

# DENTAL & WIRTSCHAFT

## Privacy Policy

27.08.2026

Wenn Sie ein Angebot der Medtrix GmbH nutzen, verarbeiten diese Ihre personenbezogenen Daten. Mit diesen Datenschutzhinweisen informieren wir Sie, wie und warum wir Ihre Daten verarbeiten und wie wir gewährleisten, dass sie vertraulich bleiben und geschützt sind.

We take data protection seriously: as a matter of principle, we only process personal data if this is necessary for the provision of a service or offer or if it is provided voluntarily by the user. We also use technical and operational security measures to protect personal data against accidental or intentional manipulation, loss, destruction or access by unauthorised persons. We regularly review and modernise these precautions.

### **Privacy policy for applications**

If you have applied for a job with us, you will find the necessary data protection information [here](#).

# Data protection at a glance

## What data do we collect?

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

## How do we collect the data?

We collect the data that is generated when you access our digital offers automatically. Otherwise, we collect data based on your entries or messages or through the use of cookies or similar technologies.

## What do we use the data for?

### Bereitstellung digitaler Angebote:

- Cookies und ähnliche Technologien
- Technische Bereitstellung und Sicherheit
- Unbedingt erforderliche Technologie
- Anlegen und Nutzen eines Benutzerkontos/Logins
- Podcasts

### Produktoptimierung:

- Weiterentwicklung der Nutzerfreundlichkeit

- Nutzungsanalyse

### **Veranstaltungen:**

- Bestellen von Produkten

### **Kommunikation:**

- Kontakt: Verwaltung und Beantwortung von Anfragen und Kommunikation
- Umfragen

### **Werbung für unsere eigenen Produkte:**

- Direktwerbung
- Newsletter
- Marketing für eigene Produkte
- Gewinnspiele und Quizze
- Unternehmensauftritte in den Sozialen Medien

### **Werbung für Dritte:**

- Eigenvermarktung von Anzeigen
- Fremdvermarktung durch Dritte

## **Do we share data?**

If you have given your consent or we are otherwise legally authorized to do so, we will pass on your personal data to service providers (e.g., hosting, marketing, sales partners, payment service providers) for the above-mentioned purposes. In such cases, we comply with the legal requirements and, in particular, conclude appropriate contracts or agreements with the recipients of your data to protect your data.

We transfer personal data to other companies within our group of companies or grant them access to this data for administrative purposes. This transfer of data is based on our legitimate business and economic interests or takes place if it is necessary to fulfill our contractual obligations or if the consent of the data subjects or legal permission has been obtained.

## Do we transfer data to third countries?

In order to use our digital services, it may be necessary to transfer certain personal data to third countries, i.e. countries where the GDPR does not apply. However, we only allow your data to be processed in a third country if the specific requirements of Art. 44 ff. GDPR are met and thus an adequate level of data protection is guaranteed in that country. This means that the third country must either have an adequacy decision by the European Commission or suitable safeguards in accordance with Art. 46 GDPR or one of the conditions of Art. 49 GDPR. **Unless otherwise stated below, we use the currently valid [standard contractual clauses](<https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>) “current version of the standard contractual clauses”) for the transfer of personal data to processors in third countries.**

## How do we secure the data?

In order to protect your privacy and ensure a level of protection appropriate to the risk, we take technical and organizational measures in accordance with legal requirements, taking into account the state of the art, implementation costs, and the nature, scope, circumstances, and purposes of processing, as well as the varying likelihood and severity of threats to the rights and freedoms of natural persons. These measures ensure the confidentiality, integrity, availability, and resilience of your data. This includes, among other things, the use of recognized encryption methods (SSL or TLS) and pseudonymization.

However, we would like to point out that, due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions outside our area of responsibility. In particular, unencrypted data disclosed, e.g., by email, may be read by third parties. We have no technical influence on this.

## When do we delete the data?

We delete or anonymize your personal data as soon as it is no longer required for the purposes for which we collected or used it.

However, we may still need to store your data until the expiry of the retention obligations and periods imposed by the legislator or supervisory authorities, which may arise from the German Commercial Code, the German Fiscal Code, and the German Money Laundering Act (usually 6 to 10 years). In addition, we may retain your data until the expiry of the statutory limitation periods (i.e., usually 3 years, but in individual cases up to 30 years) if this is necessary for the assertion, exercise, or defense of legal claims. After that, the relevant data will be deleted.

## **What rights do you have?**

- Information
- Deletion
- Correction
- Objection

You can contact the data protection officer with your request by mail or by email at [swmh-datenschutz@atarax.de](mailto:swmh-datenschutz@atarax.de).

This privacy policy is updated from time to time. The date of the last update can be found at the beginning of this information.

You will find detailed data protection information below.

## **How we make our content available to you**

## Cookies and similar technologies

If cookies, device identifiers, or other personal data are stored or accessed on your device for processing purposes, this is done on one of the legal bases of Art. 6 GDPR.

In order to be able to provide the telemedia service you have expressly requested, we also take into account the provisions of Section 25 of the German Telecommunications Digital Services Data Protection Act (TDDDG), in particular the requirement under Section 25 (2) No. 2 TDDDG.

You can find an overview of the technologies used under Privacy settings.

## Types and functions of cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on users' devices. A cookie primarily serves to store information about a user during or after their visit to an online offering. The stored information may include, for example, language settings on a website, login status, a shopping cart, or video interactions. The term “cookies” also includes other technologies that perform the same functions as cookies (e.g., when user information is stored using pseudonymous online identifiers, also known as “user IDs”).

There are the following types of cookies and functions:

- **Temporary cookies (also known as session cookies):** Temporary cookies are deleted at the latest after a user leaves an online offering and closes their browser.
- **Permanent cookies:** Permanent cookies remain stored even after the browser is closed. This allows, for example, the login status to be saved or preferred content to be displayed directly when the user visits a website again. Similarly, the interests of users, which are used for reach measurement or marketing purposes, can be stored in such a cookie.
- **First-party cookies:** First-party cookies are set and used by us to process user information.
- **Third-party cookies:** Third-party cookies are mainly used by advertisers (so-called third parties) or other partners to process user information.

- **Strictly necessary (also: essential or necessary) cookies:** These cookies ensure functions without which these digital offerings could not be used as desired. They may be absolutely necessary for the operation of a website, for example to store logins or other user entries, or for security reasons.
- **Analysis and statistics cookies:** These cookies enable us to analyze the use of our digital offerings, in particular to measure reach—i.e., clicks, visits, and visitor numbers. The aim is to statistically determine the number of visits and visitors and their surfing behavior (duration, origin) and thus obtain market-wide comparable values. The information collected is evaluated in aggregate form in order to derive improvements and optimizations for our products.
- **Marketing and personalization cookies:** Cookies are also used to store a user's interests or behavior (e.g., viewing certain content, using functions, etc.) in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This process is also referred to as “tracking,” i.e., tracking the potential interests of users. If we use cookies or tracking technologies, we will provide separate information about this in our privacy policy or when obtaining consent.

