Privacy policy Roadsurfer GmbH

The following information informs you about the processing of personal data carried out by roadsurfer GmbH, Winzererstraße 47D, 80797 Munich (hereinafter referred to as "**roadsurfer**" or "**we**") in accordance with the General Data Protection Regulation (hereinafter referred to as "**GDPR**") and the Federal Data Protection Act (hereinafter referred to as "**BDSG**").

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General information

As a visitor to our website, you expect a high level of quality not only from our services, but also in the processing of your personal data. We therefore process personal data in strict compliance with the provisions of the GDPR and national data protection laws and only if this is permitted by law or if you have given us your consent. Personal data includes all data by which you are identified or identifiable.

We take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy. We would like to point out that data transmission over the Internet (e.g. when communicating by e-mail) may be subject to security vulnerabilities. Complete protection of data against access by third parties is not possible.

According to the GDPR, personal data is any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the individual ("personal data"). Data that can only be assigned to a legal entity does not constitute personal data and is therefore not subject to the provisions of this data protection notice or the GDPR.

Below you will find information about the controller responsible for the processing of your personal data, and the
Data Protection Officer of the controller (Section II) and about your rights in relation to the processing of your personal data (Section IV). In addition, at you will find information on the processing of your personal data (Section III) as well as information in connection with the website and the offers made available on the website. You can find out how we process the data of business partners and applicants in Section I and in our special data protection information provided there.

Section I. Duty to inform

I) Website visitors

Data protection information for the use of our website can be found below in sections III-VII.

II) Business partner

Additional information on how we process the data of business partners can be found here: https://roadsurfer.com/en/datenschutz/geschaeftspartner

III) Applicants

Additional information on how applicants' data is processed can be found here: https://roadsurfer.com/en/datenschutz/bewerber

IV) Social media services

The supplementary privacy policy for data processing in relation to social media channels can be found here: https://roadsurfer.com/en/datenschutz/social-media

Section II. Responsible body and data protection officer

Who is responsible for data collection on this website?

Data processing on this website is carried out by roadsurfer. The full contact details can be found in the legal notice of this website.

Contact details of the data protection officer

You can contact the company data protection officer of roadsurfer at

E-mail: datenschutz@roadsurfer.com

Section III. Data processing on this website

I) How do we collect your data?

On the one hand, your data is collected when you provide it to us. This may, for example, be data that you enter in a contact form. Other data is collected automatically or with your consent by our IT systems when you visit the website. This is primarily technical data (e.g. internet browser, operating system or time of page view). This data is collected automatically as soon as you enter this website.

II) What do we use your data for?

Some of the data is collected to ensure that the website is provided without errors. Other data may be used to analyze your user behavior (see Cookies and Section V below).

III) Newsletter

If you have given your consent, we will transmit the personal data entered by you in the newsletter input mask and the logging data of your opt-in to roadsurfer GmbH, so that you will also receive newsletters from roadsurfer GmbH containing advertising information about their products and/or services. Data processing by roadsurfer GmbH is governed by the data protection declaration of roadsurfer GmbH, which can be found at https://roadsurfer.com/de/datenschutz.

If you have expressly consented in accordance with Art. 6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG, we will use your e-mail address to send you our newsletter on a regular basis. To receive the newsletter, it is sufficient to provide an email address. If you subscribe to our e-mail newsletter, we will send you regular information about our offers. The only mandatory information for sending the newsletter is your e-mail address. The provision of any other data is voluntary and is used to address you personally. We use the so-called double opt-in procedure for sending the newsletter. This means that we will only send you an e-mail newsletter if you have expressly confirmed to us that you consent to the sending of newsletters. We will then send you a confirmation e-mail asking you to confirm that you wish to receive future newsletters by clicking on a corresponding link.

By activating the confirmation link, you give us your consent to the use of your personal data in accordance with Art. 6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG. When you register for the newsletter, we store your IP address as well as the date and time of registration in order to be able to trace any possible misuse of your email address at a later date. The data collected by us when you register for the newsletter will be used exclusively for the purposes of advertising via the newsletter. You can unsubscribe from the newsletter at any time using the link provided in the newsletter. Alternatively, you can also send your unsubscribe request at any time to datenschutz@roadsurfer.com by email. Once you have unsubscribed, your e-mail address will be deleted from our newsletter mailing list immediately.

We use Mailchimp to send the newsletter. You can find more information on this in section V.

IV) Analysis tools and tools from third-party providers

When you visit this website, your surfing behavior may be statistically evaluated. This is done primarily with so-called analysis programs. Detailed information on these analysis programs can be found in section V of this privacy policy.

V) External hosting via Amazon Web Services (AWS)

The provider is Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg (hereinafter referred to as AWS).

When you visit our website, your personal data is processed on the servers of AWS. Personal data may also be transferred to the parent company of AWS in the USA. The data transfer to the USA is based on the EU standard contractual clauses.
Details can be found here:
https://aws.amazon.com/de/blogs/security/aws-gdpr-data-processing-addendum/.

Further information can be found in the AWS privacy policy:
https://aws.amazon.com/de/privacy/?nc1=f_pr.

The use of AWS is based on Art. 6 para. 1 lit. f GDPR. We have a legitimate interest in displaying our website as reliably as possible. 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 TDDDG. Consent can be revoked at any time.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5776.

