

# Privacy Policy

General Data Protection Regulation (abbr. GDPR)

This privacy policy applies Datenschutz-Grundverordnung (DSGVO), the German version of General Data Protection Regulation

## 1. General information about personal data processing

(1) In the following data protection regulation will be explained how Steinkamp KG Porzellanhandel processes personal data which transmission occurs every time our website or offers are used. Personal data is defined as any data identifiable with user personality, e.g. name, address, e-mail addresses or user behavior.

(2) Controller according to Art. 19 para. 7 DSGVO:

Steinkamp KG Porzellanhandel  
Bahnhofstr. 6  
95195 Röslau  
Germany  
Tel.: +49 (0) 9238 - 99 091 0  
Fax: +49 (0) 9238 - 99 091 17  
Email: [info@porzellantreff.de](mailto:info@porzellantreff.de)

(3) The company data protection officer can be reached at [datenschutz@porzellantreff.de](mailto:datenschutz@porzellantreff.de) or under the above mentioned address with the notation 'For data protection officer' or 'For attention of Mr. Jäckel'

## 2. Data subject rights

1) The data subject shall have these rights regarding concerning personal data:

- Right of access (Art. 15 DSGVO) to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed;
- Right to rectification (Art. 16 DSGVO) the data subject shall have the right to have incomplete personal data completed;
- Right to erasure (Art. 17 DSGVO) The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her, it shall not apply to the extent that processing is necessary according to Art. 17 para. 3 DSGVO;
- Right to restriction of processing (Art. 18 DSGVO);
- Right to information (Art. 19 DSGVO);
- Right to data portability (Art. 19 DSGVO);
- Right to withdraw consent to processing of his or her personal data (Art. 7 para. 3 DSGVO). The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

(2) In addition, user has the right to lodge a complaint to a data protection supervisory authority if he believes that the processing of his personal data by us is unlawful. These are regional representatives for data protection, one can find the contact person, for example via the following URL: <https://datenschutz.saarland.de/datenschutz/zustaendigkeiten/#c139>.

### **(3) Right to object processing of personal data**

Should our processing of personal data go against user interests, he has the right to obtain restriction of processing. This is the case, if, in particular, the processing is not required to fulfill user's order, which should always be stated in the corresponding feature description. In the event of such a disagreement, we ask user to explain the reasons why we should not process his personal data as usual. In the case of user justified objection, we examine the situation and either discontinue or adapt the data processing, alternatively we demonstrate our compelling legitimate grounds for the processing. If personal data are processed for marketing or analysis purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling. About user advertising conflict, user can exercise right to object using the following contact data: Steinkamp KG Porzellanhandel, , Bahnhofstr. 6, 95195 Röslau, Tel.: +49 (0) 9238 - 99 091 0, Fax: +49 (0) 9238 - 99 091 17, Email: info@porzellantreff.de

### **3. Data security**

Safety of user data is important to us, therefore user personal data is transmitted using a secure SSL or TLS encryption / connection. TLS (Transport Layer Security) or its previous version SSL (Secure Socket Layer) is a protocol for encrypting data transmissions on the Internet. Hereby we protect user personal data from unauthorized access. It is possible to recognize the encryption of the connection in the browser line by the sign "https //" or the lock symbol.

In addition, we secure our internet presence and other systems through technical and organizational measures against loss, deletion, access, modification or spreading of user data by unauthorized persons. Despite regular checks, full protection against all dangers is not possible.

### **4. Visiting our website**

During merely informative use of our website, i.e. if user does not register or otherwise provide us with information, we collect only the individual-related data that user's browser is sending to our server. Soon after user requests data from our website, by default access data is collected and stored.

The collected access data includes:

- website page which data was requested,
- name of the file,
- date and time of the made request,
- amount of transferred data,
- the access status / HTTP status code (in other words whether the requested file was transferred or possibly not found, etc.),
- type and version description of the used web browser,
- the installed operating system, its language and set resolution,
- Used IP-Address.

This data is required to show user our website and to ensure its stability and security. Furthermore, the data is used for internal statistical purposes as well as for the technical administration of the internet presence. The legal basis is Art. 6 para. 1 sentence 1 lit. b DSGVO. Our legitimate interest consequences are stemming from the stated purposes of data collection.

## 5. Using our website

(1) Should user wish to place an order within our online shop, he must be aware of the necessity to provide some personal data during order process, including:

- Name
- Invoice and shipping addresses
- E-mail address

The personal data to be transmitted is derived from the respective input mask, whereby the necessary mandatory information is specially marked. All other data is optional.

