



## Privacy Policy

20.07.2026

Wenn Sie ein Angebot der Nordbayerischer Kurier Zeitungsverlag GmbH 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.

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

- Liveticker
- Login
- Push-Nachrichten
- Teilen von Inhalten

### **Produktoptimierung**

- Weiterentwicklung der Nutzerfreundlichkeit
- Reichweitenmessung
- Nutzungsanalyse
- Umfragen

### **Vertragsabwicklung**

- Bestellen von Produkten
- Veranstaltungen

### **Kommunikation**

- Kontakt und Kommunikation

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

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

### **Werbung durch 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.

## **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.

## **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.

## 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                                                 | unlimited | local storage |

| Cookie                        | Purpose                                                                | Duration  | Type          |
|-------------------------------|------------------------------------------------------------------------|-----------|---------------|
|                               | consent banner<br>so that it is only<br>shown once                     |           |               |
| _sp_non_keyed_<br>local_state | Information<br>about the<br>metadata and<br>the user's<br>UniqueUserID | unlimited | local storage |

## 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>.

## Koomot

Zur Darstellung von Landkarten und geografischen Positionen nutzen wir den Dienst koomot. Damit koomot-Inhalte eingebunden werden können, ist aus technischen Gründen eine Kommunikation zwischen koomot und dem Endgerät des Nutzers erforderlich. Dabei werden die folgenden Informationen vom Endgerät des Nutzers an koomot übermittelt: IP-Adresse, die URL der abgerufenen Seite, die Latenz der Netzwerkverbindung, das Datum und die Uhrzeit. Diese Daten werden getrennt von anderen Daten, die der Nutzer unter Umständen zur Verfügung stellt, gespeichert.

Koomot speichert diese Daten zu folgenden Zwecken:

Loadbalancing, d.h. um die Zugriffe auf deren Inhalte auf mehrere Geräte zu verteilen und möglichst schnelle Ladezeiten bieten zu können;  
Gewährleistung der Sicherheit der IT-Systeme, z.B. zur Abwehr von konkreten Angriffen auf Systeme und Erkennung von Angriffsmustern;  
Sicherstellung des ordnungsgemäßen Betriebs der IT-Systeme, z. B. wenn

Fehler auftreten, die komoot nur durch die Speicherung der IP-Adresse beheben kann;  
bei konkreten Hinweisen auf Straftaten eine Strafverfolgung, Gefahrenabwehr oder Rechtsverfolgung zu ermöglichen.  
Die IP-Adressen der Nutzer werden dabei für einen Zeitraum von 14 Tagen gespeichert.

### Cookies

Außerdem werden folgende Cookies im Rahmen des komoot-Embeds gespeichert.

Cookies zum Speichern der Sprache des Nutzers

NewRelic Cookies zur Fehleranalyse

Diese Cookies sind für den Betrieb von komoot technisch erforderlich bzw. erforderlich, um vom Nutzer angefragte Funktionen zur Verfügung zu stellen.

Weitere Informationen finden Sie unter: <https://www.komoot.de/privacy>

## Artikel merken

„Meine Zeitung“ bietet Ihnen die Möglichkeit, sich Inhalte anzeigen zu lassen, die Sie interessieren oder die Sie sich merken wollen. Wenn Sie Ihre Lieblingsthemen ausgewählt haben, zeigen wir Ihnen aus dem gewählten Themengebieten Artikel oder die merkten Artikel an. Dazu ist ein Login erforderlich.

The legal basis for the aforementioned data processing is Art. 6 para. 1 lit. b) GDPR.

## Embeds

We use embeds, i.e., embedded content, to offer you interesting content. The respective embedding is carried out using a technical process known as framing. Framing involves simply inserting a provided HTML link into the code of a website to create a display frame on our pages, enabling the content stored on the servers of the third-party platform to be played.

This third-party content is displayed to you with your consent (Art. 6 (1) (a) GDPR).

Some of this content comes from social networks or other companies, including those in the USA. By integrating their content, cookies and similar technologies may be used by them and data may be transferred to them, including to the USA (e.g., your IP address, browser information, cookie ID, pixel ID, page accessed, date and time of access). Details on the integrated content of the individual networks or these companies, which is stored on their servers and for the provision of which your IP address is transmitted to these companies, as well as on the data processing carried out by these companies, which may also include advertising purposes, can be found in the following lines.

