



## PRIVACY POLICY OF 1NCE GMBH

As of December 2022

Thank you for visiting our website. We take your privacy very seriously and are committed to protecting your personal data when you use our website.

Personal data includes information that is related to a natural person who is or can be identified. A natural person is considered identifiable if he or she can be identified directly or indirectly (e.g., by association with an online ID). Personal data that is collected through our website is used exclusively for our own purposes.

Our Privacy Policy applies for the following websites operated by 1nce GmbH as well as their subdomains:

[IoT Flat Rate | Connectivity for M2M and IoT applications | 1NCE](#)  
[1NCE Shop | Buy the 1NCE IoT Flat Rate now | 1NCE - IoT SIM](#)  
[1NCE Portal | Manage your 1NCE IoT Flat Rate | 1NCE - IoT SIM](#)  
[Introduction - Welcome | 1NCE Developer Hub](#)  
<https://downloads.1nce.com>  
[1NCE GmbH - Home | Facebook](#)  
[1NCE \(@1NCE\\_IoT\) / Twitter](#)  
[1NCE | LinkedIn](#)  
[1NCE - YouTube](#)  
[1NCE: Information and News | XING](#)

### I. HOSTING PROVIDER

Our portal and online shop is hosted on the server of a hosting provider (currently Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen) in the Federal Republic of Germany. The personal data that we process, which is described below, is stored on this server. Our systems all feature state-of-the-art encryption. It is therefore very likely to be hardly possible for the hosting provider to access such personal data. We have therefore nevertheless entered into a processing agreement with the hosting provider for reasons of precaution.

Our website is hosted by Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg (hereinafter referred to as "AWS"). When you visit our website, your personal data is processed on AWS servers. In the process, it cannot be ruled out that personal data will also be transmitted to the parent company of AWS in the USA. A data transfer takes place based on the EU's standard contractual clauses.

For more information, please see [AWS Data Privacy Policy](#).

Our legitimate interests provide the legal basis for the use of AWS pursuant to Art. 6(1)(f) of the GDPR.

### II. DATA PROTECTION CONTACTS

**Responsible for Data Processing (Controller) within the Meaning of Art. 4(7) of the General Data Protection Regulation (GDPR)**

**1NCE GmbH**

legally represented by its Managing Directors Messrs. Alexander P. Sator, Younes Allaki and Ivo Rook



Sternengasse 14 – 16  
50676 Cologne  
Germany  
Email: [privacy@1nce.com](mailto:privacy@1nce.com)  
Website: <https://1nce.com>

#### **Data Protection Officer**

Sicoda GmbH  
Oliver Gönner  
Rochusstraße 198  
53123 Bonn  
Germany  
Email: [dsb@sicoda.de](mailto:dsb@sicoda.de)

### **III. LEGAL BASES FOR PROCESSING DATA**

Art. 6 of the General Data Protection Regulation (GDPR) provides the legal basis for our data processing. The legal basis may differ in the individual case depending upon the circumstances under which we process your data.

#### **Consent**

Insofar as you have consented to allow us to process your personal data, Article 6(1)(a) of the GDPR provides the legal basis for such processing. You may withdraw your consent with effect for the future at any time.

#### **Agreement**

Art. 6(1)(b) of the GDPR will provide the legal basis for processing personal data collected for the performance of any contract to which you are party. That will also apply to processing required prior to entering into such a contract.

#### **Legal Obligation**

Article 6(1)(c) of the GDPR will provide the legal basis for processing required to fulfill any legal obligations of our Company.

#### **Vital Interests**

Art. 6(1)(d) of the GDPR will provide the legal basis for processing personal data in order to protect your vital interests or those of another natural person.

#### **Legitimate Interest**

Art. 6(1)(f) of the GDPR will provide the legal basis for processing personal data in order to safeguard the legitimate interests of our Company or any third party unless the interests, fundamental rights or freedoms of the data subject override those legitimate interests. The legitimate interest of our Company lies in the conduct of our business.

#### **Employment Relationship**

According to Art. 88 of the GDPR in conjunction with § 26 of the Federal Data Protection Act (*Bundesdatenschutzgesetz* – BDSG), the personal data of a data subject may be processed if necessary to make a decision regarding employment of that individual or, if such a relationship has already been



established, to maintain or terminate the relationship or exercise or fulfill rights of and obligations towards employee representatives arising from any law or wage agreement, works agreement or employment agreement (collective agreement).

#### IV. RIGHTS OF DATA SUBJECTS

Your personal data may be processed by us. Chapter 3 of the GDPR gives you various rights that our Company will honor.

