



# Privacy Policy

14.11.2025

Wenn Sie ein Angebot der Abokarten Verwaltungs GmbH BT nutzen, verarbeitet 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.

## 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
- Einbindung von externen Multimedia-Inhalten (Video, Audios, Kartendienste, Twitter, Instagram, etc.)

### Produktoptimierung

- Weiterentwicklung der Nutzerfreundlichkeit
- Reichweitenmessung
- Nutzungsanalyse

### Vertragsabwicklung

- Bestellen von Produkten

### 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**

We use cookies and similar technologies to provide you with the best experience when using our digital offerings. We use them to ensure functionality, IT security, and fraud prevention.

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 set out in 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.

### **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.

## **Unbedingt erforderliche Cookies**

Diese Cookies sind notwendig, damit Sie auf der Webseite navigieren und ihre Funktionen verwenden können, zum Beispiel um Ihre Datenschutzpräferenzen einzustellen, sich anzumelden oder um Formulare auszufüllen. Ohne diese Cookies können die von Ihnen über die Webseite angefragten Leistungen nicht ordnungsgemäß erbracht werden. Unbedingt erforderliche Cookies benötigen nach anwendbarem Recht keine Einwilligung durch den Nutzer.

Sie können Ihren Webbrowser so konfigurieren, dass auch unbedingt erforderliche Cookies blockiert werden, doch können Sie die Webseite dann möglicherweise nicht in der vorgesehenen Weise nutzen.

Sofern die mit Hilfe von unbedingt erforderlichen Cookies verarbeiteten Daten im Einzelfall als personenbeziehbar anzusehen sind, stellt unser berechtigtes Interesse am Betrieb der Webseite die Rechtsgrundlage für die Verarbeitung dieser Daten dar.

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

## 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.

# Wenn Sie Angebote bestellen

## Ordering products

If you order one of our offers or products, we need your address, contact and communication data as well as your bank and, if applicable, credit card data when the contract is concluded.

The processing of this data is necessary for the initiation or fulfilment of the contract (Art. 6 para. 1 sentence 1 lit. b GDPR).

After termination of the contract, we delete your data or block it, unless we are legally obliged to retain this data. The deletion usually takes place after ten years at the latest.

## Payment

In order to offer you various payment functions, we use software from service providers who support us in processing the payment transaction. The software also manages transactions and controls access control, billing, the checkout process, invoice dispatch, and payment transactions. It also supports our user, product, and price management. In doing so, we process your personal master data (e.g., name, address data), your communication data (e.g., email), order data, contract billing and payment data, and our planning and control data.

The legal basis for this is the fulfilment of the contract (Art. 6 (1) (b) GDPR) and our legitimate interest in proper and functioning payment processing (Art. 6 (1) (f) GDPR).

## Payment processing - Plenigo

If you choose a payment method offered by the payment service provider Frisbii, payment processing will be handled by Frisbii Germany GmbH (Mainzer Landstraße 51, 60329 Frankfurt am Main), to whom we will forward the information you provided during the ordering process along with information about your order (name, address, country/region, IBAN,

BIC, account number, bank code, credit card number, invoice amount, currency, tax rate, transaction number, product name and description, device ID, order ID, customer ID, invoice ID, email address, IP address) in accordance with Art. 6 (1) (b) GDPR.

## **Payment processing Payone**

We transfer your data (name, address, and, if applicable, date of birth) to infoscore Consumer Data GmbH (“ICD”), Rheinstr. 99, 76532 Baden-Baden, Germany, for the purpose of credit assessment, obtaining information for assessing the risk of payment default based on mathematical-statistical methods using address data, and verifying your address (deliverability check). 76532 Baden-Baden.

The legal basis for these transfers is Art. 6 (1) (f) GDPR, because only by transferring and checking the data can we assess whether payment obligations can be met, enabling us to carry out the contractual activities in a secure manner. Transfers based on these provisions may only be made if this is necessary to safeguard the legitimate interests of our company or third parties and does not outweigh the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data.