## Technical provision and security

When our offer is used, we automatically employ essential technologies and process the following information:

- Information about the accessing device and the software used
- Date and time of access
- Websites from which the user accesses our website or which the user visits via our website
- IP address

The collection of these logs and their temporary storage and processing are necessary to ensure system security and integrity (in particular to ward off and defend against attempts at attack or damage) and are carried out in accordance with our legitimate interest (§ 25 (2) No. 2 TDDDG, Art. 6 (1) f GDPR).

The storage period for this log data is usually seven days; for reliable detection of AI bots, it is 30 days. From this point on, this specific server log

data is anonymized based on our legitimate interest in statistical evaluation to assess AI bots and their impact on our content (Art. 6 (1) f GDPR).

## **Essential technology**

The following tools and cookies are strictly necessary technologies, i.e., essential for providing our services as requested by the user.

The legal basis for the data processing described below is our legitimate interest pursuant to Art. 6 (1) (f) GDPR.

## **Google Tag Manager**

The Google Tag Manager service is an organizational tool that enables us to control services. The tool only uses the IP address to establish a connection to the server and to function technically. Otherwise, no personal data is processed by the tool itself. Tag Manager ensures that other services are only executed if the conditions (tags) specified in Tag Manager are met. This allows us to ensure, for example, that tools requiring consent are only loaded after you have given your consent. Tag Manager does not access the data processed by the tools.

## **Google reCaptcha**

We use Google reCaptcha to determine whether a human or a computer is making a particular entry, for example when logging in or filling out contact or newsletter forms. Google (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) uses the following data to check whether you are a human or a computer: IP address of the device used, the website you are visiting and on which the captcha is integrated, the date and duration of the visit, the identification data of the browser and operating system type used, the Google account if you are logged in to Google, and mouse movements on the reCaptcha areas. Based on this data, reCaptcha analyzes your actions on the website and evaluates them with a score between 0 and 1. The lower this value is, the more likely reCaptcha estimates that the respective user is a bot and therefore not a human.

The legal basis for the data processing described is your consent in accordance with Art. 6 (1) (a) GDPR. We use reCaptcha solely to ensure the

security of our websites, to protect ourselves from automated entries (such as bot attacks), and to ensure exclusively private, non-commercial use by human users.

You can find an option to revoke your consent in our privacy settings.

## Consent management

In order to obtain and store your consent under data protection law, we use the consent management platform from Sourcepoint (Sourcepoint Technologies, Inc., 228 Park Avenue South, #87903, New York, NY 10003-1502, United States). This platform uses strictly necessary cookies to query the consent status and thus display the corresponding content.

The data is stored for a maximum of 13 months.

| Cookie           | Purpose                                                                                | Duration  | Type          |
|------------------|----------------------------------------------------------------------------------------|-----------|---------------|
| consentUUID      | UniqueUserID to store the user's consent status                                        | 12 months | Cookie        |
| _sp_su           | Identification of users for sampling consent rates reporting                           | 12 months | Cookie        |
| _sp_user_consent | UniqueUserID to retrieve the user's consent status stored in our database if necessary | Unlimited | Local storage |
| _sp_local_state  | Determines whether a user has seen the consent banner so that it is only shown once    | unlimited | local storage |

| Cookie                    | Purpose                                                    | Duration  | Type          |
|---------------------------|------------------------------------------------------------|-----------|---------------|
| _sp_non_keyed_local_state | Information about the metadata and the user's UniqueUserID | unlimited | local storage |

## Registration

We want to offer you our content and services as conveniently as possible and provide you with a website that is tailored to you and your personal wishes and expectations. We therefore offer you the option of creating a free customer profile, which allows you to take advantage of a variety of personalized services (Art. 6 (1) (b) GDPR).

Your data will be deleted when you delete your user account or after two years of inactivity.

Folgende Daten werden für Ihre Registrierung verarbeitet:

- E-Mail\*
- Passwort\*
- Anrede\*
- Titel (Präfix)
- Titel (Suffix)
- Vorname\*
- Nachname\*
- Straße und Hausnummer\*
- Adresszusatz
- PLZ\*
- Stadt\*
- Land\*
- Telefonnummer
- Geburtsdatum
- Beruf\*

Die Felder, die mit einem Asterisk bzw. Stern (\*) markiert sind, müssen ausgefüllt werden.

## “Stay logged in” function

We use cookies based on our legitimate interest in providing a user-friendly service (Art. 6 (1) (f) GDPR) so that you do not have to log in again when you return to the website or app and so that we can automatically recognize you. The function is deleted after 30 days of inactivity. Once the “Stay logged in” function has expired, you will be asked to log in again.

## **Podcasts**

Wir setzen SoundCloud als Player für Audiodateien ein, um redaktionelle Inhalte anders und besser zu erzählen zu können oder um Geschichten mit ausgewählten Audioformaten anzureichern.

Wenn Sie ein SoundCloud-Widget nutzen, erhält SoundCloud bestimmte Daten, einschließlich Daten über die Webseite, die Sie besucht haben. SoundCloud und das Widget können dazu in der Lage sein, Sie zu erkennen, und in einigen Fällen kann das Widget auch dazu eingesetzt werden, personalisierte Inhalte anzuzeigen. Soundcloud erfährt dadurch, wann Sie mit einem Widget interagieren.

Das Ausspielen der Audiodateien und die Analyse sowie Optimierung unseres Audioangebotes erfolgt mit Ihrer Einwilligung nach Art. 6 Abs. 1 S. 1 lit. a DSGVO.

Ein Widerruf ist unter jedem Podcast möglich.

Detaillierte Informationen zu den Datenverarbeitungen und den Widerspruchsmöglichkeiten (Opt-Out) erhalten Sie bei Soundcloud bei deren Datenschutzhinweisen und deren Cookie-Richtlinie.

## **How we optimize our products**

### **Further development of user-friendliness**

We use cookies and tracking tools to optimize our digital offerings based on your usage. To do this, we measure the development of reach and the use of content and functions, and use A/B testing to determine which variants users prefer.

## **Usage analysis**

We want to continuously develop and improve our products. To do this, we need to analyze usage. This serves to evaluate visitor traffic to our digital offerings and may include behavior, interests, or demographic information about visitors, such as age or gender, as pseudonymous values. With its help, we can see, for example, when our digital offerings are used most frequently or which functions are popular. This enables us to identify areas that need optimization.

In addition to usage analysis, we also use testing procedures to test different versions of our digital offerings or their components, for example, and to increase certain user actions or reactions if necessary.

