

# Privacy Policy

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## Privacy Policy Introduction and Overview

We have written this privacy policy (version 03.09.2024-112758134) in order to explain to you, in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#) and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered gender-neutral.

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

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

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

## Scope

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

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

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

## Legal bases

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

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

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

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

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

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

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

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

## Contact details of the data protection controller

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

Olga Ovadias  
Neudorferstraße 2a/2/5  
2353 Guntramsdorf

E-Mail: [olga.ovadias@gmail.com](mailto:olga.ovadias@gmail.com)

Phone: [+43 699 18048406](tel:+4369918048406)

Company details: <https://www.steuerberatung-ovadias.at/impressum/>

## Storage Period

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

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

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

## Rights in accordance with the General Data Protection Regulation

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

- According to Article 15 DSGVO, you have the right to information about whether we are processing data about you. If this is the case, you have the right to receive a copy of the data and to know the following information:
  - for what purpose we are processing;
  - the categories, i.e. the types of data that are processed;

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

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

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

# Austria Data protection authority

**Manager:** Dr. Matthias Schmidl

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

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

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

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

## Security of data processing operations

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


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

## TLS encryption with https

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

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

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


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


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


## Communications

### Communications Overview

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

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

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

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

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

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

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

## **Affected persons**

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

## **Telephone**

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

## **Email**

If you communicate with us via email, your data is stored on the respective terminal device (computer, laptop, smartphone, ...) as well as on the email server. The data will be deleted as soon as the business case has ended and the legal requirements allow for its erasure.

## **Online forms**

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

## **Legal bases**

Data processing is based on the following legal bases:

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

# Data Processing Agreement (DPA)

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

## Who are the processors?

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

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

**Data subject** (you as a customer or interested party) □ **Controller** (we as a company and contracting entity) □ **Processors** (service providers such as web hosts or cloud providers)

## Contents of a Data Processing Agreement

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

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

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

- ensuring data security measures


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


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


## Cookies

### Cookies Overview

 Affected parties: visitors to the website

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

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

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

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

### What are cookies?

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

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

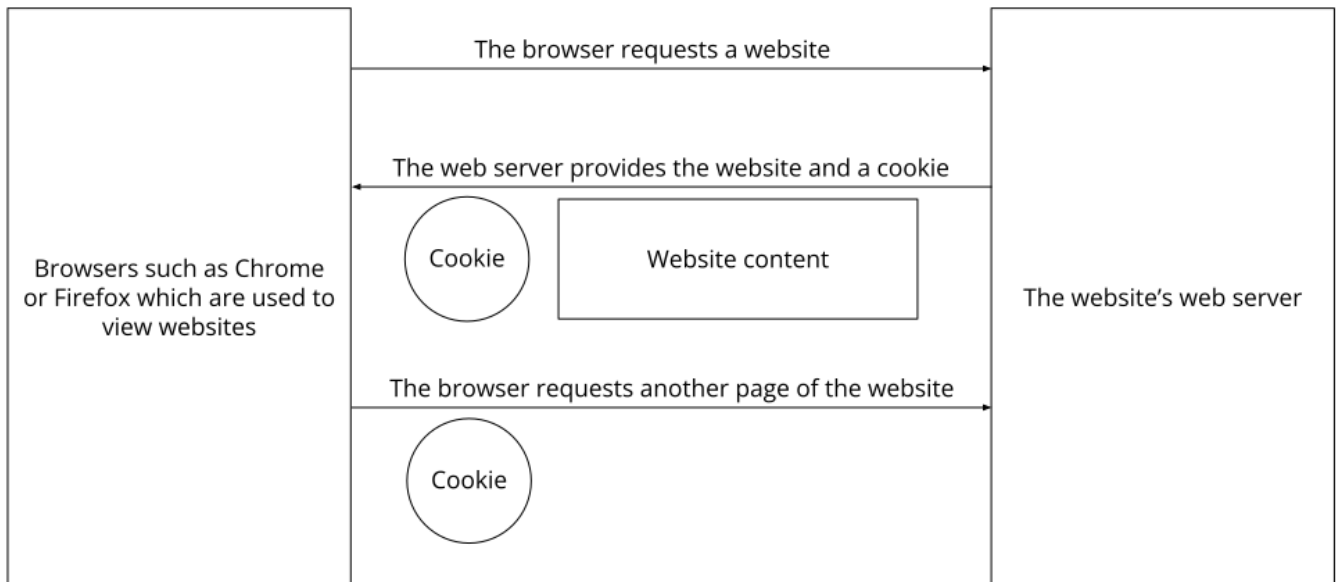
Whenever you surf the Internet, you are using a browser. Common browsers are for example, Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

