

Privacy policy

This data protection declaration clarifies the type, scope and purpose of the processing of personal data within our online offer and the associated websites, functions and content (hereinafter referred to as "online offer" or "websites"). The privacy policy applies regardless of the domains, systems, platforms and devices used (e.g. desktop or mobile) on which the online offer is executed.

1. Basic information on data processing and legal bases

1.1. Responsible party

ALZURA AG
Gewerbegebiet Sauerwiesen 2
Technologie-Park I & II
67661 Kaiserslautern, Germany
Tel.: +49 6301 600-0
info@alzura.com

1.2. Contact details of the data protection officer

Janine Piconi
Gewerbegebiet Sauerwiesen 2
Technologie-Park I & II
67661 Kaiserslautern, Germany
datenschutz@alzura.com

1.3. Scope of the processing of personal data

We process the personal data of our users that is required to handle our business processes and to provide a functional website as well as our content and services.

Your data is transferred as soon as you use our services, register on our platform, add or change information in your account, send us messages via the contact form or contact us in any other way.

In addition, we automatically collect meta/communication data when you visit our website and occasionally also collect information from other sources, such as credit information services or credit agencies.

As a rule, the following data is stored:

Category	Definition of
Meta/communication data	Device ID, IP address, location data, operating system including the corresponding version and possibly the browser used
Usage and connection data	Access times, interests, websites visited, IP address and other log data
Access data	User name, user ID, password (encrypted) and e-mail address
Inventory data	Company name, company address, contact person, type of business, number of employees and VAT identification number
Contact details	E-mail address and telephone number
Payment data	Bank details, creditworthiness data, invoices and order history
Content data	Reviews, support requests, other text entries, photographs and videos
Applicant data	Names, contact details, qualifications, application documents

1.4. Legal basis for the processing of personal data

We process your personal data for various purposes and on the basis of various legal bases that permit such processing:

- If personal data is processed for the fulfilment of contracts concluded with us, Art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.
- If we obtain the consent of the data subject for the processing of personal data, Art. 6 para. 1 lit. a GDPR serves as the legal basis.
- If the processing of personal data is necessary to fulfil a legal obligation that applies to our company, Art. 6 para. 1 lit. c GDPR forms the legal basis.
- If the processing of personal data is necessary to protect the vital interests of the data subject or another natural person, Art. 6 para. 1 lit. d GDPR serves as the legal basis.
- If the processing is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh this interest, Art. 6 para. 1 lit. f GDPR is the legal basis for the processing.

2. Transfer of data to third parties and third-party providers

We pass on personal data to affiliated companies and their subsidiaries, for example to payment and shipping service providers, for the purpose of order processing or contract fulfilment.

In order to be able to offer you a comprehensive range of products, we also cooperate with other marketplaces and online shops within the European Economic Area (EEA). Their product stocks are mirrored on our website. When you purchase these items, your address data is transmitted to the respective cooperation partner for dispatch processing. The companies we work with are either subject to this privacy policy or follow guidelines that offer at least as much protection as this privacy policy.

If we use subcontractors to provide our services, we take the necessary legal precautions and appropriate technical and organisational measures to ensure the protection of personal data in accordance with the applicable legal regulations.

As we are constantly developing our business, we or individual subsidiaries may sell or buy parts of the company or components. In such transactions, customer information is usually transferred together with the part of the business being transferred. However, this information will continue to be subject to the pre-existing privacy policy (except, of course, where the customer expressly consents to different terms). In the unlikely event that all, part or significant parts of our online offerings are sold, personal data will be passed on to the buyer.

If content, tools or other means from other providers (hereinafter jointly referred to as "third-party providers") are used within the scope of this privacy policy and their registered office is located in a third country, it can be assumed that data will be transferred to the countries in which the third-party providers are based. The transfer of data to third countries outside the European Economic Area (EEA) takes place either if there is an adequate level of data protection, user consent or other legal authorisation (e.g. EU standard contractual clauses). However, we would like to point out that a level of data protection comparable to that in the EU cannot be guaranteed in these countries.

3. Security measures

We use organisational, contractual and technical security measures that correspond to the current state of the art in order to ensure compliance with data protection laws and to protect the data processed by us against accidental or intentional manipulation, loss, destruction and access by unauthorised persons.

The security measures include in particular those listed in [the documentation of the technical and organisational measures](#).

