

Süddeutsche Zeitung

Privacy policy

27.02.2025

If you use an digital offer of the Süddeutsche Zeitung as a SZ Plus subscriber, the Süddeutsche Zeitung GmbH processes your personal data. With this data protection notice, we inform you how and why we process your data and how we ensure that it remains confidential and is protected. If you are a printed SZ subscriber, you will find the relevant data protection notices of then relevant data processing under Fulfillment of contracts, Communication and Promotion & Marketing.

If you use SZ.de by concluding a contract with advertising after accessing the website, you will find the data protection information applicable in this case here.

We take data protection very 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 you have provided this data voluntarily. We also use technical and operational safeguards to protect your data from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. We review and modernize these precautions on a regular basis.

Data protection at a glance

What data do we collect from you?

- Inventory data (e.g. names, addresses)
- Contact data (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 contract, term)
- Utilization data (e.g. web pages visited, interest in content, access times)
- Meta/communication data (e.g. device information, IP addresses)

How do we collect your data?

We automatically collect the data that is generated when you access our digital offerings. Otherwise, we collect data on the basis of your input or communications or through the use of cookies or similar technologies.

What do we use your data for?

Providing the content

- Cookies and similar technologies

- Technical deployment and security
- Essential technology
- Articles as a gift
- Bookmark articles and Meine SZ
- Comments and contributions
- Embeds (video, audio, map services, Twitter, Instagram, etc.)
- Games
- Liveticker
- Login
- Personalized customer approach
- Podcasts
- Push notifications
- Sharing content

Product optimization

- Further development of user-friendliness
- Usage analysis
- SZ personalization
- Surveys

Fulfillment of contracts

- Purchase orders
- Events

Communication

- Contact and communication

Promotion & Marketing

- Direct marketing
- Self-promotion
- Conversion measurement
- Newsletter
- Raffles and quizzes
- Company presence in the social media

Third party advertising

- Self-advertising of ads
- Third party advertising

Do we share your data?

If you have consented or if we are otherwise legally authorized to do so, we will share your personal data with service providers (e.g. hosting, marketing, sales partners) for the above purposes. In such cases, we strictly comply with the legal requirements and, in particular, conclude appropriate contracts or agreements that serve to protect your data with the recipients of your data.

We may transfer personal data to other companies within our group of companies or grant them access to this data. Insofar as this transfer is for administrative purposes, the transfer of data is based on our legitimate corporate and business interests or is conducted insofar as it is necessary for the fulfillment of our contract-related obligations or if the consent of the data subjects or a legal permission exists.

Do we transfer data to third countries?

In order to use our digital offerings, it may be necessary to transfer certain personal data to third countries, i.e. countries in which the GDPR is not applicable law. However, we only permit processing of your data in a third country if the special requirements of Art. 44 GDPR and consequently the guarantee of an adequate level of data protection in the country are met. This means that the third country must either have an adequacy decision from the European Commission or appropriate safeguards pursuant to Art. 46 GDPR or one of the requirements of Art. 49 GDPR. **Unless otherwise stated below, we use as appropriate guarantees the applicable Standard Contractual Clauses for the transfer of personal data to processors in third countries.**

How do we protect your data?

In order to protect your privacy and to ensure a level of protection appropriate to the risk, we take technical and organizational measures. We take these measures in accordance with the legal requirements, considering the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the different probabilities of occurrence and the extent of the threat to the rights and

freedom of natural persons, which are reviewed and adapted on a regular basis. The 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 are not observed by other persons or institutions not within our sphere of responsibility. In particular, data disclosed unencrypted - e.g., if this is done by e-mail - can be read by third parties. We have no technical influence on this.

When do we delete your 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, if necessary, we must continue to store your data until the expiry of the retention obligations and periods issued by the legislator or supervisory authorities, which may result 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; in individual cases, however, up to 30 years), insofar as this is necessary for the assertion, exercise or defense of legal claims. After that, the corresponding data will be deleted.

What are your rights?

- Information
- Deletion
- Correction
- Objection

You can contact the data protection officer with your request by mail or e-mail, swmh-datenschutz@atarax.de, with your request.

This privacy notice will be adjusted from time to time. The date of the last update can be found at the beginning of this information.

Privacy settings

You can obtain an overview of all the tools and cookies we use as well as a withdrawal option by clicking on Privacy Settings in the footer of the respective website.

In the following, you will receive data protection information in detailed form.

Providing the content

Cookies and similar technology

We use cookies and similar technologies to provide you with the best experience when using our digital offerings and to help fund us. We use them i.a. für ensuring functionality, for IT security and fraud prevention, usage analysis in order to be able to optimize the products and for marketing and advertising.

For an overview of the technologies used and withdrawal or objection options, click on Privacy Settings in the footer of the website you are visiting.

If cookies, device identifiers or other personal data are stored or accessed on your terminal for processing operations, this is in accordance with the legal basis stated in Art. 6 of the General Data Protection Regulation.

In order to be able to provide the telemedia service you expressly requested, we also take into account the regulations in Section 25 Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz (TDDDG) and, in particular, on absolute necessity in accordance with Section 25 (2) No. 2 TDDDG.

Technical deployment and security

When you use our offerings, we automatically use absolutely necessary technologies to enable the usability of the functions provided and to ensure the security and stability of our offer:

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

The processing of the IP address is absolutely necessary to enable the delivery of our offerings to your end device and to measure the efficiency and performance of our offerings. Usage profiles are not created in the process. Our servers store your IP address for up to seven days for the purpose and interest of being able to guarantee the security of our offer. The other data is deleted after 30 days.

Account takeover for troubleshooting

If you contact us about an error in the operation of our digital offering, we can temporarily take over your SZ account to identify and rectify the error so that we can trace the error and rectify it more quickly. This is only necessary for a few minutes in order to obtain information about the version, operating system, etc..

The legal basis for the data processing operations is our legitimate interest.

Essential technology

We cannot do without certain cookies and similar technologies, as they are indispensable for our telemedia service and business model - as requested by the user. In addition to data, we need to provide and ensure functionality and security. The following tools and cookies are essential technologies.

The legal basis for the data processing operations is our legitimate interest.

Paid content model

We have introduced a payment model for our online content, i.e., the content on our websites and apps is only provided in return for payment. On the one hand, use requires the conclusion of a contract, whereby the user has the choice of either paying a sum of money for a digital subscription or providing data. On the other hand, our paid content model provides that initially selected content or a certain number of articles can be accessed without prior conclusion of a subscription (so-called metering model) and subsequently the content is restricted and only made available upon payment of a monetary amount or conclusion of a paid subscription. In addition, access to individual, exclusive "Plus" articles is granted only to subscribers.

The setting of cookies is absolutely necessary for this function, as otherwise it would not be possible for paying customers to access paid journalistic content.

If you have registered with us via login, these reading permissions are associated with the personal data in your user account.

Piano Composer

Name	Purpose	Duration	Tyoe
xbc	Controlling the paid content model	2 years	Cookie
_tbc	Identification of the user's browser; contains encrypted browserId,	2 years	Cookie

Name	Purpose	Duration	Type
	userId, isNew-Flag		
_tac	Access token containing an encrypted payload with current permissions; updated when a user's access status changes (login, conversion, expired access permissions, cookie deletion)	90 days	Cookie
_tae	Zeitstempel des Ablaufs für _tac; zeigt an, wann der _tac-Cookie zuletzt aktualisiert wurde.	2 years	Cookie
_tp-customVariables	During a payment: redirection to and from a 3D-Secure bank page	2 days	local storage
_tp-customVariables-expiration	During a payment: redirection to and from a 3D-Secure bank page	2 days	local storage

Google Tag Manager

The Google Tag Manager service is an organizational tool and allows us to control services. The tool only uses the IP address to connect to the server and to function technically. Otherwise, no personal data is processed by way of the tool itself. The Tag Manager ensures that other services are only executed if the conditions (tags) set in the Tag Manager are met for them. In this way, we ensure that, for example, tools that require consent are only loaded after you have given your consent. The Tag Manager does not access the data processed by the tools.

Sourcepoint

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 sets cookies that are absolutely necessary in order to query the consent status and thus to be able to play out corresponding content.

Cookie	Purpose	Duration	Type
consentUUID	UniqueUserID to store the consent status of the user	12 months	Cookie
_sp_su	Marking of users for the sample of the reporting of the consent rates	12 months	Cookie
_sp_user_consent	UUniqueUserID to retrieve the user's consent status stored in our database when needed	12 months	local storage
_sp_local_state	Determine if a user has seen	12 months	local storage

Cookie	Purpose	Duration	Type
	the Consent banner so that it is shown only once		
_sp_non_keyed_local_state	Information about the metadata and the UniqueUserID of the user	12 months	local storage

We use the cookie authId in order to not lose the Consent status and to prevent a renewed Consent request. In order to be able to pass on the Consent settings for logged-in users across domains and products, this cookie is absolutely necessary.

Podcasts on Spotify

For podcasts that we offer to SZ Plus subscribers on Spotify, it is necessary to secure the communication with Spotify during the login process. For this purpose, we set the spotify-oauth-state cookie for one day.

