.

The image rights are with:

Fotograf Manfred Scheucher – [www.manfred-scheucher.at](http://www.manfred-scheucher.at)

All texts are copyrighted.

# Privacy Policy

## Table of contents

- [Privacy Policy Introduction and Overview](#)
- [Scope](#)
- [Legal bases](#)
- [Contact details of the data protection controller](#)
- [Storage Period](#)
- [Rights in accordance with the General Data Protection Regulation](#)
- [Data transfer to third countries](#)
- [Security of data processing operations](#)
- [Communications](#)
- [Data Processing Agreement \(DPA\)](#)
- [Cookies](#)
- [Customer Data](#)
- [Web hosting](#)
- [Social Media](#)
- [Cookie Consent Management Platform](#)
- [Web Design Introduction](#)
- [Explanation of the terminology used](#)
- [Closing Remarks](#)

## Privacy Policy Introduction and Overview

We have written this privacy policy (version 16.05.2023-122505902) in order to explain to you, in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#) and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered gender-neutral.

**In short:** We provide you with comprehensive information about any of your personal data we process.

Privacy policies usually sound very technical and use legal terminology. However, this privacy policy is intended to describe the most important things to you as simply and transparently as possible. So long as it aids transparency, technical **terms are explained in a reader-friendly manner, links** to further information are provided and **graphics** are used. We are thus informing in clear and simple language that we only process personal data in the context of our business activities if there is a legal basis for it. This is certainly not possible with brief, unclear and legal-technical statements, as is often standard on the internet when it comes to data protection. I hope you find the following explanations interesting and informative. Maybe you will also find some information that you have not been familiar with.

If you still have questions, we kindly ask you to contact the responsible body named below or in the imprint, follow the existing links and look at further information on third-party sites. You can of course also find our contact details in the imprint.

## Scope

This privacy policy applies to all personal data processed by our company and to all personal data processed by companies commissioned by us (processors). With the term personal data, we refer to information within the meaning of Article 4 No. 1 GDPR, such as the name, email address and postal address of a person. The processing of personal data ensures that we can offer and invoice our services and products, be it online or offline. The scope of this privacy policy includes:

- all online presences (websites, online shops) that we operate
- Social media presences and email communication
- mobile apps for smartphones and other devices

**In short:** This privacy policy applies to all areas in which personal data is processed in a structured manner by the company via the channels mentioned. Should we enter into legal relations with you outside of these channels, we will inform you separately if necessary.

## Legal bases

In the following privacy policy, we provide you with transparent information on the legal principles and regulations, i.e. the legal bases of the General Data Protection Regulation, which enable us to process personal data.

Whenever EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016. You can of course access the General Data Protection Regulation of the EU online at EUR-Lex, the gateway to EU law, at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>.

We only process your data if at least one of the following conditions applies:

1. **Consent** (Article 6 Paragraph 1 lit. a GDPR): You have given us your consent to process data for a specific purpose. An example would be the storage of data you entered into a contact form.
2. **Contract** (Article 6 Paragraph 1 lit. b GDPR): We process your data in order to fulfill a contract or pre-contractual obligations with you. For example, if we conclude a sales contract with you, we need personal information in advance.
3. **Legal obligation** (Article 6 Paragraph 1 lit. c GDPR): If we are subject to a legal obligation, we will process your data. For example, we are legally required to keep invoices for our bookkeeping. These usually contain personal data.
4. **Legitimate interests** (Article 6 Paragraph 1 lit. f GDPR): In the case of legitimate interests that do not restrict your basic rights, we reserve the right to process personal data. For example, we have to process certain data in order to be able to operate our website securely and economically. Therefore, the processing is a legitimate interest.

Other conditions such as making recordings in the interest of the public, the exercise of official authority as well as the protection of vital interests do not usually occur with us. Should such a legal basis be relevant, it will be disclosed in the appropriate place.

In addition to the EU regulation, national laws also apply:

- In **Austria** this is the Austrian Data Protection Act (**Datenschutzgesetz**), in short **DSG**.
- In **Germany** this is the Federal Data Protection Act (**Bundesdatenschutzgesetz**), in short **BDSG**.

Should other regional or national laws apply, we will inform you about them in the following sections.

## Contact details of the data protection controller

If you have any questions about data protection, you will find the contact details of the responsible person or controller below:

ms creative Manfred Scheucher  
Berghamerstraße 60, 4072 Alkoven  
Email: siehe oa.

E-Mail: [office@ms-creative.com](mailto:office@ms-creative.com)

Phone: [+43 664 1611053](tel:+436641611053)

Company details: <https://www.ms-creative.com/v07/?sn=500>

## Storage Period

It is a general criterion for us to store personal data only for as long as is absolutely necessary for the provision of our services and products. This means that we delete personal data as soon as any reason for the data processing no longer exists. In some cases, we are legally obliged to keep certain data stored even after the original purpose no longer exists, such as for accounting purposes.

If you want your data to be deleted or if you want to revoke your consent to data processing, the data will be deleted as soon as possible, provided there is no obligation to continue its storage.

We will inform you below about the specific duration of the respective data processing, provided we have further information.

## Rights in accordance with the General Data Protection Regulation

In accordance with Articles 13, 14 of the GDPR, we inform you about the following rights you have to ensure fair and transparent processing of data:

- According to Article 15 DSGVO, you have the right to information about whether we are

processing data about you. If this is the case, you have the right to receive a copy of the data and to know the following information:

- for what purpose we are processing;
  - the categories, i.e. the types of data that are processed;
  - who receives this data and if the data is transferred to third countries, how security can be guaranteed;
  - how long the data will be stored;
  - the existence of the right to rectification, erasure or restriction of processing and the right to object to processing;
  - that you can lodge a complaint with a supervisory authority (links to these authorities can be found below);
  - the origin of the data if we have not collected it from you;
  - Whether profiling is carried out, i.e. whether data is automatically evaluated to arrive at a personal profile of you.
- You have a right to rectification of data according to Article 16 GDPR, which means that we must correct data if you find errors.
  - You have the right to erasure (“right to be forgotten”) according to Article 17 GDPR, which specifically means that you may request the deletion of your data.
  - According to Article 18 of the GDPR, you have the right to restriction of processing, which means that we may only store the data but not use it further.
  - According to Article 20 of the GDPR, you have the right to data portability, which means that we will provide you with your data in a standard format upon request.
  - According to Article 21 DSGVO, you have the right to object, which entails a change in processing after enforcement.
    - If the processing of your data is based on Article 6(1)(e) (public interest, exercise of official authority) or Article 6(1)(f) (legitimate interest), you may object to the processing. We will then check as soon as possible whether we can legally comply with this objection.
    - If data is used to conduct direct advertising, you may object to this type of data processing at any time. We may then no longer use your data for direct marketing.
    - If data is used to conduct profiling, you may object to this type of data processing at any time. We may no longer use your data for profiling thereafter.
  - According to Article 22 of the GDPR, you may have the right not to be subject to a decision based solely on automated processing (for example, profiling).
  - You have the right to lodge a complaint under Article 77 of the GDPR. This means that you can complain to the data protection authority at any time if you believe that the data processing of personal data violates the GDPR.