4. Registration and user account

We set up a personal account for each user, through which they can view their contact and order data. The required mandatory information is provided during registration. The user accounts are not public and are not indexed by search engines. After cancellation of an account, the data will be deleted at the user's request, unless legal retention is required in accordance with Art. 6 para. 1 lit. c GDPR. Users are responsible for backing up their data before cancellation. We reserve the right to irrevocably delete all data stored during the term of the contract.

We store the IP address and the time of the respective user action as part of the registration and renewed logins as well as the use of our online services. This data is stored on the basis of our legitimate interest and the user's interest in protection against misuse and unauthorised use. This data is not passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so in accordance with Art. 6 para. 1 lit. c GDPR.

We process usage data (e.g. the websites visited on our online offering, interest in our products) and content data (e.g. entries in the contact form or user profile) for advertising purposes in a user profile, for example to display product information to users based on the services they have used to date.

5. Contact Process

When contacting us, the user's details are processed to process the contact enquiry and its handling in accordance with Art. 6 para. 1 lit. b) GDPR.

User data may be stored in our customer relationship management system ("CRM system") or a comparable enquiry organisation.

Contacting applicants: In the area of HR management we use the software "Personio" of the company Personio GmbH, Buttermelcherstraße 16, 80469 Munich, Germany. If you use the online application, you will be redirected to the recruiting page of ALZURA AG at Personio. For your application via the online form, the current version of the [data protection](#) declaration stated there applies.

6. Newsletter

If you order goods or services from us and enter your e-mail address, this e-mail address may subsequently be used by us to send you newsletters, provided we inform you of this in advance. In such a case, only direct advertising for our own similar goods or services will be sent via the newsletter. You can cancel the sending of this newsletter at any time. There is a corresponding link in every newsletter for this purpose. In this case, the legal basis for sending the newsletter is Art. 6 para. 1 lit. f GDPR in conjunction with Section 7 para. 3 UWG.

After you unsubscribe from the newsletter distribution list, we may store your e-mail address in a blacklist to prevent future mailings to you. The data from the will only be used for this purpose and will not be merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). Storage in the blacklist is not limited in time. You can object to the storage if your interests outweigh our legitimate interest.

7. Collection of access data and log files

We collect on the basis of our legitimate interest within the meaning of Art. 6 para. 1 lit. f. GDPR, we collect data about every access to the server on which this service is located (so-called server log files). The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, geodata, customer number, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Log file information is stored for a maximum period of 6 months for security reasons (e.g. to

investigate misuse or fraud) and to improve our online offering, after which it is deleted. Data whose further storage is required for evidence purposes is excluded from deletion until the respective incident has been finally clarified.

8. Cookies and reach measurement

Our websites use so-called "cookies". Cookies are small text files and do not cause any damage to your end device. They are stored on your device either temporarily for the duration of a session (session cookies) or permanently (permanent cookies). Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your end device until you delete them yourself or they are automatically deleted by your web browser. Cookies are used to make our websites more user-friendly, effective and secure.

In some cases, cookies from third-party companies may also be stored on your device when you visit our website (third-party cookies). These enable us or you to use certain services of the third-party company (e.g. cookies for processing payment services).

Cookies have various functions. Many cookies are technically necessary, as certain website functions would not work without them (for example, displaying videos). Other cookies are used to evaluate user behaviour or display advertising. You can find out which cookies we use in detail and how we use them in our [cookie policy](#).

Cookies that are required to carry out the electronic communication process (essential cookies) or to provide certain functions that you have requested (functional cookies) or are required to optimize the websites (performance and statistics cookies and marketing cookies are used, for example, to measure visitor behaviour) are stored on the basis Art. 6 para. 1 lit. f GDPR, unless another legal basis is specified. The website operator has a legitimate interest in the storage of cookies for the technically error-free and optimised provision of its services. If you have given your consent to the storage of cookies, the cookies in question will be stored exclusively on the basis of this consent (Art. 6 para. 1 lit. a GDPR); consent can be revoked at any time.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be restricted.

Insofar as cookies are used by third-party companies or for analysis purposes, we will inform you about this separately in the context of this data protection declaration and, if necessary, request your consent.