Datawrapper

We use Datawrapper (Datawrapper GmbH, Raumerstraße 39, 10437 Berlin) to create interactive charts from statistics. We do not store any personal data and do not perform any tracking. For embedding and display absolutely necessary are the transmission of the IP address, which is used only for the provision of the service, and a cookie. This data is only required for the technical implementation of the embedding and is deleted from all systems after a maximum of 24 hours.

Kilkaya

For live analysis of the performance of our articles we use the analysis script of the company Kilkaya (Kilkaya AS, Åsveien 3, 1424 Ski, Norway). Kilkaya is an analytics tool designed specifically for news sites with high traffic, and helps us optimize and prioritize our pages and articles. Kilkaya does this by

capturing all traffic metrics in real time, such as page views, clicks, time spent on pages, unique users. The tool uses the IP address to connect to the server and to function technically. To count unique users, we use a user ID. No other data is linked to this ID, so you cannot be identified personally.

Name	Purpose	Duration	Type
_k5a	Analysis of article views	12 months	Cookie

Deliver ads

In order to play the ads on our digital offers in the correct size and in a format supported by your device and to be able to redirect you to the corresponding target page when you click on the ad, your IP address and information about your device type are processed by us, by our advertising marketers and by the respective third-party provider. This is an absolutely necessary technology, which is shown in the Cookie Policy under the special category "Provide ads or content technically".

We use the ad server of Xandr for this purpose, with which we play out non-user-based ads without tracking tools. The cookie from adnxs.com is used here.

Name	Purpose	AdServer	Type
adnxs	Provide ads technically	Xandr	Cookie
szdm_uxid	Provide ads technically	AdSpirit	Cookie

VG Wort

We use technology from the Verwertungsgesellschaft Wort (VG Wort, Rechtsfähiger Verein kraft Verleihung, Untere Weidenstraße 5, 81543 Munich, Germany) to measure accesses to texts in order to record the likelihood of individual texts being copied. Many of our pages are therefore equipped with JavaScript calls through which we report the accesses to the VG Wort. In this way, we enable our authors to participate in the

distributions of the VG Wort, which ensure the statutory remuneration for the use of copyrighted works in accordance with § 53 UrhG.

The access count measurement is carried out by Kantar Germany GmbH (Landsberger Str. 284, 80687 Munich) according to the Scalable Central Measurement Method (SZM). It uses either a session cookie or a signature created from various automatically transmitted information from your browser to recognize computer systems. In the session cookie, a randomly generated unique identification number is stored, a so-called session ID. In addition, a cookie contains information about its origin and the storage period. IP addresses are only processed in anonymized form.

Adobe Typekit Web Fonts

We use Adobe Typekit from Adobe for uniform presentation. The provider is Adobe Systems Incorporated, 345 Park Avenue, San Jose, CA 95110-2704, USA (Adobe).

When you access this website, your browser loads the required fonts directly from Adobe in order to display them correctly on your device. In doing so, your browser establishes a connection to Adobe's servers in the USA. This gives Adobe knowledge that this website has been accessed via your IP address. No cookies are stored when the fonts are provided.

The legal basis for this data processing is your consent (Art. 6 para. 1 lit. a) GDPR). Consent can be revoked at any time.

The data transfer to the USA is based on the existing adequacy decision and the standard contractual clauses of the EU Commission. Adobe is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link

<https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000TNo9AAG&status=Active>

You can find more information about Adobe Fonts at

<https://www.adobe.com/de/privacy/policies/adobe-fonts.html>.

You can find Adobe's privacy policy at
<https://www.adobe.com/de/privacy/policy.html>

Bookmark article and Meine SZ

"My SZ" offers you the possibility to display content that interests you or that you want to remember. If you have selected your favorite topics, we will show you articles from the selected topics or the articles you have bookmarked. A login is required for this.

This data processing is necessary for the fulfillment of a contract.

Articles as a gift

As a Plus subscriber you have the possibility to give away Plus articles. If you click on the "Give away article" link for the respective article, we link your UserID to the gift link and save this date so that we can limit the number of articles given away and prevent misuse of this function. This data processing is based on our overriding legitimate interest to enable you to make a gift to a third party (Art. 6 para.1 p.1 lit. f) GDPR). The date is automatically deleted after one week.

As a donee who has received the gift link, you must register with us or log in (login) to be able to read the donated article. We store the UserID generated during registration for one year so that we can assign the gift to you and you can always call up the article again during this period. In addition, we set a cookie with the article ID to enable you to read the article and to be able to exclude misuse and ensure performance. The setting of the cookie is absolutely necessary (§25 TDDDG) and the associated data processing is based on our overriding legitimate interest (Art. 6 para.1 p.1 lit.f) GDPR).

Review of the year with AI

When you enter a question, our SZ AI tool searches for suitable articles in the SZ article database, selects the five articles that best match the question and passes these together with the question to the language model (LLM, the

actual AI). The LLM generates the answer exclusively from these articles. To improve the quality of future answers, we train the LLM with the questions you enter and the answers it receives. There is no personal reference here.

In order to be able to block requests that intentionally overload the system and to block users who deliberately want to force the AI to generate unethical or criminal statements, we analyze the questions entered and answers generated with the help of your SingleSignOn-ID (SSO-ID) based on our overriding legitimate interest (Art. 6 para.1 s.1 lit.f) GDPR) in protection against misuse. The SSO ID will be deleted after the purpose has been achieved, at the latest after four months.

Comments and contributions

In online comments, you can question the opinions of our authors, exchange arguments and provide further information for the dialog. To express opinions, you must be a subscriber to SZ Plus, have an SZ account and log in via our login (see [Registration and Login](#)). All users can read comments - even if they are not SZ Plus subscribers.

To enable you to comment, we use your name and a UID as well as your e-mail address to identify you as a user. We also use your e-mail address so that you receive notifications from the community. When you publish a comment you have written, your full name stored in your SZ account will be published in the comment field on SZ.de. Please note that this can also be found on the Internet, for example, by search engines.

We collect and process the data you provide in order to be able to publish your comment as requested. The data processing is necessary for the fulfillment of the contract. In particular, we also need your e-mail address in order to contact you in the event of objections to your comment or message and to give you the opportunity to comment. The data processing is necessary for compliance with a legal obligation to which the controller is subject.

The tool also supports us in moderating user comments also within the framework of our social media presences. The analysis of user comments also serves to ensure compliance with netiquette rules in the comment areas.

The following data is processed by Conversario:

- User name (e.g. Facebook name),
- user picture,
- comment text,
- date and time,
- user ID,
- comment ID

The legal basis for data processing in this case is our legitimate interest and is done in our interest to detect violations of our netiquette rules in advance and to prevent publication in this case. For more information, please see [Conversario's privacy policy](#).

If you have previously published comments with a user name of your choice, we will use your name in the future for new comments as well as for your previously published comments, provided that you have previously consented to this data processing. You can withdraw this consent at any time at debatte@sz.de. You also have the option of deleting your comments already published with your user name under "My comments" should you not wish the full name to be displayed.

If you do not consent to the use of the full name, your previous comments will continue to be published under your user name. You will not be able to publish new comments.

You can change your data and delete them together with your comments by logging into the comment function and making the desired changes under Profile/Settings. There you also have the possibility to download your comment archive.

Embeds

We use embeds to provide you with content of interest. The respective embedding is performed by the technical procedure of so-called framing. Framing is the process of simply inserting a provided HTML link into the code of a website to create a playback frame on our pages, thereby enabling playback of the content stored on the third-party platform's servers.

This third-party content is loaded subsequent to your consent.

Some of such content also originates from social networks or other companies in the USA. By integrating their content, cookies and similar technologies may be used by them and data may also be transmitted to them

in 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 taking place at these companies, which may also include advertising purposes, can be found in the following lines.

You can withdraw your consent in the privacy settings.

- **Bayerischer Rundfunk** (BR, Anstalt des öffentlichen Rechts, Rundfunkplatz 1, 80335 München); further informationen about privacy you can find [here](#).
- **Meta Platforms Ireland Limited** (4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland); further informationen about privacy you can find [here](#).
- **Instagram** (c/o Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland), further informationen about privacy you can find [here](#).
- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland); further informationen about privacy you can find [here](#).
- **Spotify** (Spotify AB, Regeringsgatan 19, SE-111 53 Stockholm, Schweden), further informationen about privacy you can find [here](#).
- **Youtube** (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland), further informationen about privacy you can find [here](#).

Liveticker

In our live ticker from tickaroo (Tickaroo GmbH, Waffnergasse 8, 93047 Regensburg, Germany), you have the option to select a sport to display news about it. Your browser calls up the online news ticker directly from the servers of tickaroo. Your IP address, date, time and URL of all accesses are stored for a maximum of four weeks and anonymized call statistics are created. For the statistics, a random token is generated in the browser, stored as a cookie and sent with each ticker call.

The storage of and access to information in your device are absolutely necessary and take place according to § 25 para. 2 TDDDG.