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

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

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





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

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

**Name:** \_ga

**Value:** GA1.2.1326744211.152112758134-9

**Purpose:** Differentiation between website visitors

**Expiry date:** after 2 years

A browser should support these minimum sizes:

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

## Which types of cookies are there?

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

There are 4 different types of cookies:

### Essential cookies

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

### **Purposive cookies**

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

### **Target-orientated cookies**

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

### **Advertising cookies**

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

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

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

### **Purpose of processing via cookies**

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

### **Which data are processed?**

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

### **Storage period of cookies**

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

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

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

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

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

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

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

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

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

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

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

## Legal basis

The so-called “cookie directive” has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section 165 (3) of the Telecommunications Act (2021). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in Section 15 (3) of the Telemedia Act (TMG), which has been replaced by the Digital Services Act (DSA) since May 2024.

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


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


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


## Web hosting

### Web hosting Overview

 Affected parties: visitors to the website

 Purpose: professional hosting of the website and security of operations

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

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

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

## What is web hosting?

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

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

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

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

Illustration:



## Why do we process personal data?

The purposes of data processing are:

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

## Which data are processed?

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

- the full address (URL) of the accessed website (e. g.

https://www.examplepage.uk/examplesubpage.html?tid=112758134)

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

## How long is the data stored?

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

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

## Legal basis

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

## Webhosting Other


Contact data for our Webhosting:


Wix.com Ltd.  
Yunitsman 5 St  
Tel Aviv, Israel


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


## Website Builders Introduction

### Website Builders Privacy Policy Overview

 Affected parties: website visitors

 Purpose: service optimisation

 Data processed: The data that is being processed includes but is not limited to technical usage information, browser activity, clickstream activity, session heat maps, contact details, IP addresses or geographic locations. You can find more details in the Privacy Policy below as well as in the providers' Privacy Policies.

 Storage duration: depends on the provider

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

## **What are website builders?**

We use a modular website builder for our website. This is a special form of Content Management System (CMS). Website builders enable website operators to create websites very easily and without any programming knowledge. In many cases, web hosts also offer website builders. Your personal data may be collected, stored and processed if a website builder is being used. In this Privacy Policy, you will find general information about data that is processed by such modular website builder systems. You can find more information in the respective provider's Privacy Policy.

## **Why do we use website builders for our website?**

The greatest advantage of modular website builders is their ease of use. We want to offer you a clear, simple and nicely designed website that we can easily operate and maintain by ourselves – without needing any external support. Nowadays website builders offer many helpful functions that we can use even without having any programming knowledge. This enables us to design our website according to our wishes and therefore, to give you an informative and pleasant experience on our website.

## **Which data are stored by website builders?**

First of all, the exact data that is stored depends on the website builder that is being used. Each provider processes and collects different data from website visitors. However, technical usage information such as users' operating system, browser, screen resolution, language and keyboard settings, hosting provider as well as the date of the website visit are usually collected. Moreover, tracking data (e. g. browser activity, clickstream activities, session heat maps, etc.) may also be processed. The same goes for personal data, since data such as contact information e. g. email address, telephone number (if you have provided it), IP address and geographic location data may also be processed and stored. In the respective provider's Privacy Policy you can find out exactly which of your data is getting stored.

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

Provided that we have any further information on this, we will inform you below about the duration of the data processing associated with the website builder we use. You can find detailed information on this in the provider's Privacy Policy. Generally, we only process personal data for as long as is absolutely necessary to provide our services and products. The provider may store your data according to their own specifications, over which we have no influence.

## **Right to object**

You always retain the right to information, rectification and erasure of your personal data. If you have any questions, you can also contact the responsible parties at the respective website builder system at any time. You can find the corresponding contact details either in our Privacy Policy or on the website of the respective provider.

What is more, in your browser you can clear, disable or manage cookies that providers use for their

functions. Depending on the browser you use, this can be done in different ways. Please note, that this may lead to not all functions working as usual anymore.

## Legal Bases


We have a legitimate interest in using a website builder system to optimise our online service and present it in an efficient and user-friendly way. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we only use the website builder system if you have consented to it.


If the processing of data is not absolutely necessary for the operation of the website, your data will only be processed on the basis of your consent. This particularly applies to tracking activities. The legal basis for this is Article 6 (1) (a) GDPR.


