Süddeutsche Zeitung

Privacy Policy

24.09.2026

When you use SZ.de – the Süddeutsche Zeitung's digital online service – by concluding a contract with advertising after accessing the website, Süddeutsche Zeitung GmbH processes your personal data. With this privacy notice, we inform you how and why we process your data in the context of the contract with advertising and how we ensure that it remains confidential and protected.

If you use SZ.de as an SZ Plus subscriber, you can find the privacy notice applicable in that case here.

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

Privacy policy for applications

If you have applied for a job with us, you will find the necessary data protection information here.

Data protection at a glance

What data do we collect?

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

How do we collect the data?

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

What do we use the data for?

To fulfill the contract through advertising
In order to provide our journalistic content alongside usage analytics, product optimization, personalized content, marketing for our products, and third-party advertising (AIB), we process the personal data you provide

in exchange for the contract through advertising for the purpose of fulfilling the contract (Art. 6(1)(b) GDPR) for the following purposes:

Provision of content:

- Cookies and similar technologies
- Technical provision and security
- Absolutely necessary technology
- Integration of external multimedia content (Video, audio, map services, Twitter, Instagram, etc.)
- Live ticker
- Podcasts and videos
- Games
- Content sharing

Product optimisation:

- Further development of user-friendliness
- Usage analysis

Personalisierte Inhalte und Marketing

- Personalized customer communication
- SZ-Personalisation
- Use of AI
- Marketing for our own products
- Conversion measurement

Advertising by third parties (IAB)

- Self-marketing of adverts
- External marketing by third parties

To provide you with additional services
If you use the following SZ services—which are no longer covered by the advertising agreement—data processing takes place on the legal grounds specified in the respective description:

- Remember article and My SZ
- Ordering products
- Direct advertising
- Games
- Comments

- Contact and communication
- Registration and login
- Newsletter
- Push messages
- Surveys
- Company presence on social media

Do we share data?

We pass on your personal data to service providers (e.g. hosting, marketing, sales partners) for the purposes described above. In such cases, we comply with the statutory requirements and, in particular, conclude appropriate contracts or agreements with the recipients of your data that serve to protect your data.

We transfer personal data to other companies within our corporate group or grant them access to such data for administrative purposes. This transfer of data is based on our legitimate business and economic interests or takes place where it is necessary to fulfil our contractual obligations, or where the data subjects have given their consent or a statutory permission applies.

Do we transfer data to third countries?

For the use of our digital services, 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 your data to be processed in a third country if the specific requirements of Articles 44 et seq. GDPR are met and an adequate level of data protection is thereby ensured in that country. This means that either an adequacy decision by the European Commission must exist for the third country or appropriate safeguards pursuant to Article 46 GDPR must be in place. In this context, data may also be transferred to third countries outside the EU in accordance with Article 49 (1) (b) GDPR. **Unless otherwise stated below, we use the respectively valid standard contractual clauses as appropriate safeguards for the transfer of personal data to processors in third countries.**

How do we secure the data?

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

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

When do we delete the data?

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

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

What rights do you have?

- Information
- Deletion
- Correction

- Objection

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

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

Cookie-Policy

In the cookie policy, which you can access in the footer of the website under “Contract with advertising” via the “Cookie policy” link, you will find information about the cookies and similar technologies we use, as well as about the third parties authorised for advertising.

You will find detailed data protection information below.

How we make our content available to you

Cookies and similar technologies

We use cookies and similar technologies in order to provide you with an optimal experience and to finance our services, i.e. cookies, device identifiers, or other personal data are stored or accessed on your device. This data processing is carried out for the performance of the contract on

the basis of the contract with advertising concluded with you (Article 6 (1) sentence 1 (b) GDPR).

In order to be able to provide the telemedia service expressly requested by you, we also take into account the provisions of Section 25 TDDDG and, in particular, the requirement of strict necessity under Section 25 (2) no. 2 TDDDG.

Technical provision and security

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

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

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

The storage period for this log data is usually seven days; for reliable detection of AI bots, it is 30 days. From this point on, this specific server log data is anonymized based on our legitimate interest in statistical evaluation to assess AI bots and their impact on our content (Art. 6 (1) f GDPR).

Für das technische Monitoring zur Sicherstellen des Betriebs verwenden wir das Session-Cookie _dd_s.

Detection of abusive use of the digital service
In order to detect conspicuous, automated, excessive or otherwise abusive use of our digital service, we process server log data, user IDs, and login and subscription status on the basis of our overriding legitimate interest in ensuring that our service is used in accordance with the contract. This enables us to take appropriate technical or organisational measures to limit such use and to protect the stability, security and economic basis of our

platform.
The data is deleted after 30 days.

Account takeover for troubleshooting
If you contact us about an error in the operation of our digital service, we can take over your SZ account for a short time 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 aforementioned data processing is Art. 6 para. 1 lit. b) GDPR.

Essential technology

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

The legal basis for the data processing activities described below is Article 6 (1) sentence 1 (b) GDPR.

Paid content model

We have introduced a payment model for our online content, i.e. the content of our websites and apps is only made available for a fee. On the one hand, the conclusion of a contract is required for use, 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 then the content is restricted and only made available against payment of a sum of money or conclusion of a paid subscription. In addition, access to individual, exclusive "Plus" articles is only granted 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 authorisations will be linked to the personal data in your user account.

Piano Composer

name	purpose	duration	type
_pid	Contains the URL of the domain received by the front end on which the cookie is set. Used as the domain for other cookies.	1 month	cookie
_tbc	identification of the user's browser	14 months	cookie
_pctx	Synchronizatio n of different product scripts with common data points	13 months	cookie
_pprv	Storage of information regarding user consent in relation to specific products	13 months	cookie
xbc	control of the paid content model	2 years	cookie

Google Tag Manager

The Google Tag Manager service is an organizational tool that enables us to control services. The tool only uses the IP address to establish a connection to the server and to function technically. Otherwise, no personal data is

processed by the tool itself. Tag Manager ensures that other services are only executed if the conditions (tags) specified in Tag Manager are met. This allows us to ensure, for example, that tools requiring consent are only loaded after you have given your consent. Tag Manager does not access the data processed by the tools.

Consent management

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

The data is stored for a maximum of 13 months.

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

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

We use the authId cookie to ensure that the consent status is not lost and to prevent a new consent request. This cookie is absolutely necessary in order to be able to pass on the consent settings across domains and products for logged-in users.

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. The transfer of the IP address, which is used solely for the provision of the service, and a cookie are essential for embedding and display. This data is only required for the technical implementation of the embedding and is deleted from all systems after a maximum of 24 hours.

Deliver and present advertising

In order to display the adverts 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 advert, we, our advertising marketers and the respective third-party provider process your IP address and information about your device type. This is an absolutely necessary technology, which is shown in the data protection settings under the special category "Provide adverts or content technically".

Name	Purpose	AdServer	Type
adnxs	Deliver ads	Xandr	Cookie
szdm_uxid	Deliver ads	AdSpirit	Cookie

VG Wort

We use technology from the collecting society VG Wort (VG Wort, legally capable association by virtue of the award, Untere Weidenstraße 5, 81543 Munich) to measure access to texts in order to record the probability of individual texts being copied. Many of our pages are therefore equipped with JavaScript calls, which we use to report access to VG Wort. In this way, we enable our authors to participate in the distributions of VG Wort, which ensure the statutory remuneration for the use of copyright-protected works in accordance with Section 53 UrhG.

The measurement of access figures 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, which is created from various automatically transmitted information from your browser, to recognise computer systems. A randomly generated unique identification number, a so-called session ID, is stored in the session cookie. A cookie also contains information about its origin and the storage period. IP addresses are only processed in anonymised form.