**In short:** you have rights – do not hesitate to contact the responsible party listed above with us!

If you believe that the processing of your data violates data protection law or your data protection rights have been violated in any other way, you can complain to the supervisory authority. For Austria, this is the data protection authority, whose website can be found at <https://www.dsb.gv.at/>. In Germany, there is a data protection officer for each federal state. For more information, you can contact the Federal Commissioner for [Data Protection and Freedom of Information \(BfDI\)](#). The

following local data protection authority is responsible for our company:

## **Austria Data protection authority**

**Manager:** Mag. Dr. Andrea Jelinek

**Address:** Barichgasse 40-42, 1030 Wien

**Phone number.:** +43 1 52 152-0

**E-mail address:** [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

**Website:** <https://www.dsb.gv.at/>

## **Data transfer to third countries**

We only transfer or process data to countries outside the EU (third countries) if you consent to this processing, if this is required by law or if it is contractually necessary. In any case, we generally only do so to the permitted extent. In most cases, your consent is the most important reason for data being processed in third countries. When personal data is being processed in third countries such as the USA, where many software manufacturers offer their services and have their servers located, your personal data may be processed and stored in unexpected ways.

We want to expressly point out, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing by US services (such as Google Analytics) may result in data processing and retention without the data having undergone anonymisation processes. Furthermore, US government authorities may be able to access individual data. The collected data may also get linked to data from other services of the same provider, should you have a user account with the respective provider. We try to use server locations within the EU, whenever this is offered and possible.

We will provide you with more details about data transfer to third countries in the appropriate sections of this privacy policy, whenever applicable.

## **Security of data processing operations**

In order to protect personal data, we have implemented both technical and organisational measures. We encrypt or pseudonymise personal data wherever this is possible. Thus, we make it as difficult as we can for third parties to extract personal information from our data.


Article 25 of the GDPR refers to “data protection by technical design and by data protection-friendly default” which means that both software (e.g. forms) and hardware (e.g. access to server rooms) appropriate safeguards and security measures shall always be placed. If applicable, we will outline the specific measures below.

## **TLS encryption with https**

The terms TLS, encryption and https sound very technical, which they are indeed. We use HTTPS (Hypertext Transfer Protocol Secure) to securely transfer data on the Internet.

This means that the entire transmission of all data from your browser to our web server is secured – nobody can “listen in”.

We have thus introduced an additional layer of security and meet privacy requirements through technology design [Article 25 Section 1 GDPR](#)). With the use of TLS (Transport Layer Security), which is an encryption protocol for safe data transfer on the internet, we can ensure the protection of confidential information.

You can recognise the use of this safeguarding tool by the little lock-symbol , which is situated in your browser's top left corner in the left of the internet address (e.g. examplepage.uk), as well as by the display of the letters https (instead of http) as a part of our web address.

If you want to know more about encryption, we recommend you to do a Google search for “Hypertext Transfer Protocol Secure wiki” to find good links to further information.

## Communications

### Communications Overview

? Affected parties: Anyone who communicates with us via phone, email or online form

? Processed data: e. g. telephone number, name, email address or data entered in forms. You can find more details on this under the respective form of contact

? Purpose: handling communication with customers, business partners, etc.

? Storage duration: for the duration of the business case and the legal requirements

⚖️ Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1) (f) GDPR (legitimate interests)

If you contact us and communicate with us via phone, email or online form, your personal data may be processed.

The data will be processed for handling and processing your request and for the related business transaction. The data is stored for this period of time or for as long as is legally required.

### Affected persons

The above-mentioned processes affect all those who seek contact with us via the communication channels we provide.

### Telephone

When you call us, the call data is stored in a pseudonymised form on the respective terminal device, as well as by the telecommunications provider that is being used. In addition, data such as your name and telephone number may be sent via email and stored for answering your inquiries. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

### Email

If you communicate with us via email, your data is stored on the respective terminal device



(computer, laptop, smartphone, ...) as well as on the email server. The data will be deleted as soon as the business case has ended and the legal requirements allow for its erasure.

## Online forms

If you communicate with us using an online form, your data is stored on our web server and, if necessary, forwarded to our email address. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

## Legal bases

Data processing is based on the following legal bases:

- Art. 6 para. 1 lit. a GDPR (consent): You give us your consent to store your data and to continue to use it for the purposes of the business case;
- Art. 6 para. 1 lit. b GDPR (contract): For the performance of a contract with you or a processor such as a telephone provider, or if we have to process the data for pre-contractual activities, such as preparing an offer;
- Art. 6 para. 1 lit. f GDPR (legitimate interests): We want to conduct our customer inquiries and business communication in a professional manner. Thus, certain technical facilities such as email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.

## Data Processing Agreement (DPA)

In this section, we would like to explain what a Data Processing Agreement is and why it is needed. As the term "Data Processing Agreement" is quite lengthy, we will often only use the acronym DPA here in this text. Like most companies, we do not work alone, but also use the services of other companies or individuals. By involving different companies or service providers, we may pass on personal data for processing. These partners then act as processors with whom we conclude a contract, the so-called Data Processing Agreement (DPA). Most importantly for you to know is that any processing of your personal data takes place exclusively according to our instructions and must be regulated by the DPA.

### Who are the processors?

As a company and website owner, we are responsible for any of your data that is processed by us. In addition to the controller, there may also be so-called processors involved. This includes any company or person who processes your personal data. More precisely and according to the GDPR's definition, this means: Any natural or legal person, authority, institution or other entity that processes your personal data is considered a processor. Processors can therefore be service providers such as hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

To make the terminology easier to comprehend, here is an overview of the GDPR's three roles:

**Data subject** (you as a customer or interested party) □ **Controller** (we as a company and

contracting entity) □ **Processors** (service providers such as web hosts or cloud providers)

## Contents of a Data Processing Agreement

As mentioned above, we have concluded a DPA with our partners who act as processors. First and foremost, it states that the processor processes the data exclusively in accordance with the GDPR. The contract must be concluded in writing, although an electronic contract completion is also considered a “written contract”. Any processing of personal data only takes place after this contract is concluded. The contract must contain the following:

- indication to us as the controller
- obligations and rights of the controller
- categories of data subjects
- type of personal data
- type and purpose of data processing
- subject and duration of data processing
- location of data processing

Furthermore, the contract contains all obligations of the processor. The most important obligations are:

- ensuring data security measures
- taking possible technical and organisational measures to protect the rights of the data subject
- maintaining a data processing record
- cooperation with the data protection authority upon request
- performing a risk analysis for any received personal data
- subprocessors may only be appointed with the written consent of the controller

You can see an example of what a DPA looks like at <https://gdpr.eu/data-processing-agreement/>. This link shows a sample contract.

## Cookies

### Cookies Overview

? Affected parties: visitors to the website

? Purpose: depending on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

? Processed data: depends on the cookie used. More details can be found below or from the manufacturer of the software that sets the cookie.

? Storage duration: can vary from hours to years, depending on the respective cookie

⚖️ Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What are cookies?

Our website uses HTTP-cookies to store user-specific data.

