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Privacy Policy

Thank you for your interest in our website. The protection of your personal data (hereinafter referred to as "data") is a major and very important concern for us. Below, we would like to inform you in detail about which data is collected during your visit to our website and your use of our offers there, and how we subsequently process or use this data.

Please note that this Privacy Policy may be updated from time to time due to the implementation of new technologies or legislative changes. We will notify you of these changes as appropriate, and we will, of course, duly take your interests into account when making changes.

Please also see our separate <u>Domain Name Registration Privacy Policy</u> regarding the processing of personal data for registration of domain names. The purpose of that policy is to inform you about how personal data is processed when a domain is registered.

A. General Information

1. Controller

The controllers are Domain Directors Pty Ltd, Collins Square, Tower 5, Level 22, 727 Collins St, Docklands VIC 3008, Australia, and CentralNic Group PLC, a company registered in England & Wales with Registration Number 08576358, Address: 4th Floor, Saddlers House, 44 Gutter Lane, London, EC2V 6BR. E-mail: info@centralnic.com.

Within the CentralNic group certain departments and tasks are shared between the individual group companies. The controllers shall jointly determine the purpose and means of processing. This is described below and in our Privacy Policy regarding the processing of personal data for registration of domain names. Hereinafter, the use of the name "CentralNic" refers to the joint controllers collectively, unless one or more entities are expressly mentioned. If you have any questions or claims regarding data protection, you can contact any group company mentioned in this privacy policy and our website.

2. Data Protection Officer / Privacy Officer

C/O Privacy Officer

Domain Directors Pty Ltd, Collins Square, Tower 5, Level 22, 727 Collins St, Docklands VIC 3008, Australia

dataprotection@centralnic.com

If you have any questions or comments about this Privacy Policy or about data protection in general, please contact our data protection officer / Privacy Officer by e-mail at dataprotection@centralnic.com.

The Data Privacy Officer of CentralNic Group PLC can be contacted at Data Privacy Officer, CentralNic Group PLC, 4th Floor, Saddlers House, 44 Gutter Lane, London, EC2V 6BR or by e-mail at info@centralnic.com.

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3. Your rights

You may assert the following rights free of charge against any person responsible for the processing of your personal data:

- Right to withdraw your consent.
- Right of access: You may request access to your personal information that we process.
- Right to object: You have the right to object to the processing of your personal data at any time for reasons relating to your special situation. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defence of legal claims. The collection of data for the provision of the website and the storage of the log files is absolutely necessary for the operation of the website.
- Right to rectification: If the information concerning you is not (or is no longer) accurate, you may request a rectification. If your data is incomplete, you may request their completion.
- Right to erasure: You can request the erasure of your personal data.
- Right to restriction of processing: you have the right to request a restriction on the processing of your personal data.
- Right to data portability: you have the right to receive or have a third party receive the data that we process automatically on the basis of your consent or in the performance of a contract. This right only applies to (electronically) data processing carried out by automated means whereat the processing is either based on your consent or on a contract pursuant and that you have us provided with the data yourself. Therefore, the right is not applicable to the log files collected via our website.

For the assertion of claims, please contact the controller or data protection officer (find contact details above). Should you wish to contact us by e-mail, please use an address used to access our system so that we can identify you.

You also have the right to lodge a complaint about the controller's processing of your personal data with a supervisory authority responsible for data protection.

4. Legal Bases for Processing Your Data

In principle, we only process data when a legal basis is available. We specify the legal basis in the segments about data processing, but in general, we are permitted to process your personal data if one of the following conditions applies.

- The data subject's consent for the processing of personal data.
- Processing personal data as a necessity for the fulfilment of a contract in return for payment or free of charge. This shall also apply to processing operations necessary for the implementation of pre-contractual measures.
- The processing is necessary for the fulfilment of a legal obligation to which we are subject.
- The processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights, and fundamental freedoms of the data subject do not outweigh the above-mentioned interests.



5. Retention Periods

The data processed by us will be erased or their processing will be restricted in compliance with the legal regulations. Unless expressly stated in the context of this Privacy Policy, we will erase data stored by us as soon as it is no longer required for their intended purpose. Data will only be retained beyond the time it is no longer needed for its intended purpose if this is necessary for other legally permissible purposes or if the data must be retained longer due to statutory retention obligations. In these cases, processing is restricted, i.e. blocked, and the data are not processed for other purposes. For example, a statutory retention obligation exists, due to documentation obligations under tax and corporate law.