With this Privacy Policy, we have made you more familiar with the most important general information on data processing. If you want to find out more about this, you will find further information – if available – in the following section or in the Privacy Policy of the provider.


## Wix Privacy Policy

### Wix Privacy Policy Overview

 Affected parties: website visitors

 Purpose: service optimisation

 Processed data: data such as technical usage information like browser activity, clickstream activities, session heat maps and contact details, IP addresses or geographic locations. You can find more details on this in the Privacy Policy below.

 Storage period: no precise information is known

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

## What is Wix?

For our website we use the website construction-kit Wix by the Israeli company Wix.com Ltd., 40 Hanamal Tel Aviv St., Tel Aviv 6350671, Israel. In addition to the headquarters in Tel Aviv, the company also has other headquarters such as in Berlin, Dublin, Vancouver, or New York. Due to the use of Wix, your personal data may be collected, stored and processed. In this privacy policy we want to explain why we use Wix, what data is stored, where your data is stored and how you can prevent data retention.

Wix is a website construction-kit that makes it very easy to create HTML5 websites as well as mobile websites. The online platform is based on the cloud principle and allows easy integration of various Wix or third-party provider functions into your own website.

## Why do we use Wix on our website?

For working on our website, we need an easy-to-use system, that allows us to present you a beautiful design and interesting content quickly and easily. We have found Wix to be the right system for this. Thanks to both, Wix's easy operation and its extensive functions, we can design our

website as we wish, while ensuring its user-friendliness.

## What data is stored by Wix?

Non-personal data include for example technical usage information such as browser activity, clickstream activity, session heat maps, as well as data about your computer, operating system, browser, screen resolution, language and keyboard settings, internet provider and date of the page visit.

Personal data are also recorded. These are primarily contact details (email address or telephone number, if you have provided them), IP address or your geographical location.

Tracking systems such as cookies are used to collect data about your behaviour on our website. For example, it records which sub-pages you take a particular interest in, how much time you spend on individual pages, when you leave a page (bounce rate) or which pre-sets (e.g. language settings) you have made. Based on this data, [Wix.com](https://www.wix.com) can adjust their marketing measures better to your interests and your user behaviour. Therefore, the next time you visit our website, you will get to view it with the settings you have chosen priorly. [Wix.com](https://www.wix.com) may also forward personal data to third parties (such as service providers).

Below we will show you a list of exemplary cookies that are placed due to the use of Wix:

**Name:** XSRF-TOKEN

**Value:** 1591628008|P01ovn-JtsrK

**Purpose:** This cookie is a security cookie and prevents the so-called cross-site request forgery, which is an attack on a computer system.

**Expiry date:** after end of session

**Name:** \_wixCIDX

**Value:** b2474394-b64f-4c7a-a598-16b9043a8938112758134-9

**Purpose:** This cookie appropriately stores data when you to log in to our website, to shorten the logon process the following time.

**Expiry date:** after 3 months

**Name:** AWSELB

**Value:** EB626B5A40C80CEFD0EB26286F9684716FECD023880992D31DEC38112758134-1

**Purpose:** This cookie is used to distribute the website's load across multiple servers. Therefore, the page loading speed gets increased.

**Expiry date:** after one hour

**Name:** AWSELBCORS

**Value:** 85FDC7C91873988D19D2D53305AA8CAB73AF02FCEAEB626B5A40C

**Purpose:** We have not yet been able to find out more information on this cookie. We will inform you as soon as we know more.

**Expiry date:** after one hour

**Note:** Please note that the cookies shown above are examples and that this list does not claim to



be exhaustive.

## How long and where is the data stored?

Your data can be stored on various servers that are distributed across the globe. For example, the data can be stored in the USA, Ireland, South Korea, Taiwan, or Israel.

Wix always stores data until it is no longer required for their provided service. We have not yet been able to find out more about the period the data is stored for.

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

You have the option to update, correct or delete your personal data at any time. You can also contact Wix's data protection department directly at [privacy@wix.com](mailto:privacy@wix.com).

To deactivate, delete, or manage cookies you have to select the appropriate settings in your browser. Depending on which browser you use, the cookie settings work a little differently. The following instructions show how you can set or manage cookies in the most common browsers.

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

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

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

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

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

Wix.com Ltd. is headquartered in Israel. The European Commission declared Israel to be a country that provides adequate protection for personal data of EU citizens.