These rights include

- pursuant to **Art. 15 of the GDPR**, the right to receive information to the extent specified therein as to whether we process your personal data;
- pursuant to **Art. 16 of the GDPR**, the right to require correction without undue delay of any of your personal data in our possession that is incorrect or incomplete;
- pursuant to **Art. 17 of the GDPR**, the right to require erasure of any of your personal data stored by us unless further processing is necessary to permit the exercise of the right of freedom of expression and information; - to fulfill a legal obligation; - for reasons of public interest or to establish, enforce or defend legal claims;
- pursuant to **Art. 18 of the GDPR**, the right to restrict processing of your personal data if you contest the accuracy of the personal data; - processing is unlawful but you oppose erasure of the data; we no longer need your personal data but you need the data to establish, enforce or defend legal claims or you have objected to processing pursuant to Art. 21 of the GDPR;
- pursuant to **Art. 20 of the GDPR**, the right to receive personal data that you have made available to us in a structured, commonly used and machine-readable format or require that the data be transferred to another controller;
- pursuant to **Art. 77 of the GDPR**, the right to lodge a complaint with a supervisory authority. You may as a rule address your concerns to the regulatory authority responsible for your habitual place of residence, your place of employment or our principal place of business.

#### V. DURATION OF STORAGE

We will store your personal data only for as long as such storage is still required for the purposes for which it was originally collected and is still permissible unless legal record-keeping requirements do not allow erasure or you have given us your express consent to further storage of your personal data.

In the case of certain data that is subject to legal record-keeping requirements, we will store such data until the legal retention period expires.

If you expressly consent to have certain data stored by us, we will retain your data until you notify us to the effect that you withdraw your consent to such storage. You may withdraw your consent at [privacy@1nce.com](mailto:privacy@1nce.com)

#### VI. RECIPIENTS OF DATA

Only groups and individuals within the Company that need your personal data to carry out their activities or fulfill contractual and legal obligations will receive access to such data.

We may in some cases make your data available to service providers that contract with us and process your personal data as instructed by us. In some cases, recipients will be independently responsible under



legislation governing data protection and therefore be also obligated to comply with the requirements of the GDPR as well as with the provisions of other legislation governing data protection.

In any case in which we instruct a service provider to process personal data, we will have entered into a separate binding agreement covering such processing with that provider pursuant to Art. 28 of the GDPR.

To the extent necessary, we may in individual cases forward personal data to our consultants in legal or tax matters. Such recipients will in any such case be bound to confidentiality and secrecy by reason of their respective professional codes

## **VII. TRANSFER OF DATA TO THIRD COUNTRIES**

In isolated cases, we may transfer your personal data to a service provider that maintains its principal place of business in a third country, i.e., a country outside the EU/EEA.

In such cases, we will ensure that the requirements of the GDPR pertaining to transfers of data to third countries contained in its Art. 44 et seq. are fulfilled.

## **VIII. WEB SERVER LOGS**

The use of the online services we offer will involve storage of connection data in the server log files.

This data will include:

- IP address of the requestor
- browser information (operating system used and screen resolution)
- website visited
- referring website
- time of and date of visit

Web server logs will be processed exclusively for security purposes.

We use data from web server logs only for statistical analysis in connection with the operation, security and improvement of our services. However, we reserve the right to examine such data retroactively in the case of a concrete reason to suspect any illegal use.

## **IX. CONTACT FORM/EMAIL**

Contact forms provided in connection with our website enable you to send us any data you desire. Such data will be forwarded by email to our Company's mailbox by our web server.

The following data will also be stored when the message is sent:

- your IP address
- date and time of the message

Please note that the content of the contact form will not be encrypted. It is in your own interest to use a secure communication channel for confidential communication. For that purpose, you also have the alternative possibility of contacting us by using any of the email addresses provided.

When you send us a message, you consent to allow us to process your personal data in connection with your query. You may withdraw your consent at any time without specifying any reason for doing so. Please



note, however, that we will no longer be able to address the issue you contacted us about if you withdraw your consent.

If you contact us, your consent provides the legal basis for processing your personal data pursuant to Art. 6(1)(a) of the GDPR.

If you contact us for the purposes of entering into or performing a contract, Art. 6(1)(b) of the GDPR will provide the legal basis for such processing.

## **X. ONLINE SHOP AND LOG-IN AREA**

You can order our products through our online shop at <https://shop.1nce.com/portal/shop/>. However, you must first register to do so. If you are already registered as a customer, you have to log in.

The following data is collected and forwarded to us when you register to use our online shop:

- salutation (required)
- first and last name (required)
- company name (required)
- telephone number (required)
- language (required)
- email address (required)

In the case of companies located in the EU, we will carry out a VAT ID Check to verify the validity of the data entered. This involves automated comparison of your data with the entries in the VIES database. This comparison takes place automatically when you complete the registration process and submit the corresponding data.

If you are not located in the EU, you will receive a request for further documents after you register to permit verification of your commercial status. Positive verification is a prerequisite for approval and the use of our online shop. Once you have completed the registration process, you can order products through our online shop after you log in.

When you log in, you will be asked to enter the email address and password you provided when you registered. Any data collected in connection with the log-in process will be used only to make the respective service available. Any analysis of such data will serve only to ensure convenient and secure operation of the system.

The following data will be recorded in connection with the user log-in process:

- log-in timestamp
- user type (owner, admin, user, API)
- user ID
- portal & API

Our legitimate interest in the security and enhancement of our website provides the legal basis for processing such data pursuant to Art. 6(1)(f) of the GDPR.