Processing of user personal data is necessary for the performance of a contract as well as settlement of the order. This legal basis is Art. 6 para. 1 sentence 1 lit. b DSGVO

(2) User can create a customer account. For the purpose of using user's personal data for other, following orders, the data user provides will be revocably stored and processed. The legal basis is Art. 6 para. 1 sentence 1 lit. b DSGVO

(3) Due to requirements of German commercial and tax law, we are obliged to store user address, payment and order data for a period of ten years. User's data will therefore not be completely deleted even if the storage for the closed contract is no longer required. However, the processing is limited to the extent required for compliance with a legal obligation to which the controller is subject. The legal basis is Art. 6 para. 1 sentence 1 lit. c DSGVO

(4) The data shared with us in the course of user's order is handled solely for order execution. For order completion we may use the external service providers named below:

(a) In order to arrange the order shipping process, we have to share user's address data with our parcel service providers. They are obliged to treat the information in strict confidence and to store and use it exclusively for the shipping purposes and to delete it after successful delivery. The legal basis of data processing is Art. 6 para. 1 sentence 1 lit. b DSGVO.

(b) To arrange payments, user's payment details will be forwarded to the responsible institution or the selected payment service provider. The legal basis of data processing is Art. 6 para. 1 sentence 1 lit. b DSGVO.

User's payment details are forwarded to the relevant payment service provider according to the means of payment you have selected during the ordering procedure. The payment service provider bears the responsibility for user payment data. Information about the responsible party of the payment service providers as well as the categories of personal data processed to the payment service providers can be obtained from the following Internet addresses:

- PayPal und PayPal Plus:  
For payments via PayPal, credit card (through PayPal Plus), direct debit (through PayPal Plus), cash before delivery (through PayPal Plus), payments in installments (through PayPal Plus), the data required for payment is processed to PayPal (Europe) S.à rl et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg. PayPal reserves the right to conduct a credit check for certain types of payments, such as cash before delivery (through PayPal Plus) and installment payments (through PayPal Plus). Information on identity verification at PayPal and data exchange with credit bureaus (credit history check) can be found here: <https://www.paypal.com/de/webapps/mpp/ua/creditchk>. The legal basis is Art. 6 para. 1 sentence 1 lit. c DSGVO, based on legitimate interest in determining user's

financial solvency. For more information,  
see: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>

- Pay Now/Sofort

If the data subject selects Sofortüberweisung of SOFORT GmbH payment data of the data subject will be transmitted to SOFORT GmbH, Theresienhöhe 12, 80339 Munich, Germany („SOFORT“). The Sofort GmbH belongs to Klarna Group (Klarna Bank AB (publ), Sveavägen 46, 11134 Stockholm, Schweden ("Klarna"). Klarna's applicable privacy policy can be found at: <https://www.klarna.com/sofort/datenschutz> (in German language)

- iPayment

If the data subject selects credit card or direct debit via iPayment, payment data of the data subject will be forwarded to 1 & 1 Internet AG, Elgendorfer Str. 57, 56410 Montabaur. For more information about the Privacy Policy of 1 & 1, visit the following Internet address: <http://www.1und1.de/Datenschutz> (in German language)

(5) User can as well choose bill or direct debit as payment methods. In this case there is a necessity of the credit risk assessment on the basis of mathematical-statistical procedures at credit reference agency SCHUFA Holding AG, Kormoranweg 5, 65201 Wiesbaden (abbr. "Schufa") (Credit rating). The personal data necessary for credit check usually, name, date of birth, address and, in case of the payment method direct debit, bank details are processed to Schufa as well. The processing, storage and data circulation are then used for the purpose of credit check, to avoid a payment default and on the basis of Art. 6 para. 1 sentence 1 lit. b and Art. 6 Sub 1 S. 1 lit. DSGVO. On the basis of this information, a statistical probability for a loan default and thus financial solvency is calculated. If the credit check is positive, an order with bill as the payment method is possible. If the credit check is negative, our shop system will not offer bill as the payment method.

The decision, whether an order can be paid with bill is based solely on an automated decision of our online shop system, all data are provided for us by Schufa, so that there is no need for a manual examination of documents by one of our employees.

