

Privacy policy

Introduction

At Robee Technology, we take data protection very seriously, which is why our privacy agreement is voluntarily based on the world's strictest data protection rules. It is based on the European General Data Protection Regulation (GDPR/DSGVO) and thus ensures the highest level of data protection for all users of RobeeAsk & RobeeTask.

With the following data protection declaration, we would like to inform you about the types of your personal data (hereinafter also referred to as "data") that we process, for what purposes and to what extent. The data protection declaration applies to all processing of personal data carried out by us, both as part of the provision of our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online offer").

The terms used are not gender specific.

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Responsible

Robee Technology Ltd.
UK registered # 13481486

Email address: support@robeeask.com

Overview of processing

The following overview summarises the types of data processed and the purposes of their processing and refers to the data subjects.

Types of data processed

- Inventory data (e.g. names, addresses).
- Content data (e.g. entries in online forms).
- Contact details (e.g. email, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).
- Contract data (e.g. subject matter of the contract, term, customer category).
- Payment data (e.g. bank details, invoices, payment history).

Categories of persons concerned

- Business and Contractual Partners.
- Interested parties.
- Communication partner.
- Customers.
- Users (e.g. website visitors, users of online services).

Purposes of the processing

- Affiliate Tracking.
- Application Procedure.
- Provision of our online offer and user friendliness.
- Office and organizational procedures.
- Direct marketing (e.g. by e-mail or post).
- Feedback (e.g. collecting feedback via online form).
- Marketing.
- Contact requests and communication.
- Profiles with user-related information (creation of user profiles).
- Reach measurement (e.g. access statistics, recognition of returning visitors).
- Security Measures.
- Provision of contractual services and customer service.
- Managing and responding to requests.

Relevant legal bases

Below you will find an overview of the legal basis of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. Should more specific legal bases be relevant in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Art. 6(1) p. 1 lit. a. DSGVO)** - The data subject has given his or her consent to the processing of personal data relating to him or her for a specific purpose or purposes.
- **Contract performance and pre-contractual enquiries (Art. 6(1) p. 1 lit. b. DSGVO)** - Processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request.
- **Legal obligation (Art. 6 para. 1 p. 1 lit. c. DSGVO)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate interests (Art. 6(1) p. 1 lit. f. DSGVO)** - Processing is necessary for the purposes of the legitimate interests of the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

Security measures

We take appropriate technical and organisational measures to ensure a level of protection appropriate to the risk in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons.

The measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as the access, entry, disclosure, assurance of availability and separation of the data. We also have procedures in place to ensure the exercise of data subjects' rights, the deletion of data, and responses to data compromise. Furthermore, we already take the protection of personal data into account in the development and selection of hardware, software and procedures in accordance with the principle of data protection, through technology design and through data protection-friendly default settings.

SSL encryption (https): To protect your data transmitted via our online offer, we use SSL encryption. You can recognise such encrypted connections by the prefix `https://` in the address line of your browser.

Transmission of personal data

In the course of our processing of personal data, it may happen that the data is transferred to or disclosed to other bodies, companies, legally independent organisational units or persons. The recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we

observe the legal requirements and, in particular, conclude appropriate contracts or agreements that serve to protect your data with the recipients of your data.

Transfer of data within the organization: We may transfer or provide access to personal data to other entities within our organization. Where this transfer is for administrative purposes, the transfer of the data is based on our legitimate business and operational interests or is made where it is necessary for the performance of our contractual obligations or where there is consent from the data subjects or legal permission.

Data processing in third countries

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

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

Deletion of data

The data processed by us will be deleted in accordance with the legal requirements as soon as their consents permitted for processing are revoked or other permissions cease to apply (e.g. if the purpose of processing this data has ceased to apply or it is not required for the purpose).

If the data are not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for reasons of commercial or tax law or whose storage is necessary for the assertion, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

Our privacy notices may also contain further information on the retention and deletion of data, which will take precedence for the processing operations in question.

use of cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. The primary purpose of a cookie is to store information about a user during or after his visit within an online offer. Stored information may include, for example, language settings on a website, login status, a shopping cart, or where a video was watched. The term cookies also includes other technologies that perform the same functions as cookies (e.g. when user details are stored using pseudonymous online identifiers, also known as "user IDs").

