# Privacy policy for the use of our solar manager app Effective Date: May 20, 2024

# Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our PVSTAR Manager app, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

Last Update: 20. March 2024

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#### Controller

First Name, surname/Company

**Chint PVSTAR Energy Solutions GmbH** 

Strett, house no. Stralauer Platz 33-34, 10243 Berlin, Germany Psotcode, City, Coutry Berlin, Germany E-mail address: service@pvstar.com Phone: Optional Legal Notice: optional (recommended)

# **Contact information**

service@pvstar.com

#### **Overview of processing operations**

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

Categories of Processed Data

- Inventory data.
- Payment Data.
- Contact data.
- Content data.
- Contract data.
- Usage data.
- Meta, communication and process data.
- Products data.
- Power plant date

#### Categories of Data Subjects

- Customers.
- Prospective customers.
- Communication partner.

- Users.
- Business and contractual partners.
- Installers.

### **Purposes of Processing**

- Provision of contractual services and fulfillment of contractual obligations.
- Contact requests and communication.
- Security measures.
- Direct marketing.
- Web Analytics.
- Office and organisational procedures.
- Managing and responding to inquiries.
- Feedback.
- Marketing.
- Profiles with user-related information.
- Provision of our online services and usability.
- Information technology infrastructure.

# **Relevant legal bases**

**Relevant legal bases according to the GDPR:** In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- Performance of a contract and prior requests (Article 6 (1) (b) GDPR) Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Compliance with a legal obligation (Article 6 (1) (c) GDPR) Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Legitimate Interests (Article 6 (1) (f) GDPR) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, data protection laws of the individual federal states may apply.

**Reference to the applicability of the GDPR and the Swiss DPA:** These privacy notices serve both to provide information in accordance with the Swiss Federal Act on Data Protection (Swiss DPA) and the General Data Protection Regulation (GDPR).

### **Security Precautions**

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

TLS/SSL encryption (https): To protect the data of users transmitted via our online services, we use TLS/SSL encryption. Secure Sockets Layer (SSL) is the standard technology for securing internet connections by encrypting the data transmitted between a website or app and a browser (or between two servers). Transport Layer Security (TLS) is an updated and more secure version of SSL. Hyper Text Transfer Protocol Secure (HTTPS) is displayed in the URL when a website is secured by an SSL/TLS certificate.

# **Transmission of Personal Data**

In the context of our processing of personal data, it may happen that the data is transferred to other places, companies or persons or that it is disclosed to them. Recipients of this data may include, for example, service providers commissioned with IT tasks or providers of services and content that are embedded in a website. In such cases, the legal requirements will be respected and in particular corresponding contracts or agreements, which serve the protection of your data, will be concluded with the recipients of your data.

Data Transmission within the Group of Companies: We may transfer personal data to other companies within our group of companies or otherwise grant them access to this data. Insofar as this disclosure is for administrative purposes, the disclosure of the data is based on our legitimate business and economic interests or otherwise, if it is necessary to fulfill our contractual obligations or if the consent of the data subjects or otherwise a legal permission

is present.

### International data transfers

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 disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.

Subject to express consent or transfer required by contract or law, we process or have processed the data only in third countries with a recognised level of data protection, on the basis of special guarantees, such as a contractual obligation through so-called standard protection clauses of the EU Commission or if certifications or binding internal data protection regulations justify the processing (Article 44 to 49 GDPR, information page of the EU

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\_en).

Data Processing in Third Countries: If we process data in a third country (i.e., outside the European Union (EU) or the European Economic Area (EEA)), or if the processing is done within the context of using third-party services or the disclosure or transfer of data to other individuals, entities, or companies, this is only done in accordance with legal requirements. If the data protection level in the third country has been recognized by an adequacy decision (Article 45 GDPR), this serves as the basis for data transfer. Otherwise, data transfers only occur if the data protection level is otherwise ensured, especially through standard contractual clauses (Article 46 (2)(c) GDPR), explicit consent, or in cases of contractual or legally required transfers (Article 49 (1) GDPR). Furthermore, we provide you with the basis of third-country transfers from individual third-country providers, with adequacy decisions primarily serving as the foundation. "Information regarding third-country transfers and existing adequacy decisions can be obtained from the information provided by the EU Commission:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-prot ection\_en.