- **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](#).
- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland); further information on data protection can be found [here](#).
- **YouTube** (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland). Further information on data protection can be found [here](#).
- **TikTok** (TikTok Technology Ltd., 10 Earlsfort Terrace, Dublin D02 T380, Ireland); further information on data protection can be found [here](#).
- **Bandcamp**, Weitere Information zum Datenschutz finden Sie [hier](#).
- **CartoDB**, Weitere Information zum Datenschutz finden Sie [hier](#).
- **Datawrapper**, Weitere Information zum Datenschutz finden Sie [hier](#).
- **Genially**, Die Embed-Funktion von Genially ermöglicht es uns, interaktive Grafiken und andere Multimedia-Inhalte des Online-Tools Genially in unsere Seite zu integrieren. Weitere Information zum Datenschutz finden Sie [hier](#).

- **giphy**, Weitere Information zum Datenschutz finden Sie [hier](#).
- **glomex**, Weitere Information zum Datenschutz finden Sie [hier](#).
- **Google Maps** der Google Inc., [Hier](#) finden Sie nähere Informationen zu Zweck und Umfang der Datenverarbeitung durch Google und Ihre diesbezüglichen Einstellungsmöglichkeiten zum Schutz Ihrer Privatsphäre.
- **Knightlab**(Timeline JS, Juxtapose), Weitere Infomation zum Datenschutz finden Sie [hier](#).
- **Reddit**, Weitere Information zum Datenschutz finden Sie [hier](#).
- **SoundCloud**, Weitere Infomation zum Datenschutz finden Sie [hier](#).
- **Spotify** (Spotify AB, Regeringsgatan 19, SE-111 53 Stockholm, Sweden). Further information on data protection can be found [here](#).
- **Thinglink**, Weitere Infomation zum Datenschutz finden Sie [hier](#).
- **Vimeo** Vimeo Inc., 555 West 18th Street, New York 10011, USA; further information on data protection can be found [here](#).
- **yumpu**, Weitere Information zum Datenschutz finden Sie [hier](#).

## OpenStreetMaps

Die Geolokalisierung und Darstellung unserer Angebote erfolgt mittels OpenStreetMap - Deutschland. Das dazu verwendete Karten-Plugin wird von deutschen Servern geladen. Die Dazu erforderliche Verarbeitung Ihrer IP-Adresse erfolgt mit unserem überwiegenden berechtigten Interesse (Art.6 Abs.1 S.1 lit.f) DSGVO). Sie können dem Einsatz des Karten-Dienstes widersprechen, indem Sie in den Datenschutz-Einstellungen die entsprechende Einstellung vornehmen.

Informationen zur Datenverarbeitung durch OpenstreetMap - Deutschland finden Sie [hier](#).

## Comments and contributions

Wir diskutieren mit Ihnen die großen Themen des Tages. Das Tool Conversario der ferret go GmbH, Kadiner Str. 11, 10243 Berlin unterstützt uns auch bei der Moderation von Nutzerkommentaren im Rahmen unserer Social-Media-Auftritte.

Die Analyse der Nutzerkommentare dient ebenso der Sicherstellung der Einhaltung der Netiquette-Regeln in den Kommentarbereichen.

Folgende Daten werden von Conversario verarbeitet:

- Nutzernamen (bspw. Facebook Name),
- Nutzerbild,
- Kommentartext,
- Datum und Uhrzeit,
- Nutzer-ID,
- Kommentar-ID

Rechtsgrundlage für die Datenverarbeitung ist in diesem Fall Art. 6 Abs. 1 S. 1 lit. f) DSGVO und erfolgt in unserem Interesse, Verstöße gegen unsere Netiquette-Regeln im Vorfeld festzustellen und eine Veröffentlichung in diesem Fall zu unterbinden. Weitere Informationen erhalten Sie in den Datenschutzhinweisen von Conversario.