The following cookie types and functions are distinguished:

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

Notes on legal bases: The legal basis on which we process your personal data using cookies depends on whether we ask you for consent. If this is the case and you consent to the use of cookies, the legal basis for the processing of your data is your declared consent. Otherwise, the data processed with the help of cookies is processed on the basis of our legitimate interests (e.g. in the business operation of our online offer and its improvement) or, if the use of cookies is necessary to fulfil our contractual obligations.

Storage period: If we do not provide you with explicit information on the storage period of permanent cookies (e.g. in the context of a so-called cookie opt-in), please assume that the storage period can be up to two years.

General information on revocation and objection (opt-out): Depending on whether the processing is based on consent or legal permission, you have the option at any time to revoke any consent given or to object to the processing of your data by cookie technologies (collectively referred to as "opt-out"). You can initially declare your objection by means of your browser settings, e.g. by deactivating the use of cookies (whereby this may also restrict the functionality of our online offer). An objection to the use of cookies for online marketing purposes can also be declared by means of a variety of services, especially in the case of tracking, through the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>. In addition, you can obtain further instructions on how to object in the context of the information on the service providers and cookies used.

Processing of cookie data on the basis of consent: We use a cookie consent management procedure, in the context of which the consent of users to the use of cookies, or the processing and providers mentioned in the cookie consent management procedure, can be obtained and managed and revoked by users. In this context, the declaration of consent is stored in order not to have to repeat its request and to be able to prove the consent in accordance with the legal obligation. The storage can take place on the server side and/or in a cookie (so-called opt-in cookie, or with the help of comparable technologies), in order to be able to assign the consent to a user or his device. Subject to individual information on the providers of cookie

management services, the following information applies: The duration of the storage of consent can be up to two years. A pseudonymous user identifier is created and stored with the time of consent, information on the scope of consent (e.g. which categories of cookies and/or service providers) and the browser, system and end device used.

- **Types of data processed:** Usage data (e.g. web pages visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners") in the context of contractual and comparable legal relationships as well as related measures and in the context of communication with contractual partners (or pre-contractual), e.g. to answer inquiries.

We process this data to fulfil our contractual obligations, to secure our rights and for the purposes of the administrative tasks associated with this information as well as the corporate organisation. We only disclose the data of the contractual partners to third parties within the framework of the applicable law to the extent that this is necessary for the aforementioned purposes or for the fulfilment of legal obligations or with the consent of the persons concerned (e.g. to participating telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). The contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope of this data protection declaration.

We inform the contractual partners of the data required for the above-mentioned purposes before or in the course of data collection, e.g. in online forms, by means of special marking (e.g. colours) or symbols (e.g. asterisks or similar), or in person.

We delete the data after the expiry of legal warranty and comparable obligations, i.e., in principle after 4 years, unless the data is stored in a customer account, e.g., as long as it must be kept for legal archiving reasons (e.g., for tax purposes usually 10 years). We delete data disclosed to us by the contractual partner within the scope of an order in accordance with the specifications of the order, in principle after the end of the order.

Insofar as we use third-party providers or platforms to provide our services, the terms and conditions and data protection notices of the respective third-party providers or platforms apply in the relationship between the users and the providers.

Customer account: Contractual partners can create an account within our online offer (e.g. customer or user account, "customer account" for short). If registration of a customer account is required, contractual partners will be informed of this as well as of the details required for registration. Customer accounts are not public and cannot be indexed by search engines. Within the scope of registration and subsequent logins and uses of the customer account, we store the IP addresses of the customers together with the access times in order to be able to prove the registration and to prevent any misuse of the customer account.

If customers have terminated their customer account, the data relating to the customer account will be deleted, unless their retention is required for legal reasons. It is the responsibility of customers to back up their data upon termination of the customer account.

Shop and e-commerce: We process the data of our customers to enable them to select, purchase or order the selected products, goods and associated services, as well as their payment and delivery or execution. If necessary for the execution of an order, we use service providers, in particular postal, forwarding and shipping companies, to carry out the delivery or execution to our customers. For the processing of payment transactions, we use the services of banks and payment service providers. The required information is marked as such in the context of the order or comparable purchase process and includes the information needed for delivery, or provision and billing, as well as contact information, so that any consultation can be held.