User consent to this automated decision is:

*„By checking this box and clicking on the button ‘Continue ordering process’ you agree to the automated decision explained below. We process your personal data with regard to the automated decision, as to whether the sales agreement upon bill can be concluded with you. This decision is based exclusively on an automated processing of your personal data in the context of the aforementioned scoring. If your credit check is positive, an order upon bill is possible. If the credit check is negative, our shop system will not offer you any order upon bill payment. The decision is thus made without a checkup of your buying interest upon bill, neither the decision-making process comes under influence of any of our employees. Provided that certain probability values are taken into account by the automated decision, these are based on a scientifically recognized mathematical-statistical method. You can revoke this consent at any time. However, the revocation does not affect the legality of the processing carried out on the basis of the consent until the revocation.“*

It is possible to object to the data processing to the Schufa at any time, but then no further order upon bill is possible within our onlineshop. The concern of the scoring and the automated decision is limited solely to whether an order upon bill is possible. We use the scoring and the automated decision of our shop system solely to protect ourselves against possible payment defaults.

Furthermore, we may process credit card issuing information to CardProcess GmbH, if necessary, with information about non-claim related behavior that shatters trustworthiness ( e.g. in case of credit card fraud). This is done in accordance with legal requirements, provided that is necessary to protect our legitimate interests and legitimate interests of the third parties, and there are no grounds for assuming that user's interests or fundamental rights and freedoms that require the protection of personal data will not prevail. The processing, storage and data circulation are therefore carried out for the purpose of fraud prevention on the basis of Art. 6 para. 1 sentence 1 lit. f DSGVO.

## **6. When registering for our newsletter**

(1) When ordering our newsletter, user agree that we use his or her e-mail address for our own advertising purposes (so-called direct advertising).

### **Permission to send newsletter**

*„I wish to be regularly informed by email about interesting offers within the product range of porzellantreff.de. I can revoke this consent at any time. The newsletter is sent according to our privacy policy“*

(2) The registration for our newsletter follows the so-called 'double-opt-in-procedure', i.e. after registration with user's e-mail address, an e-mail message is received first with an activation link to confirm the registration. Subscription is only completed once, user clicks on the activation link. During registration besides user's e-mail address, his IP address as well as the registration and confirmation time are stored. This is done in order to clarify the misuse of the third party data later on and to prove user registration.

(3) Registration should be confirmed within the next 24 hrs via the activation link, if not the stored data, during the registration process, will be automatically deleted.

(4) For newsletter registration user e-mail address is the only data required. Specifications of additional, separately marked data is optional and will be used to address user personally. After the confirmation, user e-mail address will be stored and used to send newsletters, where information on products and services is presented. Legal basis for the personal data processing is user consent in accordance with the Art. 6 para. 1 sentence 1 lit. a DSGVO.

(5) User may withdraw his consent to store and use his e-mail address for the newsletter sending purposes at any time and unsubscribe from it, e.g. by sending an e-mail to [info@porzellantreff.de](mailto:info@porzellantreff.de), or by clicking on the link at the bottom of every newsletter.

## **7. When contacting by e-mail or contact form**

(1) During user contact by e-mail or via the contact form on our website personal data are processed and stored by us. Which personal data is collected via the contact form is apparent from the contact form. During contact via e-mail, the following personal data will be collected and stored by us: e-mail address, e-mail text as well as other optionally provided data.

(2) The data user provided us with is used only to process contact request. Legal basis for the personal data processing is user's consent in accordance with the Art. 6 para. 1 sentence 1 lit. b DSGVO or more precisely our legitimate interest in answering user request in accordance with the Art. 6 para. 1 sentence 1 lit. b DSGVO.

(3) If recording is no longer required, we will delete all personal data collected in this context. If there are statutory data retention requirements, its processing is limited to this purpose. The legal basis is Art. 6 para. 1 sentence 1 lit. c DSGVO.

## 8. Cookies

(1) This website uses cookies. Cookies are small text files that are stored on your device (PC, laptop, tablet, smartphone, etc.) by browser. These cookies are used to provide user with better experience on our website and for analytical purposes. Should user view the corresponding page again, the cookies serve the purpose of device recognition, the consequence of this is that data user entered before is available again when completing the form or processing the order directly from the shopping cart. Is the processing necessary for the performance of a contract to which the data subject is party, the legal basis for it is Art. 6 para. 1 sentence 1 lit. b GDPR. The data processed by cookies are necessary for the protection of our legitimate interests and to evaluate it for the purpose of offer analyzing and optimizing pursuant to Art. 6 para. 1 sentence 1 lit. f DSGVO.