9. Integration of third-party services and content

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR), we use content or service offers from third-party providers within our online offer. (GDPR), we use content or service offers from third-party providers. The following presentation provides an overview of third-party providers and their content, along with links to their privacy policies, which contain further information on the processing of data and, in some cases already mentioned here, objection options (so-called opt-out):

9.1. HubSpot

We use the CRM system "HubSpot". This is an integrated software solution that we use to cover various aspects of our online marketing. These include, among others: Content management (websites and blog), social media publishing and reporting (e.g. traffic sources and hits), contact management (e.g. user segmentation and CRM), landing pages and contact forms.

Our registration service enables visitors to our websites to find out more about our company, download content and provide their contact information and other demographic information. This information and the content of our websites are stored on the servers of our software partner HubSpot. It can be used by us to contact visitors to our websites and to determine which of our company's services are of interest to them. All information we collect is subject to this privacy policy. We use all information collected exclusively to optimize our marketing.

HubSpot is a software company from the USA with a branch in Ireland. Contact: HubSpot, 2nd Floor 30 North Wall Quay, Dublin 1, Ireland, Phone: +353 1 5187500. Data may be transferred to the USA as part of the processing. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a) GDPR.

You can find out more about HubSpot's [privacy policy by](#) clicking on the following link. Hubspot uses cookies if you have given your consent. You can find more information about the cookies used by HubSpot [here](#) and [here](#).

9.2. Google Analytics

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR), we use Google Analytics, a web analysis service of Google Ireland Limited. GDPR), we Google Analytics, a web analysis service of Google Ireland Limited. Google uses cookies. The information generated by the cookie about your use of this website (if you have consented to this) is transmitted to a Google server in Ireland and stored there.

Google will use this information on our behalf to analyse the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with further services associated with the use of this online offer and the use of the Internet. Pseudonymised user profiles can be created from the processed data.

We use Google Analytics to display adverts from Google and its partners only to users who have shown an interest in our online offering or who have certain characteristics, such as interests in certain topics or products, which are determined on the basis of the websites visited. This is done in the context of "Remarketing" and "Google Analytics Audiences". With the help of remarketing audiences, we also want to ensure that our adverts correspond to

the potential interests of users and are not annoying.

We only use Google Analytics with activated IP anonymisation. This means that the IP address of users is truncated by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there. The IP address transmitted by the user's browser will not be merged with other Google data.

As part of the processing, data may be transferred to the USA. The security of the transmission is secured via so-called standard contractual clauses, which ensure that the processing of personal data is subject to a level of security that complies with the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a) GDPR.

You can find further information on data use by Google, setting and objection options on Google's websites: "[Data use by Google when you use websites or app sources partners'](#)", "[Data use for advertising purposes](#)" and "[Manage information that Google uses to you advertising show](#)".

9.3. Google remarketing services

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR) we use the marketing and remarketing services (in short "Google Marketing Services") of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

As part of the processing, data may be transferred to the USA. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a) GDPR.

Google marketing services enable us to display targeted adverts for and on our websites so that users only see adverts that match their interests. If, for example, a user is shown adverts for products that they were interested in on other websites, this is referred to as "remarketing". For these purposes, when our and other websites on Google marketing services are active are accessed, Google executes a Google code directly and so-called remarketing tags are integrated into the website, provided that the user has given their consent. With their help, an individual cookie is stored on the user's device (comparable technologies can also be used instead of cookies). The cookies can be set by various domains, including google.com, doubleclick.net, invite-media.com, admeld.com, googlesyndication.com or googleadservices.com. This file records which websites the user has visited, what content they are interested in and which offers they have clicked on, as well as technical information about the browser and operating system, referring websites, time of visit and other information about the use of the online offer. The IP address of the user is also recorded, whereby we inform you in the context of Google Analytics that the IP address is shortened within member states of the European Union or in other contracting

states of the Agreement on the European Economic Area and only in exceptional cases transmitted in full to a Google server in the United States.

USA and shortened there. The IP address is not merged with the user's data within other Google services. Google may also combine the information with such information from other sources. If the user subsequently visits other websites, they can be shown adverts tailored to their interests.

User data is processed pseudonymously as part of Google marketing services. Google does not store and process the user's name or email address, but only the relevant cookie-related data within pseudonymous user profiles. From Google's point of view, the adverts are not managed and displayed for a specifically identified person, but for the cookie owner, regardless of who this cookie owner is. This does not apply if a user has expressly allowed Google to use the data without this pseudonymisation. The information collected by Google Marketing Services about users is transmitted to Google and stored on Google's servers in Ireland.