## Legal basis

If you have consented to the use of Wix, your consent is the legal basis for the corresponding data processing. According to **Art. 6 Paragraph 1 lit. (Consent)** your consent is the legal basis for the processing of personal data as may occur when collected by Wix.

We also have a legitimate interest in using Wix to optimise our online service and to present our services nicely for you. The corresponding legal basis for this is **Art. 6 para. 1 lit. f GDPR (legitimate interests)**. Nevertheless, we only use Wix if you have given your consent to it.

Wix uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR) as basis for data processing by recipients based in third countries (which are outside the European Union, Iceland, Liechtenstein and Norway) or for data transfer there. These clauses oblige Wix to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?locale=en](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?locale=en).

With this Privacy Policy we have made you familiar with the most important information on data processing by Wix.com. If you want to find out more about it, we recommend you to read the company's Privacy guidelines at <https://www.wix.com/about/privacy>.

## Data Processing Agreement (DPA) Wix


In accordance with Article 28 of the General Data Protection Regulation (GDPR), we have entered into a Data Processing Agreement (DPA) with Wix. What exactly a DPA is and especially what must be included in a DPA, you can read in our general section "Data Processing Agreement (DPA)".


This contract is required by law because Wix processes personal data on our behalf. It clarifies that Wix may only process data they receive from us according to our instructions and must comply with the GDPR. You can find the link to the data processing agreement at <https://www.wix.com/about/privacy-dpa-users>.


## Web Analytics

### Web Analytics Privacy Policy Overview

 Affected parties: visitors to the website

 Purpose: Evaluation of visitor information to optimise the website.

 Processed data: Access statistics that contain data such as access location, device data, access duration and time, navigation behaviour, click behaviour and IP addresses. You can find more details on this from the respective web analytics tool directly.

 Storage period: depending on the respective web analytics tool used

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

## What is Web Analytics?

We use software on our website, which is known as web analytics, in order to evaluate website visitor behaviour. Thus, data is collected, which the analytic tool provider (also called tracking tool) stores, manages and processes. Analyses of user behaviour on our website are created with this data, which we as the website operator receive. Most tools also offer various testing options. These enable us, to for example test which offers or content our visitors prefer. For this, we may show you two different offers for a limited period of time. After the test (a so-called A/B test) we know which product or content our website visitors find more interesting. For such testing as well as for various other analyses, user profiles are created and the respective data is stored in cookies.

## Why do we run Web Analytics?

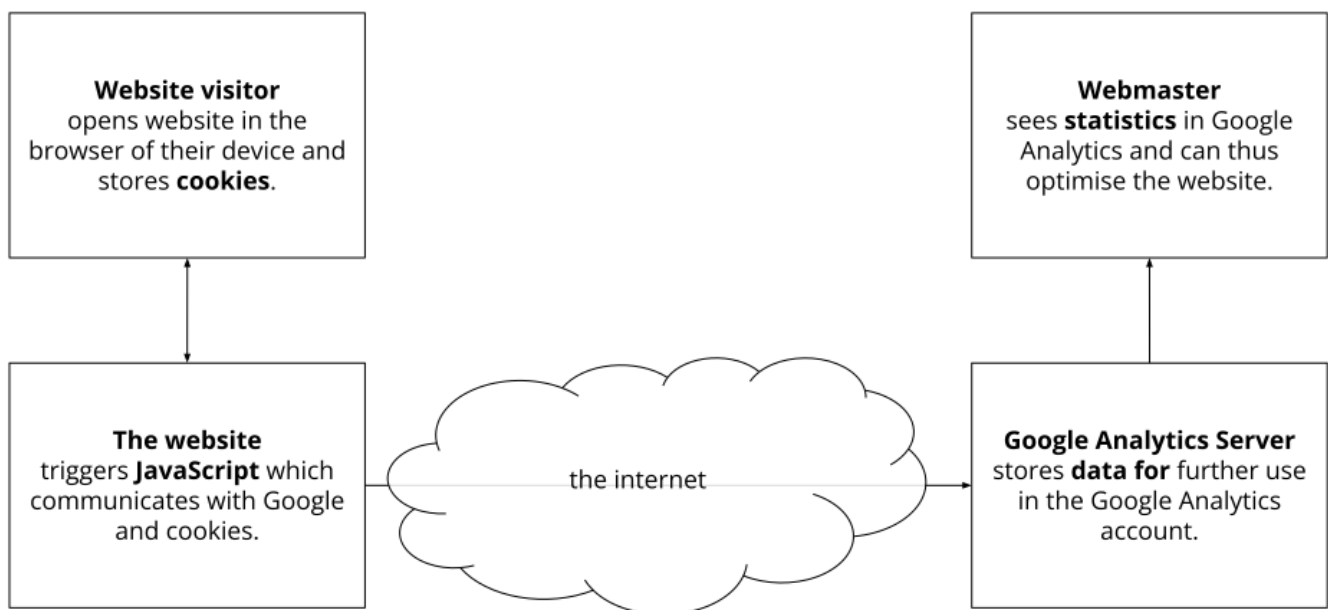
We have a clear goal in mind when it comes to our website: we want to offer our industry's best website on the market. Therefore, we want to give you both, the best and most interesting offer as well as comfort when you visit our website. With web analysis tools, we can observe the behaviour of our website visitors, and then improve our website accordingly for you and for us. For example, we can see the average age of our visitors, where they come from, the times our website gets visited the most, and which content or products are particularly popular. All this information helps us to optimise our website and adapt it to your needs, interests and wishes.