## Liveticker

Für unsere Live-Berichterstattung setzen wir Software unseres Dienstleisters storytile GmbH, Gollierstr. 70, 80339 München ein. Ihr Browser ruft den Online-Nachrichtenticker direkt von den Servern der Dienstleister auf. Bevor der Liveticker gestartet wird, müssen Sie über die vorgeschaltete Zwei-Klick-Lösung Ihre Einwilligung zu dieser Verarbeitung erteilen. Es werden Ihre IP-Adressen, Datum, Uhrzeit sowie aufgerufene URL aller Zugriffe für maximal vier Wochen gespeichert. Die Aufrufstatistiken werden anonymisiert; eine Zuordnung zu einzelnen Nutzern ist nachträglich nicht mehr möglich.

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

## Push notifications

You can sign up to receive our push notifications. We use the CleverPush service, operated by CleverPush UG (limited liability), Nagelsweg 22, 20097 Hamburg (“CleverPush”), to send our push notifications.

To sign up, you must confirm your browser's request to receive notifications. This process is documented and stored. This includes storing the time of registration and your browser ID or device ID. The collection of this data is necessary so that we can trace the processes in the event of misuse and therefore serves our legal protection.

In order to be able to display the push notifications to you, we process your browser ID and, in the case of mobile access, your device ID with your consent in accordance with Art. 6 (1) (a) GDPR.

We also evaluate the push notifications statistically to determine whether and when our push notifications were displayed and clicked on by you.

You can revoke your consent to the storage and use of your personal data for the purpose of receiving our push notifications and the statistical collection described above at any time with future effect. To revoke your consent, you can change the settings for receiving push notifications in your browser. If you use our push notifications on a desktop PC with the Windows operating system, you can also unsubscribe from our push notifications by right-clicking on the respective push notification in the settings that appear there. The unsubscription process is explained in detail at the following link: <https://cleverpush.com/faq>.

Your data will be deleted as soon as it is no longer required for the purpose for which it was collected. Your data will therefore be stored for as long as your subscription to our push notifications is active.

## Registration

Sie können sich über unsere Login-Systeme ein digitales Konto anlegen, mit dem Sie sich nach der ersten Registrierung bei allen unseren jeweiligen digitalen Angeboten anmelden können. Einige Angebote können Sie nur nutzen, wenn Sie sich ein Konto einrichten, beispielsweise

- Themen folgen

- Autoren folgen
- Artikel merken
- Anzeige der gefolgten Themen & Autoren sowie der gemerkten Themen in einer eigenen Übersichtsseiten.

Bei der Anmeldung nutzen wir Cookies in Ihrem Browser, um Sie zu identifizieren.

## Data processing in detail

The following data is processed when a digital account is created:

| Data                                  | Purpose of processing                                                                | Storage period                                                                    |
|---------------------------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| Log-in data (email address, password) | Logging in or rejecting a user                                                       | Until account deletion or after two years if not used if not used after two years |
| Master data                           | Personal address                                                                     | Until objection                                                                   |
| Pseudonymous identifier               | Link between user account and subscriber data and recognition of a user              | Until end of contract                                                             |
| Opt-in data                           | Securing system operation and identification of the e-mail address                   | Three years                                                                       |
| Subscription data                     | Query of reading authorisation                                                       | Until end of contract                                                             |
| Identification numbers                | Prevention and analysis of misuse                                                    | Seven days                                                                        |
| Usage data                            | Further development and optimisation of our digital products and subscription offers | Until revocation                                                                  |

The legal basis for the aforementioned data processing is Art. 6 para. 1 lit. b) GDPR.

Die Löschung Ihres digitalen Kontos können Sie unter [leserservice@verlagsgruppe-hcs.de](mailto:leserservice@verlagsgruppe-hcs.de) beauftragen. Sie können dann keine anmeldepflichtigen digitalen Dienste mehr nutzen. Wenn Sie noch digitale Abonnements bei uns haben, für die ein digitales Konto erforderlich ist, kann dieses Konto aus rechtlichen Gründen nicht vor Ende der vereinbarten Abo-Laufzeit gelöscht werden. Wenn Sie Ihr digitales Konto löschen, ersetzt das nicht die schriftliche Kündigung eines digitalen Abos. Wenn Sie als Abonnent der gedruckten Ausgabe ein digitales Konto bei uns haben, können Sie Ihr digitales Konto löschen oder dies beauftragen, verzichten dann aber auf die damit verbundenen Funktionen wie den Online-Aboservice.

Wenn Sie sich später wieder für ein digitales Konto registrieren wollen, ist dies jederzeit möglich.