Detailed information on ICD within the meaning of Art. 14 GDPR, i.e. information on the business purpose, the purposes of data storage, the data recipients, the right to self-disclosure, the right to erasure or rectification, etc., can be found at [this link](<https://finance.arvato.com/icdinfoblatt> “Data protection BS Payone”).

## **Payment processing PayPal**

At your request, you can use the services of PayPal (PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg) for payment. For this purpose, we pass on your payment data (total amount of the order, reference on the PayPal account) to PayPal on the basis of Art. 6 para. 1 sentence 1 lit. b) GDPR. The processing of data for payment with PayPal is necessary for the fulfilment of the contract.

PayPal collects information about the transaction as well as other information associated with the transaction, such as the amount sent or requested, the amount paid for products or services, information about the merchant, including information about the means of payment used to carry

out the transaction, device information, technical usage data and location data. In the case of a PayPal payment, we may see your data in our PayPal account.

With PayPal Express Checkout, you do not have to re-enter order information or credit card or address details, as these are transferred directly by PayPal.

PayPal reserves the right to carry out an identity and credit check via credit agencies under certain circumstances. Further information on PayPal's data protection can be found [here](#).

## **Credit assessment**

Profiling, i.e. automated data processing with the aim of evaluating certain personal aspects, only takes place to check creditworthiness in the course of digital subscription orders in connection with a terminal device.

Prior to transactions with an economic risk, we would like to be able to assess as well as possible whether the payment obligations entered into can be met. This constitutes our legitimate interest in the processing of your data, so that the legal basis is Art. 6 para. 1 sentence 1 lit. f) GDPR.

By providing information and using so-called probability values, CRIF GmbH supports us in making decisions and helps us to process everyday (goods) credit transactions quickly.

This involves making a forecast of future events based on collected information and past experience. CRIF GmbH calculates the probability values primarily on the basis of the information stored by CRIF GmbH about a data subject, which is also shown in the information pursuant to Art. 15 GDPR. Address data is also used. Based on the entries stored for a person and the other data, an assignment is made to statistical groups of persons who have shown similar payment behaviour in the past. The method used is known as "logistic regression" and is a well-founded mathematical-statistical method for predicting risk probabilities that has been tried and tested in practice for many years.

The following data is used by CRIF GmbH to calculate the score, although not every type of data is included in every individual score calculation: Date of birth, gender, shopping basket value, address data and length of residence, previous payment defaults, public negative features such as non-

disclosure of assets, creditor satisfaction excluded, creditor satisfaction not proven, debt collection proceedings and debt collection monitoring proceedings. CRIF GmbH itself does not make any decisions, it merely provides us with information to help us make decisions. The risk assessment and evaluation of creditworthiness is carried out solely by us, as only we have a wealth of additional information at our disposal.

You can request information about your personal data stored by CRIF at any time: CRIF GmbH, Victor-Gollancz-Str. 5, 76137 Karlsruhe and [here](#) for further information on data protection.

## Events

For events, we process your name, contact and address data required for the purpose of organising the events. The legal basis for this is Art. 6 para. 1 sentence 1 b) GDPR. Without processing the personal data, we would not be able to organise the events or offer this service to the participants. The data will not be used for advertising purposes and will only be passed on to third parties if a co-organiser or event service provider is permitted to receive this data or if an increased level of security is required (e.g. forwarding to the police, BKA).

As soon as the purpose for collecting the data and statutory retention obligations have been fulfilled, the data will be deleted.

## What else you should know

### Controller

Verantwortlicher im Sinne der DSGVO ist die

**Abokarten Verwaltungs GmbH BT**

Poststraße 9/11

95028 Hof

## 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@verlagsgruppe-hcs.de](mailto:datenschutz@verlagsgruppe-hcs.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.