## Which data are processed?

The exact data that is stored depends on the analysis tools that are being used. But generally, data such as the content you view on our website are stored, as well as e. g. which buttons or links you click, when you open a page, which browser you use, which device (PC, tablet, smartphone, etc.) you visit the website with, or which computer system you use. If you have agreed that location data may also be collected, this data may also be processed by the provider of the web analysis tool.

Moreover, your IP address is also stored. According to the General Data Protection Regulation (GDPR), IP addresses are personal data. However, your IP address is usually stored in a pseudonymised form (i.e. in an unrecognisable and abbreviated form). No directly linkable data such as your name, age, address or email address are stored for testing purposes, web analyses and web optimisations. If this data is collected, it is retained in a pseudonymised form. Therefore, it cannot be used to identify you as a person.

The following example shows Google Analytics' functionality as an example for client-based web tracking with JavaScript code.



The storage period of the respective data always depends on the provider. Some cookies only retain data for a few minutes or until you leave the website, while other cookies can store data for several years.

## Duration of data processing

If we have any further information on the duration of data processing, you will find it below. We generally only process personal data for as long as is absolutely necessary to provide products and services. The storage period may be extended if it is required by law, such as for accounting purposes for example for accounting.

## Right to object

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

## Legal basis

The use of Web Analytics requires your consent, which we obtained with our cookie popup. According to **Art. 6 para. 1 lit. a of the GDPR (consent)**, this consent represents the legal basis for the processing of personal data, such as by collection through Web Analytics tools.


In addition to consent, we have a legitimate interest in analysing the behaviour of website visitors, which enables us to technically and economically improve our offer. With Web Analytics, we can recognise website errors, identify attacks and improve profitability. The legal basis for this is **Art. 6 para. 1 lit. f of the GDPR (legitimate interests)**. Nevertheless, we only use these tools if you have given your consent.

Since Web Analytics tools use cookies, we recommend you to read our privacy policy on cookies. If you want to find out which of your data are stored and processed, you should read the privacy policies of the respective tools.


If available, information on special Web Analytics tools can be found in the following sections.

## Messenger & Communication Introduction


### Messenger & Communication Privacy Statement Overview

 Affected parties: website visitors

 Purpose: for contact requests and general communications between yourself and us

 Processed data: Data such as name, address, email address, telephone number, general content data, plus IP address if applicable

You can find more details on this under the respective tools used.

 Storage duration: depends on the messenger & communication functions

Legal bases: Article 6 paragraph 1 letter a GDPR (consent), Article 6 paragraph 1 letter f GDPR (legitimate interests), Article 6 paragraph 1 sentence 1 letter b. GDPR (contractual or pre-contractual obligations)

## What are Messenger & Communication functions?

We offer you various options on our website to communicate with us (e.g. messenger and chat functions, online or contact forms, email, telephone). With the use of these functions, your data will be processed and stored insofar as it is necessary to answer your inquiry and conduct any of our subsequent measures.

In addition to classic means of communication such as email, contact forms or telephone, we also use chats or messengers. The most commonly used messenger function at the moment is

WhatsApp, but of course, there are many different providers who offer messenger functions for websites. If content is end-to-end encrypted, it will be indicated in our individual privacy policies or in the privacy policy of the respective provider. End-to-end encryption means that the content of a message is not visible to the provider themselves. However, information about your device, location settings and other technical data can still be processed and stored.