The legal basis for the data processing operations is our legitimate interest.

Podcasts

We have commissioned service providers to play out and display podcasts and videos and to integrate their services and tools into our digital offerings on our behalf. In the process, the IP address and device information are processed for the technical provision of these services as well as the collection of statistical data such as retrieval figures. This data is anonymized or pseudonymized before it is stored in the database, unless it is required for the provision of the podcasts.

The legal basis for the data processing operations is our legitimate interest.

Third-party advertisements and ads are played in the podcasts if you have previously consented to this data processing.

Personalized customer approach

In order to play out special content or offers tailored to the interests of target groups on our websites and in the apps, we analyze the behavior of our users, i.e., we monitor individual browsers and thus the behavior of users only on the SZ websites and in the SZ apps. From this data, we create reports on the use of the website and apps. We store either the 20 most recently read articles or the behavior in the last 30 days in order to display appropriately adapted content, i.e. if users have consumed two articles on the same topic within 30 days, we display content or an offer that matches this topic.

For this purpose, we collect contextual data, i.e. data about the content (article) itself. Only with your consent do we set a cookie with a unique identifier so that we can analyze where and when you actually consumed the content, and so that we can then assign you to user segments with at least five users. We use the user segments for a personalized customer approach, i.e. one that corresponds to the criteria of the segment, by playing out special content and offers via a user segment ID.

For this purpose, we use software from our service provider Piano (Drammensveien 165, 0277 Oslo, Norway), which enables us to perform the following functionalities

- A/B tests to be able to check which content leads to more customer loyalty or subscriptions or purchases,
- the detection of an adblocker status.

We use the Piano Composer software of the service provider Piano (Drammensveien 165, 0277 Oslo, Norway) to control these digital reading rights.

Name	Purpose	Term	Type
xbc	User ID to analyze user behavior (we store either the 20 most recently read articles or behavior in the last 30 days) in order to perform segmentation and display a specific offer or appropriately adapted content	2 years	Cookie
_tbc	User's browser identification; contains encrypted browserId, userId, isNew flag	2 years	Cookie
_tac	access token containing encrypted payload with	90 days	Cookie

Name	Purpose	Term	Type
	current permissions; updated when user's access status changes (login, conversion, expired access permissions, cookie deleted)		
_tae	expiration timestamp for _tac; indicates when the _tac cookie was last updated.	2 years	Cookie
_tp-customVariables	During a payment: redirect to a 3D Secure Bank page	2 days	Local storage
_tp-customVariables-expiration	During a payment: redirection to and from a 3D Secure Bank page	2 days	local storage

Push notifications

You can sign up to receive our push notifications. To send our push notifications, we use the dispatch service of the company ethinking GmbH, Rosenstr. 19, 10178 Berlin.

You will regularly receive the latest notifications via our push notifications. To sign up, you must confirm your browser's query to receive notifications

and thereby also give your consent for the statistical evaluation, which allows us to identify whether and when our push notifications were displayed and clicked on. This process is documented and stored by us. This includes the storage of the login time as well as your browser ID or your device ID. The collection of this data is also necessary so that we can trace the processes in the event of misuse and therefore serves our legal protection.

Your data will be deleted as soon as it is no longer required to achieve the purpose of its collection.

Withdrawal

You can withdraw your consent at any time with effect for the future by unsubscribing in your browser via the address bar. To do so, please go to www.sz.de and perform the following steps:

Mozilla Firefox:

1. click on the small lock symbol in the address bar
2. click on "x" at "allowed" in the permissions.
3. reload the page - the notification request will appear again. Please then use the selection "Never allow" or "Block" instead of "Not now".

Google Chrome:

1. click on the small lock in the address bar
2. open the dropdown to the right of notifications and select "Block".

If you are subscribed to push messages in the Messages app, you can disable them in the settings (3-dot icon) under "Push settings".

Registration and login

You can create a digital account via our login systems, which you can use to log in to all of our respective digital offerings after initial registration. Some offers you can only use if you create an account. When you log in, we use cookies in your browser to identify you.

Data processing in detail

Data	Purpose of processing	Storage period
Log-in data	Logging in or rejecting a user	Until withdrawn or if not used after two years
Master data	Personal address	Until withdrawn or if not used after two years
Pseudonymous identifier	Link between user account and subscriber data and recognition of a user	Until withdrawn or if not used after two years
Opt-in data	Securing of system operation and identification of e-mail address	Until withdrawn or if not used after two years
Subscription data	Read authorization query	Until withdrawn or if not used after two years
Identification numbers	Defense against and analysis of misuse	Seven days
Usage data	Further development and optimization of our digital products and subscription offers	Until withdrawn or if not used after two years

This data processing is necessary for the fulfillment of a contract.

You can delete your digital account yourself at sz.de/subscription under "Login data" or request this. You will then no longer be able to use any digital services that require registration. If you still have digital subscriptions with us that require a digital account, this account cannot be deleted before the end of the agreed subscription term for legal reasons. If you delete your digital account, this does not replace the written cancellation of a digital subscription. If you have a digital account with us as a print subscriber, you can delete your digital account or instruct us to do so, but you will then forgo the associated features such as the online subscription service.

If you later want to register for a digital account again, this is possible at any time.

Pre-filled forms

We use your data stored in the profile (this can be both data that you have actively added there during registration or at a later point in time, or data that you have provided as part of a previous order and which we automatically adopt when you place a new order) to facilitate your ordering or other processes by means of pre-filled forms. This data processing is in our legitimate interest.

If you do not log out after logging in and before leaving the website or app so that you do not have to log in again the next time you visit, you will remain logged in. If you are inactive, we will log you out after 20 days for security reasons.

Games

In our digital offerings such as the website and the digital newspaper (ePaper), you are offered the opportunity to access digital puzzles such as crossword puzzles or Sudoku directly from our offerings. For this purpose only, your IP address is transmitted to the puzzle server of our service provider and stored in a system log file.

After 10 days, the IP addresses are deleted.

This data processing is necessary for the fulfillment of a contract.

Sharing content

You have the option of recommending content from our websites via the buttons placed on the content; on mobile devices via the native sharing function. We provide content - and no personal data - to the social networks for the sole purpose of displaying content. When you use the buttons, we only link to the page of the respective social media provider. We do not process any personal data from you.

How we optimize our products

Further development of user-friendliness

We use cookies and tracking tools to optimize our digital offerings based on your utilization. To do this, we measure the development of reach as well as the use of content and function and we use A/B testing to check which variants users like better.

The legal basis for the data processing operations is our legitimate interest.

Usage analysis

We aim to constantly develop and improve our products. For this purpose, we require usage analysis that goes beyond mere reach measurement. Usage analysis serves to evaluate the flow of visitors to our online offerings and may include behavior, interests or demographic information about visitors, such as age or gender, as pseudonymous values. With their help, we can recognize, for example, when our digital offerings are most frequently used or which functions are readily reused. This allows us to identify which areas need optimization.

In addition to usage analysis, we also use test procedures, for example, to test different versions of our online offerings or their components.

For these purposes, profiles, i.e. data summarized for a usage process are created and information is stored in and read from a browser or terminal device. 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. Only if you have consented to the collection of your location data will it be processed.

The IP addresses of the users are also stored. We use an IP masking method (i.e. pseudonymization by shortening the IP address) for your protection. Generally, the data stored in the context of web analytics, A/B testing and optimization is not clear user data (such as e-mail addresses or names), but pseudonyms, so that neither we nor the providers of the software used, who act for us as processors, know the actual identity of the users.

SZ personalization

To enable you to discover content of interest to you as quickly and directly as possible in our digital offering, we analyze which SZ offerings and SZ products (editorial texts, podcasts, newsletters, quizzes, games, purchases, events, etc.) you use, read or order from us. From this collected behavior, we create your profile and derive possible preferences and interests from it, on the one hand to be able to recommend further content and products to you, and on the other hand so that you can personalize our digital offering for yourself.

In practice, this gives you the opportunity to

- to receive new articles, videos, podcasts, games and other content that match your interests as a priority.
- if you explicitly order this, to receive an annual review in which you can see how many and which articles you have read in the past year and share and compare this with other SZ readers.

We process the following personal data from you

- Your subscription status, i.e. whether you have ordered a subscription from us and if so, which one,
- Your usage behavior, i.e. when you use which articles, videos, podcasts, games and other content, how often and for how long,
- A Single Sign On ID (SSO ID), if you have registered with us and logged in, for example, to use certain services, or
- A unique device ID if you use our digital offerings without being logged in,

On the one hand, we combine this data from the individual products via a pseudonymized and cross-product ID, so that we can improve the overall user experience with a cross-product analysis and play you, the user,

content and offers from Süddeutsche Zeitung that are tailored to your needs in a manual, semi-automated and fully automated manner.

On the other hand, we determine the conversion rate in order to track which users have taken out which digital subscription and by which means (websites, apps), and calculate personalized values for our customers. To calculate customer values, we use the SingleSignOn-ID (SSO-ID) and merge it with usage data in our data platform.