For these purposes, profiles, i.e., data summarized for a usage process, are created and information is stored in a browser or on a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there, as well as technical information such as the browser used, the computer system used, and information on usage times.

The IP addresses of users are also stored. We use an IP masking procedure (i.e., pseudonymization by shortening the IP address) for your protection. In general, no clear data of users (such as email addresses or names) is stored in the context of web analysis, A/B testing, and optimization, but rather pseudonyms, so that neither we nor the providers of the software used, who act as processors for us, know the actual identity of the users.

## **Google Analytics**

We use Google Analytics (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland) to measure and analyze the use of our online offering on the basis of a pseudonymous user identification number. This identification number does not contain any unique data such as names or email addresses. It is used to assign analysis information to a terminal device in order to identify which content users have accessed within one or

more usage processes, which search terms they have used, which they have accessed again, or how they have interacted with our online offering. The time and duration of use are also stored, as well as the sources of users who refer to our online offering and technical aspects of their terminal devices and browsers. Pseudonymous user profiles are created using information from the use of various devices, whereby cookies may be used. Google Analytics does not log or store individual IP addresses for EU users. However, Analytics provides rough geographical location data by deriving the following metadata from IP addresses: city (and the derived latitude and longitude of the city), continent, country, region, subcontinent (and ID-based counterparts). For EU data traffic, IP address data is used exclusively for this derivation of geolocation data before being deleted immediately. It is not logged, is not accessible, and is not used for any other purpose. When Google Analytics collects measurement data, all IP queries are performed on EU-based servers before the traffic is forwarded to Analytics servers for processing.

The data is stored for 14 months (applies to user-level and event-level data). Aggregated data is anonymized and is not deleted.

Google is our data processor, with whom we have concluded the necessary agreements. We have also taken measures to ensure appropriate and adequate safeguards for the protection of personal data in third-country data transfers by concluding EU standard contractual clauses and, where necessary, observing additional measures to protect the rights of data subjects.

If you have consented to Google and linked your devices to your Google account, Google may be able to track your usage behavior across multiple devices (“Google Signals”). Google uses logins to the Google network for these statistics and thus performs cross-device tracking. Cross-device tracking is intended to enable different visits to a website to be assigned to a visitor, even if they access the content via different devices. With Signals, Google provides reports on cross-device user numbers and on different groups of users based on the different device combinations used. To do this, Google uses data from users who have enabled the “personalized advertising” option in their Google account settings. This means that interest-based advertising can also be displayed to you when you switch devices.

For more information on terms of use and data protection, please visit

- Terms of Use,
- Privacy Overview,
- Privacy Policy.

You can prevent the storage of cookies by adjusting your browser software settings accordingly; however, we would like to point out that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link:

[http://tools.google.com/dlpage/gaoptout?hl=de.](http://tools.google.com/dlpage/gaoptout?hl=de)

The legal basis for data processing is your consent in accordance with Art. 6 para. 1 lit. a) GDPR.

## **Participate in surveys**

To find out how satisfied you are with our products, you can participate in our surveys. For each survey, you decide individually whether you want to participate and what information you want to give us.

To enable participants to interrupt a survey embedded in the website and continue it with the same browser, a session cookie is created when the survey participation starts. This also prevents the same survey from being displayed to you multiple times.

You can delete this cookie at any time in your browser's privacy settings. However, this will remove the option to continue a partially completed survey from the point where you left off and the protection against the survey being displayed again.

If personal data is collected in a survey, it will be deleted at the latest at the end of the year in which the survey and its evaluation were completed.

The legal basis for data processing is your consent in accordance with Art. 6 para. 1 lit. a) GDPR.

## When you request quotes

### Ordering products

If you order one of our services, we require your address, contact and communication details as well as your bank details and, where applicable, your credit card details when the contract is concluded.

The processing of the personal data you provide is necessary for the proper handling of the contractual relationship. It is based on Article 6 (1) (b) GDPR.

The data are deleted as soon as they are no longer required for the aforementioned purposes. However, we retain your personal data for as long as we are legally obliged to do so, for example due to retention obligations or limitation periods for potential legal claims that have not yet expired.

## When you contact us

### Contacting us

When you contact us, we only collect personal data (e.g. name, e-mail address, telephone number) if you provide it to us voluntarily. This information is expressly provided on a voluntary basis. The purpose of processing your data is to process and respond to your enquiry. This is also our legitimate interest in data processing in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR.

In the case of a telephone enquiry, your data will also be processed by telephone applications and in some cases also via a voice dialogue system in order to support us in the distribution and processing of enquiries.

We will delete your data that we have received in the course of contacting you as soon as your request has been fully processed and no further communication with you is required or requested by you.

## When we advertise our products

### Direct marketing

We also use your contact data beyond contract-related use for advertising purposes. This is only done if you have expressly consented (Art. 6 para. 1 lit. a) GDPR) or on the basis of our legitimate interest in a personalised customer approach or direct advertising (Art. 6 para. 1 lit. f) GDPR), for example for information about the same and similar products of our company (Section 7 para. 3 UWG).

If you no longer wish to receive advertising, you can withdraw your consent or object to advertising at any time.

The data processed by us will be deleted as soon as they are no longer required for their intended purpose, you have objected to the advertising and the deletion does not conflict with any statutory retention requirements.

- durch einen Klick auf den Abmelde-Link am Ende der Mail
- per Mail an [mtd-datenschutz@medtrix.group](mailto:mtd-datenschutz@medtrix.group)
- schriftlich an die MedTriX GmbH, Unter den Eichen 5, 65195 Wiesbaden (bitte Mailadresse und den Namen von der Registrierung angeben)
- telefonisch unter +49 611 9746 0.

### Newsletter

You receive newsletters from us only if you have explicitly subscribed to them by providing your name and email address. The email address

provided is verified by means of a confirmation email (“double opt-in procedure”). We process these personal data on the basis of your consent pursuant to Article 6 (1) (a) GDPR.

If you have given your consent, we analyse your clicks in newsletters using so-called tracking pixels, i.e. invisible image files. These are assigned to your email address and linked to a unique ID in order to clearly attribute clicks in the newsletter to you. The usage profile is intended to help tailor the newsletter offering to your interests. We record when you read newsletters and which links you click, and we use this to infer an interest profile.

You can unsubscribe from any newsletter at any time and withdraw your consent to its dispatch and analysis – however, you will then no longer receive the newsletter. For this purpose, an appropriate link is included in every newsletter.

Your data are deleted after you unsubscribe from the newsletter at the end of the year in which you cancelled your subscription.