The Google marketing services we use include the online advertising programme "Google Ads". In the case of **Google Ads**, each Ads customer receives a different "conversion cookie", provided the user has given their consent. Cookies can therefore not be tracked via the websites of Adwords customers. The information collected with the help of the cookie is used to create conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers learn the total number of users who clicked on their advert and were redirected to a page with a conversion tracking tag. However, they do not receive any information that can be used to personally identify users.

We can integrate third-party adverts on the basis of the Google marketing service "**DoubleClick**". DoubleClick uses cookies (provided the user has given consent) to enable Google and its partner websites to display adverts based on users' visits to this website or other websites on the Internet.

We can integrate third-party adverts on the basis of the Google marketing service "**AdSense**". AdSense uses cookies (provided the user has given consent) to enable Google and its partner websites to display adverts based on users' visits to this website or other websites on the Internet.

We can also use the "**Google Optimiser**" service. Google Optimiser allows us to track the impact of various changes to a website (e.g. changes to input fields and design) as part of so-called "A/B testing". Cookies are stored on users' devices for these test purposes, provided the user has given their consent. Only pseudonymised user data is processed.

We may also use the "**Google Tag Manager**" to integrate and manage Google analytics and marketing services on our websites. The Tag Manager itself does not process any personal data, as it is used purely to manage other services - e.g. Google Analytics, etc. You can find more information about the Tag Manager at: <https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>.

Further information on the use of data for marketing purposes by Google can be found on the [overview page](#) or in Google's [privacy policy](#).

If you wish to object to interest-based advertising by Google marketing services, you can use the setting and [opt-out options](#) provided by Google. You can also change your cookie settings at any time by deleting the stored cookies via your browser's system settings. When you visit the website again, the query will appear again.

9.4. Google Signals

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR), we use the web analysis service Google Signals. GDPR), we use the web analysis service Google Signals.

Google uses Signals to provide reports on the number of users across devices and on different groups of users based on different device combinations used. To do this, Google uses the data of users who have activated the "personalised advertising" option in their Google account settings.

Google Signals is only used with activated IP anonymisation. This means that the IP address of users within the member states of the EU and the European Economic Area is truncated. This truncation eliminates the personal reference of the IP address. This means that no conclusions can be drawn about the identity of an individual user. You can object to the collection by Google Signals at any time by deactivating "personalised advertising" in your [Google account](#).

Additional information about how Google handles your personal data in its advertising network [found here](#) and in Google's [privacy policy](#).

9.5. Google Fonts

The Google Web Fonts service is used on our websites. The service is provided by Google Ireland Limited Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland. With the help of Google Web Fonts, we can load and display external fonts, so-called Google Fonts, on our websites. Google Web Fonts are integrated locally on our website. This means that the fonts are not loaded from Google servers ([privacy policy](#) and [opt-out](#)).

The legal basis for this processing is Art. 6 para. 1 lit. f GDPR - a legitimate interest. Our legitimate interest in the processing lies in presenting the website in an attractive and user-friendly manner. Local hosting ensures that no data is transmitted to Google and no data transfer takes place.

9.6. Google Maps

Maps are provided by the "Google Maps" service, which is operated by the third-party provider Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Further information can be found in the [privacy policy](#) and [opt-out option](#).

As part of the processing, data may be transferred to the USA. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your

consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a GDPR.

9.7. Google Currents

Functions of the "Google Currents" service are integrated into our online offering. These functions are offered by the third-party provider Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. If you are logged into your Google Currents account, you can link the content of our pages to your Google Currents profile by clicking on the Google Currents button. This allows Google to associate your visit to our pages with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by Google Currents ([privacy policy](#) and [opt-out](#)).

9.8. Google Firebase

Our apps use technology from Google Firebase (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, "Google"). Firebase is part of the Google Cloud Platform and offers numerous services for developers. You can find a list [here](#). For Firebase Analytics, Google uses an "Instance ID" as well as the advertising ID of the end device. You can restrict the use of the advertising ID in the device settings of your mobile device. For Android: Settings > Google > Ads > Reset advertising ID. For iOS: Settings > Privacy > Advertising > No ad tracking. For more information about Firebase's privacy and security, [click here](#). Where possible, we use servers located within the EU. However, it cannot be ruled out that data may also be transferred to the USA. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may be revoked in accordance with Art. 49 para. 1 lit. a GDPR serve as the legal basis for the transfer to third countries. Further information on Google Firebase and data protection can be found [here](#) and [here](#).