EU-US Trans-Atlantic Data Privacy Framework: Within the context of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the data protection level for certain companies from the USA as secure within the adequacy decision of 10th July 2023. The list of certified companies as well as additional information about the DPF can be found on the website of the US Department of Commerce at <a href="https://www.dataprivacyframework.gov/">https://www.dataprivacyframework.gov/</a>. We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

# Erasure of data

The data processed by us will be erased in accordance with the statutory provisions as soon as their processing is revoked or other permissions no longer apply (e.g. if the purpose of processing this data no longer applies or they are not required for the purpose). If the data is not deleted because they are required for other and legally permissible purposes, their processing is limited to these purposes. This means that the data will be restricted and not processed for other purposes. This applies, for example, to data that must be stored for commercial or tax reasons or for which storage is necessary to assert, exercise or defend legal claims or to protect the rights of another natural or legal person. In the context of our information on data processing, we may provide users with further information on the deletion and retention of data that is specific to the respective processing operation.

### **Rights of Data Subjects**

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

- Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **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 request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

#### **Business services**

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

We process this data in order to fulfill our contractual obligations. These include, in particular, the obligations to provide the agreed services, any update obligations and

remedies in the event of warranty and other service disruptions. In addition, we process the data to protect our rights and for the purpose of administrative tasks associated with these obligations and company organization. Furthermore, we process the data on the basis of our legitimate interests in proper and economical business management as well as security measures to protect our contractual partners and our business operations from misuse, endangerment of their data, secrets, information and rights (e.g. for the involvement of telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only disclose the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfill legal obligations. Contractual partners will be informed about further forms of processing, e.g. for marketing purposes, within the scope of this privacy policy.

Which data are necessary for the aforementioned purposes, we inform the contracting partners before or in the context of the data collection, e.g. in online forms by special marking (e.g. colors), and/or symbols (e.g. asterisks or the like), or personally.

We delete the data after expiry of statutory warranty and comparable obligations, i.e. in principle after expiry of 4 years, unless the data is stored in a customer account or must be kept for legal reasons of archiving. The statutory retention period for documents relevant under tax law as well as for commercial books, inventories, opening balance sheets, annual financial statements, the instructions required to understand these documents and other organizational documents and accounting records is ten years and for received commercial and business letters and reproductions of sent commercial and business letters six years. The period begins at the end of the calendar year in which the last entry was made in the book, the inventory, the opening balance sheet, the annual financial statements or the management report was prepared, the commercial or business letter was received or sent, or the accounting document was created, furthermore the record was made or the other documents were created.

If we use third-party providers or platforms to provide our services, the terms and conditions and privacy policies of the respective third-party providers or platforms shall apply in the relationship between the users and the providers.

- Processed data types: Inventory data (e.g. names, addresses); Payment Data (e.g. bank details, invoices, payment history, payment method); Contact data (e.g. e-mail, telephone numbers); Contract data (e.g. contract object, duration, customer category, price); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- Data subjects: Customers; Prospective customers. Business and contractual partners.
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations; Security measures; Contact requests and communication; Office and organisational procedures. Managing and responding to inquiries.
- Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR); Compliance with a legal obligation (Article 6 (1) (c) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

Further information on processing methods, procedures and services used:

- **Customer Account:** Customers can create an account within our online offer (e.g. customer or user account, "customer account" for short). If the registration of a customer account is required, customers will be informed of this as well as of the details required for registration. The customer accounts are not public and cannot be indexed by search engines. In the course of registration and subsequent registration and use of the customer account, we store the IP addresses of the contractual partners along with the access times, in order to be able to prove the registration and prevent any misuse of the customer account. If the customer account has been terminated, the customer account data will be deleted after the termination date, unless it is retained for purposes other than provision in the customer account or must be retained for legal reasons (e.g. internal storage of customer data, order transactions or invoices). It is the customers' responsibility to back up their data when terminating the customer Account; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR).
- Online Shop and E-Commerce: We process the data of our customers in order to enable them to select, purchase or order the selected products, goods and related services, as well as their payment and delivery, or performance of other services. If necessary for the execution of an order, we use service providers, in particular postal, freight and shipping companies, in order 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 details are identified as such in the course of the ordering or comparable purchasing process and include the details required for delivery, or other way of making the product available and invoicing as well as contact information in order to be able to hold any consultation; Legal Basis: Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