### **“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.

### **Sharing content**

You have the option of recommending content on our websites via the buttons placed on the content; on mobile devices via the native sharing function. We provide the social networks with content - and no personal data - that is used exclusively to display content. If you use the buttons, we merely link to the page of the respective social media provider. We do not process any of your personal data.

# 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.

## Reach measurement

Our website uses the multi-stage measurement method “INFOnline Measurement” from INFOnline GmbH (NFOnline GmbH, Brühler Str. 9, D-53119 Bonn) to determine statistical parameters (page impressions, visits, technical clients) relating to the use of our digital offering. The aim of usage measurement is to statistically determine the number of visits to our website, the number of website visitors, and their surfing behavior—based on a uniform standard procedure—and thus obtain market-wide comparable values. The purpose of data processing is therefore to generate digital performance values (page impressions, visits, and technical clients) in order to be able to track and verify the use of our offerings.

As a member of the Informationsgemeinschaft zur Feststellung der Verbreitung von Werbeträgern e.V. (IVW), usage statistics are regularly updated by the IVW with “page impressions” and “visits” in the IVW report.

As a participant in the agof study “daily digital facts,” the usage statistics of our digital offerings are regularly collected by the Arbeitsgemeinschaft Online-Forschung e.V. (Working Group for Online Research) and the Arbeitsgemeinschaft Media-Analyse e.V. (Working Group for Media Analysis) and published with the “unique user” metric.

Due to the nature and volume of the data collected by INFOnline Measurement, it is not possible to clearly assign a user to a specific person. A JavaScript code (known as a “measurement manager”) is used which, when called up via the user's browser or end device (client), automatically

integrates and executes the necessary measurement sensors for anonymous and/or pseudonymous data processing to determine the key figures, based on the consent information from our Consent Management Platform (CMP). INFOnline Measurement is designed as an anonymous system (without customer identification) and as a pseudonymous system (with customer identification).

### **Type of data**

Due to the type and volume of data, the data collected with INFOnline Measurement does not allow a user to be clearly assigned to a specific person. A JavaScript code (known as a “measurement manager”) is used which, when called up via the user's browser or end device (client), automatically integrates and executes the necessary measurement sensors for anonymous and/or pseudonymous data processing to determine the key figures based on the consent information from the consent management platform (CMP) used by the provider for the digital offering. INFOnline Measurement is designed as an anonymous system (without customer identification) and as a pseudonymous system (with customer identification).

### **Anonymous census procedure (IOMb)**

In the anonymous census procedure (IOMb), no personal data are processed, in particular not the IP address. The IP address is completely removed from communication and processing. For this purpose, a communication interface, the so-called “service platform”, acts as the measurement end point and prevents the user's IP address from being exchanged with the INFOnline systems in the context of INFOnline measurement. The IP address, as personal data, is discarded on the service platform during the counting process before the measurement request is forwarded to INFOnline. No geolocation takes place via the IP address. The data record generated in the census procedure consists solely of PI data collection.

### **Pseudonymous measurement procedure (IOMp)**

In the pseudonymised measurement method (IOMp), the following data are collected using the 3rd-party cookie “i00” (ioam.de) and the 1st-party cookie “ioma2018”, which constitutes personal data within the meaning of the GDPR:

- IP address

On the internet, every device requires a unique address for the transmission of data, the so-called IP address. The storage of the IP address, at least for a short period of time, is technically necessary due to the way the internet functions. Before any processing takes place, IP addresses are shortened by 1 byte and only further processed in anonymised form. The unshortened IP addresses are not stored or processed.

- A randomly generated client identifier

For the purpose of reach measurement, unique identifiers of the end device are used to recognise computer systems, namely a “local storage object” (LSO) or a “fingerprint” created from various pieces of information automatically transmitted by your browser. This identifier is unique for a browser as long as the cookie or local storage object is not deleted. Measuring the data and subsequently assigning it to the respective identifier may also be possible when you access other websites that likewise use INFOnline GmbH’s pseudonymous measurement method.

The following unique identifiers may be transmitted to INFOnline GmbH as a hash:

- truncated client IP or X-Forwarded-For (XFF)
- user agent (as a hash)

Personal data within the meaning of the EU GDPR are used for measurement only to the extent that JavaScript is deployed in relation to a user who has been assigned an individual IP address and a randomly generated client identifier for the retrieval of web content.