## Newsletter - Data processing in detail

| Data                     | Purpose of processing                              | Legal basis for processing | Storage period     |
|--------------------------|----------------------------------------------------|----------------------------|--------------------|
| E-mail address           | Sending the newsletter                             | Consent                    | until cancellation |
| IP address for opt-in    | Proof of double opt-in                             | Consent                    | until cancellation |
| Time of DOI verification | Proof of double opt-in In                          | Consent                    | until revocation   |
| Salutation*              | Direct address                                     | Consent                    | until revocation   |
| First name*              | Direct address                                     | Consent                    | until revocation   |
| Last name*               | Direct address                                     | Consent                    | until revocation   |
| Usage data               | Further development and improvement of the service | Consent                    | until revocation   |

| Data        | Purpose of processing              | Legal basis for processing | Storage period   |
|-------------|------------------------------------|----------------------------|------------------|
| End devices | Correct delivery of the newsletter | Consent                    | until revocation |

\*Voluntary information

## Marketing for own products

In order to show you advertisements for our own products, we use services provided by advertising partners or collaborate with advertising partners and ad networks (remarketing). These partners use cookies, pixels, or similar technical means to display and analyze advertisements.

Ads may be tailored to the individual user by, for example, using browser information regarding usage (such as pages visited, times of visit, and duration of visit). User-specific ads are also possible. In addition, analyses regarding reach or for billing purposes may be conducted in pseudonymized form. We have outlined the details regarding the services used, our partners, and the various options for opting out below.

This advertising is carried out with your consent (Art. 6(1)(a) GDPR).

## Participation in prize draws

In the context of prize draws, we collect and process the following data from you:

- Email address, in order to inform you about a win
- First name, last name, address, in order to be able to send prizes by post

When (non-cash) prizes are offered, further personal data are required in particular from the winners after the end of the prize draw, such as their address, so that they can be notified in the event of a win and the prize can be delivered.

The collection and processing of personal data serve the purpose of carrying out the respective prize draw and quizzes and, where applicable, sending out prizes. The data are processed on the basis of your consent (Article 6(1)(1)(a) GDPR) and, in the case of prize draws, pursuant to Article 6(1)(1)(b) GDPR. All data are stored for the purpose and duration of the prize draw and deleted after the end of the promotion, unless statutory retention obligations apply.

Your data may be passed on to our prize draw service providers and sponsors within the framework of the terms and conditions of participation to which you have agreed, and will be deleted insofar as they are no longer required.

For further details in connection with the respective prize draw, please refer to the terms and conditions of participation.

## Company presence in the social media

We maintain a presence on social media. Insofar as we have control over the processing of your data, we ensure that the applicable data protection regulations are complied with. Below you will find the most important information on data protection law in relation to our company websites.

In addition to us, we are responsible for the company websites within the meaning of the EU General Data Protection Regulation (GDPR) and other data protection regulations:

- **Meta Platforms** (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland); further information on data protection can be found [here](#).
- **Instagram** (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland); weitere Informationen zum Datenschutz finden Sie [hier](#).
- **LinkedIn** (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland); further information on data protection can be found [here](#).

We process the data for statistical purposes in order to further develop and optimise the content and to make our offer more attractive. This data includes the total number of page views, page activities and data and

interactions provided by visitors. This data is processed and made available by the social networks. We have no influence on the generation and presentation of this data.

Your personal data is also processed for market research and advertising purposes. For example, it is possible that user profiles are created based on your usage behaviour and the resulting interests. This allows, among other things, adverts to be placed within and outside the platforms that presumably correspond to your interests. Cookies are usually stored on your computer for this purpose. Irrespective of this, data that is not collected directly from your end devices may also be stored in your user profiles. Data is also stored and analysed across devices; this applies in particular, but not exclusively, if you are registered as a member and logged in to the respective platforms.

We do not collect or process any other personal data.

The processing of your personal data by us is based on our legitimate interests in effective information and communication pursuant to Article 6 (1) sentence 1 (f) GDPR.

If you are asked to give your consent to data processing, i.e. if you declare your agreement by confirming a button or similar (opt-in), the legal basis for the processing is Article 6 (1) sentence 1 (a) and Article 7 GDPR.

If you are a member of a social network and do not want the network to collect data about you via our presence and link it to your stored member data with the respective network, you must

- log out of the respective network before visiting our fan page,
- delete the cookies stored on your device, and
- close and restart your browser.

After you log in again, however, you will once more be recognisable to the network as a specific user.

In total, you have the following rights in relation to the processing of your personal data:

right of access; right to rectification; right to erasure; right to restriction of processing; right to object; right to data portability; right to lodge a complaint with the competent data protection authority about unlawful processing of your personal data.

As we do not have full access to your personal data, you should contact the providers of the social media platforms directly in order to exercise your data subject rights, since they each have access to the personal data of their users and can take appropriate measures and provide information.

If you nevertheless require assistance, we will of course do our best to support you. You can find our contact details [here](#).

For a detailed description of the respective processing activities and the options for withdrawing consent, we refer you to the information linked below.

- **Meta-Plattformen** [Optout](#)
- **LinkedIn** [Optout](#)

## When third parties advertise their products with us

Um unsere digitalen Angebote zu refinanzieren, vermarkten wir in manchen unserer Online-Angebote und Websites unsere Werbeflächen, indem wir Werbebanner einblenden.

### **Self-marketing of adverts**

Unsere Werbevermarkter unterstützen uns bei der Vermarktung unserer Werbeflächen, indem sie Werbeanzeigen akquirieren und ausspielen.

Wir haben mit diesen und den von ihnen im Rahmen der Vermarktung eingesetzten Dritten im Sinne von Art. 4 Nr. 10 DSGVO entweder eine Vereinbarung i.S.v. Art. 26 DSGVO geschlossen, in der wir die jeweiligen Verantwortlichkeiten für die Erfüllung der Verpflichtungen gemäß der

DSGVO hinsichtlich der gemeinsamen Verarbeitung festgelegt haben, oder eine Auftragsverarbeitungsvereinbarung i.S.v. Art. 28 DSGVO.

Bei einer gemeinsame Verantwortung sind wir verpflichtet, Ihnen die Erteilung und den Widerruf datenschutzrechtlicher Einwilligungen zu ermöglichen. Zudem sind wir die zentrale Anlaufstelle für Sie als betroffene Person. Wir leiten Betroffenenanfragen, die bei uns eingehen und die gemeinsame Verarbeitung betreffen, unverzüglich an unsere Vermarkter zur Beantwortung weiter. Dessen ungeachtet können Sie die Ihnen nach der DSGVO zustehenden Rechte als betroffene Person sowohl bei und gegenüber uns als auch bei und gegenüber jedem anderen Verantwortlichen geltend machen.

Folgende Vermarkter setzen wir ein:

- Traffactive GmbH, Dachauer Straße 90, 80335 München

The legal basis for data processing is your consent in accordance with Art. 6 para. 1 lit. a) GDPR.