6. Children

Our website is not intended for children under the age of 16.

7. Recipients of Data, Third-Country Transfers, Linked Third-Party Websites

We do use external service providers for the processing of your data and hereby want to inform you about the third parties and processors we transfer data to. We use various third-party services on our website. These have different purposes, which we will discuss in more detail in the individual descriptions. These services serve to make our website functional, secure, and visually appealing, as well as to optimise its content on an ongoing basis. In general, we transfer data to the following categories of recipients:

Billing service providers, print- and postal providers, insurances, telecommunications provider, insurance broker and subject matter experts for assessing and regulating of claims, public authorities, provided a justified request, credit institutions and payment service providers, external accountant, auditors, Host Providers and other service providers for this website, and legal counsel.

In the case of cross border transfer (transfer to a third country or to an international organisation) we do inform you separately about the recipient, and the correspondent legal basis. However, in the case that your data is transferred outside of the European Union either to Controllers or Processors, the transfer is justified by the Standard Contractual Clauses according to the Annex of the Commission Implementing Decision (EU) 2021/914 regarding the Regulation (EU) 2016/679, or by other safeguards.

As far as processors are being used, they are bound by our instructions under data protection law. These service providers are our contractors and assist with processing of your personal data, for example, to provide this website. These contractors have been carefully selected and authorised and are regularly monitored. The authorisations are based on agreements for processing. The processors do not perform any independent processing for their own purposes.

Our website may contain links to third-party websites. If you follow a link to one of these websites, we point out to you that these offers have their own data protection policies and that we are not the controllers for the processing of your data on these websites. Please review each privacy policy before disclosing personal information to those controllers.

8. Data Security

We apply technical and organisational security measures to protect personal data that is collected, in particular against accidental or intentional manipulation, loss, destruction or against the attack of unauthorised persons. Our security measures are continuously improved in line with technological developments. To protect your data in transit we use encryption technologies (TLS).



9. Automated Decision Making

We do not use automated decision making, including profiling.

10. Data processing when you are based in the EU/EEA, EU-Representative

When you are based in the EU/EEA, we only process data when a legal basis is available as mentioned above. For EU/EEA related data processing, in general, the following legal bases shall apply to the processing of data under our responsibility.

- The data subject's consent for the processing of personal data, Article 6 (1) (a), Article 7 GDPR.
- Processing personal data as a necessity for the fulfilment (performance) of a contract in return for payment or free of charge, Article 6 (1) (b) GDPR. This shall also apply to processing operations necessary for the implementation of pre-contractual measures.
- The processing is necessary for the fulfilment of a legal obligation to which we are subject, Article 6 (1) (c) GDPR.
- The processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights, and fundamental freedoms of the data subject do not outweigh the above-mentioned interests, Article 6 (1) (f) GDPR.

Subject to the member states' legal requirements, you may be entitled to assert the following rights: Right of access by the data subject, Article 15 GDPR, Right to rectification, Article 16 GDPR, Right to erasure ('right to be forgotten'), Article 17 GDPR, Right to restriction of processing, Article 18 GDPR, Right to data portability, Article 20 GDPR, Right to object, Article 21 GDPR, Right to withdraw consent, Article 7 (3) GDPR, Right to lodge a complaint with a supervisory authority, Article 77 GDPR.

The EU-GDPR Representative of controllers not established in the EU can be reached at Key-Systems GmbH, Im Oberen Werk 1, 66386 St. Ingbert, Germany, datenschutz@key-systems.net. The Representative serves as a point of contact for data subjects on all issues related to the processing of personal data and for the purpose of ensuring compliance with the EU GDPR.

B. Collection and Processing of your Personal Data when using our Website

1. Technical Provision of the Website, Hosting

For the informational use of our website, you generally do not need to actively provide personal data. Each time you use the internet, your browser is transmitting certain information which we store in so-called log files, such as:

- Date and time of retrieval of one of our web pages;
- your IP address;
- host name of the connecting device;
- the website from which our website was accessed;
- following websites that were accessed via our website;
- the page visited on our website;
- the transmitted amount of data and the access status (file transmission, file not found etc.);

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- your browser type and version used;
- the operating system used.