## **Anonymous measurement procedure (IOMa)**

The anonymous measurement procedure (IOMa) uses a measurement sensor (JavaScript) that calculates the metrics in the user’s browser (LocalStorage (LSO)), encrypts them automatically, and transmits the aggregated usage data to a communication interface, the so-called “service platform”. On the service platform, the identifiers required for internet communication (e.g. the client’s IP address) are removed, and the encrypted, anonymised measurement data are enriched with geolocation information and transmitted to the central server component at INFOnline.

If the collected measurement data are enriched with a geolocation of the browser, an IP address is likewise used only for the purpose of determining the geolocation and enriching the collected measurement data. Any IP address required for this is discarded immediately after the enrichment.

During the implementation phase of IOMa, a 1st-party cookie is used to store the timestamps (Unix epoch timestamp) of the most recent use per service and per page code. These values are added as a benchmark for the creation of time-based metrics, such as the visit when switching the HTTP origin. No further personal data/IDs are stored in the cookie. After the implementation phase, it should then be deleted so that measurement is carried out entirely without cookies.

Personal data within the meaning of the GDPR are used for measurement only to the extent that JavaScript is used in relation to a user who has been assigned an individual IP address for retrieving web content.

Accordingly, by using the anonymous measurement procedure (IOMa) in INFOnline Measurement, we do not permanently process any personal data about you.

### **Use of data**

The measurement procedure used on this website by INFOnline GmbH collects usage data. This is done in order to determine the performance metrics Page Impression, Visit and Client.

- **Geolocation**

In the pseudonymised measurement procedure (IOMp) and in the anonymised measurement procedure (IOMa), the assignment of a website visit to the place of access is based exclusively on the anonymised IP address and only down to the geographical level of federal states/regions. It is in no case possible to infer a user's exact place of residence from the geographical information obtained in this way.

- **Cross-service aggregation of usage data**

The usage data of a technical client (e.g. a browser on a device) are collected in the pseudonymised measurement procedure (IOMp) and stored in a database.

### **Duration of data storage**

The full IP address is not stored by INFOnline GmbH. The IP address is used

only to receive the data packets and is then shortened by 1 byte. In the census procedure (IOMb), the shortened IP address is discarded; in the pseudonymous (IOMp) and anonymous procedures (IOMa), the shortened IP address is stored for a maximum of 60 days. In the pseudonymous (IOMp) and (IOMa) procedures, the usage data are stored in connection with the unique identifier for a maximum of 6 months.

The validity of the “i00” cookie used in the pseudonymous procedure (IOMp) and of the “ioma2018” cookie on the user’s end device is limited to a maximum of 1 year.

### **Legal basis**

Measurement using INFOnline Measurement (pseudonymous system: IOMp) and measurement using INFOnline Measurement (anonymous system: IOMa) is carried out on the basis of your consent.

## **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.

## Matomo

We use the Matomo web analytics platform to analyze visitor data. This serves to optimize our products based on our legitimate interest, Art. 6 (1) (f) GDPR. For this purpose, the following usage information is transmitted to our server and stored for analysis purposes:

- User IP address (with 2 bytes anonymized)
- Date and time of retrieval
- URL of the page accessed (Page URL)
- URL of the page that was accessed before the current page (referrer URL)
- Screen resolution used
- Time in the local user's time zone
- User location: country, region, city, approximate latitude and longitude (geolocation)
- User agent of the browser used (user agent header): Based on the user agent, we use our Universal Device Detection Library to identify the browser, operating system, device used (desktop, tablet, mobile phone, TV, car, console, etc.), brand, and model.
- Random unique visitor ID
- Time of this user's first visit
- Time of this user's last visit
- Number of visits by this user
- Site search
- Goals

## Google Analytics

### 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 serves to assign analytics information to a device in order to determine which content users have accessed within one or more usage processes, which search terms they have used, whether they have accessed this content 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 end devices and browsers. In the process, pseudonymous profiles of users are created with information from the use of different devices, and cookies may be used.