In the following cases, we also process your email address:

- If you have subscribed to one of our newsletters, we can use your email address to determine whether you are already a subscriber and whether or not we should therefore play subscription advertising to you.
- If you are a new customer, we will greet you with a welcome email and recommendations (if explicit permission has been granted) based on your interests. In this case, we link your Single Sign On ID to the email address you provide.

The data will be deleted after 90 days without activity or after revocation.

Your data will be processed on the basis of your consent.

Surveys

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

To enable participants to interrupt a survey embedded on the website and resume it with the same browser, a session cookie is created at the start of the survey participation. This also prevents you from being shown the same survey more than once.

You can delete this cookie at any time in the data protection settings of your browser. However, this means that you will no longer be able to continue a partially completed survey at the point where it was interrupted and you will no longer be protected 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.

Your data will be processed on the basis of your consent.

For our surveys, we use the online survey tool easyfeedback from our service provider easyfeedback GmbH, Ernst-Abbe-Straße 4, 56070 Koblenz. Information on data protection can be found [here](#).

Fulfillment of contracts

Purchase orders

If you order one of our offers, we require your address, contact and communication data as well as your bank and, if applicable, credit card data upon conclusion of the contract.

The processing of the personal data provided by you is necessary for the fulfillment of a contract.

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

Payment data

We pass on your payment data to the commissioned credit institution or the respective payment service provider as part of the processing of payments. The processing is carried out to fulfill the contract. The legal basis for this is Art. 6 para. 1 sentence 1 lit. b) GDPR.

Payment processing Plenigo

In order to be able to offer you various payment functions through an online payment route, we use software from plenigo GmbH (Agnesstr. 37, 80798 Munich, Germany), which supports us in handling the payment process. The software also manages transactions and controls access control, billing as well as the checkout process, invoice dispatch and payment transactions. It also supports our user, product and price management. The legal basis for this is Art. 6. para. 1 p.1 lit. f) GDPR.

In doing so, plenigo GmbH processes your specified personal master data (such as name, address data), your communication data (e.g. e-mail), order data, contract billing and payment data as well as our planning and control data on the basis of an order processing agreement pursuant to Art. 28 GDPR.

Payment processing Unzer

We pass on your payment data to the commissioned credit institution or the respective payment service provider as part of the processing of payments. The processing is carried out for the fulfillment of the contract. The legal basis for this is Art. 6 para. 1 p. 1 lit. f) GDPR.

Your bank account or credit card data will be processed for payment by Unzer GmbH, Vangerowstraße 18, 69115 Heidelberg, whose privacy policy can be found [here](#). Please note that Unzer GmbH may transfer your personal data to other parties necessary for processing the transaction, in particular to the participating credit institutions, banks, credit card institutions, HPC GmbH, Vangerowstraße 18, 69115 Heidelberg, PAY. ON AG, Lucile-Grahn-Straße 37, 81675 Munich and HUELLEMANN & STRAUSS ONLINESERVICES S.à r.l. 1, Place du Marché, L-6755 Grevenmacher, R.C.S. Luxembourg B 144133, where your personal data is also processed.

Billing data may be transmitted to collection service providers to the extent necessary for the purpose of debt collection. In this context, we reserve the right, in particular, to assign our claim to a collection agency or to commission such an agency with the collection of our claim. We also reserve the right to transmit information about outstanding payments to credit agencies. Of course, this will always be done in strict compliance with the legal provisions.

Payment processing Payone GmbH

We transmit 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 to assess the risk of non-payment based on mathematical-statistical methods using address data, and to verify your address (check for deliverability).

The legal basis for these transmissions is our legitimate interest, because only by transmitting and checking the data can we assess whether the payment obligations can be met, so that we can carry out the contractual activities in a secure manner. Transmissions on the basis of these regulations may only take place 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 person concerned, which require the protection of personal data.

Detailed information on the ICD, i.e. information on the business purpose, on the purposes of data storage, on the data recipients, on the right of self-disclosure, on the right to deletion or correction etc. can be found under [this link](#).

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 p. 1 lit. b) GDPR. The processing of data for payment with PayPal is necessary in the context of the execution of the contract.

PayPal collects information about the transaction as well as other information related to 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 information in our PayPal account.

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

PayPal reserves the right to conduct an identity and credit check via credit agencies under certain circumstances. You can find more information about PayPal's data protection [here](#).

Credit assessment and profiling

Profiling, i.e., automated data processing with the aim of evaluating certain personal aspects, only takes place for credit assessment 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 represents our legitimate interest in processing your data, so that the legal basis is Art. 6 (1) p. 1 lit. f) GDPR.

By providing information and by means of so-called probability values, CRIF GmbH supports us in decision-making and helps to be able to process everyday (goods) credit transactions quickly.

In this process, a forecast of future events is made on the basis of collected information and experience from the past. CRIF GmbH calculates the probability values primarily on the basis of the information stored about a data subject at CRIF GmbH, which is also shown in the information pursuant to Art. 15 GDPR. In addition, address data is used. On the basis of the entries stored for a person and the other data, an assignment to statistical groups of persons is made who have shown similar payment behavior in the past. The method used is known as "logistic regression" and is a well-founded mathematical-statistical method for forecasting risk probabilities that has been tried and tested in practice for a long time.

The following data is used by CRIF GmbH for the score calculation, although not every type of data is also included in every individual score calculation: Date of birth, gender, shopping cart value, address data and duration of residence, previous payment problems, public negative features such as failure to provide a statement 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 only supports its affiliated contractual partners with its information in the decision-making process. The risk assessment and evaluation of creditworthiness is carried out solely by the direct business partner, as only he has a great deal of additional information at his disposal.

This also applies if he relies solely on the information and probability values of CRIF GmbH.

You may at any time request information about the personal data relating to you and stored by CRIF GmbH, Leopoldstr. 244, 80992 Munich as well as [here](#) to obtain further information on data protection.

Events

For events, we process your name, contact and address data, which are necessary for the purpose of conducting the events. Without processing the personal data, we would not be able to hold 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-organizer or event service provider is allowed to receive this data or if an increased security level is necessary (e.g. forwarding to the police, BKA).

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

This data processing is necessary for the fulfillment of a contract.

If you communicate with us

Contact

When you contact us, we only collect personal data (e.g. name, e-mail address, telephone number) if you provide us with this information voluntarily. You can send this information to us by email or letter, for example. Your personal data will only be used to contact you or for the purpose for which you have provided us with this data, e.g. to process your inquiries, technical administration of the website and customer management.

Any communication of this information (including information on communication channels such as e-mail address, telephone number) is expressly on a voluntary basis. The data will be used exclusively to process your request if the data processing is necessary for the fulfillment of the contract or if there is a legitimate interest to do so. In the case of a telephone inquiry, your data will also be processed by telephone applications and, in some cases, by a voice dialogue system in order to support us in the distribution and processing of the inquiries.

This data is passed on to our service providers for customer service and is deleted if it is no longer required.

If we promote our products

Direct marketing

We also use your contact data for advertising purposes in addition to contract-related use. 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 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).

The data processed by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. Deletion generally takes place after two years of inactivity.

We store the proof of your consent, which we provide via the double opt-in procedure, for 3 years even if you withdraw your consent (Art. 6 para. 1 lit. c), Art. 5 para. 1 lit. a), Art. 7 para. 1, Art. 6 para. 1 lit. f) GDPR)

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

- by clicking on the unsubscribe link at the end of the mail
- by mail to werbewiderspruch@sz.de

- in writing to Süddeutsche Zeitung GmbH, Aboservice, Hultschiner Str. 8, D-81677 München, Germany (please include your e-mail address or telephone number and the name from the registration)
- or by phone via +49 (0)89 2183 0.

If you have consented, we evaluate your clicks in our advertising mailings with the help of so-called tracking pixels, i.e. invisible image files. These are assigned to your mail address and are linked to a separate ID in order to clearly assign clicks in the advertising mailings to you. The usage profile is used to tailor the advertising mailing offer to your interests. We record when you read advertising mailings and which links you click on, and use this information to create an interest profile.

You can unsubscribe from any advertising mailing at any time and revoke your consent to the analysis. For this purpose, you will find a corresponding link in each advertising mailing.

Your data will be deleted after unsubscribing from the advertising mailing.

Self-promotion

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

Advertisements may be customized for each user, for example, by using browser usage information (such as pages visited, hours of use, length of stay). However, user-related advertisements are also possible. Furthermore, evaluations of the range or for billing purposes can be carried out in pseudonymized form. The details of the services used, cooperation partners and individual possibilities of objection are described below.

We use the *_pcfe* cookie to count how often you have been shown a certain number of self-advertisements so that these self-advertisements can no longer be displayed or other self-advertisements can be displayed. This cookie stores up to 30 interactions of each type. The cookie is deleted after 90 days.

Your data will be processed on the basis of your consent.

You can get an overview of all the tools and cookies we use, as well as a revocation option, by clicking on Privacy Settings at the bottom of the website you visit.