The temporary storage of the data is necessary for the course of a website visit to enable delivery of the website. Further storage of the log files takes place in order to ensure the functionality of the website and the security of the information technology systems (especially to prevent abusive attacks, so-called DDoS attacks). Unless otherwise specified, your IP address will be shortened as soon as possible so that it is no longer possible to identify you. The legal basis for the temporary storage is to provide you with our website for the fulfilment of a contract or to process operations necessary for the implementation of pre-contractual measures. The legal basis for further storage with a shortened IP address is our legitimate interest to protect our information technology systems. A personal evaluation of the data, in particular for marketing purposes, does not take place without prior consent.

To operate this website, we use AWS of Amazon Inc., 410 Terry Avenue North, Seattle WA 98109, USA, as a hosting provider to process meta and communication data of our website users, on our behalf and based on our legitimate interests in an efficient and secure provision of this website.

2. Security and Performance

Google reCAPTCHA

We use Google reCAPTCHA to prevent automatic programs/bots from using our contact form. This increases the security of our website and avoids SPAM. This is also our legitimate interest and fulfils our legal obligation.

The collected data is hardware and software information, e.g. device and application data as well as the results of security checks. This data is transmitted to Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The data will not be used for personalised advertising.

Further information can be found in Google's privacy policy at https://policies.google.com/privacy. Further documentation can be found at https://developers.google.com/recaptcha/ and at https://www.google.com/recaptcha/admin/create.

3. Newsletter

We use your personal data to send you our newsletters and to inform you about news from our company, new services, new products, and events tailored to your interests. This includes information on current or future range of services and products as well as functions and events with participation of our company or group companies (e.g. trade fairs). To send you the newsletter, we need your email address. The legal basis for the processing is your consent. We will use the personal data you provided during registration exclusively for sending our newsletter. After the registration of your email address, you will receive an e-mail from us asking for you to confirm that you wish to receive the newsletter by clicking a link. If the confirmation by hyperlink is not given within a period of 7 days, your information will be blocked and deleted after a month. We are also entitled to keep your IP addresses, and times of registration and confirmation times to verify your registration and to appropriately clarify any possible misuse of your personal data.

We can analyse our newsletter campaigns. When you open an e-mail, a file contained in the e-mail (so-called web-beacon) connects to our newsletter-server. This makes it possible to determine whether a newsletter message has been opened and which links, if any, have been clicked on. In addition, technical information is recorded (e.g. time of retrieval, IP address, browser type and operating system). This information cannot be assigned to the respective newsletter recipient. It is



used exclusively for the statistical analysis of newsletter campaigns. The results of these analyses can be used to better adapt future newsletters to the interests of the recipients. If you do not want any analysis, you must unsubscribe from the newsletter. For this purpose, we provide a corresponding link in every newsletter message.

The legal basis for this is your consent and the necessity for compliance with a legal obligation to which we are subject. The legal basis for the transfer to a third country is as well your consent. Please note that the level of EU data protection cannot be guaranteed in the third country. In particular, effective legal remedies against official access to your personal data may not exist.

Your data will be processed in an electronic newsletter system for the duration of your subscription. For this purpose and for sending the newsletter, we use the processor "HubSpot" of the provider HubSpot Ireland Ltd, One Dockland Central, Guild Street, Dublin 1, Co. Dublin, Ireland (US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA), which processes the data on our behalf.

If personal data is transferred to the US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA, HubSpot guarantees by means of standard contractual clauses plus UK Data Transfer Addendum to maintain EU and UK data protection level. For more information, please visit https://legal.hubspot.com/security. For more information about HubSpot's privacy policy, please visit https://legal.hubspot.com/privacy-policy.

Since we base our processing on your consent, this means that you have the right to withdraw your consent at any time or to object to the processing of your personal data for the purpose of sending the newsletter. If you do so, we will immediately remove you from our newsletter distribution list to comply with your request. You can withdraw your consent at any time by sending an e-mail to our data protection officer / privacy officer or by following the instructions at the end of a promotional/newsletter e-mail. If you send us an e-mail, please let us know what your withdrawal should refer to so that we can assign your request.

4. Commercial Services

a. Account Registration

You may register a customer account. Registration of domain names is only possible if you have a registered account. You will need to provide some personal data during the registration process, which is marked with "mandatory field". These are generally the following categories of data:

Contact Name (First Name, Last Name), City, Zip Code, State, Country, Phone number, E-Mail address, Company/Organisation, Currency

We will use this data for identification of customers and to administer your account. Additionally, the data will be used to pre-fill your domain name registration forms when you register an account. The legal basis for the data processing is the necessity to process personal data for the fulfilment of a contract or to process operations necessary for the implementation of pre-contractual measures.