## **External marketing by third parties**

When you access our digital offerings, you will also be shown content from third parties who use our advertising space to place adverts. We refinance our offering by displaying these adverts. If such content is loaded, this is done from the servers of the respective third-party providers. This always involves the transmission of certain data to the third-party providers, in many cases including personal data. In addition, cookies or similar technologies are used for most of the third-party services used to load the content.

In order to provide advertising that is relevant and tailored to current interests, an attempt is made to draw conclusions about current interests based on the website visit and surfing behaviour. This user data is used to communicate advertising in the form of banners and other marketing methods - possibly based on the user's interests. For the purpose of retargeting (remarketing) of website visitors, as well as for the purpose of measuring success, cookies from third-party providers (so-called third-party cookies) are used and, if necessary, user profiles are created under a

pseudonym. These can be analysed for advertising and monitoring purposes. It is not possible to draw direct conclusions about a person.

An overview of the third parties and how they process your data and for what purpose can be found in the privacy settings.

The legal basis for data processing is your consent in accordance with Art. 6 para. 1 lit. a) GDPR.

In this context, data may also be transferred to third countries outside the EU with your consent in accordance with Art. 49 para. 1 lit. a) GDPR.

The publisher uses the Transparency and Consent Framework of IAB Europe 2.2 to manage this type of advertising in compliance with data protection regulations. This framework of the Interactive Advertising Bureau Europe ("IAB Europe"), an industry association for online marketing, defines and monitors the data protection-compliant display of advertising.

## **Advertising via the IAB TCF**

IAB Europe has defined the following purposes for the processing of data, including the personal data of users, in order to manage advertising in compliance with data protection regulations:

### **Saving or accessing information on a terminal device (Purpose 1)**

Cookies, terminal device or similar online identifiers (e.g. login-based identifiers, randomly generated identifiers, network-based identifiers) may be stored on or read from your terminal device together with other information (e.g. browser type and browser information, language, screen size, supported technologies, etc.) in order to recognise it each time it accesses an app or a website. This is done for one or more of the processing purposes listed here.

Most of the processing purposes explained in this notice are based on the storage of or access to information on your device when you use an app or visit a website. For example, it may be necessary for a provider or website operator to store a cookie on your device when you first visit a website in order to recognise it on your next visits (by retrieving this cookie each time).

### **Use of reduced data to select adverts (Purpose 2)**

Adverts presented to you on this service may be based on reduced data, such as the website or app you are currently using, your approximate

location, your device type or the content you are interacting with (or have interacted with) (e.g. to limit the frequency of adverts displayed to you).

**\*Examples**

- A car manufacturer wants to advertise its electric vehicles to environmentally conscious users who live in the city after hours. The advert is presented on a page with related content (e.g. an article about climate protection measures) after 6.30pm to users whose vague location suggests that they are in an urban area.
- A major manufacturer of watercolour paints wants to run an online advertising campaign for its latest watercolour range. The aim is to diversify the target audience to reach as many amateur and professional artists as possible and to avoid showing the advert alongside inappropriate content (e.g. articles about painting a house). The number of adverts you are presented with is determined and limited to avoid them being shown too often.

**Creation of profiles for personalised advertising (Purpose 3)**

Information about your activities on this service (such as completed forms, viewed content) may be stored and combined with other information about you (e.g. information from your previous activity on this service or other websites or apps) or similar users. This is then used to create or improve a profile about you (this may include, for example, possible interests and personal characteristics). Your profile may be used (including at a later date) to enable us to present you with adverts that are likely to be more relevant to you based on your potential interests.

**\*Examples**

- For example, if you read several articles about the best bicycle accessories in the trade, this information can be used to create a profile about your interest in bicycle accessories. Such a profile can be used or improved at a later stage on the same or another website or app to show you adverts for a specific brand of bicycle accessories. If you are also looking at a configurator for a vehicle on a luxury car manufacturer's website, this information may be combined with your interest in bicycles to refine your profile and lead to the assumption that you are interested in luxury bicycle equipment.
- A clothing company wants to promote its new collection of high-quality baby clothes. It contacts an agency that has a network of high-income customers (e.g. high-end supermarkets) and asks the agency to

create profiles of young parents or couples who can be assumed to be affluent and have recently had a baby, so that these can later be used to advertise in partner apps.

#### **Use of profiles to select personalised advertising (Purpose 4)**

Advertising displayed to you on this service may be based on your advertising profile. This advertising profile may include your activities (such as completed forms, viewed content) on this service or other websites or apps, possible interests and personal characteristics.

##### **\*Examples**

- An online retailer wants to advertise a limited range of running shoes. They want to target adverts to users who have previously viewed running shoes in their mobile app. Tracking technologies could be used to recognise that you have previously used the mobile app to search for running shoes so that you are shown the relevant adverts in the app.
- A profile created for personalised advertising relating to a person who has searched for cycling accessories on a website may be used to present the relevant cycling accessories advertisement on another company's mobile app.

#### **Creating profiles to personalise content (Purpose 5)**

Information about your activities on this service (such as: completed forms, non-promotional content viewed) may be stored and combined with other information about you (such as your previous activity on this service or other websites or apps) or similar users.

This is then used to create or complete a profile about you (this may include, for example, possible interests and personal characteristics). Your profile may be used (including at a later date) to show you content that is likely to be more relevant to you based on your potential interests, for example by changing the order in which content is shown to you to make it even easier for you to find content that matches your interests.

##### **\*Examples**

- You read several articles on a social media platform about how to build a tree house. This information can be added to a profile to record your interest in content about outdoor activities and do-it-yourself instructions (with the aim of enabling the personalisation of content so

that you are presented with more blog posts and articles about treehouses and wooden cabins in the future, for example).

- You watched three videos about space exploration on different TV apps. An independent news platform that you have not previously used creates a profile based on this usage behaviour and identifies space exploration as a topic of potential interest for future videos.

### **Use of profiles to select personalised content (Purpose 6)**

Content presented to you on this service may be based on your personalised content profiles, which include your activities on this or other services (such as forms you submit, content you view), possible interests and personal characteristics, such as the changed order in which content is displayed to you, to make it even easier for you to find (non-advertising) content that matches your interests.

#### **\*Examples**

- You read articles about vegetarian food on a social media platform and then use the cooking app of a company that is independent of the platform. The profile created about you on the social media platform is used to present you with vegetarian recipes on the home page of the cookery app.
- You have watched three rowing videos on various websites. When you use your TV app, a video sharing platform that is independent of the websites recommends five more rowing videos that may be of interest to you, based on a profile that was created about you when you watched the online videos on these websites.

### **Measurement of advertising performance (Purpose 7)**

Information about which adverts are presented to you and how you interact with them can be used to determine how much an advert has appealed to you or other users and whether the objectives of the advertising campaign have been achieved. The information includes, for example, whether you have viewed an advert, whether you have clicked on it, whether it has encouraged you to buy a product or visit a website, etc. This information is helpful in determining the relevance of advertising campaigns.