## **Why do we use Messenger & Communication functions?**

The ability to communicate with you is very important to us. After all, we want to keep the conversation with you going and answer any questions you may have about our service as best we can. Needless to say, smooth communication is an important part of our service. With our practical messenger & communication functions, you always have the option to choose the ones you prefer most. In exceptional cases, however, we may not be able to answer certain questions via chat or messenger. This may be the case for internal contractual matters, for example. For matters like these, we recommend you to use other communication options such as email or telephone.

We generally assume our responsibility under data protection law, even if we use the services of any social media platform. However, the European Court of Justice has decided that in certain cases the operator of the social media platform be jointly responsible alongside us in the scope of Art. 26 GDPR. Should this be the case, we will point it out separately and work on the basis of a relevant agreement. You will find the essence of the agreement for the respective platforms below.

Please note that when using our integrated elements, your data may also be processed outside the European Union, since many providers, such as Facebook Messenger or WhatsApp, are American companies. As a result, you may not be able to claim or enforce your rights in relation to your personal data as easily.

## **Which data is processed?**

Exactly which data is retained and processed depends on the respective messenger & communication function provider. In general, it is data such as your name, address, telephone number, email address and content data such as any information you enter into a contact form. In most cases, information about your device and IP address are also stored. Moreover, data that are transmitted via a messenger & communication function are also stored on the providers' servers.

If you want to know exactly which data is stored and processed by the respective providers and how you can object to the data processing, you please carefully read the respective privacy policy of the company in question.

## **How long is data stored?**

How long data is processed and stored depends primarily on the tools we use. Below you can find out more about the data processing of individual tools. The providers' privacy policies usually state exactly which data is stored and processed and for how long. In general, we only process personal data for as long as necessary to provide our services. When data is stored in cookies, the storage period varies greatly. Data may e.g. be deleted immediately after leaving a website, or they may be stored for several years. Therefore, you should study each individual cookie in detail if you want to

know more about data storage. In most cases, you will also find helpful information about individual cookies in the privacy policies of the individual providers.

## Right to object

You also have the right and the option to revoke your consent to the use of cookies or third-party providers at any time. This can be done either via our cookie management tool or via other opt-out functions. For example, you can also prevent data collection by cookies by managing, deactivating or deleting the cookies in your browser. For more information, we recommend you to read the Consent section.

Since cookies may be in use with messenger & communication functions, we recommend you to read our general privacy policy on cookies. To find out exactly which of your data is stored and processed, please read the privacy policies of the respective tools.

## Legal Basis

If you have consented to the data processing and storage by integrated messenger & communication functions, this consent is the legal basis for data processing (**Art. 6 Para. 1 lit. a GDPR**). We process your request and manage your data within the framework of contractual or pre-contractual relationships in order to fulfill our pre-contractual and contractual obligations or to answer inquiries. The basis for this is **Art. 6 Para. 1 section 1 lit. b GDPR**. In general, if you have given your consent, your data will also be stored and processed on the basis of our legitimate interest (**Art. 6 Para. 1 lit. f GDPR**) in quick and smooth communication with you or other customers and business partners.

## WhatsApp Privacy Policy

We use the instant messaging service WhatsApp on our website. The service provider is the American company WhatsApp Inc., a subsidiary of Meta Platforms Inc. (formerly Facebook Inc. until October 2021). For the European region, the responsible company is WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

### What is WhatsApp?

We probably don't need to introduce WhatsApp to you in detail. The likelihood that you use this well-known messaging service on your smartphone is relatively high. For many years, there have been voices criticizing WhatsApp or its parent company Meta Platforms regarding their handling of personal data. The main criticism in recent years has been the merging of WhatsApp user data with Facebook. In response, Facebook adjusted its terms of service in 2021. Facebook stated that, as of 2021, no personal data from WhatsApp users is currently being shared with Facebook.

However, if you use WhatsApp and have consented to the data processing, various personal data about you will be processed by WhatsApp. This includes your phone number, chat messages, sent photos, videos, and profile data. Photos and videos are supposed to be stored only temporarily, and all messages and calls are encrypted end-to-end. Therefore, they should not be accessible by Meta itself. In addition, information from your address book and other metadata are stored by

WhatsApp.

## Why do we use WhatsApp?

We want to stay in touch with you, and the best way to do that is via WhatsApp. On the one hand, because the service works flawlessly, and on the other hand, because WhatsApp is still the most widely used instant messaging tool worldwide. The service is practical and enables uncomplicated and quick communication with you.

## How secure is data transfer with WhatsApp?

WhatsApp processes data from you, among other things, in the USA. WhatsApp is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).