(2) This website uses the following types of cookies:

- In most cases, we use cookies that are automatically deleted from user's hard drive after leaving our page or logging out (so-called session cookies).
- we also use temporary cookies that are stored on user's device for a specified period of time. If user visits our site again to use our services, his device will be automatically recognized as well as inputs and settings he has set, so he does not have to re-enter them. These cookies are automatically deleted from his system after a preset period of time, different for each type of cookie.

(3) This website includes content and services from other providers, they may as well use cookies and active components. In this context please see the following remarks.

(4) You may change the cookies storage point within your browser settings at any time, e.g. the acceptance of cookies altogether, of third-party cookies (cookies defined by some third party, i.e. not by the actual website on which you are currently located) of some particular cookies or delete those.

However, in such cases you may not use all features of our website. To protect your privacy, we recommend you to delete cookies on your device as well as its browsing history on regular basis.

## 9. Analyse-Tools

The tracking measures listed below are used to analyze the use of our website and evaluate it for the purpose of optimizing. By using statistics we can improve our offer and make it more interesting for our users as well as measure the success of our advertising methods and optimize our advertising campaign. Lastly it allows us to send personalized marketing information. The legal basis is Art. 6 para. 1 sentence 1 lit. f DSGVO, where our legitimate interest results from the above-mentioned purposes.

### Google Analytics

This website uses Google Analytics, a web analysis service provided by Google LLC (Google). Google Analytics uses so-called Cookies, text files which are stored on user's computer and which allow an analysis of the website usage by the user himself.

The information generated by the cookie concerning the usage of [www.porzellantreff.de](http://www.porzellantreff.de) is generally processed and stored within a Google server in the US. However, should user activate IP anonymization while on this website, his IP address will be shortened by Google priorly to transmission due to the regulation between member states of the EU or other

another signatory state of the European Economic Area Treaty. Please be aware that this website uses Google Analytics with the extension ‘\_anonymizeIp ()’, it allows only shortened IP addresses processing and no personal identification. On behalf of the site maintainer, this information is used by Google in order to evaluate user behaviour on the website, to compile reports on website activity and to provide other services related to website activity and internet usage to the website operator. The IP address processed by Google Analytics should not be merged with other Google data. It is possible to adjust browser settings and to prevent the installation of cookies, however in this case it is possible that user will not be able to use all the functions of this website.

Moreover, it is possible to prevent acquisition of the data generated by the cookies and related to user behaviour on the Internet (including user IP address) by Google as well as processing of the data by Google through using the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Besides that, it is possible to prevent data acquisition through the Google Analytics by clicking on the link below. Opt-out Browser Add-on will be activated, which prevents the future collection of user data when visiting our website:

*This option is available on our website at  
<http://www.porzellantreff.de/en/page/datenschutz.html>*

User personal data is processed by the US Google as well. The company is submitted to the EU-US Privacy Shield, which ensures compliance with the level of data protection in the EU, <https://www.privacyshield.gov/EU-US-Framework>.

Additional information on the privacy policy and the terms of use can be found here::  
<http://www.google.com/intl/de/policies/privacy> or <https://services.google.com/sitestats/de.html>

## **10. Marketing-Tools**

### **Usage of Google Adwords Conversion-Tracking**

We use the offer of Google Adwords with the aid of the so-called Conversion-tracking. These are services of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (‘Google’). These serve to draw attention to our offers on external websites with the help of advertising materials (so-called Google Adwords). Through the advertising campaign data it is possible to determine how successful the individual advertising measures are. Our purpose here is to provide user with user-centered advertisements, to make our website more interesting to users and to achieve a fair calculation of advertising costs. The legal basis for processing of user data is Art. 6 para. 1 S. 1 lit. f DSGVO. Our interest results from the above-mentioned purposes.

These advertising materials are supplied by Google via so-called ‘ad servers’. We use ad server cookies, which measure certain performance metrics such as ads display or user clicks. Should one reach our website through some Google ad, Google Adwords will save a cookie on his PC. These cookies usually lose their efficiency after 30 days and should not serve for personal identifications. These analytical values are usually recorded within the cookie: a unique cookie ID, number of Ad impressions per placement (or Frequency), last impression (relevant to post-view conversions) as well as opt-out information (indentation that the user does not wish to be addressed anymore).