Project and development services: We process the data of our clients and customers (hereinafter uniformly referred to as "Clients") in order to enable them to select, acquire or commission the chosen services or works and related activities as well as their payment and provision or execution or performance.

The required information is identified as such in the context of the order, purchase order or comparable contract conclusion and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any consultations. Insofar as we obtain access to information of the end customers, employees or other persons, we process this in accordance with the legal and contractual requirements.

Further information on commercial services: We process the data of our clients and customers (hereinafter collectively referred to as "Clients") in order to enable them to select, purchase or commission the chosen services or works and related activities, as well as their payment and delivery or execution or performance.

The required information is identified as such in the context of the order, purchase order or comparable contract conclusion and includes the information required for the provision of services and invoicing as well as contact information in order to be able to hold any consultations.

- **Types of data processed:** inventory data (e.g. names, addresses), payment data (e.g. bank details, invoices, payment history), contact data (e.g. e-mail, telephone numbers), contract data (e.g. subject matter of contract, term, customer category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Affected persons:** Interested parties, business and contractual partners, customers.
- **Purposes of processing:** provision of contractual services and customer service, contact requests and communication, office and organisational procedures, management and response to requests, security measures.
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legal obligation (Art. 6 para. 1 p. 1 lit. c. DSGVO), Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Payment procedure

Within the framework of contractual and other legal relationships, due to legal obligations or otherwise on the basis of our legitimate interests, we offer efficient and secure payment options to the data subjects and use other service providers in addition to banks and credit institutions for this purpose (collectively "payment service providers").

The data processed by the payment service providers include inventory data, such as the name and address, bank data, such as account numbers or credit card numbers, passwords, TANs and checksums, as well as the contract, sum and recipient-related information. The information is required to complete the transactions. However, the data entered is only processed by the payment service providers and stored with them. I.e. we do not receive any account or credit card related information, but only information with confirmation or negative information of the payment. Under certain circumstances, the data may be transmitted by the payment service providers to credit agencies. The purpose of this transmission is to check identity and creditworthiness. In this regard, we refer to the terms and conditions and the data protection information of the payment service providers.

For payment transactions, the terms and conditions and data protection information of the respective payment service providers apply, which can be accessed within the respective websites or transaction applications. We also refer to these for the purpose of further information and assertion of revocation, information and other data subject rights.

- **Types of data processed:** inventory data (e.g. names, addresses), payment data (e.g. bank details, invoices, payment history), contract data (e.g. subject matter of contract, term, customer category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Affected persons:** Customers, interested parties.
- **Purposes of processing:** provision of contractual services and customer service.
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Services used and service providers:

- for **Mastercard:** payment services; service provider: Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium; Website: <https://www.mastercard.de/de-de.html>; Privacy Policy: <https://www.mastercard.de/de-de/datenschutz.html>.
- **PayPal:** payment services and solutions (e.g. PayPal, PayPal Plus, Braintree); service provider: PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg; website: <https://www.paypal.com/de>; privacy policy: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.
- for **Visa:** payment services; service provider: Visa Europe Services Inc, London Branch, 1 Sheldon Square, London W2 6TT, UK; Website: <https://www.visa.de>; Privacy Policy: <https://www.visa.de/nutzungsbedingungen/visa-privacy-center.html>.

Provision of the online offer and web hosting

In order to provide our online offer securely and efficiently, we use the services of one or more web hosting providers from whose servers (or servers managed by them) the online offer can be accessed. For these purposes, we may use infrastructure and platform services, computing capacity, storage space and database services as well as security services and technical maintenance services.

The data processed in the context of the provision of the hosting offer may include all information relating to the users of our online offer, which is generated in the context of use and communication. This regularly includes the IP address, which is necessary to be able to deliver the contents of online offers to browsers, and all entries made within our online offer or from websites.

E-mail dispatch and hosting: The web hosting services we use also include the dispatch, receipt and storage of e-mails. For these purposes, the addresses of the recipients and senders as well as further information regarding the e-mail dispatch (e.g. the providers involved) and the contents of the respective e-mails are processed. The aforementioned data may also be processed for the purpose of identifying SPAM. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted in transit, but (unless a so-called end-to-end encryption method is used) not on the servers from which they are sent and received. We can therefore not assume any responsibility for the transmission path of the e-mails between the sender and the reception on our server.