9.9. Google reCAPTCHA

We use "Google reCAPTCHA" (hereinafter referred to as "reCAPTCHA") on our websites. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. The purpose of reCAPTCHA is to check whether the data input on the respective website (e.g. in a contact form) is made by a human or by an automated programme. For this purpose, reCAPTCHA analyses the behaviour of the website visitor based on various characteristics. This analysis begins automatically as soon as the website visitor enters the website. For the analysis, reCAPTCHA evaluates various information (e.g. IP address, time spent the website by the website visitor or mouse movements made by the user). The data collected during the analysis is forwarded to Google. The reCAPTCHA analyses run completely in the background. Website visitors are not informed that an analysis is taking place. The data is stored and analysed on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in protecting its website from abusive automated spying and SPAM. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG, insofar as the

consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting) within the meaning of the TDDDGD. Consent can be revoked at any time. Further information on Google reCAPTCHA can be found in the [Google Privacy Policy](#) and the [Google Terms of Use](#). The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF to comply with these data protection standards. Further information on this can be obtained from the provider under the following link: [Privacy Policy](#).

9.10. Facebook social plugins

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR), we use social plugins ("plugins") of the social network facebook.com, which is operated by Facebook Ireland Ltd. (GDPR) social plugins ("plugins") of the social network [facebook.com](#), which is operated by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). The plugins can display interaction elements or content (e.g. videos, graphics or text contributions) and can be recognised by one of the [Facebook logos](#).

As part of the processing, data may be transferred to the USA. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data complies with a security level that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a) GDPR.

When a user accesses a function of this online offering that contains such a plugin, their device establishes a direct connection with the Facebook servers. The content of the plugin is transmitted by Facebook directly to the user's device and integrated into the online offering. User profiles can be created from the processed data. We therefore have no influence on the scope of the data that Facebook collects using this plugin.

By integrating the plugins, Facebook receives the information that a user has accessed the corresponding page of the online offering. If the user is logged in to Facebook, Facebook can assign the visit to their Facebook account. If users interact with the plugins, for example by clicking the Like button or leaving a comment, the corresponding information is transmitted directly from your device to Facebook and stored there. If a user is not a member of Facebook, it is still possible for Facebook to find out their IP address and store it. According to Facebook, however, only an anonymised IP address is in Germany.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as the relevant rights and setting options to protect the privacy of users can be found in Facebook's [data protection information](#).

If a user is a Facebook member and does not want Facebook to collect data about them via this online offering and link it to their membership data stored on Facebook, they must log out of Facebook and delete their cookies before using our online offering. Further settings and objections to the use of data for advertising purposes are possible within the [Facebook](#)

[profile settings](#) or via the [US site](#) or the [EU site](#). The settings are platform-independent, i.e. they are applied to all devices (desktop or mobile).

9.11. Facebook, Custom Audiences and Facebook marketing services

Within our online offer, the so-called "**Facebook pixel**" of the social network Facebook, which is operated by Facebook Inc, 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are resident in the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, is used on the basis of our legitimate interests in the analysis, optimisation and economic operation of our online offer and for these purposes.

With the help of the Facebook pixel, Facebook is able to determine the visitors to our online offering as a target group for the display of adverts (so-called "Facebook ads"). Accordingly, we use the Facebook pixel to display the adverts placed by us.

Only display Facebook ads to Facebook users who have also shown an interest in our online offering or who have certain characteristics (for example, interests in certain topics or products determined on the basis of the websites visited) that we transmit to Facebook (so-called "custom audiences"). With the help of the Facebook pixel, we also want to ensure that our Facebook ads correspond to the potential interest of users and are not annoying. With the help of the Facebook pixel, we can also track the effectiveness of Facebook adverts for statistical and market research purposes by seeing whether users have been redirected to our website after clicking on a Facebook advert (so-called "custom audiences" or "Conversion").

The Facebook pixel is integrated directly by Facebook when you visit our website and can store a cookie on your device if you have consented to this. If you subsequently log in to Facebook or visit Facebook while logged in, your visit to our website will be noted in your profile. The data collected about you is anonymous to us, so it does not allow us to draw any conclusions about the identity of the user. However, the data is stored and processed by Facebook so that a connection to the respective user profile is possible and can be used by Facebook and for its own market research and advertising purposes. If we transmit data to Facebook for comparison purposes, it is encrypted locally on the browser and only then sent to Facebook via a secure https connection. This is done for the sole purpose of creating a comparison with the data that is also encrypted by Facebook.