These cookies help Google and us too to recognize user's Internet browser again. Should user visit Adwords customer's website and the cookie stored on his computer has not yet expired, Google as well as Adwords customer may recognize that the user clicked on some specific ad and therefore he will be redirected to that page. Each Adwords customer will be assigned a different cookie. Cookies can not be tracked via Adwords customer's website. We ourselves do not collect or process any personal data in the aforementioned advertising measures. We receive only statistical evaluations provided by Google. On their basis we can identify which of the used advertising measures were particularly effective. We do not receive any further data from the used advertising material, in particular we can not identify the users on the basis of this information.

Due to the marketing tools used your browser automatically establishes a direct connection to the Google server. We have no control over the exact size or the further handling of the data, processed with the usage of this tool by Google and inform you therefore according to our level of awareness: in case of AdWords conversion integration Google receives the information about user's usage of our website or his clicks on our ads. If user is registered at any Google service, the company may associate visit with his account. Even if user is not registered at Google or is not logged in, there is a chance that the provider will find and store his IP address.

User can prevent participation in this tracking process in various ways:

- By deactivating conversion tracking cookies by setting his browser to block cookies from the domain 'www.googleadservices.com', <https://www.google.com/settings/ads>, whereby these settings will be deleted, if one erases the cookies
- And by adjusting user browser settings, e.g. user may refuse to accept or delete third-party cookies (cookies set by third parties and not by the actual website you are currently on) altogether as well as individually.

Google processes user personal data in the US as well and is submitted to the EU-US Privacy Shield, which ensures compliance with the level of data protection in the EU, [see https://www.privacyshield.gov/EU-US-Framework](https://www.privacyshield.gov/EU-US-Framework).

For more information about privacy policy at Google, click here: <http://www.google.com/intl/de/policies/privacy> or here <https://services.google.com/sitestats.html>. One can as well visit the Network Advertising Initiative (NAI) website at <http://www.networkadvertising.org>

### **Google Adwords Remarketing**

This website also uses the online marketing tool Google AdWords Remarketing, a service of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ( hereinafter known as Google). Google Adwords Remarketing service deploys cookies and by using a pseudonymous cookie ID presents ads relevant to users and adapted for them.

Google uses the cookie ID to determine which ads are shown in which browser and can prevent them from being displayed multiple times. We are thus pursuing the purpose of presenting user with interesting advertisements, and therefore make our website more attractive for him. The legal basis for the processing of user data is Art. 6 para. 1 sentence 1 lit. f DSGVO, where our interest results from the above-mentioned purposes.

User can prevent participation in this tracking process in several ways:



- By deactivating conversion tracking cookies by setting your browser to block cookies from the domain 'www.googleadservices.com', <https://www.google.com/settings/ads>, whereby these settings will be deleted, if user erases the cookies
- And by adjusting user browser settings, e.g. you may refuse to accept or delete third-party cookies (cookies set by third parties and not by the actual website you are currently on) altogether as well as individually.

Google processes user personal data in the US as well and is submitted to the EU-US Privacy Shield, which ensures compliance with the level of data protection in the EU, [see https://www.privacyshield.gov/EU-US-Framework](https://www.privacyshield.gov/EU-US-Framework).

For more information about privacy policy at Google, click here: <http://www.google.com/intl/de/policies/privacyor> here <https://services.google.com/sitestats.html>. One can as well visit the Network Advertising Initiative (NAI) website at <http://www.networkadvertising.org>

### **DoubleClick by Google**

This website also uses the online marketing tool DoubleClick by Google, a service of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (hereinafter known as Google). DoubleClick uses cookies to serve ads that are relevant to users, to improve campaign performance reports, or to prevent a user from seeing the same ads multiple times. Google uses a cookie ID to determine which ads are running in which browser and can prevent them from being displayed multiple times. Due to the marketing tools used user's browser automatically establishes a direct connection to the Google server. We have no control over the exact size or the further handling of the data, processed with the usage of this tool by Google and inform user therefore according to our level of awareness: in case of AdWords conversion integration Google receives the information about user usage of our website or his clicks on our ads. If user is registered at any Google service, the company may associate visit with his account. Even if user is not registered at Google or not logged in, there is a chance that the provider will find and store user's IP address.

One can prevent participation in this tracking process in various ways:

- By deactivating conversion tracking cookies by setting his browser to block cookies from the domain 'www.googleadservices.com' <https://www.google.de/settings/ads>, whereby these settings will be deleted, if user erases the cookies;
- And by adjusting user's browser settings, e.g. one may refuse to accept or delete third-party cookies (cookies set by third parties and not by the actual website user is currently on) altogether as well as individually.