Google Analytics does not log or store individual IP addresses for EU users. However, Analytics provides approximate geographic 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 traffic, IP address data is used exclusively for this derivation of geolocation data before it is immediately deleted. It is not logged, is not accessible, and is not used for any further purposes. When Google Analytics collects measurement data, all IP queries are carried out on EU-based servers before the traffic is forwarded to Analytics servers for processing. The retention period for the data is 14 months (this concerns data at user and event level). Aggregated data is anonymized and is not deleted.

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

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.

- Campanero, a division of DRID Kommunikation und Design GmbH, Arnoldstraße 16, 22765 Hamburg. All data is stored on DRID's servers hosted by Host Europa; you can find information about their privacy policy [here](#).

## 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 you request quotes

## 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 fulfillment 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.

## **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.

- per Mail an [datenschutz@kurier.de](mailto:datenschutz@kurier.de)
- schriftlich an die Nordbayerischer Kurier Zeitungsverlag GmbH, An der Feuerwache 5, 95445 Bayreuth oder [kundenservice@kurier.de](mailto:kundenservice@kurier.de) (bitte Mailadresse und den Namen von der Registrierung angeben)
- oder telefonisch über 0921 / 294-294
- durch einen Klick auf den Abmelde-Link am Ende der Mail

## **Marketing for own products**

In order to show you adverts for our own products, we use the services of advertising partners or cooperate with advertising partners and advertising networks (remarketing). These use cookies, pixels or similar technical means to display and analyse advertisements.

Adverts can be adapted to the respective user, for example by using information from the browser on usage (such as pages visited, visiting times, length of stay). User-specific adverts are also possible. In addition, analyses of reach or for billing purposes can be carried out in pseudonymised form. The details of the services used, co-operation partners and individual objection options are presented below.

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

You can obtain an overview of all the tools and cookies we use as well as a cancellation option by clicking on Data protection settings.

## **Google Ads advertising and remarketing**

To draw attention to our offers, we place adverts in the Google search network and advertising banners in the Google display network (banners on third-party websites) and use the conversion measurement and remarketing of Google Ads and Analytics. We can combine adverts with search terms or use individual adverts to advertise products and services that you have viewed on our site. With Ads remarketing lists, we can optimise search and display campaigns if you have already visited our site. With conversion measurement, we see the success of interest-based advertising in the Google search network and advertising banners in the Google display network (banners on third-party websites) based on the analysis of user behaviour for more targeted advertising.

For this interest-based advertising, Google analyses your user behaviour with cookies that are set when you click on ads or visit our websites. We and Google then receive information that you have clicked on an advert and have been forwarded to us. Based on these evaluations, we can recognise which of the advertising measures used are particularly effective and can optimise them as a result.

The statistics that Google provides us with include the number of users who have clicked on one of our adverts and show which of our websites you have been redirected to. We can also target you more specifically if you have already visited our website. We can also track which search terms were clicked on particularly often and which adverts lead to the purchase of a subscription, for example.

Due to the marketing tools used, your browser automatically establishes a direct connection with the Google server. We have no influence on the scope and further use of the data collected by Google through the use of this tool and therefore inform you according to our level of knowledge: Through the integration of Ads Advertising, Google receives the information that you have called up the corresponding part of our website or clicked on an advert from us. If you are registered with a Google service, Google can assign the visit to your account. Even if you are not registered with Google or have not logged in, it is possible that the provider will find out your IP address and store it.

You can also find more information on this in the notes on website statistics and in the data protection provisions of [Google](#).

You can prevent this technology by disabling the use of cookies via your browser settings, deselecting individual types of ads in Google's ad settings,

disabling interest-based ads on Google or disabling cookies from advertising providers with the help of the respective deactivation help of the network advertising initiative. We and Google will then only receive statistical information on how many users have visited a page and when. This can only be prevented by appropriate browser extensions.

## **Conversion measurement**

To find out whether and how effective our adverts are for our own products, we use conversion measurement by embedding a conversion tracking tag or code snippet in our digital products. When you view our adverts, a temporary cookie is stored on your computer or mobile device. As soon as you complete an action, our system recognises the cookie and we record a conversion.

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

## **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   |
| End devices              | Correct delivery of the newsletter                 | Consent                    | until revocation   |

\*Voluntary information

## Competitions

Für die Teilnahme an Gewinnspielen ist es mitunter erforderlich, dass Sie sich

- registrieren,
- die Teilnahmebedingungen akzeptieren und
- den Datenschutz-Hinweis lesen.