In the following we explain what cookies are and why they are used, so that you can better

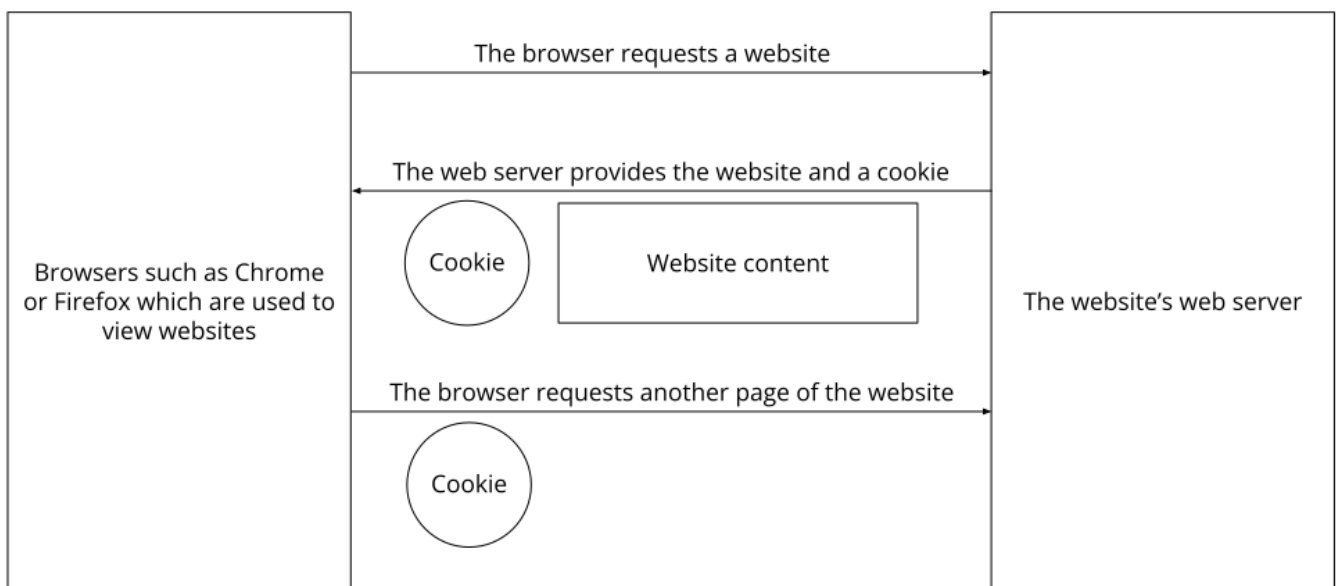
understand the following privacy policy.

Whenever you surf the Internet, you are using a browser. Common browsers are for example, Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

It is important to note that cookies are very useful little helpers. Almost every website uses cookies. More precisely, these are HTTP cookies, as there are also other cookies for other uses. HTTP cookies are small files that our website stores on your computer. These cookie files are automatically placed into the cookie-folder, which is the “brain” of your browser. A cookie consists of a name and a value. Moreover, to define a cookie, one or multiple attributes must be specified.

Cookies store certain user data about you, such as language or personal page settings. When you re-open our website to visit again, your browser submits these “user-related” information back to our site. Thanks to cookies, our website knows who you are and offers you the settings you are familiar to. In some browsers, each cookie has its own file, while in others, such as Firefox, all cookies are stored in one single file.

The following graphic shows a possible interaction between a web browser such as Chrome and the web server. The web browser requests a website and receives a cookie back from the server. The browser then uses this again as soon as another page is requested.



There are both first-party cookies and third-party cookies. First-party cookies are created directly by our site, while third-party cookies are created by partner-websites (e.g. Google Analytics). Each cookie must be evaluated individually, as each cookie stores different data. The expiry time of a cookie also varies from a few minutes to a few years. Cookies are not software programs and do not contain viruses, trojans or other malware. Cookies also cannot access your PC's information.

This is an example of how cookie-files can look:

**Name:** \_ga

**Value:** GA1.2.1326744211.152122505902-9

**Purpose:** Differentiation between website visitors

**Expiry date:** after 2 years

A browser should support these minimum sizes:

- At least 4096 bytes per cookie
- At least 50 cookies per domain
- At least 3000 cookies in total

## **Which types of cookies are there?**

The exact cookies that we use, depend on the used services, which will be outlined in the following sections of this privacy policy. Firstly, we will briefly focus on the different types of HTTP-cookies.

There are 4 different types of cookies:

### **Essential cookies**

These cookies are necessary to ensure the basic functions of a website. They are needed when a user for example puts a product into their shopping cart, then continues surfing on different websites and comes back later in order to proceed to the checkout. These cookies ensure the shopping cart does not get deleted, even if the user closes their browser window.

### **Purposive cookies**

These cookies collect information about user behaviour and whether the user receives any error messages. Furthermore, these cookies record the website's loading time as well as its behaviour in different browsers.

### **Target-orientated cookies**

These cookies ensure better user-friendliness. Thus, information such as previously entered locations, fonts sizes or data in forms stay stored.

### **Advertising cookies**

These cookies are also known as targeting cookies. They serve the purpose of delivering customised advertisements to the user. This can be very practical, but also rather annoying.

Upon your first visit to a website you are usually asked which of these cookie-types you want to accept. Furthermore, this decision will of course also be stored in a cookie.

If you want to learn more about cookies and do not mind technical documentation, we recommend <https://tools.ietf.org/html/rfc6265>, the Request for Comments of the Internet Engineering Task Force (IETF) called "HTTP State Management Mechanism".

## **Purpose of processing via cookies**

The purpose ultimately depends on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

## Which data are processed?

Cookies are little helpers for a wide variety of tasks. Unfortunately, it is not possible to tell which data is generally stored in cookies, but in the privacy policy below we will inform you on what data is processed or stored.

## Storage period of cookies

The storage period depends on the respective cookie and is further specified below. Some cookies are erased after less than an hour, while others can remain on a computer for several years.

You can also influence the storage duration yourself. You can manually erase all cookies at any time in your browser (also see "Right of objection" below). Furthermore, the latest instance cookies based on consent will be erased is after you withdraw your consent. The legality of storage will remain unaffected until then.

## Right of objection – how can I erase cookies?

You can decide for yourself how and whether you want to use cookies. Regardless of which service or website the cookies originate from, you always have the option of erasing, deactivating or only partially accepting cookies. You can for example block third-party cookies but allow all other cookies.

If you want to find out which cookies have been stored in your browser, or if you want to change or erase cookie settings, you can find this option in your browser settings:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

If you generally do not want cookies, you can set up your browser in a way to notify you whenever a cookie is about to be set. This gives you the opportunity to manually decide to either permit or deny the placement of every single cookie. This procedure varies depending on the browser. Therefore, it might be best for you to search for the instructions in Google. If you are using Chrome, you could for example put the search term "delete cookies Chrome" or "deactivate cookies Chrome" into Google.

## Legal basis

The so-called "cookie directive" has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section

96 (3) of the Telecommunications Act (TKG). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in Section 15 (3) of the Telemedia Act (TMG).

For absolutely necessary cookies, even if no consent has been given, there are legitimate interests (Article 6 (1) (f) GDPR), which in most cases are of an economic nature. We want to offer our visitors a pleasant user experience on our website. For this, certain cookies often are absolutely necessary.

This is exclusively done with your consent, unless absolutely necessary cookies are used. The legal basis for this is Article 6 (1) (a) of the GDPR.

In the following sections you will find more detail on the use of cookies, provided the used software does use cookies.

## Customer Data

### Customer Data Overview

? Affected parties: Customers or business and contractual partners

? Purpose: Performance of a contract for the provision of agreed services or prior to entering into such a contract, including associated communications.