Furthermore, when using the Facebook pixel, we use the additional function "extended matching", whereby data is used to form target groups ("custom audiences" or "Look Alike Audiences") are transmitted to Facebook in encrypted form. Further [information](#).

We also use the "**Custom Audiences from File**" procedure of the social network Facebook, Inc. In this case, the email addresses of the newsletter recipients are uploaded to Facebook. The upload process is encrypted. The upload is used solely to determine the recipients of our Facebook adverts. We want to ensure that the adverts are only shown to users who are interested in our information and services.

Facebook processes the data in accordance with Facebook's [data usage policy](#). Specific information and details about the Facebook pixel and how it works can be found in the Facebook [help section](#).

You can object to the collection by the Facebook pixel and use of your data to display Facebook ads. To set which types of adverts are displayed to you within Facebook, you can go to the [page set up Facebook by](#) and follow the instructions on the settings for usage-based advertising. The settings are platform-independent (desktop or mobile).

As part of processing via **YouTube** (Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland - [privacy policy](#) and [opt-out](#)), data may be transferred to the USA. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a GDPR.

You can also object to the use of cookies for reach measurement and advertising purposes via the [deactivation page of the Network Advertising Initiative](#) and additionally via the [US website](#) or the [European website](#).

9.12. Instagram

Functions of the Instagram service are integrated into our online offering. These functions are offered by Instagram Inc, 1601 Willow Road, Menlo Park, CA, 94025, USA.

If you are logged into your Instagram account, you can link the content of our pages to your Instagram profile by clicking on the Instagram button. This allows Instagram to associate your visit to our pages with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by Instagram ([privacy policy](#)).

9.13. LinkedIn

Our online services use functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Each time one of our pages containing LinkedIn functions is accessed, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited our website with your IP address. If you click on the LinkedIn "Recommend" button and are logged into your LinkedIn account, LinkedIn is able to associate your visit to our website with you and your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by LinkedIn ([privacy policy](#) and [opt-out](#)).

The legal basis for the processing is your consent in accordance with Art. 6 para. 1 lit. a GDPR. If you do not want the aforementioned data to be collected and processed via LinkedIn, you can refuse your consent or revoke it at any time with effect for the future.

As part of processing via LinkedIn, data may be transferred to the USA and Singapore. The security of the transfer is regularly ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR.

9.14. X (formerly Twitter)

Functions of the X service (formerly Twitter) may be integrated into our online offering. These functions are offered by the parent company X Corp, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. The Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland, is responsible for the data processing of persons living outside the USA.

When the social media element is active, a direct connection is established between your end device and the X server. X thereby receives information about your visit to this website. By using X and the "Re-Tweet" function or

"Repost", the websites you visit are linked to your X account and made known to other users. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by X. Further information on this can be found in X's [privacy policy](#).

Data transfer to the USA is on [the standard contractual clauses of the EU Commission](#). You can change your data protection settings at X in the [account settings](#).

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF to comply with these data protection standards. Further information on this can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/participant/2710>.

9.15. XING

We use functions of the XING network. The provider is New Work SE, Dammtorstraße 29-32, 20354 Hamburg, Germany. Each time one of our pages containing XING functions is accessed, a connection to XING servers is established. To the best of our knowledge, no personal data is stored in the process. In particular, no IP addresses are stored and usage behaviour is not evaluated ([privacy policy](#)).

The processing is carried out in accordance with Art. 6 para. 1 lit. f. GDPR on the basis of our legitimate interest in being able to contact our customers. The analysis processes initiated by XING may be based on different legal bases, which must be specified by XING (for example, consent within the meaning of Art. 6 para. 1 lit. a GDPR).

9.16. External payment service providers

We use the payment service of PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter referred to as "PayPal") on our website. If you make a payment with us via PayPal, your payment data (e.g. name, payment amount, bank account details, credit card number) will be transmitted by the payment service provider to PayPal processed for the purpose of payment processing. The respective contractual and data protection provisions of the respective providers apply to these transactions. The payment service providers are used on the basis of Art. 6 para. 1 lit. b GDPR (contract processing)

and in the interest of a smooth, convenient and secure payment process (Art. 6 para. 1 lit. f GDPR). Insofar as your consent is requested for certain actions, Art. 6 para. 1 lit. a GDPR is the legal basis for data processing; consent can be revoked at any time for the future.