Bei der Auslobung von (Sach-)Preisen werden insbesondere nach Ende des Gewinnspiels von den Gewinnern weitere persönliche Daten benötigt, wie etwa die Anschrift, um diese im Falle des Gewinns benachrichtigen und den Gewinn übermitteln zu können.

Die Erfassung und Verarbeitung der personenbezogenen Daten dient zur Durchführung des jeweiligen Gewinnspiels und der Quizze sowie gegebenenfalls zur Zusendung von Gewinnen. Die Daten werden mit Ihrer Einwilligung verarbeitet (Art. 6 Abs. 1 S.1 lit. a) DSGVO), bei Gewinnspielen nach Art. 6 Abs. 1 S.1 lit. b) DSGVO. Sämtliche Daten werden für den Zweck und für die Dauer des Gewinnspiels gespeichert und nach Ablauf der Aktion gelöscht, sofern keine gesetzlichen Aufbewahrungspflichten bestehen. Der Benutzername, der in den Highscores/Bestenlisten veröffentlicht wird, wird nur auf Widerruf gelöscht.

Ihre Daten werden gegebenenfalls an unsere Gewinnspiel-Dienstleister und Sponsoren im Rahmen der Teilnahmebedingungen weitergegeben, denen Sie zugestimmt haben, und gelöscht, sofern diese nicht mehr erforderlich sind.

Weitere Einzelheiten im Zusammenhang mit dem jeweiligen Gewinnspiel entnehmen Sie bitte den Teilnahmebedingungen.

Sie haben das Recht, erteilte Einwilligungen gemäß Art. 7 Abs. 3 DSGVO mit Wirkung für die Zukunft zu widerrufen unter [leserservice@verlagsgruppe-hcs.de](mailto:leserservice@verlagsgruppe-hcs.de).

## 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](#).
- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland); further information on data protection can be found [here](#).
- **TikTok** (TikTok Technology Ltd., 10 Earlsfort Terrace, Dublin D02 T380, 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](#)
- **X** [Optout](#)
- **TikTok** [Optout](#)

## When third parties advertise their products with

us

Um unsere digitalen Angebote zu refinanzieren, vermarkten wir unsere Werbeflächen - über unsere Vermarktungsdienstleister aber auch über

### Dritte.

Eine Übersicht der Dritten und wie diese Ihre Daten zu welchem Zweck verarbeiten, finden Sie in den Datenschutz-Einstellungen im Footer der Website.

## **Self-marketing of adverts**

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

Folgende Vermarkter setzen wir ein:

- Seeding-Alliance GmbH, c/o Ströer, Gustav-Heinemann-Ufer 74b, 50968 Köln
- RP Digital GmbH, Zülpicher Straße 10, 40549 Düsseldorf
- Taboola Inc., Oneustonsq, 40 Melton Street, 13th Floor, London, NW1 2FD

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 gemeinsamen 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.

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.

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.

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Das von Welect erstellte Cookie bleibt gespeichert, bis Sie es aus Ihrem Browser löschen, höchstens jedoch für zwei Wochen über die letzte Inanspruchnahme des Dienstes hinaus. Ihre IP-Adresse wird Welect zufolge nach der oben beschriebenen Verarbeitung nicht gespeichert. Die Rechtsgrundlage für diese Datenverarbeitung ist Wahrung des berechtigten Interesses nach Art. 6 Abs. 1 S. 1 lit. f DS-GVO. Dieses berechtigte Interesse von Welect liegt in der korrekten Abrechnung gegenüber Werbetreibenden.

## What else you should know

### Controller

Verantwortlicher im Sinne der DSGVO ist die

**Nordbayerischer Kurier Zeitungsverlag GmbH**

An der Feuerwache 5

95445 Bayreuth

### 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.

**[datenschutz@kurier.de](mailto:datenschutz@kurier.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.

## 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.                      | Target group advertising            | Art. 6 para. 1 a GDPR |

| Data                                                                                                                                                              | Purpose | Legal basis |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------------|
| without personal reference (e.g. page activities, page views, page previews, likes, recommendations, posts, videos, page subscriptions incl. origin, time of day) |         |             |

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>

## **Privacy policy for applicants**

Here you will find information about the processing of your personal data if you have applied to our company.

## **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.