#### **\*Examples**

- You clicked on an advert on a website operator's website about a "Black Friday" discount from an online shop and bought a product. Your click

is linked to this purchase. Your interaction and that of other users is measured to find out how many clicks on the advert led to a purchase.

- Sie gehören zu den wenigen, die in der App eines App-Betreibers auf eine Werbung, über einen Rabatt anlässlich eines besonderen Ereignisses (z.B. „internationaler Tag der Anerkennung“), eines Online-Geschenkeshops geklickt haben. Der App-Betreiber möchte Statistiken darüber erhalten, wie oft eine bestimmte Anzeige innerhalb der App, insbesondere die Anzeige zu einem besonderen Ereignis (z.B. „internationaler Tag der Anerkennung“) von Ihnen und anderen Benutzern angesehen oder angeklickt wurde, um dem App-Betreiber und seinen Partnern (wie Agenturen) zu helfen, die Anzeigenschaltung zu optimieren.

### **Measuring the performance of content (Purpose 8)**

Information about what advertising is presented to you and how you interact with it can be used to determine whether (non-advertising) content has reached the intended target group and matched your interests, for example. This includes, for example, information about whether you have read a particular article, watched a particular video, listened to a particular podcast or looked at a particular product description, how much time you have spent on that service and the websites you have visited, and so on. This information helps to determine the relevance of (non-advertising) content that is displayed to you.

#### **\*Examples**

- You have read a blog post about hiking in the mobile app of an app operator and tapped on a link to a recommended similar post. Your interactions are recorded to show that the first post about hiking was useful to you and that it successfully encouraged you to read the similar post. This information is measured to determine whether more posts about hiking should be created in the future and where they should be placed on the home screen of the mobile app.
- You were presented with a video about fashion trends, but you and several other users cancelled it after 30 seconds. This information will be used to evaluate the appropriate length of future fashion trend videos.

### **Analysing target groups through statistics or combinations of data from different sources (Purpose 9)**

Based on the combination of data sets (such as user profiles, statistics,

market research, analytics data), reports can be created about your interactions and those of other users with advertising or (non-advertising) content in order to identify common characteristics (e.g. to determine which target groups are receptive to an advertising campaign or to certain content).

**\*Examples**

- The owner of an online bookstore wants to analyse how many visitors have visited his website without buying anything, or how many have visited the website to buy the latest celebrity biography of the month, as well as the average age of visitors and how many of them are male or female, broken down by category. Data about your navigation on the website and your personal characteristics is then used and combined with other such data to create these statistics.
- An advertiser wants to better understand the type of audience that interacts with their adverts. They commission a research organisation to compare the characteristics of users who have interacted with the ad with typical attributes of users of similar platforms across different devices. This comparison shows the advertiser that their target audience mainly accesses the advert via mobile devices and is likely to be between the ages of 45-60.

**Development and improvement of offers (Purpose 10)**

Information about your activities on this website, such as your interaction with adverts or content, can help to improve products and offers and to develop new products and offers based on user interactions, the type of target group, etc. This processing purpose does not include the development, supplementation or improvement of user profiles and identifiers. This processing purpose does not include the development, enhancement or improvement of user profiles and identifiers.

**\*Examples**

- Information about your activities on this offer, such as your interaction with adverts or content, can help to improve products and offers and to develop new products and offers based on user interactions, the type of target group, etc. This processing purpose does not include the development, enhancement or improvement of user profiles and identifiers.
- An advertiser is looking for a way to display adverts on a new type of device. It collects information about how users interact with this new

type of device in order to determine whether it can develop a new mechanism for displaying adverts on this type of device.

### **Use of reduced data to select content (Purpose 11)**

Content presented to you on this service may be based on reduced data, such as the website or app you are using, your approximate location, your device type or information about what content you interact (or have interacted) with (e.g. to limit how often you are shown a video or article).

#### **\*Examples**

- A travel magazine has published an article on its website about the new online courses offered by a language school to improve the travelling experience abroad. The travel school's blog posts are inserted directly at the bottom of the page and selected based on your approximate location (e.g. blog posts with the syllabus for the course of a language that is not the language of your country).
- A mobile app for sports news has introduced a new section with articles about the latest football matches. Each article contains videos with highlights of the game hosted by an external streaming platform. If you fast-forward a video, this information can be used to play a shorter video afterwards.

### **Special processing purposes**

The user has no choice for the following two special processing purposes, as these are absolutely necessary to provide the service.

- **Ensuring security, preventing and detecting fraud and troubleshooting:** Your data may be used to monitor and prevent unusual and potentially fraudulent activities (for example, regarding advertising, advertising clicks by bots) and to ensure that systems and processes function properly and securely. The data may also be used to resolve problems that you, the website or app operator or the advertiser may have in delivering content and adverts and in your interaction with them.

#### **Example**

An advertising intermediary delivers adverts from different advertisers to its network of partner websites and apps. The advertising intermediary notices a sharp increase in clicks on adverts from a particular advertiser. He analyses the data regarding the source of the clicks and finds that 80% of the clicks are from bots and not humans.

- **Provision and display of advertising and content:** Certain information (such as IP address or device features) is used to ensure the technical compatibility of the content or advertising and to enable the transfer of the content or advertising to your device.

Example

When you click on a link in an article, you are usually redirected to another page or another part of the article. To this end, 1°) your browser sends a request to a server linked to the website, 2°) the server responds to the request ("here is the article you requested") using technical information contained by default in the request sent by your terminal in order to properly display the information/images that are part of the article you requested. Technically, such an exchange of information is necessary to provide the content that is displayed on your screen.

- **Store and transmit your data protection choices:** The choices you make in relation to the purposes and companies listed in this notice will be stored and made available to the companies concerned in the form of digital signals (e.g. a character string). Only in this way can both this service and the companies concerned respect the respective decisions.

Example:

If you visit a website and are given the choice of whether or not to consent to the use of profiles for personalised advertising, the decision you make will be stored and transmitted to the advertising providers concerned so that your decision is taken into account in the advertising presented to you.

## Functions

For the following functions, personal data will be used for one or more of the above purposes if you consent to these purposes.

- **Matching and combining data from different data sources: \_\_**  
Information about your activities on this service may be matched and combined with other information about you from different sources (e.g. your activities on another online service, your use of an in-store loyalty card or your responses to a survey) to support the purposes explained in this framework.
- **Linking of different devices: \_\_** To support the purposes set out in this framework, it may be determined whether it is likely that your device is connected to other devices belonging to you or your household (e.g. because you are logged into the same service on both your mobile

phone and your computer or because you use the same internet connection on both devices).

- **Identification of end devices based on automatically transmitted information:** Your end device can be distinguished to support the purposes explained in this framework using information that it automatically transmits when accessing the Internet (e.g. the IP address of your Internet connection or the type of browser you use).