? Data processed: name, address, contact details, email address, telephone number, payment information (such as invoices and bank details), contract data (such as duration and subject matter of the contract), IP address, order data

? Storage period: the data will be erased as soon as they are no longer required for our business purposes and there is no legal obligation to process them.

⚖️ Legal bases: Legitimate interests (Art. 6 Para. 1 lit. f GDPR), Contract (Art. 6 Para. 1 lit. b GDPR)

### What is customer data?

In order to be able to offer our services and contractual services, we also process data from our customers and business partners. This data always includes personal data. Customer data is all information that is processed on the basis of contractual or pre-contractual agreements so that the offered services can be provided. Customer data is therefore all the information we collect and process about our customers.

### Why do we process customer data?

There are many reasons why we collect and process customer data. The main reason is that we simply need specific data to provide our services. Sometimes for example your email address may be enough. But if you purchase a product or service, we may e. g. also need data such as your name, address, bank details or other contract data. This data will subsequently be used for marketing and sales optimisation so that we can improve our overall service for our customers and clients. Another important reason for data processing is our customer service, which is very important to us. We want you to have the opportunity to contact us at any time with questions about our offers. Thus, we may need certain data such as your email address at the very least.

## What data is processed?

Exactly which data is stored can only be shown by putting them in categories. All in all, it always depends on which of our services you receive. In some cases, you may only give us your email address so that we can e. g. contact you or answer your questions. In other instances, you may purchase one of our products or services. Then we may need significantly more information, such as your contact details, payment details and contract details.

Here is a list of potential data we may receive and process:

- Name
- Contact address
- Email address
- Phone number
- Your birthday
- Payment data (invoices, bank details, payment history, etc.)
- Contract data (duration, contents)
- Usage data (websites visited, access data, etc.)
- Metadata (IP address, device information)

## How long is the data stored?

We erase corresponding customer data as soon as we no longer need it to fulfill our contractual obligations and purposes, and as soon as the data is also no longer necessary for possible warranty and liability obligations. This can for example be the case when a business contract ends.

Thereafter, the limitation period is usually 3 years, although longer periods may be possible in individual cases. Of course, we also comply with the statutory retention requirements. Your customer data will certainly not be passed on to third parties unless you have given your explicit consent.

## Legal Basis

The legal basis for the processing of your data is Article 6 Paragraph 1 Letter a GDPR (consent), Article 6 Paragraph 1 Letter b GDPR (contract or pre-contractual measures), Article 6 Paragraph 1 Letter f GDPR (legitimate interests) and in special cases (e. g. medical services) Art. 9 (2) lit. GDPR (processing of special categories).

In the case of protecting vital interests, data processing is carried out in accordance with Article 9 Paragraph 2 Letter c. GDPR. For the purposes of health care, occupational medicine, medical diagnostics, care or treatment in the health or social sectors or for the administration of systems and services in health or social sectors, the processing of personal data takes place in accordance with Art. 9 Para. 2 lit. h. GDPR. If you voluntarily provide data of these special categories, the processing takes place on the basis of Article 9 Paragraph 2 lit. a GDPR.

# Web hosting

## Web hosting Overview

? Affected parties: visitors to the website

? Purpose: professional hosting of the website and security of operations

? Processed data: IP address, time of website visit, browser used and other data. You can find more details on this below or at the respective web hosting provider.

? Storage period: dependent on the respective provider, but usually 2 weeks

⚖️ Legal basis: Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What is web hosting?

Every time you visit a website nowadays, certain information – including personal data – is automatically created and stored, including on this website. This data should be processed as sparingly as possible, and only with good reason. By website, we mean the entirety of all websites on your domain, i.e. everything from the homepage to the very last subpage (like this one here). By domain we mean example.uk or examplepage.com.

When you want to view a website on a screen, you use a program called a web browser. You probably know the names of some web browsers: Google Chrome, Microsoft Edge, Mozilla Firefox, and Apple Safari.

The web browser has to connect to another computer which stores the website's code: the web server. Operating a web server is complicated and time-consuming, which is why this is usually done by professional providers. They offer web hosting and thus ensure the reliable and flawless storage of website data.

Whenever the browser on your computer establishes a connection (desktop, laptop, smartphone) and whenever data is being transferred to and from the web server, personal data may be processed. After all, your computer stores data, and the web server also has to retain the data for a period of time in order to ensure it can operate properly.

Illustration:



## Why do we process personal data?

The purposes of data processing are:



1. Professional hosting of the website and operational security
2. To maintain the operational as well as IT security
3. Anonymous evaluation of access patterns to improve our offer, and if necessary, for prosecution or the pursuit of claims.li>

## Which data are processed?

Even while you are visiting our website, our web server, that is the computer on which this website is saved, usually automatically saves data such as

- the full address (URL) of the accessed website (e. g. <https://www.examplepage.uk/examplesubpage.html?tid=122505902>)
- browser and browser version (e.g. Chrome 87)
- the operating system used (e.g. Windows 10)
- the address (URL) of the previously visited page (referrer URL) (e. g. <https://www.examplepage.uk/icamefromhere.html/>)
- the host name and the IP address of the device from the website is being accessed from (e.g. COMPUTERNAME and 194.23.43.121)
- date and time
- in so-called web server log files

## How long is the data stored?

Generally, the data mentioned above are stored for two weeks and are then automatically deleted. We do not pass these data on to others, but we cannot rule out the possibility that this data may be viewed by the authorities in the event of illegal conduct.

**In short:** Your visit is logged by our provider (company that runs our website on special computers (servers)), but we do not pass on your data without your consent!

## Legal basis

The lawfulness of processing personal data in the context of web hosting is justified in Art. 6 para. 1 lit. f GDPR (safeguarding of legitimate interests), as the use of professional hosting with a provider is necessary to present the company in a safe and user-friendly manner on the internet, as well as to have the ability to track any attacks and claims, if necessary.

## Webhosting Other

Contact data for our Webhosting:

merion WebHosting GmbH  
Hofmühlgasse 3  
1060 Wien/Vienna  
FN206668z – eingetragen im Handelsgericht Wien  
+43 1 29 888 00

You can learn more about the data processing at this provider in their [Privacy Policy](#).

## Social Media

### **Social Media Privacy Policy Overview**

? Affected parties: website visitors

? Purpose: Service presentation and optimisation, staying in contact with visitors, interested parties, etc. as well as advertising

? Processed data: data such as telephone numbers, email addresses, contact data, data on user behaviour, information about your device and your IP address.

You can find more details on this directly at the respective social media tool used.

? Storage period: depending on the social media platforms used

⚖️ Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### **What is Social Media?**

In addition to our website, we are also active on various social media platforms. For us to be able to target interested users via social networks, user data may be processed. Additionally, elements of social media platforms may be embedded directly in our website. This is e.g. the case if you click a so-called social button on our website and are forwarded directly to our social media presence. So-called social media are websites and apps on which registered members can produce and exchange content with other members, be it openly or in certain groups and networks.

### **Why do we use Social Media?**

For years, social media platforms have been the place where people communicate and get into contact online. With our social media presence, we can familiarise interested people better with our products and services. The social media elements integrated on our website help you switch to our social media content quickly and hassle free.