Adblock-Detection

In order to detect when you are using an ad blocker to prevent advertisements from being displayed, thereby violating our terms of use, we use ad block detection that utilizes the local storage entry "BT_AA_DETECTION."

Adobe Typekit Web Fonts

We use Adobe Typekit from Adobe for a 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 informs Adobe that this website has been accessed via your IP address. According to Adobe, no cookies are stored when providing the fonts.

The processing is carried out on the basis of the user agreement concluded with you (Article 6 (1) (b) GDPR).

The transfer of data to the USA is based on the existing adequacy decision and on the European Commission's standard contractual clauses. Adobe is certified under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA intended to ensure compliance with European data protection standards for data processing activities in the USA. Every company certified under the DPF undertakes to comply with these data protection standards. You can find further information from the provider at the following link: https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000TNo9AAG&status=Active

Further information on Adobe Fonts is available 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

Embeds

We use embeds, i.e. embedded content, in order to offer you interesting content. The respective embedding is carried out using the technical process known as framing. In framing, the simple insertion of a provided HTML link into the code of a website creates a playback frame on our pages, thereby enabling the content stored on the servers of the third-party platform to be played.

This third-party content is displayed to you for the performance of the contract on the basis of the contract with advertising concluded with you (Article 6 (1) sentence 1 (b) GDPR).

Some of this content originates from social networks or other companies, including those based in the USA. By embedding their content, cookies and similar technologies may be used by these providers and data may be transmitted to them, possibly also to the USA (e.g. your IP address, browser information, cookie ID, pixel ID, page accessed, date and time of access). Details of the embedded content of the individual networks or these companies, which are stored on their servers and for the provision of which

your IP address is transmitted to these companies, as well as of the data processing operations carried out by these companies, which may also include advertising purposes, can be found in the following sections.

- **Bayerischer Rundfunk** (BR, Anstalt des öffentlichen Rechts, Rundfunkplatz 1, 80335 Munich). Further information on data protection can be found here.
- **Meta Platforms** (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland); further information on data protection can be found here.
- **Instagram** (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland); weitere Informationen zum Datenschutz finden Sie hier.
- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland); further information on data protection can be found here.
- **Spotify** (Spotify AB, Regeringsgatan 19, SE-111 53 Stockholm, Sweden). Further information on data protection can be found here.
- **YouTube** (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland). Further information on data protection can be found here.

Liveticker

We use software from our service providers tickaroo (Tickaroo GmbH, Waffnergasse 8, 93047 Regensburg) and Heim:spiel (HEIM:SPIEL Medien GmbH & Co. KG, Am Stadtgraben 48, 48143 Münster) for our live reporting. Your browser calls up the online news ticker directly from the servers of the service providers. Your IP address, date, time and URL of all accesses are stored for a maximum of four weeks. Tickaroo creates anonymised access statistics; it is no longer possible to assign them to individual users. For the statistics, a random token is generated in the browser, stored as a cookie and sent with every ticker call.

The storage of and access to information in your device is absolutely necessary and is carried out in accordance with Section 25 (2) TDDDG.

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

Podcasts and videos

When playing and displaying podcasts and videos, the IP address and device information are processed for the technical provision of these services and for the collection of statistical data such as retrieval figures. This data is anonymized or pseudonymized before being stored in the database, unless it is necessary for the provision of the service.

We use the local storage entries jwplacementLocalId, jwplayer.bandwidthEstimate, and jwplayerLocalId to play videos.

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

If advertising and advertisements from third parties are played in the podcasts, this likewise takes place for the performance of the contract.

Games

Our digital services offer you the option of accessing digital puzzles directly from our services. For this purpose, your IP address is transmitted to the puzzle server of our service provider and stored in a system log file. We also save your score. The IP addresses are deleted after 10 days.

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

Sharing content

You have the option of recommending content on our websites via the buttons placed on the content; on mobile devices via the native sharing function. We provide the social networks with content - and no personal data - that is used exclusively to display content. If you use the buttons, we

merely link to the page of the respective social media provider. We do not process any of your personal data.

How we optimize our products

Further development of user-friendliness

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

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

Usage analysis

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

In addition to usage analysis, we also use testing procedures to test different versions of our digital offerings or their components, for example, and to increase certain user actions or reactions if necessary.
For these purposes, profiles, i.e., data summarized for a usage process, are created and information is stored in a browser or on a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there, as well as technical information such as the browser used, the computer system used, and information on usage times.

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

Kilkaya

To analyse the performance of our articles live, we use the analysis script from Kilkaya (Kilkaya AS, Åsveien 3, 1424 Ski, Norway). Kilkaya is an analysis tool that was specially developed for news sites with high traffic and helps us to optimise and prioritise our pages and articles. Kilkaya captures all traffic metrics in real time, such as page views, clicks, time spent on pages, unique users. The tool uses the IP address to establish the connection to the server and to be able to function technically. We use a user ID to count unique users. No further data is linked to this, so that you cannot be personally identified.

Analytics and personalisation

In order to analyse how our digital services are used and how frequently each individual user reads us, we store cookies in your browser. This enables us, on the one hand, to further develop our offering and, for example, to understand how often users return and which browsers or devices are used.
On the other hand, this allows us to determine the conversion rate in order to understand which users have taken out which digital subscription via which channel (websites, apps), as well as to display suitable offers and calculate personalised values for our customers. For the calculation of customer values, we collect a Single Sign-On ID (SSO ID) and combine this with usage data collected on our data platform.

For data processing for these purposes, we use the CeleraOne software from the service provider Piano (Drammensveien 165, 0277 Oslo, Norway).

Your data are deleted as soon as they are no longer required for the intended purpose and there are no statutory retention obligations that prevent their erasure.

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

How you can personalise content and how we promote our products

Personalised customer approach

We analyse the behaviour of our users, i.e. we monitor individual browsers and thus the behaviour of users only on the SZ websites and in the SZ apps, in order to be able to display special content or offers tailored to their interests to target groups on our websites and in the apps. We use this data to create reports on the use of the website and apps. We store either the 20 most recently read articles or the behaviour 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.
To do this, we collect context-related 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 analyse where and when you have 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 personalised customer approach, i.e. according to the criteria of the segment, by displaying special content and offers via a user segment ID.

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

- A/B tests to check which content leads to more customer loyalty, subscriptions or purchases,
- Recognising an adblocker status.

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

SZ personalization

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

In practice, this gives you the opportunity to

- prioritise new articles, videos, podcasts, games and other content that match your interests.
- If you explicitly order this, you will 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 them with other SZ readers.

We process the following personal data from you

- Your subscription status, i.e. whether and which subscription you have ordered from us,
- Your usage behaviour, 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 be able to use certain services, or
- a unique device ID if you use our digital services without being logged in,

We bring this data from the individual products together via a pseudonymised and cross-product ID so that we can improve the overall user experience with a cross-product analysis and provide you as a user with manual, semi-automated and fully automated content and offers from Süddeutsche Zeitung tailored to your needs.

Secondly, we determine the conversion rate in order to track which users have taken out which digital subscriptions via which channels (websites,

apps) and calculate personalised values for our customers. To calculate customer values, we use the SingleSignOn ID (SSO ID) and merge this with usage data in our data platform.

We also process your email address in the following cases:

- 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 we should therefore play you subscription adverts or not.
- If you are a new customer, we will greet you with a welcome email and recommendations (if explicit authorisation has been granted) based on your interests. In this case, we will link your Single Sign On ID to the email address you provided.