Adjust

We use the usage evaluation and analysis technology Adjust.io of adjust GmbH, Saarbrücker Str. 36, 10405 Berlin. We collect data on interaction with our advertising materials, install and event data of the website and use it for anonymized evaluations. We use this information to measure the success of our marketing campaigns and use it for our own market research and optimization.

Your data will be stored for a maximum of 25 months.

The Adjust service has been tested and certified according to the ePrivacyseal (European Seal for your Privacy).

Awin

We participate in the performance advertising network of AWIN AG, Eichhornstraße 3, 10785 Berlin (hereinafter "AWIN"). As part of its tracking services, AWIN stores cookies for the documentation of transactions (e.g. of leads and sales) on end devices of users who visit or use websites or other online offers of its customers (e.g. register for a newsletter or place an order in an online store). These cookies serve the sole purpose of correctly assigning the success of an advertising medium and the corresponding billing within its network. In a cookie, only the information about when a particular advertising medium was clicked on by an end device is placed. In the AWIN tracking cookies, an individual sequence of numbers, which cannot be assigned to the individual user, is stored with which the partner program of an advertiser, the publisher, and the time of the user's action (click or view) are documented. AWIN also collects information about the end device from which a transaction is carried out, e.g. the operating system and the calling browser.

Criteo

In order to show you advertising for our SZ products, we work with Criteo (Criteo, 32 rue Blanche, 75009 Paris, France), an advertising platform that

displays personalized online advertising to users. For this purpose, a JavaScript is built into our websites that launches a call via HTTP or HTTPS protocol to the Criteo domains. This call is processed with an anonymized user ID and the context of the call. By setting cookies on the Criteo domains, usage across customer and publisher sites is tracked anonymously and used for personalized advertising (retargeting). The data is deleted after 13 months.

To get the best performance for a campaign, Criteo loads pixels to signal your current interest in an ad. The delivery and frequency of publisher and network pixels is dynamically controlled by the availability of inventory and performance of the publisher.

Pixel loading is done in the calling page protocol (HTTP/HTTPS) and is limited to static image pixels. Publishers and networks from which Criteo loads pixels are listed [here](#). The list is not exhaustive and is updated regularly.

Since both we and Criteo make joint decisions about data processing, we have concluded a Joint Controllership Agreement in accordance with Article 26 of the GDPR. Further information on Criteo's data protection can be found [here](#).

Google Ads advertising and remarketing

To draw attention to our offers, we place ads on Google's search network and banner ads on Google's display network (banners on third-party websites) and use conversion measurement and remarketing from Google Ads and Analytics, respectively. In doing so, we may combine ads with search terms or use custom ads to advertise products and services that you have viewed on our site. Ads remarketing lists allow us to optimize search and display campaigns if you have visited our site before. With conversion measurement, we see the success of interest-based advertising on Google's search network and advertising banners on Google's display network (banners on third-party websites) based on the analysis of user behavior to better target advertising.

For this interest-based advertising, Google analyzes your user behavior with cookies that are set when you click on ads or visit our websites. We and Google then receive information that you clicked on an ad and were redirected to us. Based on these evaluations, we can see which of the

advertising measures used are particularly effective and can optimize them as a result.

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

Due to the marketing tools used, your browser automatically establishes a direct connection with Google's 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 state 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 advertisement 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, there is the possibility that the provider learns your IP address and stores it.

More information on this can also be found in the notes on website statistics and in the privacy policy 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 using the respective Network Advertising Initiative disabling guide. We and Google then only receive the statistical information about how many users have visited a page and when. This can only be prevented by appropriate browser extensions.

Meta Platforms Conversion API

Within our online offer and also for newsletters and podcasts, we use the "Conversion API" of the social network Meta Platforms and Instagram, which is operated by Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, for the analysis, optimization and economic operation of our online offer.

In order to ensure appropriate and adequate safeguards for the protection of personal data, we have concluded EU standard contractual clauses with

Meta Platforms and observe additional measures for the protection of data subjects' rights as required.

The "Conversion API" is an interface to which conversion information can be sent on the server side. With the help of the data transfer via the API, we want to ensure that our Meta Platforms and Instagram ads correspond to the potential interest of the users and do not have a harassing effect.

Furthermore, we can track the effectiveness of the Meta Platforms and Instagram ads for internal performance measurement purposes by seeing whether users were redirected to our website after clicking on a Meta Platforms or Instagram ad and possibly performed an action (so-called "conversion").

User data is generated, read or sent at the following points:

User clicks on an SZ ad on Meta Platforms or Instagram

- Meta Platforms/Instagram registers the click
- The target URL (e.g. angebote.sueddeutsche.de) is assigned a click ID "fbclid" (unique identifier that Meta Platforms/Instagram can use to match information about user, ad, campaign, etc.)

User reaches target page (a subdomain of sueddeutsche.de)

If consent exists: fbclid information is read from URL and stored in a cookie ("szpay_fbclid", runtime: 7 days)

If a user performs a certain action on the target page (e.g. purchase of a subscription), it is checked whether the fbclid cookie is present. Only in the case that the cookie is present, the information is passed to Meta Platforms.

We store the click ID for 7 days, after which we only see the total number of actions.

In addition to the information of the purchase completion, the following information is also transmitted to Meta Platforms:

- Promotion (e.g. SZ Plus Basis subscription, etc.) or product.
- Price of the promotion

In the case of newsletters and podcasts, only the name of the newsletter/podcast is transmitted (e.g. SZ am Morgen).

At no time is any user-related information other than the click ID "fbclid" transferred to Meta Platforms.

The processing of data by Meta Platforms is carried out within the framework of Meta Platforms' Data Usage Policy. Accordingly, general information on the display of Meta Platforms ads, in the Meta Platforms Data Usage Policy: <https://de-de.facebook.com/policy.php>. Specific information and details about the "Meta Platforms Conversion API" and how it works can be found in the Meta Platforms help section: <https://www.facebook.com/business/help/2041148702652965?id=818859032317965>.

Microsoft Advertising Conversion

We use the technology "Microsoft Advertising Conversion" and specifically the conversion tracking. Microsoft Advertising Conversion Tracking is an analysis service of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. If you click on an ad placed by Microsoft, a cookie for conversion tracking will be placed on your PC. If you visit certain pages of our website when the cookie has not yet expired, Microsoft and also we can recognize that you have clicked on a certain ad and have been redirected to this page.

The data collected with the help of the conversion cookie is used to create conversion statistics for Microsoft Advertising Conversion customers who use conversion tracking. In doing so, we learn the number of users who clicked on an ad and were then redirected to a page tagged with a conversion tracking tag. In doing so, we do not receive any information that can be used to identify users personally.

Outbrain

We use Outbrain from Outbrain Inc. (39 West 13th Street, 3rd floor, New York, NY 10011, USA) to show you advertisements on partner sites. The usage by you as a person is not evaluated, but the usage history of your internet browser. We use the Outbrain cookie to determine the success of our advertisements on partner sites and how you react to our advertisements.

Outbrain uses cookies for this purpose and thereby processes data in anonymous form.

You can tell that you are connected to an Outbrain widget by the text that links to Outbrain (e.g. "Recommended by Outbrain", "from Outbrain" next to

the recommendations). When you click on the link to Outbrain, you will see a detailed notice that allows you to navigate to Outbrain's interest profile, where you will find a general representation of the types of data categories Outbrain uses to make its recommendations.

Conversion measurement

To learn if and how effective our own product advertising is, we use conversion measurement by embedding a conversion tracking tag or code snippet in our digital products. When you view our ads, a temporary cookie is stored on your computer or mobile device. Once you complete an action, our system recognizes the cookie and we record a conversion.

Your data will be processed on the basis of your consent.

Performance measurement of campaigns

We use a URL parameter that also sets a cookie (tpcc_) to measure how many users have responded to and ordered a specific advertising campaign for our products and offers. The cookie is deleted after 90 days.

Your data will be processed on the basis of your consent.

Newsletter

You will receive newsletters from us if you order them explicitly via a so-called "double-opt-in procedure", i.e. the specification of your e-mail address is verified by means of a confirmation e-mail sent to it. A processing of your personal data then takes place with your consent.

If you have consented, we evaluate your clicks in newsletters with the help of so-called tracking pixels, i.e. invisible image files. These are assigned to your mail address and are linked to a separate ID to uniquely assign clicks in the newsletter to you. The usage profile is intended to tailor the newsletter offer to your interests. We record when you read newsletters and which links you click on, and derive an interest profile from this.

The deletion takes place at the end of the year in which you unsubscribed from the newsletter.

You can unsubscribe from any newsletter at any time and withdraw your consent to the sending and evaluation.

Data processing in detail

Data	Purpose of processing	Legal basis of processing	Storage period
e-mail address	sending the newsletter	consent	until withdrawal
IP address for opt-in	proof of double opt-in	consent	until withdrawal
time of DOI verification	proof of double opt-in	consent	until withdrawal
salutation*	direct address	consent	until withdrawal
first name*	direct contact	consent	until withdrawal
Surname*	Direct contact	Consent	until withdrawal
usage data	further development and improvement of the service	consent	until withdrawal
End devices	correct playing of the newsletter	consent	until withdrawal

* voluntary information

Raffles and quizzes

In order to participate in competitions, it is sometimes necessary for you to

- register with us,
- register in the highscore/best list
- accept the conditions of participation and
- read the data protection notice.