Additionally, WhatsApp uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, WhatsApp commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).


Information on data transfers at WhatsApp, which comply with the standard contractual clauses, can be found at <https://www.whatsapp.com/legal/business-data-transfer-addendum-20210927>


We hope we have provided you with the most important information about the use and data processing by WhatsApp. You can learn more about the data processed through the use of WhatsApp in their Privacy Policy at <https://www.whatsapp.com/privacy>.

## Social Media


### Social Media Privacy Policy Overview

 Affected parties: website visitors

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

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

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

 Storage period: depending on the social media platforms used

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

## **What is Social Media?**

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

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

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

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

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

Please note that when you use social media platforms or our built-in elements, your data may also be processed outside the European Union, as many social media channels, such as Facebook or Twitter, are American companies. As a result, you may no longer be able to easily claim or enforce your rights regarding your personal data.

## **Which data are processed?**

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

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



information or make changes for you.

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

## **Duration of data processing**

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

## **Right to object**

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

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


## **Legal basis**

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


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

## **LinkedIn Privacy Policy**


### **LinkedIn Privacy Policy Overview**

 Affected parties: website visitors

 Purpose: optimisation of our service

 Processed data: includes data on user behaviour, information about your device and IP address.

More details can be found in the privacy policy below.

 Storage period: the data is generally deleted within 30 days

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

## **What is LinkedIn?**

On our website we use social plugins from the social media network LinkedIn, of the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Social plugins can be feeds, content sharing or a link to our LinkedIn page. Social plugins are clearly marked with the well-known LinkedIn logo and for example allow sharing interesting content directly via our website. Moreover, LinkedIn Ireland Unlimited Company Wilton Place in Dublin is responsible for data processing in the European Economic Area and Switzerland.

By embedding these plugins, data can be sent to, as well as stored and processed by LinkedIn. In this privacy policy we want to inform you what data this is, how the network uses this data and how you can manage or prevent data retention.

LinkedIn is the largest social network for business contacts. In contrast to e.g. Facebook, LinkedIn focuses exclusively on establishing business connections. Therefore, companies can present services and products on the platform and establish business relationships. Many people also use LinkedIn to find a job or to find suitable employees for their own company. In Germany alone, the network has over 11 million members. In Austria there are about 1.3 million.

## **Why do we use LinkedIn on our website?**

We know how busy you are. You just cannot keep up with following every single social media channel. Even if it would really be worth it, as it is with our channels, since we keep posting interesting news and articles worth spreading. Therefore, on our website we have created the opportunity to share interesting content directly on LinkedIn, or to refer directly to our LinkedIn page. We consider built-in social plugins as an extended service on our website. The data LinkedIn collects also help us to display potential advertising measures only to people who are interested in our offer.

## **What data are stored by LinkedIn?**

LinkedIn stores no personal data due to the mere integration of social plugins. LinkedIn calls the data generated by plugins passive impressions. However, if you click on a social plugin to e.g. share our content, the platform stores personal data as so-called "active impressions". This happens regardless of whether you have a LinkedIn account or not. If you are logged in, the collected data will be assigned to your account.

When you interact with our plugins, your browser establishes a direct connection to LinkedIn's

servers. Through that, the company logs various usage data. These may include your IP address, login data, device information or information about your internet or cellular provider. If you use LinkedIn services via your smartphone, your location may also be identified (after you have given permission). Moreover, LinkedIn can share these data with third-party advertisers in “hashed” form. Hashing means that a data set is transformed into a character string. This allows data to be encrypted, which prevents persons from getting identified.

Most data on of your user behaviour is stored in cookies. These are small text files that usually get placed in your browser. Furthermore, LinkedIn can also use web beacons, pixel tags, display tags and other device recognitions.

Various tests also show which cookies are set when a user interacts with a social plug-in. We do not claim for the information we found to be exhaustive, as it only serves as an example. The following cookies were set without being logged in to LinkedIn:

**Name:** bcookie

**Value:** =2&34aab2aa-2ae1-4d2a-8baf-c2e2d7235c16112758134-

**Purpose:** This cookie is a so-called “browser ID cookie” and stores your identification number (ID).

**Expiry date:** after 2 years

**Name:** lang

**Value:** v=2&lang=en-gb

**Purpose:**This cookie saves your default or preferred language.

**Expiry date:** after end of session

**Name:** lidc

**Value:** 1818367:t=1571904767:s=AQF6KNnJ0G112758134...

**Purpose:**This cookie is used for routing. Routing records how you found your way to LinkedIn and how you navigate through the website.