# Provision of online services and web hosting

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.).). Security measures.
- Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

# Further information on processing methods, procedures and services used:

• Provision of online offer on rented hosting space: For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

- Collection of Access Data and Log Files: The access to our online services is logged in the form of so-called "server log files". Server log files may include the address and name of the web pages and files accessed, the 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 general 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 to ensure the stability and optimal load balancing of the servers; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR). Retention period: Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.
- Alibaba Cloud: Services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); Service provider: Alicloud (Germany) Gmbh, Neue Rothofstraße 13 -19, 60313 Frankfurt am Main, Germany; Website: <u>https://www.alibabacloud.com/</u>. Privacy Policy: <u>https://www.alibabacloud.com/help/en/legal/latest/alibaba-cloud-international-websiteprivacy-policy</u>.

# Purchase of applications via Appstores

The purchase of our apps is done via special online platforms operated by other service providers (so-called "appstores"). In this context, the data protection notices of the respective appstores apply in addition to our data protection notices. This applies in particular with regard to the methods used on the platforms for web analytics and for interest-related marketing as well as possible costs.

- Processed data types: 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. contract object, duration, customer category); Usage data (e.g. websites visited, interest in content, access times); Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status). Content data (e.g. text input, photographs, videos).
- Data subjects: Customers. Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Provision of contractual services and fulfillment of contractual obligations. Marketing.
- Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

# Further information on processing methods, procedures and services used:

- Apple App Store: App and software distribution platform; Service provider: Apple Inc., Infinite Loop, Cupertino, CA 95014, USA; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: <u>https://www.apple.com/ios/app-store/</u>.
  Privacy Policy: https://www.apple.com/privacy/privacy-policy/.
- Google Play: App and software distribution platform; Service provider: Google Ireland

Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: <u>https://play.google.com/store/apps?hl=en</u>. Privacy Policy: https://policies.google.com/privacy

https://policies.google.com/privacy.

#### **Communication via Messenger**

We use messenger services for communication purposes and therefore ask you to observe the following information regarding the functionality of the messenger services, encryption, use of the metadata of the communication and your objection options.

You can also contact us by alternative means, e.g. telephone or e-mail. Please use the contact options provided to you or use the contact options provided within our online services.

In the case of encryption of content (i.e. the content of your message and attachments), we point out that the communication content (i.e. the content of the message and attachments) is encrypted end-to-end. This means that the content of the messages is not visible, not even by the messenger service providers themselves. You should always use a current version of the message service with activated encryption, so that the encryption of the message contents is guaranteed.

However, we would like to point out to our communication partners that although messenger service providers do not see the content, they can find out that and when communication partners communicate with us and process technical information on the communication partner's device used and, depending on the settings of their device, also location information (so-called metadata).

**Information on Legal basis:** If we ask communication partners for permission before communicating with them via messenger services, the legal basis of our processing of their data is their consent. Otherwise, if we do not request consent and you contact us, for example, voluntarily, we use messenger services in our dealings with our contractual partners and as part of the contract initiation process as a contractual measure and in the case of other interested parties and communication partners on the basis of our legitimate interests in fast and efficient communication and meeting the needs of our communication partners for communication via messenger services. We would also like to point out that we do not transmit the contact data provided to us to the messenger service providers for the first time without your consent.

Withdrawal, objection and deletion: You can withdraw your consent or object to communication with us via messenger services at any time. In the case of communication via messenger services, we delete the messages in accordance with our general data retention policy (i.e. as described above after the end of contractual relationships, archiving requirements, etc.) and otherwise as soon as we can assume that we have answered any information provided by the communication partners, if no reference to a previous conversation is to be expected and there are no legal obligations to store the messages to prevent their deletion.

**Reservation of reference to other means of communication:** Finally, we would like to point out that we reserve the right, for reasons of your safety, not to answer inquiries about messenger services. This is the case if, for example, internal contractual matters require special secrecy or if an answer via the messenger services does not meet the formal

requirements. In such cases we refer you to more appropriate communication channels.

