



# Privacy Policy

07.07.2025

Wenn Sie unsere digitalen Angebote nutzen, verarbeitet die HCS Medienwerk GmbH 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 der Inhalte

- Cookies und ähnliche Technologien
- technische Bereitstellung und Sicherheit
- Unbedingt erforderliche Technologie

#### Produktoptimierung

- Weiterentwicklung der Nutzerfreundlichkeit

## Vertragsabwicklung

- Buchen von Anzeigen

## Kommunikation

- Kontakt und Kommunikation

## 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.

## **Privacy Manager**

You can obtain an overview of all the tools and cookies we use as well as an option to withdraw your consent by clicking on Privacy settings at the bottom of the website you are visiting.

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).

The legal basis for the aforementioned data processing is our legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. 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.

## Compliance

Um Ihre datenschutzrechtliche Einwilligung einholen und speichern zu können, verwenden wir Compliance (Compliance BV, CoC 717814475, Kalmarweg 14-5, 9723 JG, Groningen (NL)). Diese setzt unbedingt erforderliche Cookies, um den Consent-Status abfragen und damit entsprechende Inhalte ausspielen zu können.

Die Cookies werden gespeichert und spätestens nach 13 Monaten gelöscht.

Rechtsgrundlage für die vorgenannten Datenverarbeitungsvorgänge ist unser berechtigtes Interesse gemäß Art. 6 Abs. 1 S. 1 lit. f) DSGVO.

## Weekli

Wenn Sie in digitalen Publikationen blättern wollen, bieten wir Ihnen diese Funktionalität, indem wir den Dienst von weekli nutzen, einem Angebot der yack.rocks GmbH aus München. Für die technische Übermittlung der Daten an den Browser des Nutzers wird die IP Adresse des Nutzers auf den Servern von weekli in Deutschland verarbeitet und zur Ermittlung von Störungen und aus Sicherheitsgründen für 7 Tage gespeichert und danach gelöscht.

Weitere Informationen finden Sie auch in den weekli

Datenschutzbedingungen unter <https://www.weekli.de/datenschutz>.

## 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.

## **What else you should know**

### **Controller**

#### **HCS Medienwerk GmbH**

Steinweg 51  
96450 Coburg

### **Data Protection Officer**

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

Luitpold-Maier-Str. 7  
D-91074 Herzogenaurach  
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.

[datenschutz@hcs-medienwerk.de](mailto:datenschutz@hcs-medienwerk.de)

## Gemeinsame Verantwortung mit Instagram

Wenn Sie unsere Instagram-Fanpage besuchen, sind wir gemeinsam mit Meta Platforms für die Verarbeitung Ihrer personenbezogenen Daten verantwortlich. Nachfolgend informieren wir Sie über die damit verbundene Datenverarbeitung auf unserer Fanpage:

### **Kontaktdaten der Verantwortlichen und gemeinsame Verantwortlichkeit nach Art. 26 DS-GVO**

Gemeinsam für die Verarbeitung Verantwortliche:  
die für diese Webseite verantwortliche Stelle (siehe eingangs erwähnte Informationen zu uns)

und

Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland

Für die Verarbeitung Ihrer personenbezogenen Daten sind wir nach Ansicht des Europäischen Gerichtshofs (EuGH) gemeinsam mit Facebook verantwortlich.

### **Auftritt auf der Facebook-Fanpage**

### **Umfang der Datenerhebung und –speicherung**

<b>Daten</b>	<b>Verwendungszweck</b>	<b>Rechtsgrundlage</b>
Userinteraktionen (Postings, Likes, etc)	Nutzerkommunikation via Social Media	Art. 6 Abs. 1 a DS-GVO
Facebook-Cookies	Zielgruppen-Werbung	Art. 6 Abs. 1 a DSGVO
Demografische Daten (basierend auf Alters-,	Zielgruppen-Werbung	Art. 6 Abs. 1 a DSGVO

Daten	Verwendungszweck	Rechtsgrundlage
Wohnort-, Sprach- oder Geschlechtsangaben)		
Statistische Daten zu Userinteraktionen in aggregierter Form, d.h. ohne Personenbeziehbarkeit (z.B. Seitenaktivitäten, -aufrufe, -vorschauen, Likes, Empfehlungen, Beiträge, Videeos, Seitenabonnements inkl. Herkunft, Tageszeiten)	Zielgruppen-Werbung	Art. 6 Abs. 1 a DSGVO