Data transfer to the USA is based on [the standard contractual clauses of the EU Commission](#). Details can be found in PayPal's [privacy policy](#).

9.17. Hotjar

Web analysis and optimisation with the help of the Hotjar service, operated by Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe. Hotjar can be used to track movements on the websites on which Hotjar is used (so-called heat maps). For example, it is possible to recognise how far users scroll and which buttons users click and how often. Technical data such as the selected language, system, screen resolution and browser type are also recorded. User profiles can be created, at least temporarily, during a visit to our website. Hotjar can also be used to obtain feedback directly from website users. In this way, we obtain valuable information to make our websites even faster and more customer-friendly.

The legal basis for the processing is your consent in accordance with Art. 6 para. 1 lit. a GDPR. If you do not want Hotjar to collect and process the aforementioned data, you can refuse your consent or revoke it at any time with effect for the future ([privacy policy](#) and [opt-out](#)).

9.18. JavaScript library JQuery

For a visually and functionally user-friendly presentation, we use external code of the JavaScript framework "jQuery" on our websites, provided by the third-party provider JS Foundation (JSFoundation, Inc., 1 Letterman Drive, San Francisco, CA 94129). In order to provide this service, the provider of this content may require information about the IP address of the user. We to only use content whose respective providers only use the IP address to deliver the content. However, we have no influence over the third-party providers use the IP address

e.g. for statistical purposes. Insofar as we are aware of this, we will inform users of this. Information on data protection of the provider can be found at <https://js.foundation/about/governance/privacy-policy>.

9.19. Microsoft Bing Ads

Conversion Tracking from Microsoft (Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA). Microsoft Bing Ads a cookie on your computer if you have reached our website via a Microsoft Bing advert and have given your consent to the cookie being placed. In this way, Microsoft Bing and we can recognise that someone has clicked on an ad, has been redirected to our website and has reached a predetermined target page (conversion page). We only learn the total number of users who clicked on a Bing advert and were then forwarded to the conversion page. No personal information about the identity of the user is disclosed. If you do not wish to participate in the tracking process, you can also reject the setting of a cookie required for this ([privacy policy](#)).

As part of the processing, data may be transferred to the USA. The security of the transfer is ensured by so-called standard contractual clauses, which guarantee that the processing of personal data is subject to a level of security that corresponds to that of the GDPR. If the standard contractual clauses are not sufficient to establish an adequate level of security, your consent may serve as the legal basis for the transfer to third countries in accordance with Art. 49 para. 1 lit. a GDPR.

9.20. IntelliAd Bid Management

Our websites use the web analysis service with bid management of IntelliAd Media GmbH, Sendlinger Str. 7, 80331 Munich. Anonymised usage data is collected, aggregated and stored and usage profiles are created from this data using pseudonyms in order to design and optimise our websites in line with requirements. When IntelliAd tracking is used, cookies are stored locally if you have given your consent.

You have the right to object to the storage of your (anonymised) usage data for the future. Use the [IntelliAd opt-out](#) function for this purpose.

9.21. Criteo

Our websites use the technology of Criteo SA, 32 Rue Blanche, 75009 Paris, France ("Criteo") to collect, store and evaluate information about the surfing behaviour of website visitors in pseudonymised form with the help of cookie text files. This only happens if you have consented to the setting of cookies when visiting our website. The technology makes it possible to recognise your device and collect information about your browsing activities in order to provide you with advertisements about goods and services that are likely to be of greater interest to you ([data protection declaration](#)).