Collection of access data and log files: We ourselves (or our web hosting provider) collect data on each access to the server (so-called server log files). The server log files may include the address and name of the web pages and files accessed, date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider.

The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and also to ensure the utilization of the servers and their stability.

- **Types of data processed:** Content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of the processing:** Provision of our online offer and user-friendliness.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Registration, login and user account

Users can create a user account. In the course of registration, users are provided with the required mandatory data and processed for the purpose of providing the user account on the basis of contractual obligation. The processed data includes in particular the login information (user name, password and an e-mail address).

In the context of the use of our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests as well as those of the users in protection against misuse and other unauthorized use. In principle, this data is not passed on to third parties unless it is necessary for the pursuit of our claims or there is a legal obligation to do so.

Users can be informed by e-mail about events that are relevant to their user account, such as technical changes.

Registration with pseudonyms: Users may use pseudonyms as user names instead of plain names.

Users' profiles are public: Users' profiles are publicly visible and accessible.

Setting the visibility of profiles: By means of settings, users can determine the extent to which their profiles are visible to the public or only accessible to certain groups of people.

Deletion of data after termination: If users have terminated their user account, their data with regard to the user account will be deleted, subject to any legal permission, obligation or consent of the users.

It is the responsibility of the users to save their data before the end of the contract in the event of termination. We are entitled to irretrievably delete all user data stored during the term of the contract.

- **Types of data processed:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** provision of contractual services and customer service, security measures, administration and response to requests.
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Community features

The community functions provided by us allow users to enter into conversations or other exchanges with each other. Please note that the use of the community functions is only permitted in compliance with the applicable legal situation, our terms and guidelines and the rights of other users and third parties.

User posts are public: User-created posts and content are publicly visible and accessible.

Storage of data for security purposes: The contributions and other inputs of the users are processed for the purposes of the community and conversation functions and, subject to legal obligations or legal permission, are not surrendered to third parties. An obligation to surrender may arise in particular in the case of illegal contributions for the purposes of legal prosecution. We would like to point out that, in addition to the content of the contributions, their time and the IP address of the user are also stored. This is done in order to be able to take appropriate measures to protect other users and the community.

Right to delete: The deletion of contributions, content or information of the user is permissible after an appropriate consideration to the extent necessary if there are concrete indications that they represent a violation of legal regulations, our specifications or the rights of third parties.

Protection of own data: Users decide for themselves what data they disclose about themselves within our online offering. For example, when users provide personal information or participate in conversations. We ask users to protect their data and to publish personal data only with caution and only to the extent necessary. In particular, we ask users to take special

care to protect their access data and to use secure passwords (i.e., especially character combinations that are as long and random as possible).

- **Types of data processed:** Usage data (e.g. web pages visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** provision of contractual services and customer service, security measures.
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Single sign-on login

"Single sign-on" or "single sign-on registration" or "authentication" are procedures that allow users to register with a provider of single sign-on procedures (e.g. a social network), including our online offer, with the aid of a user account. The prerequisite for single sign-on authentication is that the users are registered with the respective single sign-on provider and enter the required access data in the online form provided for this purpose, or are already registered with the single sign-on provider and confirm the single sign-on registration via button.

Authentication takes place directly with the respective single sign-on provider. In the course of such authentication, we receive a user ID with the information that the user is logged in under this user ID at the respective single sign-on provider and an ID that cannot be used by us for other purposes (so-called "user handle"). Whether additional data is transmitted to us depends solely on the single sign-on procedure used, on the data releases selected in the course of authentication and also on which data users have released in the privacy or other settings of the user account with the single sign-on provider. It can be different data depending on the single sign-on provider and the user's choice, usually it is the email address and the username. The password entered as part of the single sign-on procedure with the single sign-on provider is neither visible to us nor is it stored by us.

Users are asked to note that their details stored with us can be automatically matched with their user account with the single sign-on provider, but that this is not always possible or actually occurs. If, for example, the users' e-mail addresses change, they must change them manually in their user account with us.

We may use single sign-on login, where agreed with users, as part of or prior to the performance of the contract where users have been asked to do so, process it under consent and otherwise use it based on the legitimate interests of us and the interests of users in an effective and secure login system.