As soon as you put an item in the shopping cart, it will be stored in the form of what is referred to as a session cookie for the duration of the session. Such cookies are automatically deleted when the browser is closed.

#### **XI. PAYMENT PROCESSING BY STRIPE**

Our online shop uses the payment service of Stripe Payments Europe, Limited, C/O A&L Goodbody, IFSC, North Wall Quay, Dublin 1, Ireland.

If you opt to use this payment method, your payments will be processed by Stripe Payments. That will also involve transmission of your personal data to Stripe. The data transmitted will include in particular information on the nature of the payment, the invoiced amount, the date of payment, your account particulars, the currency you use to make payment, your name and your email address as well as your invoice address and if applicable your shipping address.

Stripe will use the data transmitted to process your payment and prevent fraud.

Your consent provides the legal basis for the transmission of your data to Stripe pursuant to Art. 6(1)(a) of the GDPR

We expressly draw your attention to the fact that Stripe Payments Europe Limited is headquartered in the U.S.A. If you opt to make payment through Stripe, some of your data may be transmitted to the U.S.A. The European Court of Justice is of the opinion that it is not possible to ensure a sufficient level of data protection in the case of transmission of data to the U.S.A.

Further information on Stripe and data protection may be found at <https://stripe.com/at/privacy>.

#### **XII. DIRECT MARKETING AND NEWSLETTERS**

The contact data you provide will be processed by the following group companies for direct marketing purposes within the legally permissible framework on the basis of our legitimate interest pursuant to Article 6 (1) (f) GDPR

1NCE GmbH, 1NCE K.K., 1NCE INC., 1NCE PTE. LTD., 1NCE TELECOMUNICAÇÕES LTDA.

As a rule, contact is made by the company whose contractual partner you are, but in individual cases it can also be made by another of the above-mentioned group companies.

You can object to the processing of your personal data for the purposes stated here at any time. Please address your objection to [privacy@1nce.com](mailto:privacy@1nce.com).

If you have entered your email address and any further optional data to receive our free newsletter, we will use such data only for the purposes of sending you information in connection with our newsletter.

When you subscribe to our newsletter, we will store your IP address as well as the date and time of registration. The only purpose for this is to be able to provide proof in the event a third party misuses an email address to register to receive the newsletter without the knowledge of the legitimate addressee.



When you give your consent to receive our newsletter, you also agree to allow us to use what is referred to as newsletter tracking to analyze your interaction with our newsletter. Such analysis tells us who opened our newsletter and which links contained in the newsletter were clicked. That tells us about your interests and lets us provide you with a newsletter tailored to your interests in the future.

We use newsletter tracking to process the following data:

- opening rate
- click rate
- purchases made in our shop in connection with the newsletter

Your consent provides the legal basis for processing your data pursuant to Art. 6(1)(a) of the GDPR.

You may withdraw your consent at any time without providing any reason by using the cancellation link provided in every newsletter email or by sending an email to [info@1nce.com](mailto:info@1nce.com).

We use the services of HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, U.S.A. to distribute our newsletter. Further information on HubSpot and data protection may be found at <https://legal.hubspot.com/de/privacy-policy>.

### XIII. APPLICATION FOR EMPLOYMENT

You may send us an unsolicited application for employment or apply for a position that we have advertised. You may use our online application tool to submit your application. Our tool enables you to upload and send us your resume, references, a cover letter, a photograph and other documents as well as your general contact details. If you use the online application tool, your data will be encrypted.

The data will be stored in a database.

By way of alternative, you can also submit your application by email to [jobs@1nce.com](mailto:jobs@1nce.com). Please keep in mind, however, that your data will be transmitted to us in unencrypted form in that case.

Your consent will constitute the legal basis for processing your personal data in connection with any application for employment pursuant to Art. 88 of the GDPR in conjunction with § 26 of the Federal Data Protection Act.

We will use your personal data exclusively for the purposes of processing your application for employment.

If you apply for a specific position and do not hear from us, we will erase your data 6 months after termination of the application process unless you have given us your express consent pursuant to Art. 6(1)(a) of the GDPR to include you in our talent pool and contact you in the case of employment opportunities with our Company that may be of interest to you. In that case, we will store your application data until you notify us of withdrawal of your consent.

Your consent is voluntary and you have the right to withdraw your consent at any time with effect for the future without providing any reason. We will erase your personal data as soon as we receive notification of withdrawal of consent from you unless we are required to comply with legal record-keeping requirements. If your application results in employment by our Company, we will store your data for the entire duration of your employment by the Company.



The Personnel Administration and Application Management software used to process your data in connection with an online application is made available by our service provider, Personio GmbH, Rundfunkplatz 4, 80335 Munich.

#### **XIV. SALES FORCE**

We use the Customer Relationship Management (CRM) software of Salesforce Germany GmbH.

Data that you make available to us through our website (e.g., in connection with contact requests or registration for our newsletter) will be stored by the CRM platform in the Salesforce Sales cloud.

The data will be stored and processed on servers of HubSpot within the EU. However, since Salesforce is headquartered in the U.S.A., the possibility of transmission of data to the U.S.A. and as a result access to such data by U.S. intelligence services cannot be completely excluded.