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

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

Marketing for own products

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

Advertisements can be tailored to the respective user, for example by using information from the browser about usage (such as pages visited, visit times, and length of stay). User-specific advertising placements are also possible. In addition, analyses relating to reach or for billing purposes can be carried out in pseudonymised form.

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.

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

Performance measurement

To find out whether and how effective our advertising for our own products 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. As soon as you complete an action, our system recognizes the cookie and we record a conversion.

In order to measure how many users have responded to a particular advertising campaign for our products and offers and have placed orders, we use a URL parameter that also sets a cookie (tpcc_). The cookie is deleted after 90 days.

To optimize our marketing campaigns, we process data that shows us how people interact with our advertising materials, as well as installation and event data, and use this to create anonymous evaluations.
This data will be stored for a maximum of 24 months.

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

Awin

In order to track a user's journey from our digital offering to an advertisement and on to a possible purchase, we use a tool from Awin (AWIN AG, Eichhornstraße 3, 10785 Berlin). The purpose of this tracking is to assign our sales and marketing expenses to a specific user transaction so that advertisers can be compensated for the transaction. In addition, summary reports with cumulative statistical data are created. This only reveals that the same user started their journey with us and completed it with an advertiser, and that the affiliate marketing campaign was therefore successful for this user.

By creating a restricted user profile that does not contain the user's name or identity, it is also possible to track the so-called "user journey" when it begins on one device and ends on another. The profile is only used to assign sales and marketing efforts to us, even if the user has changed devices before completing a transaction.

In order to enable the payment of commissions owed to us, even though no corresponding transaction was recorded by the tool, we exchange

information about the unrecorded transaction with the advertisers in these cases so that we can verify it using their own records.In order to track a user's journey from our digital offering to an advertisement and on to a possible purchase, we use a tool from Awin (AWIN AG, Eichhornstraße 3, 10785 Berlin). The purpose of this tracking is to assign our sales and marketing expenses to a specific user transaction so that advertisers can be compensated for the transaction. In addition, summary reports with cumulative statistical data are created. This only reveals that the same user started their journey with us and completed it with an advertiser, and that the affiliate marketing campaign was therefore successful for this user.

Criteo

In order to show you advertising for our products, we work with Criteo (Criteo, 32 rue Blanche, 75009 Paris, France), an advertising platform that displays personalised online advertising to users. For this purpose, a JavaScript is installed on our websites that starts a call via HTTP or HTTPS protocol to the Criteo domains. This call is processed with an anonymised user ID and the context of the call. By setting cookies on the Criteo domains, usage is tracked anonymously across customer and publisher pages and used for personalised advertising (retargeting). The data is deleted after 13 months.

In order to achieve the optimum performance for a campaign, Criteo loads pixels to signal your current interest in an advert. The control and frequency of the publisher and network pixels is dynamically controlled via the availability of the publisher's inventory and performance.
The pixels are loaded in the protocol of the calling page (HTTP/HTTPS) and are limited to static image pixels. Publishers and networks from which Criteo pixels are loaded are listed here. The list is not exhaustive and is updated regularly.

As both we and Criteo jointly decide on data processing, we have concluded a Joint Controllership Agreement in accordance with Article 26 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 adverts in the Google search network and advertising banners in the Google display network (banners on

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

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

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

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

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

You can prevent this technology by disabling the use of cookies via your browser settings, deselecting individual types of ads in Google's ad settings, disabling interest-based ads on Google or disabling cookies from advertising providers with the help of the respective deactivation help of the network

advertising initiative. We and Google will then only receive statistical information on how many users have visited a page and when. This can only be prevented by appropriate browser extensions.

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, optimisation and economic operation of our online offer.

In order to ensure suitable and appropriate guarantees for the protection of personal data, we have concluded EU standard contractual clauses with Meta Platforms and, if necessary, take additional measures to protect the rights of data subjects.

The "Conversion API" is an interface to which conversion information can be sent on the server side. By transferring data via the API, we want to ensure that our Meta Platforms and Instagram adverts correspond to the potential interest of users and are not annoying. We can also track the effectiveness of Meta Platforms and Instagram adverts for internal performance measurement purposes by seeing whether users have been redirected to our website after clicking on a Meta Platforms or Instagram advert and whether they have carried out an action (so-called "conversion").
User data is generated, read or sent at the following points:

User clicks on an SZ advert on Meta Platforms or Instagram

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

User reaches target page (a subdomain of sueddeutsche.de)
If consent is available: fbclid information is read from URL and stored in a cookie ("szpay_fbclid", duration: 7 days)

If a user performs a certain action on the target page (e.g. purchase of a subscription), the system checks whether the fbclid cookie is present. Only if the cookie is present is the information passed on to Meta Platforms.

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

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

- Promotion (e.g. SZ Plus basic 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 user-related information other than the click ID "fbclid" transmitted to Meta Platforms.

The processing of data by Meta Platforms takes place within the framework of Meta Platforms' Data Usage Policy. Accordingly, general information on the display of Meta Platforms ads can be found 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 conversion tracking. Microsoft Advertising Conversion Tracking is an analytics service provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. If you click on an advert placed by Microsoft, a cookie for conversion tracking will be stored on your PC. If you visit certain pages of our website when the cookie has not yet expired, Microsoft and we can recognise that you have clicked on a specific 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. We find out the number of users who have clicked on an advert and were then redirected to a page with a conversion tracking tag. We do not receive any information that can be used to personally identify users.

Outbrain

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

Outbrain uses cookies for this purpose and thus processes data in anonymised form.

You can recognise that you are connected to an Outbrain widget by the text that refers to Outbrain (e.g. "Recommended by Outbrain", "from Outbrain" next to the recommendations). If you click on the link to Outbrain, you will see a detailed note that allows you to navigate to Outbrain's interest profile, where you will find a general presentation of the types of data categories Outbrain uses to make its recommendations.

Google Ads Enhanced Conversions

In order to improve the accuracy of our Google Ads conversion tracking, we use “Google Ads Enhanced Conversions”. In this context, data that you provide to us with your consent for personalised advertising (e.g. your email address) is transmitted to Google in encrypted form. This makes it possible to link conversions on this website to Google Ads campaigns with which you have interacted on this or another device. Such a link is only established if you provide identical data (e.g. email address) both to us and to the site on which you interacted with the ad.

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

Measuring the success of campaigns

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

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

Use of AI

As part of our services, we sometimes use artificial intelligence (AI) technologies to improve our offerings and provide you with a more efficient service. In doing so, we place particular emphasis on the following principles:

- **Data minimization:** AI systems only receive the data that is actually necessary for the respective purpose.
- **Purpose limitation:** Your data will be processed exclusively for the specified purposes and will not be used for training external AI models without your express consent.
- **Transparency:** We indicate where AI-supported processes influence decisions or generate automated results.
- **Human oversight:** For decisions that have a significant impact on you, we ensure that human review is always possible.
- **Security:** All AI systems used are subject to the same strict security and data protection standards as our other IT systems.

Churn Prevention

To retain our subscribers, we target them with special promotional offers on our digital platforms when there is a high probability that they will cancel. To do this, we analyze the usage behavior of active subscribers and calculate the probability that a subscriber will cancel their subscription within the next 30 days or 10 days. For this calculation, we use an algorithm that segments subscribers based on their churn risk.

To do this, we process the following subscriber data: billing period, subscription price, subscription duration, total amount of payments made, number of billing periods and payments to date, payment provider, remaining days until the end of the current billing period, and information about the channel through which the subscription was purchased (direct, external, internal, or via social media). We also collect usage data, i.e., the number and type of page views (total, by article, by device and browser), devices and browsers used (e.g., Android, iOS, Firefox, Internet Explorer), the average time of day and hour of use, the source of visits (direct, internal, external, social media), and the number of visits with and without access to paid content.