Should users ever decide that they no longer wish to use the link between their user account and the single sign-on provider for the single sign-on procedure, they must remove this link within their user account with the single sign-on provider. If users wish to delete their data from us, they must cancel their registration with us.

- **Types of data processed:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers).
- **Data subjects:** Users (e.g. website visitors, users of online services).

- **Purposes of processing:** provision of contractual services and customer service, registration procedure.
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Blogs and publication media

We use blogs or comparable means of online communication and publication (hereinafter "publication medium"). Readers' data is processed for the purposes of the publication medium only to the extent necessary for its presentation and communication between authors and readers or for security reasons. For the rest, we refer to the information on the processing of visitors to our publication medium within the scope of this data protection notice.

Comments and Posts: When users leave comments or other posts, their IP addresses may be stored based on our legitimate interests. This is done for our security in case someone leaves unlawful content in comments and posts (insults, prohibited political propaganda, etc.). In this case, we ourselves can be prosecuted for the comment or post and are therefore interested in the identity of the author.

Furthermore, we reserve the right, on the basis of our legitimate interests, to process the user's details for the purpose of spam detection.

On the same legal basis, we reserve the right, in the case of surveys, to store the IP addresses of users for their duration and to use cookies in order to avoid multiple votes.

The personal information provided in the context of comments and contributions, any contact and website information as well as the content-related information will be permanently stored by us until the user objects.

- **Types of data processed:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** provision of contractual services and customer service, feedback (e.g. collecting feedback via online form), security measures, managing and responding to enquiries.
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Contact and enquiry management

When contacting us (e.g. via contact form, email, telephone or via social media), the information of the inquiring persons is processed insofar as this is necessary to answer the contact inquiries and any requested measures.

The answering of contact requests in the context of contractual or pre-contractual relations is carried out for the fulfilment of our contractual obligations or for the answering of

(pre)contractual requests and, moreover, on the basis of the legitimate interests in answering the requests.

- **Types of data processed:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms).
- **Affected persons:** Communication partners.
- **Purposes of processing:** contact requests and communication.
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Newsletter and electronic notifications

We send newsletters, e-mails and other electronic notifications (hereinafter "newsletter") only with the consent of the recipients or a legal permission. Insofar as the contents of the newsletter are specifically described in the context of a registration, they are decisive for the consent of the users. Otherwise, our newsletters contain information about our services and us.

To subscribe to our newsletters, it is generally sufficient to provide your e-mail address. However, we may ask you to provide a name for the purpose of a personal address in the newsletter, or further details if these are required for the purposes of the newsletter.

Double-Opt-In-Procedure: The registration for our newsletter is always carried out in a so-called double opt-in process. This means that after registration you will receive an e-mail in which you are asked to confirm your registration. This confirmation is necessary so that no one can register with other e-mail addresses. The registrations to the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes the storage of the registration and confirmation time as well as the IP address. Changes to your data stored by the shipping service provider are also logged.

Deletion and restriction of processing: We may store unsubscribed email addresses for up to three years on the basis of our legitimate interests before deleting them in order to be able to prove consent formerly given. Processing of this data will be limited to the purpose of possible defence of claims. An individual request for deletion is possible at any time, provided that the former existence of consent is confirmed at the same time. In the event of obligations to permanently observe objections, we reserve the right to store the e-mail address in a block list (so-called "block list") for this purpose alone.

The logging of the registration process takes place on the basis of our legitimate interests for the purpose of proving its proper course. If we commission a service provider to send e-mails, this is done on the basis of our legitimate interests in an efficient and secure sending system.

Notes on legal basis: The newsletter is sent on the basis of the recipients' consent or, if consent is not required, on the basis of our legitimate interests in direct marketing, if and to the extent that this is permitted by law, e.g. in the case of existing customer advertising. Insofar as we commission a service provider to send e-mails, this is done on the basis of our legitimate interests. The registration process is recorded on the basis of our legitimate interests in order to prove that it has been carried out in accordance with the law.

Contents: Information about us, our services, promotions and offers.