Salesforce has also agreed to maintain an appropriate level of data protection for data processing outside the EU by adopting standard data protection clauses (Art. 46(2)(c) of the GDPR) and binding corporate rules in compliance with Art. 47 of the GDPR.

Our legitimate interests provide the legal basis for the use of customer relationship management pursuant to Art. 6(1)(f) of the GDPR.

#### **XV. SOCIAL MEDIA PRESENCE**

Our social media presence includes a corporate page on each of the following social media platforms:

- Facebook
- Twitter
- LinkedIn

If you visit our corporate page on any of these social media platforms, that may involve processing of your personal data.

##### **Facebook**

Our social media activities include maintenance of a Facebook page. We share joint responsibility with Facebook Ireland Ltd (hereinafter Facebook) for the collection of personal data through this Facebook page.

Facebook processes personal data of visitors to this page to make the page available. Processing is carried out exclusively by Facebook. As a result, Facebook therefore also bears sole responsibility for the processing of personal data within the meaning of the GDPR. In this context, the information processed by Facebook includes the data recorded whenever a page is visited. Such data includes information on the IDs of users, the nature of the content the users download, interaction with the page and information on the content and pages visited.

Further information on the personal data processed by Facebook may be found at <https://www.facebook.com/policy.php?ref=pf>.

Facebook also describes the extent of its processing in the above policy as well as at <https://www.facebook.com/privacy/explanation>





Visitors to the website can object to certain types of data processing by Facebook. Possibilities for objecting may be found at <https://de-de.facebook.com/ads/settings>

If we process personal data obtained through our Facebook page, this will involve the data made available to us by Facebook. Facebook provides us with statistics for our page in the form of anonymized “page insights” that help us to learn more about how our Facebook pages are used.

We have entered into a separate agreement with Facebook concerning this activity that may be consulted at [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum). This agreement also enumerates the security measures that Facebook has taken and stipulates that users can contact Facebook directly if they have any questions regarding the rights of data subjects pursuant to Chapter Three of the GDPR (e.g., to information and erasure). The rights of data subjects (in particular the rights to information, to erasure and to be forgotten as well as the right to object to processing of personal data and the right to lodge a complaint with a supervisory authority) are not diluted by the agreement in place between us and Facebook. These rights may be enforced against us as well as against Facebook.

Further information on this data processing may be found at [https://www.facebook.com/legal/terms/information\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_page_insights_data).

This processing of personal data serves our legitimate interest in communication based on the use of Facebook as a medium and enhancement of the services we offer through that medium. Our overriding legitimate interest in such processing provides the legal basis for this processing pursuant to Art. 6(1)(f) of the GDPR.

Please note that the Facebook data protection policy stipulates that the personal data of users of our Facebook page may also be processed in the U.S.A. or other countries, i.e., outside the European Union and therefore outside the scope of protection of the GDPR. Facebook warrants that the personal data of visitors to our Facebook page will be processed in compliance with the requirements pertaining to the transfer of data to a third country pursuant to Art. 44 et seq of the GDPR. When you visit our Facebook-page, you agree to allow your personal data to be processed accordingly.

## **Twitter**

We share responsibility for processing personal data in connection with our Twitter-page with Twitter International Company (hereinafter “Twitter”), One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland.

If you visit our Twitter page and respond to our tweets, we may process personal data such as your user name, the content appearing on your Twitter page as well as your responses to tweets from our Company, i.e., we may retweet your responses, reply to them or mention your account in tweets that we make public. Twitter International Company (hereinafter “Twitter”), One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland, is responsible for further processing of personal data in connection with Twitter.

For example, information processed by Twitter will include data that you provided voluntarily in connection with the use of your Twitter account such as your name, user name, email address, telephone number and the data from your address book if you have uploaded it.

If you post and share content on Twitter, Twitter may analyze that content to learn more about what topics interest you in order to send you information on similar content or advertising.



Additionally, Twitter also receives what are referred to as log data such as, for example, your IP address, your browser type, the operating system you use, information on the referring website and the pages you visit, your location, your mobile carrier, device information, search terms you use and cookie information. Please note that this is also processed by Twitter even if you do not have a Twitter account.

If you have a Twitter account, the settings for your account let you determine how your personal data is processed by Twitter.

We have no way of knowing the extent and nature of data processing or any further processing and use of your personal data by Twitter and have no influence over such processing.

Further information on data processing by Twitter may be found at <https://twitter.com/de/privacy>.

Please note that the use of Twitter may involve the transmission of personal data to a country outside the EU/EEA, i.e., a "third country", in which the level of protection offered by the GDPR in respect of personal data cannot be guaranteed.

### **LinkedIn**

We share responsibility for processing personal data in connection with our LinkedIn page with LinkedIn Ireland Unlimited Company ("LinkedIn"), Wilton Plaza, Gardner House 4,5,6, Dublin 2, Ireland.

If you visit our LinkedIn page and respond to our content, we may process personal data such as your user name, the content appearing on your LinkedIn page as well as your responses to tweets from our Company, i.e., we may reply to your responses or mention your account or your content in content that we make public.