The data that is retained and processed when you use a social media channel is primarily used to conduct web analyses. The aim of these analyses is to be able to develop more precise and personal marketing and advertising strategies. The evaluated data on your behaviour on any social media platform can help to draw appropriate conclusions about your interests. Moreover, so-called user profiles can be created. Thus, the platforms may also present you with customised advertisements. For this, cookies are usually placed in your browser, which store data on your user behaviour.

We generally assume that we will continue to be responsible under Data Protection Law, even when using the services of a social media platform. However, the European Court of Justice has ruled that, within the meaning of Art. 26 GDPR, in certain cases the operator of the social media platform can be jointly responsible with us. Should this be the case, we will point it out separately and work on the basis of a related agreement. You will then find the essence of the agreement for the concerned platform below.

Please note that when you use social media platforms or our built-in elements, your data may also

be processed outside the European Union, as many social media channels, such as Facebook or Twitter, are American companies. As a result, you may no longer be able to easily claim or enforce your rights regarding your personal data.

## **Which data are processed?**

Exactly which data are stored and processed depends on the respective provider of the social media platform. But usually it is data such as telephone numbers, email addresses, data you enter in contact forms, user data such as which buttons you click, what you like or who you follow, when you visited which pages, as well as information about your device and IP address. Most of this data is stored in cookies. Should you have a profile on the social media channel you are visiting and are logged in, data may be linked to your profile.

All data that are collected via social media platforms are also stored on the providers' servers. This means that only the providers have access to the data and can provide you with appropriate information or make changes for you.

If you want to know exactly which data is stored and processed by social media providers and how you can object to the data processing, we recommend you to carefully read the privacy policy of the respective company. We also recommend you to contact the provider directly if you have any questions about data storage and data processing or if you want to assert any corresponding rights.

## **Duration of data processing**

Provided we have any further information on this, we will inform you about the duration of the data processing below. The social media platform Facebook example stores data until they are no longer needed for the company's own purposes. However, customer data that is synchronised with your own user data is erased within two days. Generally, we only process personal data for as long as is absolutely necessary for the provision of our services and products. This storage period can also be exceeded however, if it is required by law, such as e.g. in the case of accounting.

## **Right to object**

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers such as embedded social media elements at any time. This can be done either via our cookie management tool or via other opt-out functions. You can e.g. also prevent data collection via cookies by managing, deactivating or erasing cookies in your browser.

Since cookies may be used with social media tools, we also recommend you to read our privacy policy on cookies. If you want to find out which of your data is stored and processed, we advise you to read the privacy policies of the respective tools.

## **Legal basis**

If you have consented to the processing and storage of your data by integrated social media elements, this consent serves as the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**).

Generally, provided you have given your consent, your data will also be stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) in maintaining fast and good communication with you and other customers and business partners. Nevertheless, we only use the tools if you have consented. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy on cookies carefully and to take a look at the privacy policy or cookie policy of the respective service provider.

in the following section you can find information on special social media platforms – provided this information is available.

## Facebook Privacy Policy

### Facebook Privacy Policy Overview

? Affected parties: website visitors

? Purpose: service optimisation

? Processed data: data such as customer data, data on user behaviour, device information and IP address.

You can find more details in the Privacy Policy below.

? Storage period: until the data no longer serves Facebook's purposes

⚖️ Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What are Facebook tools?

We use selected Facebook tools on our website. Facebook is a social media network of the company Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. With the aid of this tool we can provide the best possible offers to you and anyone interested in our products and services.

If your data is collected and forwarded via our embedded Facebook elements or via our Facebook page (fanpage), both we and Facebook Ireland Ltd. are responsible for this. However, should any further processing occur, then Facebook is solely responsible for this data. Our joint commitments were also set out in a publicly available agreement at [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). It e.g. states that we must clearly inform you about the use of Facebook tools on our website. We are also responsible for ensuring that the tools are securely integrated into our website and are in accordance with the applicable privacy laws. Facebook, on the other hand, is e.g. responsible for the data security of Facebook's products. If you have any questions about Facebook's data collection and processing, you can contact the company directly. Should you direct the question to us, we are obliged to forward it to Facebook.

In the following we will give you an overview on the different Facebook tools, as well as on what data is sent to Facebook and how you can erase this data.

Along with many other products, Facebook also offers so called "Facebook Business Tools". This is Facebook's official name for its tools, but it is not very common. Therefore, we decided to merely call them "Facebook tools". They include the following:

- Facebook-Pixel
- Social Plugins (e.g. the “Like” or “Share” button)
- Facebook Login
- Account Kit
- APIs (application programming interface)
- SDKs (Software development kits)
- Platform-integrations
- Plugins
- Codes
- Specifications
- Documentations
- Technologies and Services

With these tools Facebook can extend its services and is able to receive information on user activities outside of Facebook.

### **Why do we use Facebook tools on our website?**

We only want to show our services and products to people who are genuinely interested in them. With the help of advertisements (Facebook Ads) we can reach exactly these people. However, to be able to show suitable adverts to users, Facebook requires additional information on people’s needs and wishes. Therefore, information on the user behaviour (and contact details) on our website, are provided to Facebook. Consequently, Facebook can collect better user data and is able to display suitable adverts for our products or services. Thanks to the tools it is possible to create targeted, customised ad campaigns of Facebook.

Facebook calls data about your behaviour on our website “event data” and uses them for analytics services. That way, Facebook can create “campaign reports” about our ad campaigns’ effectiveness on our behalf. Moreover, by analyses we can get a better insight in how you use our services, our website or our products. Therefore, some of these tools help us optimise your user experience on our website. With the social plugins for instance, you can share our site’s contents directly on Facebook.

### **What data is stored by Facebook tools?**

With the use of Facebook tools, personal data (customer data) may be sent to Facebook. Depending on the tools used, customer data such as name, address, telephone number and IP address may be transmitted.

Facebook uses this information to match the data with the data it has on you (if you are a Facebook member). However, before the customer data is transferred to Facebook, a so called “Hashing” takes place. This means, that a data record of any size is transformed into a string of characters, which also has the purpose of encrypting data.

Moreover, not only contact data, but also “event data” is transferred. These data are the information we receive about you on our website. To give an example, it allows us to see what subpages you visit or what products you buy from us. Facebook does not disclose the obtained

information to third parties (such as advertisers), unless the company has an explicit permission or is legally obliged to do so. Also, "event data" can be linked to contact information, which helps Facebook to offer improved, customised adverts. Finally, after the previously mentioned matching process, Facebook deletes the contact data.

To deliver optimised advertisements, Facebook only uses event data, if they have been combined with other data (that have been collected by Facebook in other ways). Facebook also uses event data for the purposes of security, protection, development and research. Many of these data are transmitted to Facebook via cookies. Cookies are little text files, that are used for storing data or information in browsers. Depending on the tools used, and on whether you are a Facebook member, a different number of cookies are placed in your browser. In the descriptions of the individual Facebook tools we will go into more detail on Facebook cookies. You can also find general information about the use of Facebook cookies at <https://www.facebook.com/policies/cookies>.

## **How long and where are the data stored?**

Facebook fundamentally stores data, until they are no longer of use for their own services and products. Facebook has servers for storing their data all around the world. However, customer data is cleared within 48 hours after they have been matched with their own user data.

## **How can I erase my data or prevent data retention?**

In accordance with the General Data Protection Regulation (GDPR) you have the right of information, rectification, transfer and deletion of your data.