Die werbliche Nutzung Ihrer personenbezogenen Daten steht insbesondere für Facebook im Vordergrund. Wir nutzen die Statistikfunktion, um mehr über die Besucher unserer Fanpage zu erfahren. Die Nutzung der Funktion ermöglicht es uns, dass wir unsere Inhalte an die jeweilige Zielgruppe anpassen können. Auf diese Weise nutzen wir etwa auch die demografischen Informationen zum Alter und der Herkunft der Nutzer, wobei hier kein Personenbezug für uns möglich ist. Um den Social-Media-Dienst in Form unserer Facebook-Fanpage bereitzustellen und die Insight-Funktion zu nutzen, speichert Facebook in der Regel Cookies auf dem Endgerät des Nutzers. Hierzu gehören Sitzungs-Cookies, die gelöscht werden, wenn der Browser geschlossen wird, und dauerhafte Cookies, die auf dem Endgerät verbleiben, bis sie ablaufen oder vom Nutzer gelöscht werden. Als Nutzer können Sie über Ihre Browsereinstellungen selbst entscheiden, ob und welche Cookies Sie zulassen, blockieren oder löschen möchten. Eine Anleitung für Ihren Browser finden Sie hier: [Internet Explorer](#), [Firefox](#), [Google Chrome](#), [Google Chrome mobile](#), [Microsoft Edge](#), [Safari](#), [Safari mobile](#) (Verlinkungen). Alternativ können Sie auch sogenannte Ad-Blocker, wie z.B. [Ghostery](#) installieren.

Die von Facebook verwendeten Cookies dienen lt. Angaben von Facebook der Authentifizierung, Sicherheit, Webseiten- und Produktintegrität, Werbung und Messungen, Webseitenfunktionen und -dienste, Performance

sowie der Analyse und Forschung. Einzelheiten zu den von Facebook verwendeten Cookies (z.B. Namen der Cookies, Funktionsdauer, erfasste Inhalte und Zweck) können Sie [hier](#) einsehen, in dem Sie den dortigen Links folgen. Dort finden Sie auch die Möglichkeit, die von Facebook eingesetzten Cookies zu deaktivieren. Darüber hinaus können Sie dort auch die Einstellungen zu Ihren Werbepräferenzen ändern.

Der Datenerhebung und Speicherung durch die Nutzung der o.g. Cookies von Facebook kann zusätzlich, aber auch jederzeit mit Wirkung für die Zukunft über [diesen Opt-Out-Link](#) widersprochen werden.

Unter dem vorgenannten Link können Sie Ihre Präferenzen hinsichtlich nutzungsbasierter Online-Werbung verwalten. Wenn Sie bei einem bestimmten Anbieter gegen die nutzungsbasierte Online-Werbung mit Hilfe des Präferenzmanagers Widerspruch einlegen, gilt das nur für die bestimmte Geschäftsdatenerhebung über den gerade verwendeten Web-Browser. Das Präferenzmanagement ist Cookie-basiert. Ein Löschen aller Browser-Cookies führt dazu, dass auch die Präferenzen, die Sie mit dem Präferenzmanager eingestellt haben, entfernt werden.

### **Hinweis zu Facebook Insights**

Für statistische Auswertungszwecke nutzen wir die Funktion Facebook Insights. In diesem Zusammenhang erhalten wir anonymisierte Daten zu den Nutzern unserer Facebook-Fanpage. Allerdings geben wir mithilfe der von Facebook zur Verfügung gestellten Filter die Kategorien der Daten vor, nach denen Facebook anonymisierte Statistiken bereitstellt. Facebook stellt uns folgende Kriterien bzw. Kategorien zur Auswertung der Aktivitäten des Auftritts anonymisiert zur Verfügung, sofern die entsprechenden Angaben vom User gemacht worden sind oder von Facebook erhoben werden:

- Altersspanne
- Geschlecht
- Wohnort (Stadt und Land)
- Sprache
- mobiler oder stationärer Seitenaufruf (YouTube zusätzlich einzelne Gerätetypen)
- Interaktionen im Kontext mit Posts (z.B. Reaktionen, Kommentare, Shares, Klicks, Views, Videonutzungsdauer)
- Uhrzeit der Nutzung

Diese anonymisierten Daten werden für die Analyse des Nutzerverhaltens zu statistischen Zwecken verwendet, damit wir

unsere Angebote besser auf die Bedürfnisse und Interessen seines Publikums ausrichten können.

Unser berechtigtes Interesse (Art. 6 Abs.1 f DSGVO) für die Datenverarbeitung sehen wir in der Darstellung unseres Unternehmens und unserer Produkte sowie Dienstleistungen zu Ihrer Information.

### **Weitergabe und Nutzung der personenbezogenen Daten**

Soweit Sie im Rahmen von Facebook interagieren, so hat selbstverständlich auch Facebook Zugriff auf Ihre Daten. Es ist insbesondere möglich, dass Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA, Zugriff auf Ihre Daten hat. Facebook befindet sich hier in einem unsicheren Drittstaat, in welchem das Datenschutzniveau geringer ausfällt.

### **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**

<b>Data</b>	<b>Purpose</b>	<b>Legal basis</b>
User interactions (posts, likes, etc.)	User communication via social media	Art. 6 para. 1 a GDPR

<b>Data</b>	<b>Purpose</b>	<b>Legal basis</b>
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 Platformstook 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.

### **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.