LinkedIn Ireland Unlimited Company ("LinkedIn"), Wilton Plaza, Gardner House 4,5,6, Dublin 2, Ireland, is responsible for further processing of personal data in connection with the use of LinkedIn.

For example, the information processed by LinkedIn will include data that you provided voluntarily in connection with the use of your LinkedIn account such as, for example, your name, user name, email address and telephone number.

If you post and share content on LinkedIn, LinkedIn may analyze that content to determine what topics interest you in order to send you information on similar content or advertising.

Additionally, LinkedIn also receives what are referred to as log data such as, for example, your IP address, your browser type, the operating system you use, information on the referring website and the pages you visit, your location, your mobile carrier, device information, search terms you use and cookie information. Please note that this data is also processed by LinkedIn even if you do not have a LinkedIn account.

If you have a LinkedIn account, the settings for your account will let you determine how your personal data is processed by LinkedIn.

We have no way of knowing the extent and nature of data processing or further processing and use of your personal data by LinkedIn and have no influence over such processing.

Further information on data processing by LinkedIn may be found at <https://de.linkedin.com/legal/privacy-policy>.



Please note that the use of LinkedIn may involve the transmission of personal data to a country outside the EU/EEA, i.e., a “third country”, in which the level of protection offered by the GDPR in respect of personal data cannot be guaranteed.

### **Xing**

We use the services of Xing (New Work SE, Am Strandkai 1, 20357 Hamburg, Germany) to present our company, to look for new employees and to contact them.

We would like to point out that you use Xing and its functions at your own risk. This applies in particular to the use of the interactive functions (e.g. sharing, commenting).

The data collected about you when using the service is processed by Xing and may be transferred to countries outside the European Union. This includes your IP address, the application you are using, information about the end device you are using (including device ID and application ID), information about the websites you have accessed, your location and your mobile phone provider.

This data is assigned to the data of your Xing account or your Xing profile. We have no influence on the type and scope of the data processed by Xing, the type of processing and use or the transfer of this data to third parties. Information about which data is processed by Xing and for what purposes can be found in Xing's data protection declaration (<https://privacy.xing.com/de/datenschutzerklaerung>) as well as the possibility of finding out whether and which personal data relating to you is from Xing are processed. <https://privacy.xing.com/de/datenschutzerklaerung/which-rights-can-you-apply-make/information-right>.

We also process your data if you contact us via the Xing platform. In this case, Xing collects your data and makes it available to us. Under certain circumstances, storage and further processing by us may also take place.

Data freely published and distributed by you on Xing can be included by us and made accessible to third parties.

With the clickpath function, we can view which logged-in users has accessed our Xing page, including our job offers. If you do not wish that we see this data, you can log out before accessing them.

You have options for restricting the processing of your data in the settings. In addition, you can restrict access from Xing to contact and calendar data, photos, location data, etc. on mobile devices (smartphones, tablet computers) in the setting options there. However, this depends on the operating system used. Further information on these points is available at: <https://privacy.xing.com/de/ihre-privatsphaere>.

If you have given the social network provider your consent to the data processing described above with effect for us, the legal basis is Art. 6 (1) (a) GDPR.

### **XVI. GOOGLE TAG MANAGER**

We use Google Tag Manager to determine which scripts are carried out on our website. Google Tag Manager is a service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A. (“Google”).

Google Tag Manager supports administration of website tags through a user interface without the use of cookies and does not store personal data. Google Tag Manager triggers other tags that store data but cannot access such data. Google Tag Manager collects some aggregated data to trigger tags for the purposes of monitoring the stability and performance of our systems. This data does not, however, contain any IP addresses of users or user-specific IDs, which precludes identification of a specific individual.

Our legitimate interests provide the legal basis for the use of Google Tag Manager pursuant to Art. 6(1)(f) of the GDPR.



Further information on Google Tag Manager may be found at <https://www.google.com/intl/de/tagmanager/use-policy.html>

## XVII. COOKIES

This website and all of its subdomains use cookies as well as other comparable tracking technologies such as, for example, tracking pixels or local storage objects (LSOs).

Cookies are text files that are stored on your end device. They can be read, transmitted and modified by a website when it is accessed.

We use “first-party cookies”, i.e., cookies that are controlled by the company that operates the domain the user is visiting, as well as what are referred to as “third-party cookies”. The latter are controlled by third parties and help us analyze the effectiveness of our website content and the interests of our visitors, measure the activity and performance of our website or display targeted advertising and other content on our or other websites.

Most of the cookies we use are what are referred to as “session cookies”. They will be automatically deleted at the end of your visit or browser session (“transient cookies”). Other cookies will remain on your device for a specific duration or until you delete them (“persistent cookies”). These cookies enable us to recognize your browser when you visit our site again. We use cookies only with random, pseudonymized identification numbers. These identification numbers are used to analyze your browsing activity when you visit our website. The user profile will at no time be used to identify a natural person. If you use any special functions of our website (such as, for example, the shopping cart or “Remember me”), these functions will also entail the use of cookies.