### **Special functions**

For the following special functions, personal data will be used for one or more of the above-mentioned purposes, provided that you consent to these purposes.

- **Use of precise geographical data:** With your consent, your precise location (within a radius of less than 500 metres) may be used to support the above purposes.
- **Active scanning of device characteristics for identification:** With your consent, certain characteristics of your device may be queried and used to distinguish it from other devices (e.g. the fonts or plugins installed, the resolution of your screen) to support the above purposes.

## **Personalised advertising with ID5 technology**

Wir nutzen Dienste der digitalen Werbepattform ID5 mit Sitz am 199 Bishopsgate, London EC2M 3TY, Großbritannien. ID5 legt eine eindeutige ID für jeden Besucher fest, die es Werbetreibenden ermöglicht, den Besucher mit relevanter Werbung anzusprechen und Echtzeitangebote zu platzieren. ID5 sammelt Informationen wie E-Mail-Adresse (in pseudonymisierter Form), IP-Adresse und/oder Informationen über den Browser oder das Betriebssystem und verwendet diese, um eine ID zu erstellen, mit der die Nutzer auf ihren Geräten erkannt werden können. Diese ID enthält keine identifizierbaren personenbezogenen Daten.

Wenn Sie uns Ihre Einwilligung für personalisierte Werbung erteilen, platzieren wir den ID5-Identifizierer in unserem First-Party-Cookie oder verwenden ein ID5-Cookie und erlauben, dass diese für Online-Werbung verwendet wird. Diese ID wird von uns oder in unserem Namen mit unseren Werbepartnern und anderen Drittanbietern weltweit geteilt, um interessenbasierte Inhalte und/oder gezielte Werbung zu ermöglichen (z. B. Web, E-Mail, verbundene Geräte, In-App-Werbung usw.).

Sie können Ihre Einwilligung (Art. 6 Abs. 1 S. 1 lit. a) DSGVO) jederzeit widerrufen, indem Sie in den Datenschutz-Einstellungen Ihre Einwilligung für personalisierte Werbung widerrufen. Wenn Sie das Tracking mittels der ID5 ID nicht möchten, nutzen Sie bitte die Möglichkeit des Opt-Out auf folgender Webseite des Anbieters: <https://id5-sync.com/privacy>.

Die Daten werden von ID5 unter anderem in Großbritannien verarbeitet. Für einen solchen Datentransfer besteht ein Angemessenheitsbeschluss der Europäischen Kommission gemäß Art. 45 DSGVO, so dass ein vergleichbares Datenschutzniveau gewährleistet wird. Ein angemessenes Datenschutzniveau für den Transfer an Partner der ID5 ist überdies durch den Abschluss der EU-Standardvertragsklauseln abgesichert. Weitere Informationen zu ID5 und den eingesetzten Technologien und Partner sind in der [ID5-Datenschutzerklärung](#) zu finden.

## What else you should know

### **Controller**

Verantwortlicher im Sinne der DSGVO ist die

#### **MedTriX GmbH**

Unter den Eichen 5  
65195 Wiesbaden

### **Data Protection Officer**

#### **atarax group of companies**

Luitpold-Maier-Str. 7  
D-91074 Herzogenaurach  
Germany  
Phone: 09132 79800  
Email: [swmh-datenschutz@atarax.de](mailto:swmh-datenschutz@atarax.de).

# Kontakt für Ihre Datenschutzanfrage

Hier können Sie Ihre Fragen zum Datenschutz stellen.

**mtd-datenschutz@medtrix.group**

## Joint controllers

We are joint controllers in the following cases.

## Joint controlling with Meta Platforms

When you visit our Meta Platforms fan page, we are jointly responsible with Meta Platforms for the processing of your personal data. Below we inform you about the associated data processing on our fan page, which does not affect Meta Platforms' terms of use:

### **Contact details of the controllers and joint controllership pursuant to Art. 26 GDPR**

Joint controllers:

the entity responsible for this website (see the information about us mentioned at the beginning)

and

Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland

According to the European Court of Justice (ECJ), we are jointly responsible with Meta Platforms for the processing of your personal data.

### **Appearance on the Meta Platforms fan page**

### **Scope of data collection and storage**

| Data                                                                                                                                                                                                                             | Purpose                             | Legal basis           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------------|
| User interactions (posts, likes, etc.)                                                                                                                                                                                           | User communication via social media | Art. 6 para. 1 a GDPR |
| Meta Platforms cookies                                                                                                                                                                                                           | Target group advertising            | Art. 6 para. 1 a GDPR |
| Demographic data (based on age, place of residence, language or gender information)                                                                                                                                              | Target group advertising            | Art. 6 para. 1 a GDPR |
| Statistical data on user interactions in aggregated form, i.e. without personal reference (e.g. page activities, page views, page previews, likes, recommendations, posts, videos, page subscriptions incl. origin, time of day) | Target group advertising            | Art. 6 para. 1 a GDPR |

The promotional use of your personal data is particularly important for Meta Platforms. We use the statistics function to find out more about the visitors to our fan page. Using this function enables us to customise our content to the respective target group. In this way, we also utilise demographic information on the age and origin of users, for example, although we are unable to make any personal reference here. In order to provide the social media service in the form of our Meta Platforms fan page and to use the Insight function, Meta Platforms generally stores cookies on the user's end device. These include session cookies, which are deleted when the browser is closed, and persistent cookies, which remain on the end device until they expire or are deleted by the user. As a user, you can use your browser settings to decide for yourself whether and which cookies you wish to allow, block or delete. You can find instructions for your browser here: [Internet Explorer](#), [Firefox](#), [Google Chrome](#), [Google Chrome mobile](#), [Microsoft Edge](#), [Safari](#), [Safari mobile](#) (links). Alternatively, you can also install so-called ad blockers, such as [Ghostery](#).

According to Meta Platforms, the cookies used by Meta Platforms are used for authentication, security, website and product integrity, advertising and measurement, website functions and services, performance, analysis and research. Details of the cookies used by Meta Platforms (e.g. names of cookies, duration of function, content collected and purpose) can be viewed [here](#) by following the links provided there. There you will also find the option of deactivating the cookies used by Meta Platforms. You can also change the settings for your advertising preferences there.

You can also object to the collection and storage of data through the use of the above-mentioned cookies by Meta Platforms at any time with effect for the future via [this opt-out link](#).

You can use the aforementioned link to manage your preferences regarding usage-based online advertising. If you object to usage-based online advertising with a specific provider using the preference manager, this only applies to the specific business data collection via the web browser you are currently using. Preference management is cookie-based. If you delete all browser cookies, the preferences you have set with the preference manager will also be removed.