The model is trained and updated daily using the XGBoost classification algorithm. Each active subscriber is assigned a score that reflects the probability of cancellation.

This is an automated analysis that does not involve any individual manual evaluation.

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

SZ-Wirecard Voice Assistant

When you use the SZ Wirecard Assistant, you are interacting with AI, not a human being. The content you enter is passed on to third-party providers of large language models so that the AI can deliver appropriate responses automatically and almost in real time.

You can also use the voice function. Your voice will then be processed in real time so that the AI can respond. To do this, we temporarily store the audio data and transcribe it, i.e., convert it into text. For this purpose, we require a user ID, which is deleted together with the audio data immediately after transcription. The resulting text (your dialogue) can be stored for up to 30 days — e.g., to clarify complaints and detect abuse — and is then deleted.

Processing generally takes place in Europe, but in exceptional cases, the AI response may also be generated outside the EU. In such cases, we use the applicable standard contractual clauses for the transfer of personal data to processors in third countries as appropriate safeguards.

By starting and using the SZ Wirecard Assistant, you consent to the data processing described above. You can revoke this consent at any time by discontinuing use of the SZ Wirecard Assistant.

When third parties advertise their products with us

In order to refinance our digital services, we market our advertising space – via our marketing service providers, but also via third parties.

You can find an overview of these third parties and how they process your data and for which purposes in the cookie policy in the footer of the homepage.

Self-marketing of adverts

Our advertising marketers support us in marketing our advertising space by acquiring and displaying adverts.
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 concluded either an agreement within the meaning of Art. 26 GDPR with these third parties and the third parties they use in the context of marketing within the meaning of Art. 4 No. 10 GDPR, in which we have defined the respective responsibilities for the fulfilment of the obligations under the GDPR with regard to joint processing, or an order processing agreement within the meaning of Art. 28 GDPR.

In the case of joint responsibility, we are obliged to enable you to grant and withdraw consent under data protection law. We are also the central point of contact for you as a data subject. We forward data subject enquiries that we receive and that relate to joint processing to our marketers for response without delay. Irrespective of 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.

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

Personalised content, advertising and analytics with the Utiq service

In order to display personalised advertising, content and product recommendations from advertisers to finance our digital services, we use the Utiq technology (consisting of the creation of IDs and an Authentic Consent Service) on this website. The Utiq technology is provided by Utiq SA/NV, a European ad-tech company that cooperates with participating telecommunications network operators (see the list here) which contribute to the operation of the technology. The Utiq technology enables websites like ours that use Utiq to carry out our digital marketing activities.

The Utiq technology is deactivated by default and requires your consent in order to be activated and used. The technology is only available if you are a customer of one of the participating telecommunications network operators.

If you consent to the activation of this technology, we will use it to recognise you as the same website visitor and to gain insights into your usage behaviour on our website. This allows us to offer you personalised content and advertising or to carry out analyses, depending on which additional consents you have given us for these purposes.

To provide the Utiq service, we and Utiq act as joint controllers for certain phases of the processing when we use the Utiq technology.

By consenting to the activation of the Utiq service, you agree to the following data processing:
Your IP address is read from your device and transmitted by Utiq to your telecommunications provider, which matches it with an account reference (e.g. your mobile phone number or your contract data) in order to create an online identifier ("network signal") and forward it to Utiq. On this basis, Utiq creates additional marketing identifiers (known as "martechpass" and "adtechpass"). These are randomly generated values created by Utiq that enable us to recognise you as the same visitor and to gain insights into your navigation so that we can, for example, offer you personalised content and advertising or carry out analyses, depending on which additional consents you have given us for these purposes or whether you have concluded a user agreement with us for the use of the website (contract with advertising). The martechpass and adtechpass are stored in your browser together with the corresponding first-party cookies and are valid for 180 days and 24 hours respectively.

Via the Utiq data protection portal ("consenthub"), you can view and withdraw all consents you have given for the use of the Utiq technology

across all websites participating in Utiq.

You can also withdraw your consent that applies only to this website here.

Further information about the Utiq service can be found in the Utiq consenthub or in the Utiq privacy policy.

External marketing by third parties

When you access our digital services, you will also be shown content from third parties who use our advertising space to place ads. We refinance our services through the delivery of these ads. When such content is loaded, this is done from the servers of the respective third-party providers. In this process, certain data are always transmitted to the third-party providers, in many cases including personal data. In addition, for most of the third-party services used to load this content, cookies are set or similar technologies are employed.

You can find an overview of these third parties and how they process your data and for which purposes in the cookie policy in the footer of the website.

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

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

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

Advertising via the IAB TCF

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

Saving or accessing information on a terminal device (Purpose 1)
Cookies, terminal device or similar online identifiers (e.g. login-based

identifiers, randomly generated identifiers, network-based identifiers) may be stored on or read from your terminal device together with other information (e.g. browser type and browser information, language, screen size, supported technologies, etc.) in order to recognise it each time it accesses an app or a website. This is done for one or more of the processing purposes listed here.
Most of the processing purposes explained in this notice are based on the storage of or access to information on your device when you use an app or visit a website. For example, it may be necessary for a provider or website operator to store a cookie on your device when you first visit a website in order to recognise it on your next visits (by retrieving this cookie each time).

Use of reduced data to select adverts (Purpose 2)
Adverts presented to you on this service may be based on reduced data, such as the website or app you are currently using, your approximate location, your device type or the content you are interacting with (or have interacted with) (e.g. to limit the frequency of adverts displayed to you).

*Examples

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

Creation of profiles for personalised advertising (Purpose 3)
Information about your activities on this service (such as completed forms, viewed content) may be stored and combined with other information about you (e.g. information from your previous activity on this service or other websites or apps) or similar users. This is then used to create or improve a profile about you (this may include, for example, possible interests and personal characteristics). Your profile may be used (including at a later date)

to enable us to present you with adverts that are likely to be more relevant to you based on your potential interests.

*Examples

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

Use of profiles to select personalised advertising (Purpose 4)
Advertising displayed to you on this service may be based on your advertising profile. This advertising profile may include your activities (such as completed forms, viewed content) on this service or other websites or apps, possible interests and personal characteristics.

*Examples

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

Creating profiles to personalise content (Purpose 5)
Information about your activities on this service (such as: completed forms,

non-promotional content viewed) may be stored and combined with other information about you (such as your previous activity on this service or other websites or apps) or similar users.
This is then used to create or complete a profile about you (this may include, for example, possible interests and personal characteristics). Your profile may be used (including at a later date) to show you content that is likely to be more relevant to you based on your potential interests, for example by changing the order in which content is shown to you to make it even easier for you to find content that matches your interests.

*Examples

- You read several articles on a social media platform about how to build a tree house. This information can be added to a profile to record your interest in content about outdoor activities and do-it-yourself instructions (with the aim of enabling the personalisation of content so that you are presented with more blog posts and articles about treehouses and wooden cabins in the future, for example).
- You watched three videos about space exploration on different TV apps. An independent news platform that you have not previously used creates a profile based on this usage behaviour and identifies space exploration as a topic of potential interest for future videos.

Use of profiles to select personalised content (Purpose 6)
Content presented to you on this service may be based on your personalised content profiles, which include your activities on this or other services (such as forms you submit, content you view), possible interests and personal characteristics, such as the changed order in which content is displayed to you, to make it even easier for you to find (non-advertising) content that matches your interests.

*Examples

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

to you, based on a profile that was created about you when you watched the online videos on these websites.