For participation in quizzes and online games, registration is only required if you wish to be entered in the highscores/best lists.

For registration and entry in the highscore lists, we process, among other things, your e-mail address, a - preferably invented - user name and a password. You must enter the user name in your profile in your SZ account in order to be entered in the highscore list. The user name will be published in the list of best entries on SZ.de, provided that you click on the button "Enter in list of best entries" after registration.

When (non-cash) prizes are offered, additional personal data is required from the winners, particularly after the end of the competition, such as the address, in order to be able to notify them in the event of a win and to transmit the prize.

The collection and processing of personal data is used to carry out the respective competition and quizzes and, if necessary, to send prizes. The data is processed with your consent, in the case of raffles for the fulfilment of a contract. All data will be stored for the purpose and for the duration of the sweepstakes and deleted after the end of the promotion, unless there are legal obligations to retain data. The user name published in the high scores/best lists will only be deleted upon withdrawal.

Your data may be passed on to our sweepstake service providers and sponsors within the scope of the conditions of participation to which you have consented and deleted if it is no longer required.

For further details in connection with the respective sweepstakes, please refer to the conditions of participation.

You have the right to withdraw given consents with effect for the future at datenschutz@sz.de.

Company presence in social media

We maintain presences in the "social media". To the extent that we have control over the processing of your data, we will ensure that applicable data protection regulations are complied with. In the following, you will find the most important information on data protection law with regard to our company websites.

Responsible for the company appearances in the sense of the General Data Protection Regulation as well as other data protection regulations are besides us:

- **Instagram** (c/o Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland), further informationen about privacy you can find here.
- **LinkedIn** (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Irland); further informationen about privacy you can find here.
- **Meta Platforms Ireland Limited** (4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland); further informationen about privacy you can find here.
- **Pinterest** (Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland); further informationen about privacy you can find here.
- **TikTok** (TikTok Technology Ltd., 10 Earlsfort Terrace, Dublin D02 T380, Ireland); further informationen about privacy you can find here.
- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland); further informationen about privacy you can find here.
- **Xing** (New Work SE, Am Strandkai 1, 20457 Hamburg); further informationen about privacy you can find here.

We process the data for statistical purposes in order to be able to further develop and optimize 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. These are processed and made available by the social networks. We have no influence on the generation and presentation.

In addition, your personal data is processed for market research and advertising purposes. It is possible, for example, that usage profiles are created based on your usage behavior and the resulting interests. This allows, among other things, advertisements to be placed within and outside the platforms that presumably correspond to your interests. Cookies are usually stored on your computer for this purpose. Independently of this, data that is not collected directly from your end devices may also be stored in your usage profiles. The storage and analysis also takes place across devices; this applies in particular, but not exclusively, if you are registered as a member and logged in to the respective platforms.

Beyond that, we do not collect or process any personal data.

The processing of your personal data by us is based on your consent pursuant to Art. 6 para. 1 p. 1 lit. a) GDPR.

Since we do not have complete access to your personal data, you should contact the providers of the social media directly when asserting your data subject rights, because they each have access to the personal data of their users and can take appropriate measures and provide information.

If you still need help, we will of course try to support you. [Our contact.](#)

- **LinkedIn** [Optout](#)
- **Meta Platforms** [Optout](#)
- **Pinterest** [Optout](#)
- **TikTok** [Optout](#)
- **X** [Optout](#)
- **Xing** Optout in den Xing-Einstellungen im Xing-Konto

Presence on TikTok

We use the technical platform and services of TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland (hereinafter: "TikTok") for the presentation of our company.

If you comment on, share or otherwise respond to one of our posts, we process personal data as the sole controller. This includes your TikTok user data (in particular display name, user name, profile picture), the content of

the comments you have made and the related metadata (in particular the date on which you posted the respective comment). If you also follow us on TikTok, we also process this information.

We process this data in order to support the freedom of information, the free formation and expression of opinion, the pluralistic diversity of opinion and thus democratic decision-making and the exchange of views on current topics. We also want to inspire enthusiasm for our brand and products with our contributions. This enables us to communicate with you directly and quickly and allows you to participate in the discourse on current topics.

We have activated the TikTok Analytics function for our TikTok channel, i.e. TikTok provides us with page statistics that provide anonymised information about visitor groups and visitor activity. We are jointly responsible with TikTok for this data processing, which is regulated in accordance with Art. 26 GDPR in Part B of the TikTok Analytics Joint Controller Addendum.

We store the above-mentioned data as long as it is necessary for these purposes and if and as long as this is necessary for legal proceedings or to fulfil retention obligations.

The legal basis for the processing of the data is your consent (Art. 6 para. 1 lit. a GDPR).

Data processing by TikTok

When you visit us on TikTok, TikTok collects, among other things, your IP address and other information, for example in the form of cookies on your end device. The data collected about you in this context is processed by TikTok and may be transferred to countries outside the European Economic Area. TikTok is solely responsible for this data processing under data protection law.

TikTok describes more detailed information on data processing by TikTok in its Privacy Policy. There you will also find information on how to contact TikTok, how you can assert your rights against TikTok and links to TikTok's cookie guidelines, among other things.

In its cookie policy, TikTok explains how it uses and utilises cookies. TikTok uses cookies for both registered and unregistered users. The German Federal Office for Information Security (BSI) provides information on how you can limit cookies on your end device: Limitation of cookies

Information on how to manage your privacy settings on TikTok or delete your account can be found on the [TikTok support pages](#).

According to its own statements, TikTok stores data for as long as is necessary for the provision of the platform and for the other purposes stated in TikTok's privacy policy. According to TikTok's own statement, it also retains the data if this is necessary for the fulfilment of contractual and legal obligations, if TikTok has a legitimate business interest in doing so, and for the assertion or defence of legal claims. Further information on the storage of data can be found in the [TikTok Privacy Policy](#).

If third parties display ads

In order to refinance our digital offerings, we market our advertising space - via our marketing service providers but also via [third parties advertising](#).

An overview of the third parties and how they process your data and for what purpose can be found in the data protection settings. As a SZ Plus subscriber, you will be shown fewer adverts. By reducing the amount of advertising, we ensure that the data we collect from SZ Plus subscribers is processed exclusively by us and by partners that we have checked. We oblige these partners to minimise data in accordance with European data protection regulations. Data collection via our verified advertising partners is thus reduced to a necessary minimum, for example in order to measure reach and improve quality. These measures prevent unknown and unverified third parties from creating individual profiles of our digital subscribers based on their usage behaviour and using them for their own purposes.

Self-advertising of ads

Our advertising marketers assist us in promoting our advertising space by acquiring and playing out advertisements. We use the following marketers:

- iq digital media marketing Gmbh, Toulouser Allee 27, 40211 Düsseldorf, Germany.
- Taboola Inc, Oneustonsq, 40 Melton Street, 13th Floor, London, NW1 2FD

We have entered into either an agreement within the meaning of Article 26 of the GDPR with them and the third parties used by them in the context of marketing within the meaning of Article 4 No. 10 of the GDPR, in which we have defined the respective responsibilities for fulfilling the obligations under the GDPR with regard to joint processing, or a commissioned processing agreement within the meaning of Article 28 of the GDPR.

In the case of joint responsibility, we are obliged to enable you to grant and revoke consent under data protection law. In addition, we are the central point of contact for you as a data subject. We immediately forward data subject inquiries that we receive and that concern joint processing to our marketers for response. Notwithstanding this, you can assert the rights to which you are entitled under the GDPR as a data subject both with and against us and with and against any other controller.

Your data will be processed on the basis of your consent.

Third party advertising

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

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

Your data will be processed on the basis of your consent.

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

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

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

Storing or Accessing Information on a Device (Purpose 1)

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

Most of the processing purposes explained in this notice rely on storing or accessing 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 during your first visit to a website to recognize it during subsequent visits (by retrieving this cookie each time).

Using Reduced Data to Select Advertisements (Purpose 2)

Advertisements 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 interact with (or have interacted with) (e.g., to limit the frequency of ads shown to you).

Examples:

- A car manufacturer wants to advertise its electric vehicles to environmentally conscious users living in urban areas after business hours. The advertisement is displayed on a page with related content (e.g., an article about climate protection measures) after 6:30 PM to users whose approximate location suggests they are in an urban area.

- A major watercolor paint manufacturer wants to run an online advertising campaign for its latest watercolor range. The target audience is diversified to reach as many amateur and professional artists as possible, while avoiding displaying the ad alongside unrelated content (e.g., articles about house painting). The number of ads shown to you is determined and limited to avoid overexposure.

Creating Profiles for Personalized Advertising (Purpose 3)

Information about your activities on this service (such as completed forms, viewed content) can 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 information is then used to create or enhance a profile about you (e.g., possible interests and personal characteristics). Your profile can be used (even at a later time) to present you with advertisements that are likely to be more relevant to you based on your possible interests.