9.22. Credit assessment

Our company regularly checks your creditworthiness when concluding contracts and, in certain cases where there is a legitimate interest, also for existing customers. We work together with the following companies for this purpose:

- Creditreform Kaiserslautern Langenfeld KG, Luxemburger Str. 7, 67657 Kaiserslautern ([Privacy Policy](#))
- Creditreform Bad Kreuznach Langenfeld KG, Planiger Str. 34a, 55543 Bad Kreuznach ([Privacy Policy](#))
- SCHUFA Holding LTD, Kormoranweg 5, 65201 Wiesbaden ([Privacy policy](#))
- CRIF Bürgel Ringwald e.K., Greschbachstraße 3, 76229 Karlsruhe ([Privacy policy](#))
- KSV1870 Information Ltd, Wagenseilgasse 7, 1120 Vienna, Austria ([Privacy Policy](#))
- KACZMARSKI GROUP Sp. z o.o. Sp. k., ul. Danuty Siedzikówny 12, 51-214 Wrocław ([Privacy Policy](#))

Data is made available to us for the purpose of credit checks. For this purpose, we pass on your name and contact details to the relevant credit agency. The legal basis for this transfer

is Art. 6 para. 1 lit. b and f GDPR.

9.23. Klaro

Klaro is a free open source tool that enables us to manage our users' consent in a user-friendly and data protection-compliant manner (consent management). The project initiator of this technology is KIProtect GmbH, Bismarckstr. 10-12, 10625 Berlin. A Klaro! cookie ("klaro") is only stored in your browser if you consent to its use in the "opt-in" procedure, in which the consents you have given or the revocation of these consents are stored. This data is not passed on to Klaro! developers. The data collected will be stored until you delete the Klaro! cookie or the purpose for data storage no longer applies. Mandatory statutory retention periods remain unaffected. Details on data processing by Klaro! Cookie [can be found here](#). Klaro! cookie consent technology used to obtain the legally required consent for the use of cookies. The legal basis for this is Art. 6 para. 1 sentence 1 lit. c GDPR.

9.24. Cloudflare

Our websites use services from "Cloudflare" (provider: Cloudflare, Inc., 101 Townsend St, San Francisco, CA 94107, USA). Cloudflare operates a content delivery network (CDN) and provides protection functions for the website (web application firewall). The data transfer between your browser and our servers flows via the infrastructure of Cloudflare and is analysed there to ward off attacks. Cloudflare uses cookies to enable you to access our websites. The use of Cloudflare is in the interest of secure use of our website and defence against harmful attacks from outside. This a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. Further information can be found in the [Cloudflare privacy policy](#).

9.25. Trustpilot

We use the rating platform Trustpilot A/S, Pilestræde 58, 5, 1112 Copenhagen, Denmark for our websites. You can find more information about the data processed with Trustpilot in the [privacy policy](#).

9.26. Use of ChatGPT and other AI-supported technologies

We use ChatGPT on our website. The provider is OpenAI, 3180 18th St, San Francisco, CA 94110, USA.

The use of ChatGPT on our website includes listening to, recording, transcribing and storing telephone calls and video calls with customers or suppliers. In addition, when you interact with content, your input, including metadata, is transmitted to ChatGPT's servers to generate appropriate responses. We have configured ChatGPT so that the personal data entered is not used to train ChatGPT's algorithm.

The use of ChatGPT is based on Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most efficient customer communication possible using modern technical solutions. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDGDG. Consent can be revoked at any time.

Further information can be found in the OpenAI [privacy policy](#).

9.27. Tax Transparency Act (StTranspG)

Our company is subject to the legal requirements of the Tax Transparency Act (StTG), which obliges platform operators to report certain user data to the relevant tax authorities. This reporting obligation serves to fulfil tax regulations and includes data on transactions, sales and income generated on the platform. Reportable data may include the following categories:

- Name and address of the user
- Tax identification number
- Revenue data and income from sales or services on the platform
- Bank details

The legal basis for this processing results from Art. 6 para. 1 lit. c GDPR in conjunction with the requirements of the Tax Transparency Act. This data is only transmitted to the competent tax authorities within the scope of legal obligations.

10. Rights of the users

Users have the right, upon request and free of charge, to receive information about the personal data that we have stored about them.

In addition, users have the right to correct incorrect data, restrict processing and delete their personal data.

Users can also revoke their consent, in principle with effect for the future.

11. Deletion of data

The data stored by us is deleted or pseudonymised as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. If the user's data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to user data that must be retained for commercial or tax law reasons.

12. Changes to the privacy policy

We reserve the right to amend the privacy policy in order to it to changed legal situations or in the event of changes to the service and data processing. If user consent is required or components of the privacy policy contain provisions of the contractual relationship with the users, the changes will only be made with the consent of the users.

Users are requested to inform themselves regularly about the content of the privacy policy.

If you have any questions or concerns about our privacy policy or the processing of personal data, please contact us at "datenschutz@alzura.com".