**Expiry date:** after 24 hours

**Name:** rtc

**Value:** kt0Irv3NF3x3t6xvDgGrZGDKkX

**Purpose:**No further information could be found about this cookie.

**Expiry date:** after 2 minutes

**Name:** JSESSIONID

**Value:** ajax:1127581342900777718326218137

**Purpose:** This is a session cookie that LinkedIn uses to maintain anonymous user sessions through the server.

**Expiry date:** after end of session

**Name:** bscookie

**Value:** “v=1&201910230812...

**Purpose:** This cookie is a security cookie. LinkedIn describes it as a secure browser ID cookie.

**Expiry date:** after 2 years

**Name:** fid

**Value:** AQHj7li23ZBcqAAAA...

**Purpose:** We could not find any further information about this cookie.

**Expiry date:** after 7 days

**Note:** LinkedIn also works with third parties. That is why we identified the Google Analytics cookies `_ga` and `_gat` in our test.

## How long and where are the data stored?

In general, LinkedIn retains your personal data for as long as the company considers it necessary for providing its services. However, LinkedIn deletes your personal data when you delete your account. In some exceptional cases, LinkedIn keeps some summarised and anonymised data, even account deletions. As soon as you delete your account, it may take up to a day until other people can no longer see your data. LinkedIn generally deletes the data within 30 days. However, LinkedIn retains data if it is necessary for legal reasons. Also, data that can no longer be assigned to any person remains stored even after the account is closed. The data are stored on various servers in America and presumably also in Europe.

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

You have the right to access and delete your personal data at any time. In your LinkedIn account you can manage, change and delete your data. Moreover, you can request a copy of your personal data from LinkedIn.

How to access account data in your LinkedIn profile:

In LinkedIn, click on your profile icon and select the "Settings & Privacy" section. Now click on "Privacy" and then on the section "How LinkedIn uses your data on". Then, click "Change" in the row with "Manage your data and activity". There you can instantly view selected data on your web activity and your account history.

In your browser you also have the option of preventing data processing by LinkedIn. As mentioned above, LinkedIn stores most data via cookies that are placed in your browser. You can manage, deactivate or delete these cookies. Depending on which browser you have, these settings work a little different. You can find the instructions for the most common browsers here:

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

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

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

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

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

You can generally set your browser to always notify you when a cookie is about to be set. Then you

can always decide individually whether you want to allow the cookie or not.

## Legal basis

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

LinkedIn processes data from you, among other things, in the USA. LinkedIn is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. More information can be found at [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en).


Additionally, LinkedIn uses so-called Standard Contractual Clauses (Article 46(2) and (3) GDPR). Standard Contractual Clauses (SCC) are template clauses provided by the EU Commission and are designed to ensure that your data complies with European data protection standards, even when transferred and stored in third countries (such as the USA). Through the EU-US Data Privacy Framework and the Standard Contractual Clauses, LinkedIn commits to maintaining the European data protection level when processing your relevant data, even if the data is stored, processed, and managed in the USA. These clauses are based on an implementing decision of the EU Commission. You can find the decision and the corresponding Standard Contractual Clauses here: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847).


You can find more information about the standard contractual clauses at LinkedIn here: <https://www.linkedin.com/legal/l/customer-sccs>.


You can find out more about the data that is processed by LinkedIn in their Privacy Policy at <https://www.linkedin.com/legal/privacy-policy>.


## Web Design Introduction

### Web Design Privacy Policy Overview

 Affected parties: website visitors

 Purpose: improvement of user experience

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

 Storage duration: depends on the tools used

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

## **What is web design?**

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

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

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

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

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

## **Duration of data processing**

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

## Right to object

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

## Legal Basis

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

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

## Explanation of the terminology used

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

## Processor

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

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

**Explanation:** As a company and a website owner, we are responsible for all your data we process (i. e. the 'controller'). In addition to the controller, there may also be so-called processors. This

includes any company or person who processes personal data on our behalf. In addition to service providers such as tax consultants, processors can also be hosting or cloud providers, payment or newsletter providers or large companies such as Google or Microsoft.

## Consent

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

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

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

## Personal Data

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

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

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

- name
- address
- email address
- postal address
- phone number
- birthday
- identification numbers such as social security number, tax identification number, ID card



number or matriculation number

- banking data such as account number, credit information, account balances and more.

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

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

## Profiling

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

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

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

## Controller

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

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

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

## Processing

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

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

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

All texts are copyrighted.