Tracking pixels are minute graphic files that are used to gather information on your device such as, for example, the type of end device you are using, your operating system, your IP address or the time of your visit.

Local storage objects (LSOs) function much like cookies. However, the information is stored locally in your browser.

In the case of technical means such as cookies and other technologies required for the operation of our website, our legitimate interest provides the legal basis for the use of such cookies and the related processing of your personal data pursuant to Art. 6(1)(f) of the GDPR. In this case in particular, our legitimate interests lie in being able to make available a website that features optimum technology as well as a user-friendly and needs-based design and maintain the integrity of our systems.

Technical means such as cookies and other technologies that are not required for the operation of the website and serve primarily for analysis and marketing purposes will be used and your personal data processed in that connection only if you have given us your express consent pursuant to Art. 6(1)(a) of the GDPR.

The first time you visit our website or one of its subdomains, you will be informed of the cookies used on the website and other technologies by what is referred to as a cookie banner and be given an opportunity to choose the cookies and other technologies that require your consent and give your consent if you so desire.



The cookie banner will also enable you to use the “Cookies” button to obtain information on the various functions of the cookies or use the “Privacy Policy” button to view our entire privacy policy.

You may withdraw your consent at any time and change the settings for cookies and other technologies that require your consent by clicking the little symbol in the lower left-hand corner.

#### **XVIII. THIRD-PARTY SERVICES/PROVIDERS**

The various cookies and other technologies deployed on this website and its subdomains are described below:

##### **GOOGLE UNIVERSAL ANALYTICS**

This website uses Google Universal Analytics, a web analysis service of Google Inc. (“Google”). Google Universal Analytics uses “cookies”, which are text files that are placed on your computer to permit analysis of your use of our website.

Information on your use of our website generated by the cookie will as a rule be sent to and stored on a Google server in the U.S.A. If IP anonymization is activated on this website, Google will, however, first shorten your IP address if you are located in a Member State of the European Union or another country that is party to the European Economic Area (EEA) Agreement. Only in exceptional cases will the complete IP address be sent to a Google server in the U.S.A. and shortened there.

Google uses such information to analyze the use of websites for their operators, compile reports on website activity and provide website operators with other services relating to website activity and the use of the internet. Google will not merge the IP address transmitted by your browser with other data for the purposes of Google Analytics. You may block the placement of cookies by selecting the appropriate settings on your browser. Please note, however, that this may make it impossible for you to use the full functionality of this website.

Your consent, which you may withdraw at any time with effect for the future, provides the legal basis for our use of Google Analytics to collect data pursuant to Art. 6(1)(a) of the GDPR.

Your data will be automatically erased after 50 months. Data that has been stored for the retention period is automatically erased once a month.

Further information on Google Analytics and data protection may be found at <https://policies.google.com/privacy?hl=de>.

##### **GOOGLE ANALYTICS 4**

This website uses Google Analytics 4, a web analysis service of Google Inc. (“Google”). Google Analytics uses “cookies”, which are text files that are placed on your computer to permit analysis of your use of our website. These cookies contain information on visitor interaction that are tracked when the website is visited.

Information on your use of our website that is generated by the cookie will as a rule be sent to and stored on a Google server in the U.S.A. The U.S. intelligence services can access such data by virtue



of their exhaustive legal investigatory authority. According to Google, automated IP anonymization will be used to shorten your IP address within the member states of the European Union or another country that is party to the European Economic Area (EEA) Agreement before any processing takes place in the U.S.A. It may, however, happen that your full IP address is transmitted to a Google server in the U.S.A. and that U.S. intelligence services can then access such data.

Google will use such information to analyze the use of websites for their operators, compile reports on website activity and provide website operators with other services relating to website activity and the use of the internet. In addition, data will also be processed by Google to maintain the availability of and protect its Analytics service. Google does not define the nature of such processing in greater detail.

You may block the placement of cookies by selecting the appropriate settings on your browser. Please note, however, that this may make it impossible for you to use the full functionality of this website. You can also use cookie settings to deactivate Google Analytics.

Your consent, which you may withdraw at any time with effect for the future, provides the legal basis for our use of Google Analytics to collect data pursuant to Art. 6(1)(a) of the GDPR.

Your data will be automatically erased after 14 months. Data that has been stored for the retention period is automatically erased once a month.

Further information on Google Analytics and data protection may be found at <https://policies.google.com/privacy?hl=de>.

#### SERVICES OF THE GOOGLE MARKETING PLATFORM (FORMERLY: GOOGLE DOUBLE CLICK)

Our website uses Google Marketing Platform (formerly Google Double Click) of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A.

The use of Google Marketing Platform involves placement of cookies to display advertising that may interest you. With the help of what are referred to as cookie IDs, Google can also determine whether a user has clicked on an ad or visited a webpage of our site. According to Google, these cookies contain no personal data.

We have no influence over the precise nature of data processing by Google and can therefore in the present case provide you only with the information actually at our disposal. The use of Google Marketing Platform on our website means that your browser will automatically create a direct connection with the servers of Google. If you have a Google account, Google can then establish a link between your visit to our website and your Google account. Please note that there is a possibility that Google will record and store your IP address and further identifying information even if you do not have a Google account.