Google processes user personal data in the US as well and is submitted to the EU-US Privacy Shield, which ensures compliance with the level of data protection in the EU, [see https://www.privacyshield.gov/EU-US-Framework](https://www.privacyshield.gov/EU-US-Framework).

For more information about privacy policy at Google, click here: <http://www.google.com/intl/de/policies/privacyor> here <https://services.google.com/sitestats.html>. One can as well visit the Network Advertising Initiative (NAI) website at <http://www.networkadvertising.org>.

### **Trusted Shops Trustbadge**

To display our where appropriate ratings collected with Trusted Shops, this website includes the Trusted Shops Trustbadge.

This serves to protect our legitimate interests, which predominate in the context of weighing of interests, in the optimal marketing of our offer pursuant to Art. 6 sentence 1 lit. f DSGVO. The Trustbadge and the services advertised with it belong to offer of Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Cologne.

When the Trustbadge is clicked, the Web server automatically stores a so-called server log file, which contains user's IP address, date and time of the retrieval, processed amount of data and the requesting provider (access data) contains and documented the call. These access data will not be evaluated and are automatically overwritten within seven days after the last page visit.

Other personal data should be transferred to Trusted Shops, only if user has consented to this, provided his agreement to the use of Trusted Shops services after the order completion or has already registered for it. In this case, the contractual agreement between the user and Trusted Shops applies.

### **Voucher offers from Sovendus GmbH**

Should one wish to select a trending and interesting coupon offer, the hash of his e-mail address as well as his IP address are pseudonymized, encrypted and transmitted to Sovendus GmbH, Moltkestr. 11, 76133 Karlsruhe (hereinafter known as Sovendus) (Art. 6 (1) (f) DSGVO).

The pseudonymised hash value of the e-mail address will be used to take into account any possible opposition to advertising by Sovendus (Article 21 (3), Article 6 (1) (c) DSGVO). Should user show interest for a coupon offer from Sovendus, and there is no advertising conflict with the user e-mail address and his activation of coupon banner only displayed in this case, we will encrypt his address, name and e-mail address to Sovendus in the Preparation of the voucher (Art. 6 (1) (b), f DSGVO). Further information on the processing of user data by Sovendus can be found within the online data protection guidelines at [www.sovendus.de/datenschutz](http://www.sovendus.de/datenschutz).

### **Data processing by KUPONA GmbH („KUPONA processing“)**

KUPONA GmbH, Frankfurter Strasse 8, 36043 Fulda uses cookie IDs for promotional purposes. We take responsibility in this together with KUPONA. KUPONA collects dynamic data and technical parameters of our website users, in order to show advertisements according to user interests. It is impossible to draw conclusions on the user identity. Users with pseudonymous KUPONA cookie IDs do not see more or less ads on the web, only the ads are more relevant and match their interests. The advertising possibilities of KUPONA are important to us, we can advertise our own offers on the Internet with them.

- All data provided is pseudonymized. User can not recognized.
- Legal basis for data processing is a legitimate interest
- Objections to the data processing are possible at any time under the following link: [www.kupona.de/datenschutz/widerspruch](http://www.kupona.de/datenschutz/widerspruch)

## **11. Retention period of personal data**

The retention period of personal data is based on the respective legal retention period (eg. commercial and tax law retention periods). Should legal retention periods expire, we will delete the respective personal data, as long as and the personal data are not required to fulfill the contract or to initiate an agreement or we no longer have a legitimate interest in its retention.

## 12. Disclosure of data apart from that

(1) To some extent , we use external hosting service providers to process your data and to provide deployment of this website. These were carefully selected and delegated by us and are bound by our instructions as well as are regularly monitored. The legal basis is Art. 28 DSGVO.

(2) Moreover, we only pass on user's personal data to third parties in the following cases:

- Should one provide us with an explicit consent in accordance with Art. 6 para. 1 sentence 1 lit. a DSGVO, or
- if according to Art. 6 para. 1 sentence 1 lit. c DS-GVO there is a legal obligation to disclose, e.g. in the context of law enforcement or
- the disclosure pursuant to Art. 6 para. 1 sentence 1 lit. f is required for the purpose of asserting or defending legal claims or the exercise of rights, and it can not be assumed that the disclosure conflicts with an overriding legitimate interest of the data subject.