### **Note on Meta Platforms Insights**

We use the Meta Platforms Insights function for statistical analysis purposes. In this context, we receive anonymised data on the users of our Meta Platforms fan page. However, we use the filters provided by FacebookMeta Platformstool to specify the categories of data according to which Meta Platforms provides anonymised statistics. Meta Platforms provides us with the following criteria or categories for analysing the activities of the website in anonymised form, provided that the corresponding information has been provided by the user or is collected by Meta Platforms:

- Age range
- Gender
- Place of residence (city and country)
- language
- Mobile or stationary page views (YouTube additionally individual device types)
- Interactions in the context of posts (e.g. reactions, comments, shares, clicks, views, video usage time)
- Time of use

This anonymised data is used to analyse user behaviour for statistical

purposes so that we can better tailor our offers to the needs and interests of our audience.

We see our legitimate interest (Art. 6 para. 1 f GDPR) for data processing in the presentation of our company and our products and services for your information.

### **Disclosure and use of personal data**

If you interact with Meta Platforms, Meta Platforms will of course also have access to your data.

### **Joint controlling with YouTube**

We use the technical platform and services of YouTube, a Google company, with its principal place of business at Gordon House, Barrow Street, Dublin 4, Ireland. This means that if you are habitually resident in the European Economic Area or Switzerland, unless otherwise specified in any additional terms, you will be provided with the services of Google Ireland Limited ("Google"), a company incorporated and operated under the laws of Ireland.

In accordance with the [Google Privacy Policy](#), we assume that personal data, including its processing, will also be transferred to servers of Google LLC in the USA.

In its judgement in case C-210/16, the CJEU ruled that platform operators (in this case YouTube) and the operator of a channel located on the platform are jointly responsible for the data processing carried out via the respective channel. In this respect, platform operators and channel operators are to be regarded as joint controllers pursuant to Art. 26 GDPR.

### **Data processed by us**

Your personal data is processed for the purpose of market observation and user communication, in particular by initiating and obtaining user feedback. We process the following access data for the aforementioned purposes:

Access source, region, age, gender, subscription status regarding YouTube channel, subscription source, playlist, device type, YouTube product, live/on demand, playback location, operating system, subtitles, language for video information, translations used, element type, info card type, info card, where was shared.

The above data processing can be legitimised in accordance with Art. 6 para. 1 lit. f GDPR and our "legitimate interest". We have pointed out the right to object in accordance with Art. 21 GDPR (see below). Our legitimate interest lies in playing video content on YouTube with the widest possible reach. With the help of the data collected, the topics, design, length and playback time of the videos can be better tailored to user behaviour.

If you contact us directly as a YouTube user, for example via enquiries, comments and feedback, this contact and the communication of your details is expressly on a voluntary basis and with your consent (Art. 6 para. 1 sentence 1 lit. a) GDPR). We may forward your comments or reply to them or write comments that refer to your account. The data you freely publish and disseminate on our YouTube channel is thus included by us in our offering and made accessible to our followers and other users. In addition, we process the data that you voluntarily provide to us as part of a personal message, if necessary for the purpose of replying to the message.

### **Data processed by YouTube**

Information about what data is processed by YouTube and for what purposes this data is used can be found in the [YouTube Privacy Policy](#). By using YouTube, your personal data will be collected, transferred, stored, disclosed and used by YouTube and transferred to, stored and used in the United States and any other country in which YouTube does business, regardless of your place of residence.

On the one hand, YouTube processes your voluntarily entered personal data such as your name and user name, email address, telephone number or the contacts in your address book when you upload or synchronise it. On the other hand, YouTube also analyses the content you share to determine which topics you are interested in, stores and processes confidential messages that you send directly to other users and can determine your location using GPS data, information on wireless networks or your IP address in order to send you advertising or other content. YouTube may use analysis tools such as Google Analytics for evaluation purposes. If tools of this type are used by YouTube for our channel, this is not done on our behalf. The data obtained during the analysis is also not made available to us. We can only view the information on access activities listed under point 1. This so-called "log data" can be the IP address, the browser type, the operating system, information about the previously accessed website and the pages you have accessed, your location, your mobile phone provider, the

end device you are using (including device ID and application ID), the search terms you have used and cookie information.

You have the option of restricting the processing of your data in the settings of your YouTube account as well as information on these options at <https://support.google.com/accounts?hl=de#topic=3382296>. In addition, you can restrict YouTube's access to contact and calendar data, photos, location data, etc. on mobile devices (smartphones, tablet computers) in the settings options there. However, this depends on the operating system used.

You also have the option of requesting information via the YouTube privacy policy or the YouTube terms of use or via YouTube's community guidelines and security at:

<https://www.youtube.de/t/privacy>

<https://www.youtube.com/t/terms>

[https://www.youtube.de/t/community\\_guidelines](https://www.youtube.de/t/community_guidelines)

Further information on YouTube's data protection can be found at

<https://www.youtube.com/?gl=DE&hl=de>

## Your rights

- In accordance with Art. 15 GDPR, you have the right to request **information** about your personal data processed by us. In this context, you also have the right to receive a copy of your personal data processed by us in accordance with Art. 15 para. 3-4 GDPR.
- In accordance with Art. 16 GDPR, you can immediately request the **correction** of incorrect or the completion of your personal data stored by us.
- In accordance with Art. 17 GDPR, you can request the erasure of your personal data stored by us.
- In accordance with Art. 18 GDPR, you can request the **restriction of the processing** of your personal data.
- In accordance with Art. 20 GDPR, you can request to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format and you can request the **transfer** to another controller.
- In accordance with Art. 7 para. 3 GDPR, you can **revoke** your consent once given to us at any time. This means that the processing carried out on the basis of the consent prior to the revocation was lawful and

has the consequence that we may no longer continue the data processing based on this consent in the future.

### **Right to object**

**If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR or Art. 6 para. 1 sentence 1 lit. e) GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR. In the event of such an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.**

**In the case of direct marketing, you have the right to object at any time to the processing of personal data concerning you. If you object to processing for direct marketing purposes, the personal data will no longer be processed for these purposes.**

### **Right to lodge a complaint with the supervisory authority**

You have the right to lodge a complaint with a data protection supervisory authority against the processing of your personal data if you feel that your rights under the GDPR have been violated. As a rule, you can contact the supervisory authority of your usual place of residence, your workplace or our company headquarters.

## **Data protection information in the GTC**

With this privacy policy, we fulfil the information obligations under the GDPR. Our General Terms and Conditions also contain data protection information. These explain in detail how your personal data, which we require to fulfil contracts and for the purpose of identity and credit checks, is processed.

### **Links to other websites**

We link to websites of other providers or have integrated elements from them into our website. This data protection information does not apply to

them - we have no influence on these sites and cannot check that others comply with the applicable data protection regulations.

## **Changes to the privacy policy**

We reserve the right to change or adapt this privacy policy at any time in compliance with the applicable data protection regulations.