Measurement of advertising performance (Purpose 7)
Information about which adverts are presented to you and how you interact with them can be used to determine how much an advert has appealed to you or other users and whether the objectives of the advertising campaign have been achieved. The information includes, for example, whether you have viewed an advert, whether you have clicked on it, whether it has encouraged you to buy a product or visit a website, etc. This information is helpful in determining the relevance of advertising campaigns.

*Examples

- You clicked on an advert on a website operator's website about a "Black Friday" discount from an online shop and bought a product. Your click is linked to this purchase. Your interaction and that of other users is measured to find out how many clicks on the advert led to a purchase.
- Sie gehören zu den wenigen, die in der App eines App-Betreibers auf eine Werbung, über einen Rabatt anlässlich eines besonderen Ereignisses (z.B. „internationaler Tag der Anerkennung“), eines Online-Geschenkeshops geklickt haben. Der App-Betreiber möchte Statistiken darüber erhalten, wie oft eine bestimmte Anzeige innerhalb der App, insbesondere die Anzeige zu einem besonderen Ereignis (z.B. „internationaler Tag der Anerkennung“) von Ihnen und anderen Benutzern angesehen oder angeklickt wurde, um dem App-Betreiber und seinen Partnern (wie Agenturen) zu helfen, die Anzeigenschaltung zu optimieren.

Measuring the performance of content (Purpose 8)
Information about what advertising is presented to you and how you interact with it can be used to determine whether (non-advertising) content has reached the intended target group and matched your interests, for example. This includes, for example, information about whether you have read a particular article, watched a particular video, listened to a particular podcast or looked at a particular product description, how much time you have spent on that service and the websites you have visited, and so on. This information helps to determine the relevance of (non-advertising) content that is displayed to you.

*Examples

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

Analysing target groups through statistics or combinations of data from different sources (Purpose 9)
Based on the combination of data sets (such as user profiles, statistics, market research, analytics data), reports can be created about your interactions and those of other users with advertising or (non-advertising) content in order to identify common characteristics (e.g. to determine which target groups are receptive to an advertising campaign or to certain content).

*Examples

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

Development and improvement of offers (Purpose 10)
Information about your activities on this website, such as your interaction with adverts or content, can help to improve products and offers and to

develop new products and offers based on user interactions, the type of target group, etc. This processing purpose does not include the development, supplementation or improvement of user profiles and identifiers. This processing purpose does not include the development, enhancement or improvement of user profiles and identifiers.

*Examples

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

Use of reduced data to select content (Purpose 11)
Content presented to you on this service may be based on reduced data, such as the website or app you are using, your approximate location, your device type or information about what content you interact (or have interacted) with (e.g. to limit how often you are shown a video or article).

*Examples

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

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

- **Ensuring security, preventing and detecting fraud and troubleshooting:** Your data may be used to monitor and prevent unusual and potentially fraudulent activities (for example, regarding advertising, advertising clicks by bots) and to ensure that systems and processes function properly and securely. The data may also be used to resolve problems that you, the website or app operator or the advertiser may have in delivering content and adverts and in your interaction with them.
  Example
  An advertising intermediary delivers adverts from different advertisers to its network of partner websites and apps. The advertising intermediary notices a sharp increase in clicks on adverts from a particular advertiser. He analyses the data regarding the source of the clicks and finds that 80% of the clicks are from bots and not humans.
- **Provision and display of advertising and content:** Certain information (such as IP address or device features) is used to ensure the technical compatibility of the content or advertising and to enable the transfer of the content or advertising to your device.
  Example
  When you click on a link in an article, you are usually redirected to another page or another part of the article. To this end, 1°) your browser sends a request to a server linked to the website, 2°) the server responds to the request ("here is the article you requested") using technical information contained by default in the request sent by your terminal in order to properly display the information/images that are part of the article you requested. Technically, such an exchange of information is necessary to provide the content that is displayed on your screen.
- **Store and transmit your data protection choices:** The choices you make in relation to the purposes and companies listed in this notice will be stored and made available to the companies concerned in the form of digital signals (e.g. a character string). Only in this way can both this service and the companies concerned respect the respective decisions.
  Example:
  If you visit a website and are given the choice of whether or not to consent to the use of profiles for personalised advertising, the decision you make will be stored and transmitted to the advertising providers

concerned so that your decision is taken into account in the advertising presented to you.

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

- Matching and combining data from different data sources:__ Information about your activities on this service may be matched and combined with other information about you from different sources (e.g. your activities on another online service, your use of an in-store loyalty card or your responses to a survey) to support the purposes explained in this framework.
- Linking of different devices:__ To support the purposes set out in this framework, it may be determined whether it is likely that your device is connected to other devices belonging to you or your household (e.g. because you are logged into the same service on both your mobile phone and your computer or because you use the same internet connection on both devices).
- **Identification of end devices based on automatically transmitted information:** Your end device can be distinguished to support the purposes explained in this framework using information that it automatically transmits when accessing the Internet (e.g. the IP address of your Internet connection or the type of browser you use).

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

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

Personalised advertising with ID5 technology

In order to display personalised advertising, content and product recommendations from advertisers to finance our digital services, we use ID5 technology on this website. By using an ID5 identifier (ID5 ID) which ID5, acting as an independent controller, creates from your device information, we and our advertising partners are able to carry out our digital marketing activities. This ID does not contain any of your identifiable personal data. We place this ID in a first-party cookie and/or use an ID5 cookie for online and cross-channel advertising. This ID is shared with our advertising partners and other third-party providers of advertising worldwide in order to enable interest-based content and targeted advertising across your entire online experience (e.g. web, connected devices, in-app advertising).

Detailed information on ID5's data processing activities in connection with this ID and on opting out of ID5 can be found in the privacy policy of the ID5 platform.

The above-mentioned processing is carried out for the performance of the user agreement (contract with advertising) concluded between you and us.

If you use other SZ services

Bookmark article and My SZ

"My SZ" offers you the option of displaying content that interests you or that you want to remember. Once you have selected your favourite topics, we will show you articles from the selected subject areas or the articles you have bookmarked. This requires a Login.

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

Ordering products

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

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

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

Protection against misuse by bots

We use Cloudflare Turnstile on our website, a service of Cloudflare, Inc., 101 Townsend St., San Francisco, CA 94107, USA. Turnstile is used to check whether a request is made by a natural person or by an automated program ("bot"). This allows us in particular to protect forms, login areas and other functions of our website against spam, misuse and automated attacks. Processing is based on our legitimate interest in the security, proper functioning and protection of our website in accordance with Article 6(1)(f) GDPR.

When Cloudflare Turnstile is used, the following technical information is processed:

- the IP address of the requesting device,
- information about the TLS-encrypted connection ("TLS fingerprint"),
- information from the user-agent header, in particular about the browser and operating system,
- the site key used for integration as well as the associated origin domain or the requested origin,
- technical signals for detecting browser characteristics, automated behavior and unusual access patterns.

For this purpose, Turnstile may perform, among other things, small, non-interactive JavaScript checks as well as technical checks of the browser and device environment. Depending on the configuration, this may include, for example, proof-of-work or proof-of-space procedures, queries of web APIs and further signals for detecting automated access.

Turnstile neither accesses messages, form entries or other content of the website you visit, nor does it store or transmit them to Cloudflare. The signals collected are not used to identify, profile or specifically target individuals.

We store the data arising in the course of the Turnstile check only for as long as is necessary for the purposes described above or where statutory retention obligations exist.

Device Management

If you use a digital subscription, we process technical information about the devices you use in order to manage the use of your online access and to protect it against unauthorised disclosure of your access data.

For this purpose, in particular the screen resolution, operating system version, information about the browser and the technical session, as well as a technical device identifier or a comparable identifier may be processed. This information is assigned to the customer account or subscription you use. In this context, we check whether the device used is already registered for your customer account and whether the maximum number of five different devices permitted under your subscription is being observed.