The purpose of transferring data to Google is to display advertising that may interest you and ascertain whether you have downloaded or clicked one of our ads when using Google or another platform. That enables us to measure the effectiveness of our ads and improve the content and the functionality of our website accordingly on an ongoing basis as the need arises.



Your consent provides the legal basis for the use of Google Marketing Platform services pursuant to Art. 6(1)(a) of the GDPR. You may withdraw your consent for the future at any time.

Further information on Google Marketing Platform and related data processing may be found at <https://marketingplatform.google.com/about/>.

#### LINKEDIN CONVERSION TRACKING

Our website uses LinkedIn Conversion Tracking, an analysis service of LinkedIn Corporation, 1000 West Maude Avenue, Sunnyvale CA 94085, U.S.A.

The use of LinkedIn Conversion Tracking involves deployment of what are referred to as tracking pixels. The information on the use of our website obtained through the use of tracking pixels will regularly be transmitted to a server of LinkedIn and stored in the U.S.A.

The purpose of transferring data to LinkedIn is to use the post-click and view-through conversions of our LinkedIn advertising campaigns to measure the effectiveness of our ads and improve our content and the functionality of our website accordingly on an ongoing basis as the need arises.

Your consent provides the legal basis for the use of LinkedIn Conversion Tracking pursuant to Art. 6(1)(a) of the GDPR. You may withdraw your consent for the future at any time.

Further information on data protection and the cookies of LinkedIn Corporation, 1000 West Maude Avenue, Sunnyvale CA 94085, U.S.A., may be found at [https://www.linkedin.com/legal/cookie-policy?trk=lithograph\\_footer-cookie-policy](https://www.linkedin.com/legal/cookie-policy?trk=lithograph_footer-cookie-policy).

#### TWITTER CONVERSION TRACKING

Our website uses Twitter Conversion Tracking, an analysis service of Twitter Inc. 1355 market Street, Suite 900, San Francisco, CA 94103, U.S.A. The use of Twitter Conversion Tracking involves deployment of what are referred to as tracking pixels.

The information on the use of our website obtained through the use of tracking pixels will regularly be transmitted to a server of Twitter and stored in the U.S.A.

We have no influence over the precise nature of data processing by Twitter and can therefore in the present case provide you only with the information actually at our disposal. Your browser uses the Twitter tracking pixel to establish a direct connection with the Twitter server. For example, placement of the pixel lets Twitter know when you have clicked one of our ads or visited a specific webpage of our site. If you have a Twitter account, Twitter can establish a link between this data and your Twitter account. Please note that there is a possibility that Twitter will record and store your IP address and further identifying information even if you do not have a Twitter account.

The purpose of transferring data to Twitter is to use the post-click and view-through conversions of our Twitter advertising campaigns to measure the effectiveness of our ads and improve our content and the functionality of our website accordingly on an ongoing basis as the need arises.



Your consent provides the legal basis for the use of Twitter Conversion Tracking pursuant to Art. 6(1)(a) of the GDPR. You may withdraw your consent for the future at any time.

Further information on data protection and the cookies of Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, U.S.A., may be found at <https://twitter.com/de/privacy>

#### META PIXEL (FORMERLY: FACEBOOK PIXEL)

Our website uses Facebook Pixel of Meta Platform Ireland Limited ("Meta"), 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The use of Meta Pixel involves deployment of what are referred to as tracking pixels.

The information on the use of our website obtained through the deployment of tracking pixels will regularly be transmitted to a server of Meta and stored in the U.S.A.

Your browser will use Meta Pixel to establish a direct connection with the server. We have no influence over the precise nature of data processing by Meta and can therefore in the present case provide you only with the information actually at our disposal. For example, placement of the Meta Pixel lets Meta know when you have clicked one of our ads or visited a specific webpage of our site. If you have a Facebook or Instagram account, Meta can establish a link between your visit and your account. Please note that there is a possibility that Meta will record and store your IP address and further identifying information even if you are not registered with Facebook or Instagram.

The purpose of transferring data to Meta is to use the post-click and view-through conversions of our Facebook or Instagram advertising campaigns to measure the effectiveness of our ads and improve our content and the functionality of our website accordingly on an ongoing basis as the need arises.

Your consent provides the legal basis for the use of Facebook Pixel pursuant to Art. 6(1)(a) of the GDPR.

You may withdraw your consent for the future at any time.

Further information on data protection and the cookies of Meta Platform Ireland Limited ("Meta"), 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, may be found at <https://www.facebook.com/about/privacy>.

#### YOUTUBE

Our website uses videos and plug-ins from YouTube LLC, 901 Cherry Avenue, San Bruno, CA 94066, U.S.A. YouTube is legally represented by Google Inc., which maintains its principal place of business at 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A.

If you have given your consent to the use of YouTube, a communication link will be established with the YouTube server and provide the service with various data even if our website shows only a freeze frame. This data will include the IP address of your computer, any cookies already stored on your computer and information stored in connection with prior contacts with YouTube. If no data has yet been stored, the service will first store cookies on your computer. Contact with YouTube will also give the service information on any user account you may have with YouTube. Further information





on interaction with the video such as, for example, if you click the start, pause or end buttons, will also be transmitted to the provider. You can end the data processing by visiting a page without any video and deleting all cookies from your computer.