Additionally, you may voluntarily provide further categories of data. This data will be processed for our legitimate interest of additional verification and quicker communication.

Furthermore, you will choose a User-ID and a password to log into your account. Please make sure that no unauthorised person gets access to the log-in credentials for your account.

A registered account is necessary to register domain names. For the processing of your personal data for domain name registrations, please refer to our <u>Domain Name Registration Privacy Policy</u>.



b. Direct Marketing

We have a legitimate interest (direct advertising) in advertising customers (persons with whom we have had a business relationship) by e-mail or post. In particular, we may send you news about our company or group companies, information on events and invitations to review our services and products.

For this purpose and for sending the newsletter, we use the processor "HubSpot" HubSpot Ireland Ltd, One Dockland Central, Guild Street, Dublin 1, Co. Dublin, Ireland (US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA), which processes data on our instructions.

If personal data is transferred to the US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA, HubSpot guarantees by means of standard contractual clauses plus UK Data Transfer Addendum to maintain EU and UK data protection level. For more information, please visit https://legal.hubspot.com/security. For more information about HubSpot's privacy policy, please visit https://legal.hubspot.com/privacy-policy.

To send you advertising by post, we use a post service partner.

You can object to the sending of advertising at any time by sending an e-mail to our data protection officer or by following the instructions at the end of a promotional e-mail. If possible, please send your e-mail from the same e-mail address you used for registration, so that we can assign you more easily.

c. Domain Query (Whois)

We offer the possibility to obtain information about certain owner data of already registered domain names. In the event of a search query, the data you enter into the search field and the categories of data listed under "log files" are processed. The legal basis for the processing is the necessity to process personal data for the fulfilment of a contract or to process operations necessary for the implementation of pre-contractual measures in connection with the domain guidelines. Search requests are deleted no later than seven days after the request.

5. Contact, CRM

You can contact us by e-mail, telephone, fax and via our contact forms to request a quote or to conduct other correspondence.

In order to process your request, we process names, e-mail addresses, possibly the names of your company, position, mandatory information, which are absolutely necessary to create an offer. The processing of your data in the context of contact made by e-mail, a contact form or by telephone takes place on the basis of our legitimate interest to provide a good customer service or is necessary to fulfil a contract or to process operations necessary for the implementation of pre-contractual measures insofar as the contacts are related to contractual performance obligations such as the request of a dispute entry.

Contacting us for abuse and complaint messages requires users to log into their account. In addition, the categories of data listed in "log files" are processed. If you want to request a dispute entry, we also need your further contact details (last name, first name, address, name of the company) as well as a description of your request, stating the domain in question.

We will delete your contact requests immediately after processing unless statutory retention periods require continued retention. After answering your inquiry, we will archive your request immediately. Access is only possible to a very limited extent. Solely informative inquiries, i.e. which do not result in



a contract or do not contain any other content that needs to be retained, will be deleted at the end of the year in which the request was made. See "Retention periods" for more information.

We use a ticket management system to process customer claims and inquiries by e-mail and via the contact forms. The legal basis for the processing is our legitimate interest in the efficient processing of requests.

When you use our contact form, we also process data about your location (country and city based on IP address), data obtained from our tracking system, and data about the browser and device used. We use the "HubSpot" service of the provider HubSpot Ireland Ltd, One Dockland Central, Guild Street, Dublin 1, Co. Dublin, Ireland (US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA) as part of the contact form. For this purpose, we have concluded a data processing agreement with HubSpot, in which HubSpot undertakes to process data only in accordance with our instructions. We process your data based on our legitimate interests (efficient processing of requests).

As soon as the contact form is filled out, this information is linked to HubSpot's tracking information if you have consented to this in the cookie settings at the outset. If the email address filled in the form can be linked to an existing contact, we can identify you as an existing contact. The legal basis is your consent, which can be given when you first visit the website. You can withdraw your consent at any time with effect for the future via the cookie settings.

Insofar as personal data is transferred to the US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA, HubSpot guarantees by means of standard contractual clauses plus UK Data Transfer Addendum to maintain EU and UK data protection level. For more information, please visit https://legal.hubspot.com/security. For more information about HubSpot's privacy policy, please visit https://legal.hubspot.com/privacy-policy.