You can manage device administration yourself in the profile area of your customer account. If use is detected that does not comply with the terms of use, access to the digital service may be technically restricted. We may also display a notice to you if, for example, the permitted number of registered devices is exceeded or parallel use is detected.

Processing is necessary in order to provide the online access in accordance with the user agreement between you and us, to implement the agreed usage restrictions, and to protect our digital service against abusive multiple use. The legal basis is therefore, insofar as the processing is required for these purposes, Article 6 (1) (b) GDPR. To the extent that the processing serves to safeguard our legitimate interests in securing our digital services and protecting them against unauthorised use, the legal basis is Article 6 (1) (f) GDPR. Our legitimate interest lies in particular in ensuring the contractual use of our digital services and preventing abuse.

For device administration, we use technical functions provided by our service provider Piano. In addition, for testing purposes, a capping script may be used that can detect and, where applicable, technically prevent parallel or abusive multiple use. In doing so, only the technical information required for device and session checking is processed.

Where cookies or comparable technologies are used for device or session recognition, we will additionally inform you of this in our consent management and, where legally required, obtain your consent before their use. Technologies that are strictly necessary solely to provide the online access expressly requested by you or to ensure its security may be excluded from this.

We store the device information and technical identifiers only for as long as is necessary for device administration, abuse prevention, and the handling of security and support cases. They are then deleted or anonymised, provided that no statutory retention obligations prevent this.

Direct marketing

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

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

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

- by clicking on the unsubscribe link at the end of the e-mail
- by e-mail to werbewiderspruch@sz.de
- in writing to Süddeutsche Zeitung GmbH, Aboservice, Hultschiner Str. 8, 81677 Munich (please include your e-mail address or telephone number and the name from your registration)

- or by phone on +49 89 2183-0.

If you have given your consent, we analyse your clicks in our marketing mailings with the help of so-called tracking pixels, i.e. invisible image files. These are assigned to your e-mail address and are linked to a unique ID so that clicks in the marketing mailings can be clearly assigned to you. The purpose of the user profile is to be able to tailor the marketing mailings to your interests. We record when you read marketing mailings and which links you click on, and use this information to create an interest profile.

You can unsubscribe from any marketing mailing at any time and withdraw your consent to the analysis. There is a corresponding link for this purpose in every marketing mailing.

Your data will be deleted after cancellation of the marketing mailing.

Comments and contributions

In online comments, you can question the opinions of our authors, exchange arguments, and provide additional information to enrich the dialogue. In order to express your opinions, you must be a subscriber to an SZ Plus subscription, have an SZ account, and log in via our login function (see Registration and login). All users can read comments – even without being SZ Plus subscribers.

To enable you to comment, we use your name and a UID as well as your email address to identify you as a user. We also use your email address so that you can receive notifications from the community. When a comment written by you is published, the full name stored in your SZ account is displayed in the comments section on SZ.de. Please note that, as a result, it can also be found on the internet, for example by search engines.
We collect and process the data you provide in order to publish your comment as requested (Article 6 (1) (b) GDPR). In particular, we also require your email address so that we can contact you in the event of complaints about your comment or your report and give you the opportunity to respond (Article 6 (1) (c) GDPR).

The tool also supports us in moderating user comments, including in connection with our social media channels. The analysis of user comments likewise serves to ensure compliance with the netiquette rules in the

comments sections.
The following data are processed by Conversario:
• Username (e.g. Facebook name)
• User image
• Comment text
• Date and time
• User ID
• Comment ID

The legal basis for data processing in this case is Article 6 (1) sentence 1 (f) GDPR; processing takes place in our interest in detecting breaches of our netiquette rules in advance and preventing publication in such cases. Further information is available in Conversario's privacy notice.

If you have previously published comments using a username freely chosen by you, we will in future use your name for both new comments and your comments already published, provided you have previously consented to this data processing (Article 6 (1) sentence 1 (a) GDPR). You can withdraw this consent at any time by emailing debatte@sz.de. You also have the option of deleting your comments previously published under your username under "My comments" if you do not wish your full name to be displayed. If you do not consent to the use of your full name, your previous comments will continue to be published under your username. 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 comments function and making the desired changes under Profile/Settings. There you also have the option of downloading your comment archive.

Contacting us

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

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

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

To improve the quality of our services, we also use artificial intelligence (AI) technologies in certain cases. To this end, calls recorded with your consent are anonymized, transcribed, and analyzed so that we can assess service quality, identify relevant topics, and derive recommendations for action (Art. 6(1)(f) GDPR).
The recorded calls are deleted after no more than 80 days.

Quiz questions

When we ask you quiz questions, we store the answers you give to each question. Based on the responses submitted, we create a comparison with the answers of other participants without any reference to you personally, so that we can show you how the other participants answered the question. We also store your user ID to ensure that each question can only be answered once and that the survey results are not distorted.

With your consent (by answering the questions), which you may withdraw at any time by emailing datenschutz@sz.de, your data will be stored for a maximum of one year.

Registration

You can create a digital account (login) via our login systems, which you can use to log in to all of our digital services after your initial registration. Some offers can only be used if you have a login. When you log in, we use cookies in your browser to identify you.

Data processing in detail

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

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

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.

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

Wir können Ihnen Informationen über ähnliche Produkte und Leistungen per E-Mail zusenden (§ 7 Abs. 3 UWG). Ein Widerspruch ist jederzeit durch Klick auf den Abmeldelink in der E-Mail oder unter werbewiderspruch@sz.de möglich.

You can delete your login yourself at sz.de/abo under "Login data" or request this. It will be deleted after two years of inactivity at the latest.

Once you have deleted your login, you will no longer be able to use any digital services that require a login. If you still have digital subscriptions with us that require a login, the login cannot be deleted before the end of the agreed subscription term. If you delete your login, this does not replace the written cancellation of a digital subscription.

If you have a digital account with us as a subscriber to the printed edition, you can delete your digital account or instruct us to do so, but you will then lose the associated functions such as the online subscription service.

Pre-filled forms

We use the data stored in your profile (this may be data that you have actively added there during registration or at a later date, or data that you have entered as part of a previous order and which we automatically adopt when you place a new order) to facilitate the ordering or other processes by means of pre-filled forms (Art. 6 para. 1 sentence 1 lit. f) GDPR).

My data

If you have concluded a subscription contract with us or have given your consent to advertising, we process the following data:

Data	Data category	Processing purpose	Storage period
Name, user name, customer number, e-mail address, password	login data	logging in or rejecting a user	until account deletion or after two years if not used
Name, title, customer number, subscription number	contract data	allocation to contract	10 years after conclusion of contract

Data	Data category	Processing purpose	Storage period
telephone number	contact details	queries on fulfilment of contract	until end of contract
Postal address, telephone number, email address	contact data	advertising	until revocation or objection
delivery address, billing address*, forwarding address*	delivery data	contract fulfilment	upon conclusion of contract 10 years or until deletion
IBAN	payment data	payment of subscription	upon conclusion of contract 10 years
ID	subscription data	query of reading authorisation	until revocation or after two years if not used
ID	Usage data	Further development and optimisation of our digital products and subscription offers	Until revocation or after two years if not used
DOI (IP address, time stamp, email address)	Opt-in data	Securing system operation, identification of the email address, proof of consent	Until revocation or after two years if not used

Data	Data category	Processing purpose	Storage period
ID	Pseudonymous identifier	Link between user account and subscriber data and recognition of a user	Until revocation or after two years if not used
Date of birth*	Personal data	Birthday greetings	Until revocation

*Voluntary information

Newsletter

You will receive newsletters from us if you explicitly order them by providing your e-mail address. We will check the e-mail address you have provided by sending a confirmation e-mail to it ("double opt-in procedure") to ensure that you are really the owner of the e-mail address.