Your consent provides the legal basis for embedding YouTube videos pursuant to Art. 6(1)(a) of the GDPR. You may withdraw your consent for the future at any time.

Further information on data processing and data protection by YouTube may be found at <https://policies.google.com/privacy>.

#### VIMEO

Our website uses plug-ins from Vimeo Inc, 555 West 18th Street, New York, NY 10011, U.S.A.

If you visit a page with embedded Vimeo videos on our website, your browser will automatically transmit information to the servers of Vimeo in the U.S.A. Vimeo then receives information on the page that you have visited as well as access to your IP address.

We have set Vimeo so that the service provider cannot track your activities or place cookies.

Your consent provides the legal basis for the use of Vimeo pursuant to Art. 6(1)(a) of the GDPR. You may withdraw your consent for the future at any time.

Further information on data processing by Vimeo may be found at <https://vimeo.com/privacy>.

#### HUBSPOT ANALYTICS

Our website uses HubSpot Analytics Tracking, an analysis service of HubSpot Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, U.S.A. The use of HubSpot Analytics Tracking involves deployment of what are referred to as tracking pixels.

The information on the use of our website obtained through the use of a tracking pixel will regularly be transmitted to a server of HubSpot and stored in the U.S.A.

The purpose of transferring data to HubSpot is to obtain information on our advertising campaigns in order to measure the effect of our ads and improve our content and the functionality of our website accordingly on an ongoing basis as the need arises.

Your consent provides the legal basis for the use of HubSpot Analytics Tracking pursuant to Art. 6(1)(a) of the GDPR. You may withdraw your consent for the future at any time.

Further information on data protection and the cookies of HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, U.S.A., may be found at <https://legal.hubspot.com/privacy-policy>.

#### CONSENTMANAGER

Our website uses the consent management tool of consentmanager AB, Håltegelvägen 1b, 72348 Västerås, Sweden.



We use the consent manager to obtain any consents we may need to process personal data, in particular as regards placement of cookies that are not necessary for technical reasons.

All cookies and services that are not necessary for technical reasons are deactivated by default. Cookies and services that require consent are activated only if the visitor to the website has provided his or her consent as required by the consent manager.

The consent manager enables first-time visitors to our website to choose which cookies and services they would like to consent to and the type of processing of their personal data they prefer not to accept. Visitors can change their settings at any time.

The settings you choose are stored for the purposes of consent management. Our service provider, consentmanager AB, places cookies on your device that record the cookies and services that you have consented to receive for reference when you visit our website again. That also enables us to prove that we have complied with our legal obligation to obtain consent to place cookies and services that are not necessary for technical reasons.

We have entered into a contract for the required data processing pursuant to Art. 28 of the GDPR.

Our legal obligation to obtain and provide proof of possession of such consent to use cookies and services that are not necessary for technical reasons provides the legal basis for the use of the consent management tool and the related processing of your personal data pursuant to Art. 6(1)(c) of the GDPR.

#### HOTJAR

Our website uses Hotjar, a service of Hotjar Ltd., Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta.

Hotjar is a service that enables us to analyze the activities of visitors to our website by recording their interaction with the website and creating pseudonymous user profiles that provide us with information on the movements of visitors on our site.

Such analysis enables us to better understand the needs of our users and optimize our website services accordingly.

The pseudonymized user profiles produced by Hotjar are not used by us or by Hotjar to identify individual users of our website.

Hotjar uses cookies that are stored on your device. The use of Hotjar involves processing the personal data of visitors to our website, including their IP addresses, screen resolution, information on their browsers, country, preferred language settings, websites visited as well as the date and time of access to subdomains.

Hotjar mentions that its services may involve storage of the IP addresses of website visitors on the servers of third-party subprocessors. The possibility that such IP addresses may be temporarily stored outside the European Union cannot therefore be excluded.



Your consent provides the legal basis for the use of Hotjar to process your data pursuant to Art. 6(1)(a) GDPR. You may withdraw your consent for the future at any time.

Further information on data processing by Hotjar may be found at

<https://www.hotjar.com/legal/policies/privacy/de/>.

#### AMAZON CLOUDFRONT

We use the Content Delivery Network (CDN) Amazon Cloudfront operated by Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA on our website.

The CDN is used to provide you with the content of our website quickly and reliably using regionally and internationally distributed servers.

When you visit our website, a connection to the servers of Amazon Web Services, Inc. is established to provide the website content. Your IP address and certain browser data will be transmitted. The transmitted data is used exclusively for the purpose of providing the website content securely.

The legal basis for the use of the content delivery network is our legitimate interest in the fast and reliable provision of our website content in accordance with Art. 6(1)(f) GDPR.

More information on data protection at Cloudflare can be found at:

[https://aws.amazon.com/privacy/?nc1=h\\_ls](https://aws.amazon.com/privacy/?nc1=h_ls).