Your inquiry and your contact data may be stored in a customer relationship management system ("CRM system") if a business relationship exists or if a business initiation can be expected on the basis of prior communication. We use the CRM system "HubSpot" of the provider HubSpot Ireland Ltd, One Dockland Central, Guild Street, Dublin 1, Co. Dublin, Ireland (US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA). For this purpose, we have concluded a data processing agreement with HubSpot, in which HubSpot undertakes to process user data only in accordance with our instructions. We process your data based on our legitimate economic interests in being able to systematically manage customer and potential customer contact data. In the case of personal data in the CRM system, a check is made after two years at the end of the respective calendar year to determine whether further storage is necessary. If there is no need to do so or if there are no further legal retention obligations, the data will be deleted. If personal data is transferred to the US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA, HubSpot guarantees by means of standard contractual clauses plus UK Data Transfer Addendum to maintain EU and UK data protection level. For more information, please visit https://legal.hubspot.com/security. For more information about HubSpot's privacy policy, please visit https://legal.hubspot.com/privacy-policy. We use a ticket management system to process customer claims and inquiries by e-mail and via the contact forms. The legal basis for the processing is our legitimate interest in the efficient processing of requests.

6. Social-Media

Unless otherwise stated, we process your data on the basis of our legitimate interests in order to improve content and to make it more convenient for you to use. The purposes described coincide with our legitimate interests. If cookies are used in connection with the embedding of social media content, this is done on the basis of your consent.



Links to Social-Media Profiles

Our website integrates links to our presences on different social media sites. This is done via a linked graphic of the respective site. This prevents an automatic transfer of data to the site. A transfer will only take place when you click the link ad, being forwarded to the respective site. The respective site will then collect information whereby the data might be processed in the USA.

The collected data includes your IP-address, time, and date and from where you clicked the link. If you are logged into your social media account of the respective site, the site operator might assign the data to your account. You can prevent this by logging out on your social media account.

The following social networks are integrated into our site by linked graphics:

Facebook

Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, a subsidiary of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA.

Privacy Policy: https://www.facebook.com/policy.php

Twitter

Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA.

Privacy Policy: https://twitter.com/privacy

LinkedIn

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA.

Privacy Policy: https://www.linkedin.com/legal/privacy-policy

C. Statistics, Web-Analytics, Advertising based on Tracking and Retargeting – Use of Cookies

In some cases, we or our partners use cookies or process your data in such a way that your consent is required. Cookies are small text files that can be stored on your device when you visit our website. Tracking is possible using various technologies like the pixel technology or log file analysis. Consent is given via the so-called cookie banner, which must be actively clicked. Our cookie policy explains how you can disable individual functions to which you have consented. There you will find information on when cookies expire, how to delete cookies and how to withdraw your consent.

Unless otherwise stated, the processing described in this section is based on your consent. Learn more about how to withdraw your consent in our cookie policy. Our cookie policy is linked in the footer of our website.

1. Web-Analytics, Statistics

To determine which content from our website is most interesting for you we continuously measure the number of visitors and the most viewed content. Therefore, we process your personal data

- to record the number of visitors of our websites,
- to record the respective visiting times of our website visitors and
- to record the sequence of visits to different websites and product sites to optimise our website.



a. Google Analytics

This website uses Google Analytics of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (Holding Company: Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse the usage of our web services. The collected data is used to optimise our website and our advertising effort.

Google Analytics is a web-analysing-service provided by Google. Google processed this data on our behalf and is contractually bound to implicate measures to ensure the integrity and confidentiality of the data.

Upon visiting our website, the following data is processed:

- IP-address (in a shortened form. User cannot be directly identified)
- Approximate location (country and city)
- Technical information like browser, internet provider, device and screen resolution
- User behaviour (accessed pages, clicks and scroll-behaviour)
- Orders including the revenue of the ordered products
- Origin of your visit (from which website or which advertisement our site was reached)
- Session length and if the site was left without any interaction
- Adding to favourites
- Sharing of content (social media)

The legal basis is your consent. Upon the first visit to our website, we ask for your consent. Consent may be withdrawn at any time. This can be done here (link to Cookie-Settings of the website) or by deleting the cookies in your browser. Another possibility is the browser addon provided by google, which deactivates Google Analytics. You can download it here: <a href="https://tools.google.com/dlpage/gaoptout?hl=dehttps://tools.goog

Insofar as Google Ireland Limited transfers personal data to the US parent company Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, Google guarantees by means of standard contractual clauses to maintain the EU level of data protection.