The collected data is only fully deleted, when you delete your entire Facebook account. Deleting your Facebook account works as follows:

- 1) Click on settings in the top right side in Facebook.
- 2) Then, click "Your Facebook information" in the left column.
- 3) Now click on "Deactivation and deletion".
- 4) Choose "Permanently delete account" and then click on "Continue to account deletion".
- 5) Enter your password, click on "continue" and then on "Delete account".

The retention of data Facebook receives via our site is done via cookies (e.g. with social plugins), among others. You can deactivate, clear or manage both all and individual cookies in your browser. How this can be done differs depending on the browser you use. The following instructions show, how to manage cookies in your browser:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

If you generally do not want to allow any cookies at all, you can set up your browser to notify you whenever a cookie is about to be set. This gives you the opportunity to decide upon the permission or deletion of every single cookie.

## Legal basis

If you have consented to your data being processed and stored by integrated Facebook tools, this consent is the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, your data is also stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) to maintain fast and good communication with you or other customers and business partners. Nevertheless, we only use these tools if you have given your consent. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy about cookies carefully and to take a look at the privacy policy or Facebook's cookie policy.

Facebook also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Facebook uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847)

We hope we could give you an understanding of the most important information about the use of Facebook tools and data processing. If you want to find out more on how Facebook use your data, we recommend reading the data policies at <https://www.facebook.com/about/privacy/update>.

## Facebook Social Plugins Privacy Policy

We installed so-called social plugins from Facebook Inc. to our website. You can recognise these buttons by the classic Facebook logo, the "Like" button (hand with raised thumb) or by a "Facebook plugin" label. A social plugin is a small part of Facebook that is integrated into our page. Each plugin has its own function. The most used functions are the well-known "Like" and "Share" buttons.

Facebook offers the following social plugins:

- "Save" button

- “Like” button, Share, Send and Quote
- Page plugin
- Comments
- Messenger plugin
- Embedded posts and video player
- Group Plugin

At <https://developers.facebook.com/docs/plugins> you will find more information on how the individual plugins are used. On the one hand, we use the social plug-ins to offer you a better user experience on our site, and on the other hand because Facebook can optimise our advertisements with it.

If you have a Facebook account or have already visited [facebook.com](https://www.facebook.com), Facebook has already placed at least one cookie in your browser. In this case, your browser sends information to Facebook via this cookie as soon as you visit our website or interact with social plugins (e.g. the “Like” button).

The received information will be deleted or anonymised within 90 days. According to Facebook, this data includes your IP address, the websites you have visited, the date, time and other information relating to your browser.

In order to prevent Facebook from collecting much data and matching it with your Facebook data during your visit to our website, you must log out of Facebook while you visit our website.

If you are not logged in to Facebook or do not have a Facebook account, your browser sends less information to Facebook because you have fewer Facebook cookies. Nevertheless, data such as your IP address or which website you are visiting can be transmitted to Facebook. We would like to explicitly point out that we do not know what exact data is collected. However, based on our current knowledge, we want to try informing you as best we can about data processing. You can also read about how Facebook uses the data in the company’s data policy at <https://www.facebook.com/about/privacy/update>.

At least the following cookies are set in your browser when you visit a website with social plugins from Facebook:

**Name:** dpr

**Value:** no information

**Purpose:**This cookie is used to make the social plugins work on our website.

**Expiry date:** after end of session

**Name:** fr

**Value:** 0jiejy4122505902c2GnlufEJ9..Bde09j...1.0.Bde09j

**Purpose:**The cookie is also necessary for the plugins to function properly

**Expiry date:** after 3 months

**Note:** These cookies were set after our test and may be placed even if you are not a Facebook member.



If you are registered with Facebook, you can change your settings for advertisements yourself at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). If you are not a Facebook user, you can go to <https://www.youronlinechoices.com/uk/your-ad-choices/> and manage your usage-based online advertising. There you have the option to deactivate or activate providers.

If you want to learn more about Facebook's data protection, we recommend the company's own data policies at <https://www.facebook.com/policy.php>.

## Cookie Consent Management Platform

### Cookie Consent Management Platform Overview

? Affected parties: Website visitors

? Purpose: Obtaining and managing consent to certain cookies and thus the use of certain tools

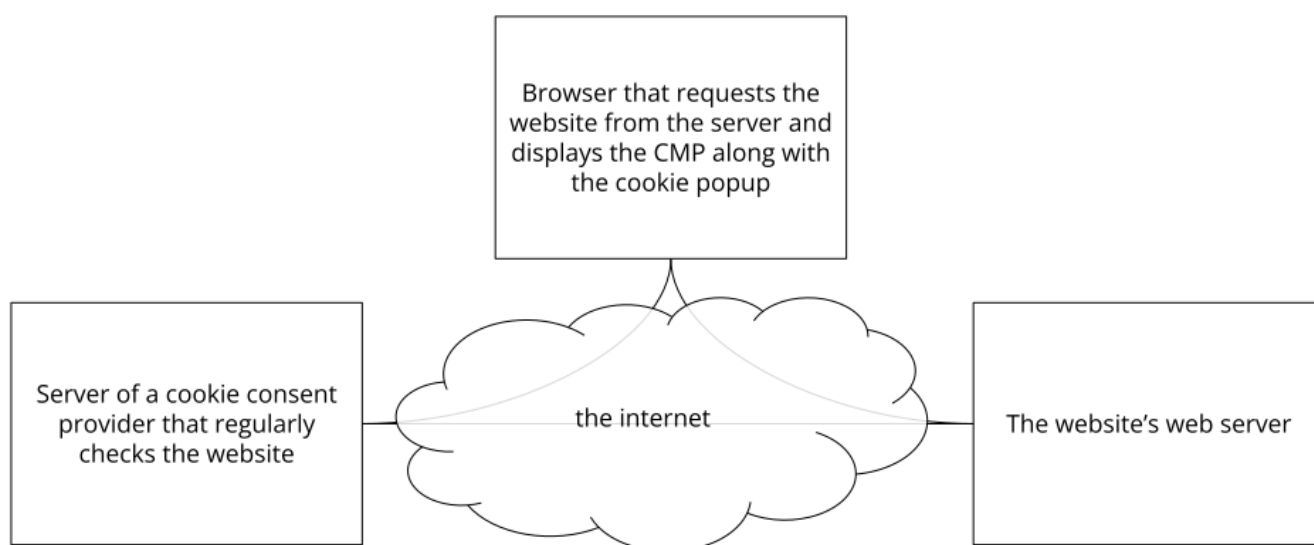
? Processed data: data for managing cookie settings such as IP address, time of consent, type of consent and individual consent. You can find more details on this directly with the tool that is being used.

? Storage period: depends on the tool used, periods of several years can be assumed

⚖️ Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is a cookie consent management platform?

We use a Consent Management Platform (CMP) software on our website that makes it easier for us and you to handle the scripts and cookies used correctly and securely. The software automatically creates a cookie pop-up, scans and controls all scripts and cookies, provides you with the cookie consent required under data protection law and helps you and us to keep track of all cookies. Most cookie consent management tools identify and categorize all existing cookies. As a website visitor, you then decide for yourself whether and which scripts and cookies you allow or not. The following graphic shows the relationship between browser, web server and CMP.