Examples:

- If you read several articles about the best bicycle accessories in the market, this information can be used to create a profile about your interest in bicycle accessories. Such a profile can later be used on the same or another website or app to show you advertisements for a specific bicycle accessory brand.
- If you also use a configurator for a vehicle on the website of a luxury car manufacturer, this information can be combined with your interest in bicycles to refine your profile and suggest that you might be interested in luxury bicycle equipment.

Use profiles to select personalised advertising

Advertisements displayed to you on this service may be based on your advertising profile. This 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 announce a limited offer on running shoes. They aim to target users who have previously viewed running shoes in

their mobile app. Tracking technologies could be used to recognize that you previously searched for running shoes in the app, so the corresponding advertisement is displayed to you in the app.

- A profile created for personalized advertising about a person who searched for bicycle accessories on a website can be used to display relevant advertisements for bicycle accessories in a mobile app of another company.

Creating Profiles for Content Personalization (Purpose 5)

Information about your activities on this service (e.g., completed forms, viewed non-advertising content) can be stored and combined with other information about you (e.g., your previous activity on this service or other websites or apps) or similar users.

This information is then used to create or enhance a profile about you (e.g., possible interests and personal characteristics). Your profile can be used (even at a later time) to display content that is likely to be more relevant to you based on your possible interests. For example, the order in which content is displayed to you may be changed to make it 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 treehouse. This information can be added to a profile to record your interest in outdoor activities and DIY guides. This enables content personalization, so you may be shown more blog posts and articles about treehouses and wooden cabins in the future.
- You have watched three videos about space exploration on various TV apps. An independent news platform that you have not used before creates a profile based on this usage behavior and identifies space exploration as a topic of potential interest for future videos.

Using Profiles to Select Personalized Content (Purpose 6)

Content presented to you on this service may be based on your personalized content profiles, which include your activities on this or other services (e.g., forms you submit, content you view), possible interests, and personal characteristics. For example, the order in which content is displayed to you

may be adjusted to make it 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 independent of the platform. The profile created about you on the social media platform is used to present vegetarian recipes on the homepage of the cooking app.
- You have watched three videos about rowing on various websites. When you use your TV app, a video-sharing platform independent of these websites recommends five more videos about rowing based on a profile created about you when you watched the online videos on those websites.

Measuring Advertising Performance (Purpose 7)

Information about which advertisements are presented to you and how you interact with them can be used to determine how engaging the advertisement was for you or other users and whether the goals of the advertising campaign were achieved. This information includes, for example, whether you viewed an ad, clicked on it, or whether it prompted you to purchase a product or visit a website. These insights help assess the relevance of advertising campaigns.

Examples:

- You clicked on an advertisement for a "Black Friday" discount from an online shop on a website and purchased a product. Your click is linked to this purchase.
- Your interaction, along with that of other users, is measured to determine how many clicks on the ad resulted in a purchase.
- You are among the few users who clicked on an advertisement in an app for a discount related to a special event (e.g., "International Day of Recognition") from an online gift shop. The app operator wants statistics on how often a specific ad, particularly the one for the special event, was viewed or clicked by you and other users within the app. This helps the app operator and its partners (such as agencies) optimize ad placement.

Measuring Content Performance (Purpose 8)

Information about which content (non-advertising) is presented to you and how you interact with it can be used to determine whether the content reached its intended audience and matched your interests. This includes, for example, whether you read a specific article, watched a specific video, listened to a specific podcast, or viewed a specific product description, as well as how much time you spent on this service and the websites you visited. These insights help assess the relevance of the content displayed to you.

Examples:

- You read a blog post about hiking in a mobile app and clicked on a link to a recommended similar post. Your interactions are recorded to note that the first post about hiking was useful to you and 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 mobile app's homepage.
- You were shown a video about fashion trends but, like several other users, stopped watching after 30 seconds. This information is used to evaluate the appropriate length for future videos on fashion trends.

Audience Analysis through Statistics or Data Combinations (Purpose 9)

Based on the combination of datasets (such as user profiles, statistics, market research, and analytics data), reports about your interactions and those of other users with advertising or non-advertising content can be created to identify common characteristics (e.g., to determine which target groups are receptive to an advertising campaign or specific content).

Examples:

- The owner of an online bookstore wants an analysis of how many visitors accessed their website without making a purchase, how many visited to buy the latest celebrity biography of the month, the average age of visitors, and how many were male or female, broken down by category. Data about your navigation on the website and your personal characteristics are then used and combined with similar data to create these statistics.
- An advertiser wants to better understand the type of audience interacting with their ads. They commission a research institute to

compare the characteristics of users who interacted with the ad with typical attributes of users on similar platforms across various devices. This comparison reveals that the advertiser's target audience primarily accesses the ads via mobile devices and is likely aged between 45 and 60 years.

Development and Improvement of Offerings (Purpose 10)

Information about your activities on this service, such as your interaction with ads or content, can help improve products and offerings and develop new products and offerings based on user interactions, the type of audience, etc. This processing purpose does not include the development, enhancement, or improvement of user profiles and identifiers.

Examples:

- Information about your activities on this service, such as your interaction with ads or content, can help improve products and offerings and develop new products and offerings based on user interactions, the type of audience, 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 ads on a novel type of device. They collect information about how users interact with this new type of device to determine whether a new mechanism for displaying ads on this type of device can be developed.

Using 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 the content you interact with (or have interacted with). This can include limiting how often a video or article is shown to you.

Examples:

- A travel magazine publishes an article on its website about new online courses offered by a language school to enhance travel experiences abroad. Blog posts from the language school are directly embedded at the end of the page and selected based on your approximate location

(e.g., blog posts featuring the curriculum for a language course that is not the language of your country).

- A mobile app for sports news introduces a new section with articles about the latest football matches. Each article contains video highlights of the games hosted by an external streaming platform. If you fast-forward through a video, this information may be used to play a shorter video afterward.

What else you need to know

Controller and data protection officer

Controller is

Süddeutsche Zeitung GmbH

Hultschiner Str. 8
D-81677 München
Germany

You can reach our **data protection officer** at

atarax Unternehmensgruppe

Luitpold-Maier-Str. 7
D-91074 Herzogenaurach
Phone: +49 9132 79800
Email: swmh-datenschutz@atarax.de.

Contact for your privacy request

Here you can ask your questions about data protection.



Your rights

- According to 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 obtain a copy of the personal data processed by us, in accordance with Art. 15, par. 3-4 GDPR
- In accordance with Art. 16 GDPR, you can immediately request the **correction** of incorrect data or the completion of your personal data stored by us.
- In accordance with Art. 17 GDPR, you can request the **deletion** of your personal data stored with us.
- In accordance with Art. 18 GDPR, you can demand the **restriction of processing** of your personal data.
- In accordance with Art. 20 GDPR, you can request to receive your personal data that you have provided us in a structured, common and machine-readable format and you can request the **transfer** to another person responsible.
- In accordance with Art. 7 (3) GDPR, you can **withdraw** your consent, once granted, to us at any time. As a result, we may no longer continue to process the data based on this consent in the future.
- In accordance with Art. 77 GDPR you have the right to **complain** to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence, your place of work or our registered office for this purpose.

Right of objection

If your personal data is processed on the basis of legitimate interests pursuant to Art. 6 (1) f GDPR or pursuant to Art. 6 (1) e GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21 GDPR. In the event of such an objection, we will no longer process your personal data, unless we can prove compelling reasons for processing worthy of protection that outweigh the interests, rights and freedoms of the person concerned or the processing serves to assert, exercise or defend legal claims.

In the case of direct marketing, you have the right to object to the processing of personal data relating to you at any time. If you object to

processing for the purposes of direct marketing, the personal data will no longer be processed for those purposes.

Company presence in social media

We maintain presences in the "social media". To the extent that we have control over the processing of your data, we will ensure that applicable data protection regulations are complied with. In the following, you will find the most important information on data protection law with regard to our company websites.

Responsible for the company appearances in the sense of the General Data Protection Regulation as well as other data protection regulations are besides us:

- **Meta Platforms Ireland Limited** (4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland); further informationen about privacy you can find here.
- **Instagram** (c/o Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland), further informationen about privacy you can find here.
- **Pinterest** (Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland); further informationen about privacy you can find here.
- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland); further informationen about privacy you can find here.
- **LinkedIn** (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Irland); further informationen about privacy you can find here.
- **Xing** (New Work SE, Am Strandkai 1, 20457 Hamburg); further informationen about privacy you can find here.

We process the data for statistical purposes in order to be able to further develop and optimize 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. These are processed and made

available by the social networks. We have no influence on the generation and presentation.

In addition, your personal data is processed for market research and advertising purposes. It is possible, for example, that usage profiles are created based on your usage behavior and the resulting interests. This allows, among other things, advertisements to be placed within and outside the platforms that presumably correspond to your interests. Cookies are usually stored on your computer for this purpose. Independently of this, data that is not collected directly from your end devices may also be stored in your usage profiles. The storage and analysis also takes place across devices; this applies in particular, but not exclusively, if you are registered as a member and logged in to the respective platforms. Beyond that, we do not collect or process any personal data.