We process the email address to send and analyse the newsletter (Art. 6 (1) (b) GDPR). We analyse your clicks in newsletters with the help of so-called tracking pixels, i.e. invisible image files. These are assigned to your email address and are linked to a unique ID so that clicks in the newsletter can be clearly assigned to you. The purpose of the user profile is to be able to tailor the newsletter offer to your interests. We record when you read newsletters and which links you click on and use this information to create an interest profile.

You can unsubscribe from any newsletter at any time. There is a corresponding link in every newsletter for this purpose.

Your data will be deleted after cancellation of the newsletter at the end of the year in which you unsubscribed from the newsletter.

Newsletter - Data processing in detail

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

*Voluntary information

Push notifications

If you allow push notifications, you give your consent to receive the notification and for the statistical analysis with which we can recognise whether and when our push notifications were displayed and clicked on (Art. 6 para. 1 sentence 1 lit. a) GDPR). This includes storing the time of registration and your browser ID or device ID.

Your data will be deleted as soon as you withdraw your consent.

You can revoke your consent at any time with effect for the future by clicking on the corresponding symbol in front of the address bar in your browser and deactivating the notifications.

Competitions

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

- register with us,
- enter your name in the high score/best list
- accept the conditions of participation and
- read the data protection notice.

To take part in quizzes and online games, you only need to register if you want to be entered in the high scores/leaderboards.

For registration and entry in the leaderboard, we process your e-mail address, a user name - preferably a fictitious one - and a password. You must enter the user name in your profile in your SZ account in order to be entered in the leaderboard. The user name will be published in the leaderboard on SZ.de if you click on the "Add to leaderboard" button after registering. When offering (non-cash) prizes, further personal data is required from the winners, in particular after the end of the competition, such as their address, in order to be able to notify them if they win and send them the prize.

The collection and processing of personal data is used to organise the respective competition and quizzes and, if applicable, to send prizes. The data will be processed with your consent (Art. 6 para. 1 sentence 1 lit. a) GDPR), in the case of competitions in accordance with Art. 6 para. 1 sentence 1 lit. b) GDPR. All data will be stored for the purpose and for the duration of the competition and deleted at the end of the campaign, provided there are no statutory retention obligations. The user name published in the high scores/best lists will only be deleted upon cancellation.

Your data may be passed on to our competition service providers and sponsors within the framework of the conditions of participation to which you have consented and deleted if they are no longer required.

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

You have the right to revoke your consent with effect for the future in accordance with Art. 7 para. 3 GDPR at datenschutz@sz.de.

Participate in surveys

In order to find out how satisfied you are with our products, you can take part in our surveys. You decide separately for each survey whether you wish to participate and which personal data you wish to provide to us.

To ensure that we do not show users the same survey multiple times, we read IP addresses, which are anonymised before being stored. This anonymisation is irreversible.

For our surveys, we use the online survey tool easyfeedback provided by our service provider easyfeedback GmbH, Ernst-Abbe-Straße 4, 56070 Koblenz. Information on data protection can be found here.

Your personal data are deleted no later than at the end of the year in which the survey and its evaluation have been completed.

To enable participants to interrupt a survey embedded on the website and continue it later using the same browser, a session cookie is created when the survey participation is started. This cookie contains a session ID formed from the prefix “efSurveySession” and a sequential number.

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

Events

For events, we process your name, contact, and address details that are required for the purpose of holding the events. Without processing these personal data, we would not be able to hold the events or offer this service to participants. The data are not used for advertising purposes and are only passed on to third parties if a co-organiser or event service provider is permitted to receive these data or if an increased security requirement makes this necessary (e.g. forwarding to the police, Federal Criminal Police Office).

The data are deleted as soon as the purpose for which they were collected has been fulfilled and any statutory retention obligations have expired.

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

What else you should know

Controller

Süddeutsche Zeitung GmbH

Hultschiner Str. 8
D-81677 Munich
Germany

Data Protection Officer

atarax group of companies

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

Contact for your data protection enquiry

You can ask your questions about data protection here.

datenschutz@sz.de

Your rights

- In accordance with Art. 15 GDPR, you have the right to request **information** about your personal data processed by us. In this context,

you also have the right to receive a copy of your personal data processed by us in accordance with Art. 15 para. 3-4 GDPR.

- In accordance with Art. 16 GDPR, you can immediately request the **correction** of incorrect or the completion of your personal data stored by us.
- In accordance with Art. 17 GDPR, you can request the erasure of your personal data stored by us.
- In accordance with Art. 18 GDPR, you can request the **restriction of the processing** of your personal data.
- In accordance with Art. 20 GDPR, you can request to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format and you can request the **transfer** to another controller.
- In accordance with Art. 7 para. 3 GDPR, you can **revoke** your consent once given to us at any time. This means that the processing carried out on the basis of the consent prior to the revocation was lawful and has the consequence that we may no longer continue the data processing based on this consent in the future.

Right to object

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

Right to lodge a complaint with the supervisory authority

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

Company presence in the social media

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

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

- **Meta Platforms** (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland); further information on data protection can be found here.
- **Instagram** (Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland); weitere Informationen zum Datenschutz finden Sie hier.
- **Pinterest** (Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland); weitere Informationen zum Datenschutz finden Sie hier.
- **LinkedIn** (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland); further information on data protection can be found here.
- **Xing** (New Work SE, Am Strandkai 1, 20457 Hamburg); further information on data protection can be found here.

We process the data for statistical purposes in order to further develop and optimise the content and to make our offer more attractive. This data includes the total number of page views, page activities and data and interactions provided by visitors. This data is processed and made available by the social networks. We have no influence on the generation and presentation of this data.

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

is also stored and analysed across devices; this applies in particular, but not exclusively, if you are registered as a member and logged in to the respective platforms.
We do not collect or process any other personal data.

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

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

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

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

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

In total, you have the following rights in relation to the processing of your personal data:
right of access; right to rectification; right to erasure; right to restriction of processing; right to object; right to data portability; right to lodge a complaint with the competent data protection authority about unlawful processing of your personal data.

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

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

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

- **LinkedIn** Optout
- **Meta-Plattformen** Optout
- **Pinterest** Optout
- **TikTok** Optout
- **Xing** Optout

Company 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.

When you comment on, share, or otherwise react to one of our posts, we, as the sole controller, process personal data. This includes your TikTok user data (in particular display name, username, profile picture), the content of the comments you submit, and the related metadata (in particular the date on which you posted the respective comment). If you also follow us on TikTok, we likewise process this information.

We process these data in order to support freedom of information, the free formation and expression of opinion, pluralistic diversity of opinions and thus democratic opinion-forming, as well as the exchange on current topics. We also wish to use our posts to generate enthusiasm for our brand and products. In this way, we can interact with you directly and quickly and you can take part in the discourse on current topics.

For our TikTok channel, we have activated the TikTok Analytics function, i.e. TikTok provides us with page statistics which, in anonymised form, give us information about visitor groups and visitor activities. For this data processing, we and TikTok are joint controllers, as regulated pursuant to Article 26 GDPR in Part B of the TikTok Analytics Joint Controller Addendum.

We store the aforementioned data for as long as they are required for these purposes and insofar and as long as this is necessary for legal proceedings or to comply with retention obligations.

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

Data processing by TikTok

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

TikTok describes its data processing activities in more detail in its Privacy Policy. There you will also find information on how to contact TikTok, how you can assert your rights vis-à-vis TikTok, as well as links to TikTok's cookie policies, among other things.