## Why do we use a cookie management tool?

Our goal is to offer you the best possible transparency in the area of data protection. We are also legally obliged to do so. We want to inform you as well as possible about all tools and all cookies that can save and process your data. It is also your right to decide for yourself which cookies you accept and which you do not. In order to grant you this right, we first need to know exactly which cookies actually landed on our website. Thanks to a cookie management tool, which regularly scans the website for all cookies present, we know about all cookies and can provide you with GDPR-compliant information. You can then use the consent system to accept or reject cookies.

## Which data are processed?

As part of our cookie management tool, you can manage each individual cookie yourself and have complete control over the storage and processing of your data. The declaration of your consent is stored so that we do not have to ask you every time you visit our website and we can also prove your consent if required by law. This is saved either in an opt-in cookie or on a server. The storage time of your cookie consent varies depending on the provider of the cookie management tool. Usually this data (e.g. pseudonymous user ID, time of consent, detailed information on the cookie categories or tools, browser, device information) is stored for up to two years.

## Duration of data processing

We will inform you below about the duration of the data processing if we have further information. In general, we only process personal data for as long as is absolutely necessary for the provision of our services and products. Data stored in cookies are stored for different lengths of time. Some cookies are deleted after you leave the website, others may be stored in your browser for a few years. The exact duration of the data processing depends on the tool used, in most cases you should be prepared for a storage period of several years. In the respective data protection declarations of the individual providers, you will usually receive precise information about the duration of the data processing.

## Right of objection

You also have the right and the option to revoke your consent to the use of cookies at any time. This works either via our cookie management tool or via other opt-out functions. For example, you can also prevent data collection by cookies by managing, deactivating or deleting cookies in your browser.

Information on special cookie management tools can be found – if available – in the following sections.

## Legal basis

If you agree to cookies, your personal data will be processed and stored via these cookies. If we are allowed to use cookies with your **consent** (Article 6 paragraph 1 lit. a GDPR), this consent is also the legal basis for the use of cookies and the processing of your data. In order to be able to manage the

consent to cookies and to enable you to give your consent, a cookie consent management platform software is used. The use of this software enables us to operate the website in an efficient and legally compliant manner, which is a **legitimate interest** (Article 6 paragraph 1 lit. f GDPR).

## AdSimple Consent Manager Privacy Policy

### AdSimple Consent Manager Privacy Policy Overview

? Affected parties: Website visitors

? Purpose: Obtaining consent to certain cookies and thus the use of certain tools

? Processed data: data for managing cookie settings such as IP address, time of consent, type of consent and individual consent. You can find more details on this under in the privacy policy below.

? Storage period: the used cookie expires after one year

⚖️ Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

### What is the AdSimple Consent Manager?

On our website we use the AdSimple Consent Manager of the software development and online marketing company AdSimple GmbH, Fabriksgasse 20, 2230 Gänserndorf, Austria. The AdSimple Consent Manager offers us, among other things, the opportunity to provide you with a cookie notice that is comprehensive and compliant with data protection laws. This gives you the opportunity to decide which cookies you want to allow or deny. By using this software, data is sent from you to AdSimple, where it is stored. In this privacy policy we inform you on why we use the AdSimple Consent Manager, which data is transferred and stored and how you can prevent this data transfer.

The AdSimple Consent Manager is a software that scans our website to identify and categorise all existing cookies. Additionally, you as the website visitor will be informed on the use of cookies via a cookie notice script. Then you can decide yourself which cookies you want to allow or deny.

### Why do we use the AdSimple Consent Manager on your website?

We want to offer you maximum transparency when it comes to data protection. Before we can do so, we need to exactly determine which cookies have ended up on our website over time. Since the AdSimple consent manager regularly scans our website and locates all cookies, we have full control over these cookies and can therefore act in compliance with the GDPR. This enables us to inform you precisely on the use of cookies on our website.

Moreover, you will always receive an up-to-date cookie notice that is data-protection compliant. This enables you to decide yourself which cookies you want to allow or deny via the checkbox system.

### Which data are stored by the AdSimple Consent Manager?

If you agree to cookies on our website, AdSimple Consent Manager will set the following cookie:

**Name:** acm\_status

**Value:** `":true,"statistics":true,"marketing":true,"socialmedia":true,"settings":true}`

**Purpose:** This cookie saves the status of your consent. This enables our website to read and adhere to the latest status, even during future visits.

**Expiry date:** after one year

## How long and where are the data stored?

All data collected by the AdSimple Consent Manager is transferred and stored exclusively within the European Union. The collected data is stored on the AdSimple servers at Hetzner GmbH in Germany. Therefore, only AdSimple GmbH and Hetzner GmbH have access to the data.

## How can I erase my data or prevent data retention?

You have the right to access and delete your personal data at any time. You can prevent data collection and storage by for example rejecting the use of cookies via the cookie notification script. Another option to prevent data processing or to manage it according to your wishes is your browser. Depending on the browser you use, managing cookies differs slightly. Below you will find links to the instructions for the most common browsers:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

## Legal basis

If you agree to cookies, your personal data will be processed and stored via these cookies. If we are allowed to use cookies with your **consent** (Article 6 (1) (a) GDPR), this consent is also the legal basis for the use of cookies and the processing of your data. The AdSimple Consent Manager is used to manage your consent to cookies and to enable you to give your consent. The use of this software enables us to operate the website in an efficient and legally compliant manner, which is a **legitimate interest** (Article 6 (1) lit.f GDPR).

We hope we were able to provide you with a good overview of data traffic and data processing by AdSimple Consent Manager. If you want to learn more about this tool, we recommend the description page at <https://www.adsimple.at/consent-manager/>.

## Web Design Introduction

### **Web Design Privacy Policy Overview**

? Affected parties: website visitors

? Purpose: improvement of user experience

? Processed data: depends heavily on the services used. Usually, data such as IP address, technical data, language settings, browser version, screen resolution and browser name are processed. You can find more details directly with the respective web design tools.

? Storage duration: depends on the tools used

⚖️ Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

## **What is web design?**

We use various tools on our website for the purpose of our web design. Contrary to common belief, web design is not just about making our website look nice, but rather also about functionality and performance. But of course, a good-looking website is also a major goal of professional web design. Web design is a part of media design and deals with the visual as well as the structural and functional design of a website. Our aim with our web design is to improve your experience on our site. In web design jargon, this is called User Experience (UX) and usability. User Experience entails all impressions and experiences that website visitors come across on a website. What is more, usability is part of the User Experience, as it determines how user-friendly a website is. This includes the clear structuring of content, subpages or products, along with how quickly and easily the website enables you to find what you are looking for. In order to offer you the best possible experience on our website, we also use so-called third-party web design tools. Therefore, all tools and services that help improve our website's design are classified under the category "web design". This may, for example, include fonts, various plugins or other integrated web design functions.

## **Why do we use web design tools?**

The way you absorb information on a website depends very much on its structure, functionality and visual perception. Therefore, good and professional web design has become increasingly important for us. We are constantly working on improving our site as a way of further extending our services for you as a website visitor. Furthermore, a beautiful and functioning website also has economic advantages for us. Needless to say, you will only visit it and take advantage of our offers if you feel completely at ease.

## **What data is stored by web design tools?**

When you visit our website, any web design elements integrated into our pages may process your data. The exact data that is processed depends on the tools used. Below you can see exactly which tools we use for our website. For more information about data processing, we recommend you also read the respective privacy policy of the respective tools. There you can usually find out which data is processed, whether cookies are used and how long the data is stored. Moreover, fonts such as Google Fonts, for example, also automatically transmit information such as your language settings, IP address, browser version, browser screen resolution and browser name to Google's servers.