The processing of your personal data by us is based on your consent pursuant to Art. 6 para. 1 p. 1 lit. a) GDPR.

Since we do not have complete access to your personal data, you should contact the providers of the social media directly when asserting your data subject rights, because they each have access to the personal data of their users and can take appropriate measures and provide information.

If you still need help, we will of course try to support you. [Our contact.](#)

- **Meta Platforms** [Optout](#)
- **Pinterest** [Optout](#)
- **X** [Optout](#)
- **LinkedIn** [Optout](#)
- **Xing** Optout in den Xing-Einstellungen im Xing-Konto

Joint controllership

We are joint controller in the following cases.

Joint controllership for events

If you book and visit our events, we are responsible for processing your personal data together with Ultima Media Germany GmbH (contact details see above).

If you participate in an event organized by us, we process your data in order to carry out the event and to enable you to participate. This also includes, if applicable, that we include your name, details of your company or institution and your current professional position in a list of participants, which is made available to the other participants of the event (if applicable also in electronic form), or, if applicable, we make your data (name, details of company/institution) available to the moderators of the event for the purpose of holding the event. In addition, we use this data to send you event-related materials (e.g. conference proceedings) produced after the event. Furthermore, we may pass on your data to cooperation partners if this is necessary to carry out the event and to enable your participation, e.g. external guest management. The legal basis for this data processing is the fulfillment of a contract.

In addition, we use service providers (contract processors, e.g. dispatch service providers) in accordance with Art. 28 GDPR and subject to instructions, among other things for the postal or digital dispatch of invitations or within the scope of guest management. All processors will only have access to your data to the extent and for the period of time necessary for the provision of the services.

If we organize an event together with one or more other event organizers, a possible transfer of data is justified by the fact that we have contractually defined the purposes and means of processing together as jointly responsible for data protection in accordance with Art. 26 para. 1 GDPR.

We store the above-mentioned data for the purposes also mentioned above until you object, in order to be able to meet the justified mutual interest in communication or information. We will store your objection for the purpose of securing evidence for a period of 3 years.

joint controllership Meta Platforms

When you visit our Meta Platforms Fanpage, we are jointly responsible with Meta Platforms for the processing of your personal data. In the following, we inform you about the associated data processing on our fan page, of which the terms of use of Meta Platforms remain unaffected:

contact details of the controllers and joint responsibility according to Art. 26 DS-GVO.

Joint controllers:

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

and

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

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

Appearance on the Meta Platforms Fanpage.

Scope of data collection and storage

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

The promotional use of your personal data is in the foreground, especially for Meta Platforms. We use the statistics function to learn more about the

visitors to our Fanpage. The use of the function enables us to adapt our content to the respective target group. In this way, we also use demographic information on the age and origin of users, for example, although no personal reference is possible for us 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 decide for yourself via your browser settings whether and which cookies you want 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 for authentication, security, website and product integrity, advertising and measurement, website features and services, performance, and analysis and research. Details of the cookies used by Meta Platforms (e.g. cookie names, function duration, content collected and purpose) can be viewed [here](#) by following the links there. There you will also find the option to disable the cookies used by Meta Platforms. In addition, you can also change the settings for your advertising preferences there.

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

Under the aforementioned link, you can manage your preferences regarding usage-based online advertising. If you object to usage-based online advertising with a particular provider using the preference manager, this will only apply to the particular business data collection via the web browser you are currently using. The preference management is cookie-based. Deleting all browser cookies will also remove the preferences you have set using the preference manager.

Note about Meta Platforms Insights

We use the Meta Platforms Insights function for statistical analysis purposes. In this context, we receive anonymized data on the users of our Meta Platforms fan page. However, using the filters provided by FacebookMeta Platformsook, we specify the categories of data according to which Meta

Platforms provides anonymized statistics. Meta Platforms provides us with the following criteria or categories for evaluating the activities of the appearance anonymously, provided that the relevant 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 view (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 anonymized data is used to analyze user behavior for statistical purposes so that we can better tailor our offerings to the needs and interests of its audience.

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

Sharing and use of personal data

Insofar as you interact within the framework of Meta Platforms, Meta Platforms naturally also has access to your data.

Joint Controllership with TikTok

We have activated the TikTok Analytics function for our TikTok channel, i.e. TikTok provides us with page statistics that provide anonymised information about visitor groups and visitor activity. We are jointly responsible with TikTok for this data processing, which is regulated in accordance with Art. 26 GDPR in Part B of the TikTok Analytics Joint Controller Addendum.

TikTok describes more detailed information on data processing by TikTok in its Privacy Policy. There you will also find information on how to contact TikTok, how you can assert your rights against TikTok and links to TikTok's cookie policy, among other things.

Joint controllership Utiq

We have joint controllership with Utiq in respect of certain stages of the processing when we make use of the Utiq Technology. Part of this joint controllership includes the following:

- Utiq and we are jointly responsible for obtaining users' consent to the Utiq Technology by displaying a corresponding consent banner in our website.
- We are responsible for the user's access to a special link in the footer of the website, which provides information about the technology and its administration as well as about the partnership with Utiq.

Utiq is responsible

- for initiating a secure API call to the user's telecom operator after the user has consented to the Utiq Technology
- for mapping the network signal generated by the user's telecom operator (which is an online identifier created by matching your IP to an account reference such as your mobile number and does not contain any directly identifiable data) to the Utiq consentpass
- for generating additional marketing identifiers ("martechpass" and "adtechpass") and forwarding these to us
- for responding to data subject inquiries that users have in connection with the Utiq Technology. For this purpose, Utiq provides a central data protection portal to facilitate the exercise of data protection rights and to enable you to easily manage Utiq consents and Utiq privacy preferences.

Notwithstanding the fact that you may exercise your rights in relation to any data controller, Utiq acts as a common point of contact for any questions or concerns you may have in relation to the Utiq Technology.

The activation of the Utiq Technology is optional. This means that it is inactive by default and will only be turned on if you give your consent.

Joint controllership with YouTube

We rely on the technical platform and services of YouTube, a Google company with headquarters at Gordon House, Barrow Street, Dublin 4, Ireland. That is, if you are ordinarily resident in the European Economic

Area or Switzerland, unless otherwise specified in any Additional Terms, the Services are provided to you by Google Ireland Limited ("Google"), a company incorporated and organised under the laws of Ireland.

In accordance with the Google Privacy Policy, we assume that any transfer of personal data, including the processing thereof, will also be made to servers of Google LLC in the USA.

In its ruling in case C-210/16, the European Court of Justice decided that platform operators (here YouTube) and the operator of a channel located on the platform are jointly responsible for the data processing carried out via the respective channel. To this extent, platform operators and channel operators are to be regarded as joint responsible parties or joint controllers in accordance with 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 above-mentioned 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 legitimized according to our legitimate interest. We have referred to the right of objection according to 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 play time of the videos can be better adapted to user behavior.

If you, as a YouTube user, contact us directly, for example through inquiries, comments and feedback, this contact and the communication of your information is expressly on a voluntary basis and with your consent. If necessary, we will forward your comments or reply to them or also write comments that refer to your account. The data you freely publish and disseminate on our YouTube channel will thus be included by us in our offer and made accessible to our followers and other users. In addition, we process the data that you voluntarily give us in the context of a personal message, if necessary to answer the message.

Data processed by YouTube

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

YouTube will process your voluntarily submitted personal information, such as your name and username, email address, phone number or the contacts in your address book when you upload or synchronize. YouTube also evaluates the content you share to determine what 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, wireless network information or your IP address to send you advertisements or other content. For evaluation purposes, YouTube may use analysis tools such as Google Analytics. If tools of this kind are used by YouTube for the channel by us, this is not done on our behalf. The data obtained during the analysis is not made available to us. We can only view the information on access activities listed under point 1.

Finally, YouTube also receives information when you view content, for example, even if you have not created your own account. This so-called "log data" may include your IP address, browser type, operating system, information about the previously visited website and pages you viewed, your location, your mobile operator, the device you are using (including device ID and application ID), the search terms you used, and cookie information.

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

You may also request information through the YouTube Privacy Policy or the YouTube Terms of Use or through the YouTube Community Guidelines and Security at <https://www.youtube.de/t/privacy>.

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

https://www.youtube.de/t/community_guidelines

Further information on YouTube's privacy policy can be found at

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

Data protection information 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 fulfill the information requirements according to the GDPR. Our General Terms and Conditions also contain data protection information. In these, it is once again described in detail how in particular the processing of your personal data is carried out, which we require for the execution of the contracts and for the purpose of an identity and credit check.

Links to other websites

Our websites can contain links to websites of other providers. We have no influence on this and do not monitor the compliance of other providers with applicable data protection provisions.

Alterations of the privacy policy

We reserve the right to alter and/or adjust this data protection declaration at any time, taking into consideration the current applicable data protection provisions.