In its cookie policies, TikTok explains how it sets and uses cookies. TikTok uses cookies for both registered and non-registered users. The German Federal Office for Information Security (BSI) provides information on how you can limit cookies on your end device: Limiting cookies.

Information on how you can manage your privacy settings on TikTok or delete your account can be found, among other things, on the TikTok support pages.

According to its own statements, TikTok stores data for as long as is necessary to provide the platform and for the other purposes set out in TikTok's privacy policy. TikTok further states that it also retains data where this is necessary to fulfil contractual and legal obligations, where TikTok has a legitimate business interest in doing so, and for the establishment or defence of legal claims. More detailed information on data retention can be found in TikTok's privacy policies.

Joint controllers

We are joint controllers in the following cases.

Joint controlling for events

As joint controllers for data protection in accordance with Art. 26 para. 1 GDPR, we have jointly defined the purposes and means of processing as well as any data transfer.

If you participate in an event organised by us, we process your data in order to carry out the event and enable you to participate. This also means that we may include your name, details of your company or institution and your current professional position in a list of participants, which will be made available to other participants in the event (including in electronic form, if applicable), or we may make your data (name, details of company/institution) available to the moderators of the event for the purpose of organising the event.
In addition, we use this data to send you event-related materials created after the event.
We may also pass on your data to cooperation partners if this is necessary to organise the event and enable your participation, e.g. external guest management. The legal basis for this data processing is Art. 6 para. 1 lit. b) GDPR.

Furthermore, we use service providers (processors, e.g. mailing service providers) in accordance with Art. 28 GDPR, bound by instructions, among other things for the postal or digital dispatch of invitations or in the context of guest management. All processors will only have access to your data to the extent and for the period of time required to provide the services.

We store the above-mentioned data for the above-mentioned purposes until your cancellation. We will store your cancellation for a period of three years for evidence purposes.

Joint controlling with Meta Platforms

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

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

Joint controllers:
the entity responsible for this website (see the information about us mentioned at the beginning)
and
Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland

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

Appearance on the Meta Platforms fan page

Scope of data collection and storage

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

The promotional use of your personal data is particularly important for Meta Platforms. We use the statistics function to find out more about the visitors to our fan page. Using this function enables us to customise our content to the respective target group. In this way, we also utilise demographic information on the age and origin of users, for example, although we are unable to make any personal reference here. In order to provide the social media service in the form of our Meta Platforms fan page and to use the Insight function, Meta Platforms generally stores cookies on the user's end device. These include session cookies, which are deleted when the browser is closed, and persistent cookies, which remain on the end device until they expire or are deleted by the user. As a user, you can use

your browser settings to decide for yourself whether and which cookies you wish to allow, block or delete. You can find instructions for your browser here: Internet Explorer, Firefox, Google Chrome, Google Chrome mobile, Microsoft Edge, Safari, Safari mobile (links). Alternatively, you can also install so-called ad blockers, such as Ghostery.

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

You can also object to the collection and storage of data through the use of the above-mentioned cookies by Meta Platforms at any time with effect for the future via this opt-out link.
You can use the aforementioned link to manage your preferences regarding usage-based online advertising. If you object to usage-based online advertising with a specific provider using the preference manager, this only applies to the specific business data collection via the web browser you are currently using. Preference management is cookie-based. If you delete all browser cookies, the preferences you have set with the preference manager will also be removed.

Note on Meta Platforms Insights

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

- Age range
- Gender
- Place of residence (city and country)
- language

- Mobile or stationary page views (YouTube additionally individual device types)
- Interactions in the context of posts (e.g. reactions, comments, shares, clicks, views, video usage time)
- Time of use
  This anonymised data is used to analyse user behaviour for statistical purposes so that we can better tailor our offers to the needs and interests of our audience.

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

Disclosure and use of personal data

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

Joint controllership with TikTok

For our TikTok channel, we have activated the TikTok Analytics function, i.e. TikTok provides us with page statistics that give anonymised information about visitor groups and visitor activities. For this data processing, we and TikTok are joint controllers, as regulated pursuant to Article 26 GDPR in Part B of the TikTok Analytics Joint Controller Addendum.

TikTok describes its data processing activities in more detail in its Privacy Policy. There you will also find information on how to contact TikTok, how you can assert your rights vis-à-vis TikTok, as well as links to TikTok's cookie policies, among other things.

Joint controllership with Utiq

To provide the Utiq service, we and Utiq act as joint controllers for certain phases of the processing when the Utiq technology is used. As part of this joint controllership, the following in particular applies:

- Utiq and we are jointly responsible for obtaining users' consent to the Utiq technology by displaying an appropriate consent banner on our website.

Utiq is the controller

- for initiating a secure API call to the user's telecommunications operator after the user has consented to the Utiq technology
- for matching the network signal generated by the user's telecommunications operator (which is an online identifier created by matching your IP address with an account reference such as your mobile phone number and does not contain directly identifiable data) with the Utiq consent pass
- for generating additional marketing identifiers ("martechpass" and "adtechpass") and forwarding them to us
- for responding to data subject requests that users may 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 your Utiq consents and Utiq privacy preferences.

Notwithstanding the fact that you can exercise your rights vis-à-vis any controller responsible for the data processing, Utiq acts as the single point of contact for any questions or concerns you may have in connection with the Utiq technology.

Activation of the Utiq technology is optional. This means that it is deactivated by default and will only be activated if you give your consent.

Joint controlling with YouTube

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

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

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

Data processed by us

Your personal data is processed for the purpose of market observation and user communication, in particular by initiating and obtaining user feedback. We process the following access data for the aforementioned purposes:
Access source, region, age, gender, subscription status regarding YouTube channel, subscription source, playlist, device type, YouTube product, live/on demand, playback location, operating system, subtitles, language for video information, translations used, element type, info card type, info card, where was shared.
The above data processing can be legitimised in accordance with Art. 6 para. 1 lit. f GDPR and our "legitimate interest". We have pointed out the right to object in accordance with Art. 21 GDPR (see below). Our legitimate interest lies in playing video content on YouTube with the widest possible reach. With the help of the data collected, the topics, design, length and playback time of the videos can be better tailored to user behaviour.

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

Data processed by YouTube

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

On the one hand, YouTube processes your voluntarily entered personal data such as your name and user name, email address, telephone number or the contacts in your address book when you upload or synchronise it. On the other hand, YouTube also analyses the content you share to determine which topics you are interested in, stores and processes confidential

messages that you send directly to other users and can determine your location using GPS data, information on wireless networks or your IP address in order to send you advertising or other content. YouTube may use analysis tools such as Google Analytics for evaluation purposes. If tools of this type are used by YouTube for our channel, this is not done on our behalf. The data obtained during the analysis is also not made available to us. We can only view the information on access activities listed under point 1. This so-called "log data" can be the IP address, the browser type, the operating system, information about the previously accessed website and the pages you have accessed, your location, your mobile phone provider, the end device you are using (including device ID and application ID), the search terms you have used and cookie information.

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

You also have the option of requesting information via the YouTube privacy policy or the YouTube terms of use or via YouTube's community guidelines and security at:
https://www.youtube.de/t/privacy
https://www.youtube.com/t/terms
https://www.youtube.de/t/community_guidelines
Further information on YouTube's data protection can be found at
https://www.youtube.com/?gl=DE&hl=de

Data protection information in the GTC

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

Links to other websites

We link to websites of other providers or have integrated elements from them into our website. This data protection information does not apply to them - we have no influence on these sites and cannot check that others comply with the applicable data protection regulations.

Changes to the privacy policy

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