## **Duration of data processing**

Data processing times are very individual and depend on the web design elements used. For example, when cookies are used, the retention period can be as little as a minute, but it may also be a few years. Please make yourself familiar with this topic. You may for example read our general section on cookies as well as the Privacy Policies of the tools used. There you can likely find out exactly which cookies are used and what information is stored there. For example, Google Font files are stored for one year, in order to improve the loading speed of a website. In principle, data is only kept for as long as is necessary to provide the service. But legal requirements may require data to be stored for longer.

## **Right to object**

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers at any time. You can do this either via our cookie management tool or via other opt-out functions. You can also prevent cookies from collecting your data by managing, deactivating or deleting the cookies in your browser. However, among web design elements (typically fonts) there is also data that cannot be erased easily. This is the case whenever data is automatically collected as soon as a page is accessed and then directly transmitted to a third party (e.g. Google). In these cases, please contact the support of the respective provider. In the case of Google, you can reach support at <https://support.google.com/?hl=de>.

## **Legal Basis**

If you have consented to the use of web design tools, this consent serves as the legal basis for the relevant data processing. According to Article 6 (1) (a) GDPR (consent), your consent represents the legal basis for the processing of personal data, as it may occur when it is collected by web design tools. We also have a legitimate interest in web design to improve on our website. After all, only then can we provide you with a beautiful and professional web offer. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we strongly want to emphasise once more that we only use web design tools if you have given your consent.

You can find information on different web design tools – if available – in the following sections.

## **Typekit Fonts (Adobe) Privacy Policy**

We use Adobe's Typekit fonts on our website, which is a web font hosting service. The provider of this service is the American company Adobe Inc. The Irish company Adobe Systems Software Ireland Companies, 4-6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland, is responsible for the European region.

Adobe also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Adobe uses standard contractual clauses approved by the EU Commission as the basis for data processing by recipients based in third countries (i. e. outside the European Union, Iceland, Liechtenstein, Norway, and thus especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). Standard Contractual Clauses (SCC) are legal templates provided by the EU Commission. Their purpose is to ensure that your data complies with European data privacy standards, even if your data is transferred to and stored in third countries (such as the USA). With these clauses, Adobe commits to comply with the EU's level of data protection when processing relevant data, even if it is stored, processed and managed in the USA. These clauses are based on an implementing order by the EU Commission. You can find the order and the standard contractual clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).

For more information on the Standard Contractual Clauses at Adobe, see <https://www.adobe.com/uk/privacy/eudatatransfers.html>.

You can find out more about the data that is processed by Adobe in their Privacy Policy at <https://www.adobe.com/uk/privacy.html>.

## **Google Fonts Local Privacy Policy**

On our website we use Google Fonts, by the company Google Inc. The responsible entity for the European area is Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland). We have integrated Google fonts locally, i.e. on our web server and not on Google's servers. This means that no connection to Google's servers and therefore no data transfer or retention take place.

### **What are Google Fonts?**

Google Fonts was previously called Google Web Fonts. It is an interactive list with over 800 fonts which [Google](#) offer for free use. With the use of Google Fonts, it is possible to utilise fonts without uploading them to your own server. In order to prevent any transfer of information to Google's servers, we downloaded the fonts to our own server. This way we can comply with data privacy and do not transmit any data to Google Fonts.

## **Explanation of the terminology used**

We always strive to make our privacy policy as clear and comprehensible as possible. However, this is not always easy, especially when it comes to technical and legal matters. It is often sensible to use legal terms (such as 'personal data') or certain technical terms (such as 'cookies' or 'IP address'). But we don't want to use such terms without any explanation. This is why you will find an alphabetical list of important terms used below. These are terms we may not yet have sufficiently explained in the privacy policy. In case we have adopted any of these terms from the GDPR which are definitions, we will also list the GDPR texts here and add our own further explanations if necessary.

# Processor

## Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;*

**Explanation:** As a company and a website owner, we are responsible for all your data we process (i. e. the ‘controller’). In addition to the controller, there may also be so-called processors. This includes any company or person who processes personal data on our behalf. In addition to service providers such as tax consultants, processors can also be hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

# Consent

## Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;*

**Explanation:** With websites, such consent is usually given via a cookie consent tool. You’ve most certainly come across these. Whenever you visit a website for the first time, you will usually be asked via a banner whether you agree or consent to the data processing. You can usually also make individual settings and thus decide for yourself which level of data processing you want to allow. If you do not give your consent, no personal data may be processed. Consent can of course also be given in writing, i.e. not via a tool.

# Data concerning health

## Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“Data concerning health” means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;*



**Explanation:** Health data includes all stored information relating to your own health. It is often data that is also noted in patient files. This includes, for example, which medication you are using, X-rays, your entire medical history or your vaccination statuses.

## Personal Data

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;*

**Explanation:** Personal data is all data that can identify you as a person. This is usually data such as:

- name
- address
- email address
- postal address
- phone number
- birthday
- identification numbers such as social security number, tax identification number, ID card number or matriculation number
- banking data such as account number, credit information, account balances and more.

According to the European Court of Justice (ECJ), your **IP address is also personal data**. IT experts can use your IP address to determine at least the approximate location of your device and subsequently your location as the connection owner. Therefore, storing an IP address also requires a legal basis within the scope of the GDPR. There are also so-called **“special categories”** of personal data, which are particularly worthy of protection. These include:

- racial and ethnic origin
- political opinions
- religious or ideological beliefs
- Union membership
- genetic data such as data obtained from blood or saliva samples
- biometric data (this is information about psychological, physical or behavioural characteristics that can identify an individual).  
health Data
- Data relating to sexual orientation or sex life

# Profiling

## Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;*

**Explanation:** Profiling collects various personal data about an individual in order to learn more about that individual. On the internet, profiling is often used for advertising purposes or for credit checks. Web and advertising analysis programs e. g. collect data about your behaviour and interests on a website. This results in a special user profile that can be used to target advertising to specific target groups.

# Controller

## Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;*

**Explanation:** In our example, we are responsible for the processing of your personal data and are therefore the “controller”. If we pass on collected data to other service providers for processing, they are considered “contract processors”. For this, a “Data Processing Agreement (DPA)” must be concluded.

# Processing

## Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;*

**Note:** When we talk about processing in our Privacy Policy, we talk about any type of data processing. As mentioned above in the original GDPR declaration, this includes not only the collection but also the storage and processing of data.

## **Closing Remarks**

Congratulations! If you are reading these lines, you have most likely familiarised yourself with our entire Privacy Policy – or at least scrolled down here. As you can see from the scope of our Privacy Policy, we do not take the protection of your personal data lightly.

We find it important to inform you about the processing of your personal data to the best of our abilities. In doing so, we not only want to tell you which data is processed but also explain to you why we use various software programs. In general, Privacy Policies have very technical and legal jargon. However, since most of you are not web developers or solicitors, we wanted to take a different approach and explain the facts in simple and clear language. Of course, this is not always possible due to the subject matter. Therefore, you can also find a more detailed explanation of the most important terms at the end of the Privacy Policy.

If you have any questions about data protection on our website, please do not hesitate to contact us or the responsible body. We wish you all the best and hope to soon welcome you to our website again.

All texts are copyrighted.