- **Types of data processed:** inventory data (e.g. names, addresses), contact data (e.g. email, phone numbers), meta/communication data (e.g. device information, IP addresses).
- **Affected persons:** Communication partners.
- **Purposes of the processing:** direct marketing (e.g. by e-mail or post).
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).
- **Opt-out:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent or object to further receipt. You will find a link to cancel the newsletter either at the end of each newsletter or you can otherwise use one of the above contact options, preferably e-mail, for this purpose.

Promotional communication via e-mail, post, fax or telephone

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

Recipients have the right to revoke consent given at any time or to object to promotional communications at any time.

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

- **Types of data processed:** inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers).
- **Affected persons:** Communication partners.
- **Purposes of the processing:** direct marketing (e.g. by e-mail or post).
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Surveys and interviews

The surveys and questionnaires we conduct (hereinafter "surveys") are evaluated anonymously. Personal data is only processed insofar as this is necessary for the provision and technical implementation of the surveys (e.g. processing of the IP address in order to display the survey in the user's browser or to enable a resumption of the survey with the aid of a temporary cookie (session cookie)) or users have consented to this.

Notes on legal basis: If we ask participants for consent to process their data, this is the legal basis for the processing, otherwise the processing of participants' data is based on our legitimate interests in conducting an objective survey.

- **Types of data processed:** contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).

- **Affected persons:** Communication partners.
- **Purposes of processing:** contact requests and communication, direct marketing (e.g. by e-mail or post).
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Web analysis, monitoring and optimization

Web analytics (also referred to as "reach measurement") is used to evaluate the flow of visitors to our online offering and may include behavior, interests or demographic information about visitors, such as age or gender, as pseudonymous values. With the help of reach analysis, we can, for example, identify at what time our online offer or its functions or content are most frequently used or invite re-use. Likewise, we can understand which areas require optimization.

In addition to web analysis, we may also use testing procedures, e.g. to test and optimize different versions of our online offer or its components.

For these purposes, so-called user profiles may be created and stored in a file (so-called "cookie") or similar procedures may be used with the same purpose. This information may include, for example, content viewed, websites visited and elements used there and technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data, this may also be processed, depending on the provider.

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

Notes on legal bases: Where we ask users for their consent to use third-party providers, the legal basis for processing data is consent. Otherwise, users' data is processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Types of data processed:** Usage data (e.g. web pages visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Reach measurement (e.g. access statistics, recognition of returning visitors), profiles with user-related information (creation of user profiles).
- **Security measures:** IP masking (pseudonymization of the IP address).
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Online Marketing

We process personal data for online marketing purposes, which may include, but are not limited to, marketing advertising space or displaying promotional and other content (collectively, "Content") based on users' potential interests and measuring its effectiveness.

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

The IP addresses of the users are also stored. However, we use available IP masking procedures (i.e., pseudonymization by shortening the IP address) to protect users. In general, no clear user data (such as e-mail addresses or names) is stored as part of the online marketing process, but pseudonyms. This means that we as well as the providers of the online marketing procedures do not know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is usually stored in the cookies or by means of similar procedures. These cookies can later generally also be read on other websites that use the same online marketing procedure and analysed for the purpose of displaying content as well as supplemented with further data and stored on the server of the online marketing procedure provider.

Exceptionally, clear data may be associated with the profiles. This is the case, for example, if the users are members of a social network whose online marketing procedures we use and the network links the profiles of the users with the aforementioned data. We ask you to note that users can make additional agreements with the providers, e.g. by giving their consent as part of the registration process.

In principle, we only receive access to summarized information about the success of our advertisements. However, in the context of so-called conversion measurements, we can check which of our online marketing methods have led to a so-called conversion, i.e., for example, to a conclusion of a contract with us. The conversion measurement is used solely to analyse the success of our marketing measures.

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

Notes on legal bases: Where we ask users for their consent to use third-party providers, the legal basis for processing data is consent. Otherwise, users' data is processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Types of data processed:** Usage data (e.g. web pages visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** marketing, profiling with user-related information (creation of user profiles).

- **Security measures:** IP masking (pseudonymization of the IP address).
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).
- **Opt-out option:** We refer to the data protection information of the respective providers and the opt-out options given for the providers. If no explicit opt-out option has been specified, you have the option of deactivating cookies in your browser settings. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are offered in summary for the respective regions: a) Europe: <https://www.youronlinechoices.eu>. b) Canada: <https://www.youradchoices.ca/choices>. c) USA: <https://www.aboutads.info/choices>. d) Cross-territory: <https://optout.aboutads.info>.