Google Analytics sets cookies in your browser for the duration of two years from your last visit. These cookies contain a randomly generated User-ID, with which you can be recognised upon your next visit. The recorded data is stored in combination with the randomly generated User-ID, which makes an analysis of pseudonymised user profiles possible. This data will be automatically deleted after 14 months. Other data is stored in aggregated form indefinitely.

b. HubSpot

We use the HubSpot service of the provider HubSpot Ireland Ltd, One Dockland Central, Guild Street, Dublin 1, Co. Dublin, Ireland (US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA) on this website to analyze the use of our website and for tracking/marketing measures/usage behavior in order to provide you with advertising that really interests you. For analysis purposes and as part of the optimization of our marketing measures, the following data may be collected and processed via HubSpot:

- Geographic position
- Browser type

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- Navigation information
- Referral URL
- Performance data
- HubSpot subscription service credentials
 - Files that are displayed on site
 - Domain names
 - Pages viewed
 - Aggregated usage
 - Operating system version
 - Internet service provider
 - IP address
 - Device identifier
 - Duration of visit
 - Operating system
 - Events that occur via website
 - Access times
 - Clickstream data
 - Device model and version

For the purpose of web analysis, so-called "web beacons" are used and also "cookies" are set, which are stored on your computer and enable an analysis of your use of the website by us. For more information about HubSpot's use of cookies, please visit https://knowledge.hubspot.com/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser.

The legal basis for the processing is your consent, which can be withdrawn at any time with effect for the future, which you have given via the cookie settings. You can withdraw your consent at any time with effect for the future via the cookie settings.

Insofar as personal data is transferred to the US parent company HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141 USA, HubSpot guarantees by means of standard contractual clauses plus UK Data Transfer Addendum to maintain EU and UK data protection level. For more information, please visit https://legal.hubspot.com/security. For more information about HubSpot's privacy policy, please visit https://legal.hubspot.com/privacy-policy.

2. Advertising based on Tracking and Retargeting

We would like to show you - also on the websites of our advertising partners - only advertising that really interests you. Therefore, we use the technologies of so-called tracking and retargeting on our website for advertising that is tailored to your interests. Cookies are usually used for this purpose, but other technologies such as so-called "fingerprinting" are also used in some cases. The cookies temporarily stored for this purpose enable our retargeting partners to recognise visitors to our website under a pseudonym and to display only products that are likely to interest you. Fingerprinting recognizes your device based on your computer hardware, software, add-ons and browser settings.

Unless otherwise stated, the processing described in this section is based on your consent. Learn more about how to withdraw your consent in our cookie policy. There you will find information on when cookies expire and how to delete cookies. Our cookie policy is linked in the footer of our website.

In detail, we use the data collected for statistical and advertising purposes

for targeted advertising, also via advertising networks in cooperation with partners,



- to measure the success and billing of advertising measures between advertising partners and us,
- to keep track of what ads you have already seen to prevent you from seeing the same one again and
- to assess which parts of our website need to be optimised.

Unless otherwise stated, we use the following services as processors and contractually oblige them to process data only on our behalf.

a. Google DoubleClick

DoubleClick by Google ("DoubleClick") is a service by Google Ireland Limited Gordon House, Barrow Street, Dublin 4, Ireland (parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). DoubleClick uses cookies to display most relevant advertisements. Google keeps track of the advertisements you have seen and which of them you have actually viewed. Using the DoubleClick cookies allows Google and its advertising network to serve advertisements based on your previous web page visits (or even apps). Google will transmit information generated by the cookies to a Google server for analysis and storage. You can prevent cookies from being saved by setting your browser software accordingly.

For more detailed information on the terms and conditions of use and data protection, please visit: https://www.google.com/analytics/terms/de.html or https://www.google.com/intl/de/analytics/privacyoverview.html.

b. Salesforce Commerce Cloud (Analytics)

We use the tool salesforce commerce cloud, Salesforce Tower 415 Mission Street, 3rd Floor San Francisco, CA 94105, USA. Cookies, web beacons or similar technologies are used. The data collection takes place via a cookie ID, which is stored as a pseudonym. This pseudonym is assigned information about user activities on our websites, services, and applications. A personal identification of the user is excluded by an aggregation of the data records. In order to ensure the functionality, IP addresses are stored for a short time and shortened before each processing. The complete IP addresses are not stored or processed.

For more information about salesforce, please visit: https://www.salesforce.com/de/company/privacy/full privacy.jsp.