- **Processed data types:** Contact data (e.g. e-mail, telephone numbers); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of Processing:** Contact requests and communication. Direct marketing (e.g. by e-mail or postal).
- Legal Basis: Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Further information on processing methods, procedures and services used:

 WhatsApp: WhatsApp Messenger with end-to-end encryption; Service provider: WhatsApp Ireland Limited, 4 Grand Canal Quay, Dublin 2, D02 KH28, Ireland; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR); Website: <u>https://www.whatsapp.com/</u>; Privacy Policy: <u>https://www.whatsapp.com/legal</u>. Basis for third country transfer: EU-US Data Privacy Framework (DPF).

#### **Newsletter and Electronic Communications**

We send newsletters, e-mails and other electronic communications (hereinafter referred to as "newsletters") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. Otherwise, our newsletters contain information about our services and us.

In order to subscribe to our newsletters, it is generally sufficient to enter your e-mail address. We may, however, ask you to provide a name for the purpose of contacting you personally in the newsletter or to provide further information if this is required for the purposes of the newsletter.

**Double opt-in procedure:** The registration to our newsletter takes place in general in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external e-mail addresses.

The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

**Deletion and restriction of processing:** We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them to provide evidence of prior consent. The processing of these 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 a consent is confirmed at the same time. In the case of an obligation to permanently observe an objection, we reserve the right to store the e-mail address solely for this purpose in a blocklist.

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.

# Contents:

Information about us, our services, promotions and offers.

- **Processed data types:** Inventory data (e.g. names, addresses); Contact data (e.g. e-mail, telephone numbers). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- Purposes of Processing: Direct marketing (e.g. by e-mail or postal).
- Legal Basis: Consent (Article 6 (1) (a) GDPR).
- **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 contact options listed above, preferably e-mail.

#### Commercial communication by E-Mail, Postal Mail, Fax or Telephone

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

The recipients have the right to withdraw their consent at any time or to object to the advertising communication at any time.

After revocation or objection, we store the data required to prove the past authorization to contact or send up to three years from the end of the year of revocation or objection on the basis of our legitimate interests. The processing of this data is limited to the purpose of a possible defense against claims. Based on the legitimate interest to permanently observe the revocation, respectively objection of the users, we further store the data necessary to avoid a renewed contact (e.g. depending on the communication channel, the e-mail address, telephone number, name).

- **Processed data types:** Inventory data (e.g. names, addresses). Contact data (e.g. e-mail, telephone numbers).
- Data subjects: Communication partner (Recipients of e-mails, letters, etc.).
- Purposes of Processing: Direct marketing (e.g. by e-mail or postal).
- Legal Basis: Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

#### Plugins and embedded functions and content

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party

providers"). These may, for example, be graphics, videos or city maps (hereinafter uniformly referred to as "Content").

The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties 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 include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times). Meta, communication and process data (e.g. IP addresses, time information, identification numbers, consent status).
- Data subjects: Users (e.g. website visitors, users of online services).
- Purposes of Processing: Provision of our online services and usability.
- Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

 Google Fonts (Provision on own server): Provision of font files for the purpose of a user-friendly presentation of our online services; Service provider: The Google Fonts are hosted on our server, no data is transmitted to Google; Legal Basis: Legitimate Interests (Article 6 (1) (f) GDPR).

# **Terminology and Definitions**

In this section, you will find an overview of the terminology used in this privacy policy. Where the terminology is legally defined, their legal definitions apply. The following explanations, however, are primarily intended to aid understanding.

- **Personal Data:** "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Profiles with user-related information:** The processing of "profiles with user-related information", or "profiles" for short, includes any kind of automated processing of personal data that consists of using these personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this may include different information concerning demographics, behaviour and interests, such as interaction with websites and their content, etc.) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often

used for profiling purposes.

- Web Analytics: Web Analytics serves the evaluation of visitor traffic of online services and can determine their behavior or interests in certain information, such as content of websites. With the help of web analytics, website owners, for example, can recognize 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 their websites to the needs of their visitors. For the purposes of web analytics, pseudonymous cookies and web beacons are often used to recognize returning visitors and thus obtain more precise analyses of the use of an online service.
- **Controller:** "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Processing:** The term "processing" covers a wide range and practically every handling of data, be it collection, evaluation, storage, transmission or erasure.

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