Affiliate programs and affiliate links

We include so-called affiliate links or other references (which may include, for example, search masks, widgets or discount codes) to the offers and services of third-party providers in our online offer (collectively referred to as "affiliate links"). If users follow the Affiliate Links or subsequently take advantage of the offers, we may receive a commission or other benefits from those third parties (collectively, "Commission").

In order to be able to track whether the users have taken advantage of the offers of an affiliate link used by us, it is necessary that the respective third-party providers learn that the users have followed an affiliate link used within our online offer. The assignment of the affiliate links to the respective business transactions or to other actions (e.g. purchases) serves the sole purpose of commission accounting and will be cancelled as soon as it is no longer necessary for the purpose.

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

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

- **Types of data processed:** Contractual data (e.g. subject matter of contract, term, customer category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Affiliate tracking.
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Rating platforms

We participate in rating procedures in order to evaluate, optimize and promote our services. If users rate us via the participating rating platforms or procedures or otherwise provide feedback, the general terms and conditions of business or use and the data protection information of the providers also apply. As a rule, the evaluation also requires registration with the respective providers.

In order to ensure that the evaluating persons have actually used our services, we transmit, with the consent of the customers, the data required for this with regard to the customer and the service used to the respective evaluation platform (including name, e-mail address and order number or item number). This data is used solely to verify the authenticity of the user.

Rating widget: We integrate so-called "rating widgets" into our online offer. A widget is a functional and content element integrated into our online offer that displays variable information. It can be displayed, for example, in the form of a seal or comparable element, sometimes also called a "badge". In this case, the corresponding content of the widget is displayed within our online offer, but it is retrieved at that moment from the servers of the respective widget provider. This is the only way to always show the current content, especially the current rating. For this purpose, a data connection must be established from the website accessed within our online offer to the server of the widget provider and the widget provider receives certain technical data (access data, including IP address), which are necessary so that the content of the widget can be delivered to the user's browser.

Furthermore, the widget provider receives information that users have visited our online offer. This information may be stored in a cookie and used by the widget provider to identify which online offers participating in the evaluation process have been visited by the user. The information may be stored in a user profile and used for advertising or market research purposes.

- **Types of data processed:** Contractual data (e.g. subject matter of contract, term, customer category), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Customers, users (e.g. website visitors, users of online services).
- **Purposes of processing:** feedback (e.g. collecting feedback via online form), marketing.
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Legitimate Interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Presence in social networks (social media)

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

We would like to point out that user data may be processed outside the European Union. This may result in risks for the users, because, for example, the enforcement of the rights of the users could be made more difficult.

Furthermore, user data within social networks is usually processed for market research and advertising purposes. For example, usage profiles can be created based on the usage behavior

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

For a detailed description of the respective forms of processing and the possibilities of objection (opt-out), we refer to the data protection declarations and information provided by the operators of the respective networks.

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

- **Types of data processed:** contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** contact requests and communication, feedback (e.g. collecting feedback via online form), marketing.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Services used and service providers:

- **Twitter:** social network; service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; privacy policy: <https://twitter.com/de/privacy>, (settings) <https://twitter.com/personalization>.
- **YouTube:** Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; privacy policy: <https://policies.google.com/privacy>; opt-out: <https://adssettings.google.com/authenticated>.

Plugins and embedded functions and content

We integrate functional and content elements into our online offer that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These can be, for example, graphics, videos or city maps (hereinafter uniformly referred to as "content").

The integration always requires that the third-party providers of this content process the IP address of the user, as without the IP address they could not send the content to their browser. The IP address is thus required for the display of this content or function. We endeavour to use only such content whose respective providers only use the IP address to deliver the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain, among other

things, technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offer as well as be linked to such information from other sources.

Notes on legal bases: Where we ask users for their consent to use third-party providers, the legal basis for processing data is consent. Otherwise, users' data is processed on the basis of our legitimate interests (i.e. interest in efficient, economic and recipient-friendly services). In this context, we would also like to refer you to the information on the use of cookies in this privacy policy.

- **Types of data processed:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses), inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. entries in online forms).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of the processing:** Provision of our online offer and user-friendliness.
- **Legal basis:** Consent (Art. 6 para. 1 p. 1 lit. a. DSGVO), Contract performance and pre-contractual requests (Art. 6 para. 1 p. 1 lit. b. DSGVO), Legitimate interests (Art. 6 para. 1 p. 1 lit. f. DSGVO).

Services used and service providers:

- **YouTube videos:** Video content; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://www.youtube.com>; Privacy policy: <https://policies.google.com/privacy>; Opt-out: Opt-out plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>, Ad display settings: <https://adssettings.google.com/authenticated>.

Modification and updating of the privacy policy

We ask you to regularly inform yourself about the content of our data protection declaration. We adapt the data protection declaration as soon as the changes in the data processing carried out by us make this necessary. We will inform you as soon as the changes require an act of cooperation on your part (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy statement, please note that the addresses may change over time and please check the information before contacting us.

Rights of data subjects

As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 GDPR:

- **Right to object: You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(e) or (f) DSGVO; this also applies to profiling based on these provisions. If the personal data concerning you is processed for the purpose of direct marketing, you have the right to object at any**

time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing.

- **Right of revocation for consents:** You have the right to revoke any consent you have given at any time.
- **Right of access:** You have the right to obtain confirmation as to whether or not personal data in question is being processed and to be informed of such data and to obtain further information and a copy of the data in accordance with the law.
- **Right to rectification:** In accordance with the law, you have the right to request that data concerning you be completed or that inaccurate data concerning you be rectified.
- **Right to erasure and restriction of processing:** You have the right, in accordance with the law, to request that data relating to you be erased immediately or, alternatively, to request restriction of the processing of the data in accordance with the law.
- **Right to data portability:** You have the right to receive data concerning you, which you have provided to us, in a structured, common and machine-readable format in accordance with the legal requirements, or to demand that it be transferred to another person responsible.
- **Complaint to the supervisory authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes the requirements of the GDPR.

Definitions

This section provides you with an overview of the terms used in this privacy policy. Many of the terms are taken from the law and defined primarily in Art. 4 of the GDPR. The legal definitions are binding. The following explanations, on the other hand, are primarily intended to aid understanding. The terms are sorted alphabetically.

- **Affiliate Tracking:** Affiliate tracking logs links that the linking websites use to direct users to websites with product or other offers. The operators of the respective linking websites can receive a commission if users follow these so-called affiliate links and subsequently take advantage of the offers (e.g. buy goods or use services). For this purpose, it is necessary for the providers to be able to track whether users who are interested in certain offers subsequently take advantage of them at the instigation of the affiliate links. It is therefore necessary for the functionality of affiliate links that they are supplemented by certain values that become part of the link or are stored elsewhere, e.g. in a cookie. The values include, in particular, the source website (referrer), the time, an online identifier of the operator of the website on which the affiliate link was located, an online identifier of the respective offer, an online identifier of the user as well as tracking-specific values, such as, for example, advertising material ID, partner ID and categorizations.
- **IP masking:** "IP masking" refers to a method in which the last octet, i.e., the last two numbers of an IP address, is deleted so that the IP address can no longer be used to uniquely identify a person. Therefore, IP masking is a means of pseudonymizing processing procedures, especially in online marketing
- **Personal data:** "Personal data" means any information relating to an identified or identifiable natural person (hereinafter "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an

identifier such as a name, an identification number, location data, an online identifier (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any type of automated processing of personal data that consists in using such personal data to analyze, evaluate or to predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behavior and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behavior on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Reach measurement:** Reach measurement (also referred to as web analytics) is used to evaluate the flow of visitors to an online offering and can include visitors' behavior or interests in certain information, such as website content. With the help of reach analysis, website owners can see, for example, at what time visitors visit their website and what content they are interested in. This enables them, for example, to better adapt the content of the website to the needs of their visitors. For the purposes of reach analysis, pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online offer.
- **Controller:** 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.
- **Processing:** "processing" means any operation or set of operations which is performed upon personal data, whether or not by automatic means. The term is broad and covers virtually any handling of data, be it collection, analysis, storage, transmission or erasure.