Order processing
We have concluded a data processing agreement (DPA) for the use of the above-mentioned service concluded. This is a contract prescribed by data protection law, which
ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

VI) Cloudflare

We use the "Cloudflare" service. The provider is Cloudflare Inc, 101 Townsend St., San Francisco, CA 94107, USA (hereinafter referred to as "Cloudflare").

Cloudflare offers a globally distributed content delivery network with DNS. Technically, the information transfer between your browser and our website is routed via Cloudflare's network. This enables Cloudflare to analyze the data traffic between your browser and our website and to serve as a filter between our servers and potentially malicious data traffic from the Internet. Cloudflare may also use cookies or other technologies to recognize Internet users, but these are used solely for the purpose described here.

The use of Cloudflare is based on our legitimate interest in providing our website as error-free and secure as possible (Art. 6 para. 1 lit. f GDPR).

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details and further information on security and data protection at Cloudflare can be found here:
https://www.cloudflare.com/privacypolicy/

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5666.

Order processing
We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract prescribed by data protection law, which guarantees that the provider will only process the personal data of our website visitors in accordance with our instructions and in compliance with the GDPR.

VII) Storage duration

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for data processing no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted unless we have other legally permissible reasons for storing your personal data (e.g. retention periods under tax or commercial law); in the latter case, the deletion will take place after these reasons no longer apply.

VIII) Note on the transfer of data to third countries that are not secure under data protection law and the transfer to US companies that are not DPF-certified

Among other things, we use tools from companies based in third countries that are not secure under data protection law and US tools whose providers are not certified under the EU-US Data Privacy Framework (DPF). If these tools are active, your personal data may be transferred to these countries and processed there. We would like to point out that no level of data protection comparable to that in the EU can be guaranteed in third countries that are unsafe under data protection law. We would like to point out that the USA, as a safe third country, generally has a level of data protection comparable to that of the EU. Data transfer to the USA is therefore permitted if the recipient is certified under the "EU-US Data Privacy Framework" (DPF) or has suitable additional guarantees. Information on transfers to third countries, including data recipients, can be found in this privacy policy.

IX) Cookies

Our Internet pages 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.

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 (e.g. the shopping cart function or the display of videos). Other cookies are used to evaluate user behavior or display advertising.

Cookies that are required to carry out the electronic communication process (necessary cookies) or to provide certain functions desired by you (functional cookies, e.g. for the shopping cart function) or to optimize the website (e.g. cookies to measure the web audience) are stored on the basis of Art. 6 para. 1 lit. f GDPR (legitimate interest), unless another legal basis is specified. Roadsurfer has a legitimate interest in the storage of cookies for the technically error-free and optimized provision of its services. If consent to the storage of cookies has been requested, the cookies in question are stored exclusively on the basis of this consent (Art. 6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG); 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. If cookies are used by third-party companies or for analysis purposes, we will inform you about this separately in this privacy policy and, if necessary, request your consent.

You can revoke your consent in connection with cookies here or via the "fingerprint symbol".

X) Consent with Usercentrics

This website uses the consent technology of Usercentrics to obtain your consent to the storage of certain cookies on your end device or to the use of certain technologies and to document this in compliance with data protection regulations. The provider of this technology is Usercentrics GmbH, Sendlinger Straße 7, 80331 Munich, Germany, website: https://usercentrics.com/de/ (hereinafter "Usercentrics").

When you visit our website, the following personal data is transmitted to Usercentrics:

- Your consent(s) or the revocation of your consent(s)
- Your IP address
- Information about your browser
- Information about your end device
- Time of your visit to the website
- Geolocation

Furthermore, Usercentrics stores a cookie in your browser in order to be able to assign the consents you have given or revoke them. The data collected in this way is stored until you ask us to delete it, delete the Usercentrics cookie yourself or the purpose for storing the data no longer applies. Mandatory statutory retention obligations remain unaffected.
Usercentrics is used to obtain the legally required consent for the use of certain technologies. The legal basis for this is Art. 6 para. 1 lit. c GDPR.

Order processing

We have concluded an order processing contract with Usercentrics. This is a contract prescribed by data protection law, which ensures that Usercentrics processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

XI) Server log files
The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are

- Browser type and browser version Operating system used
- Referrer URL
- Host name of the accessing computer
- Time of the server request
- IP address

This data is not merged with other data sources. The collection of this data is based on Basis of Art. 6 para. 1 lit. f GDPR. We have a legitimate interest in the technically error-free presentation and optimization of our website - for this purpose, the server log files must be recorded. This data is generally deleted after 7 days.

XII) Contact form

If you send us inquiries via the contact form, your details from the inquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the inquiry and in the event of follow-up questions.

We will not pass on this data without your consent. This data is processed on the basis of Art. 6 para. 1 lit. b GDPR if your request is related to the fulfillment of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the inquiries addressed to us (Art. 6 para. 1 lit. f GDPR) or on your consent (Art. 6 para. 1 lit. a GDPR) if this has been requested.

We will retain the data you provide on the contact form until you request its deletion, revoke your consent for its storage, or the purpose for its storage no longer pertains (e.g. after fulfilling your request). Mandatory statutory provisions - in particular retention periods - remain unaffected.

XIII) Request by e-mail, telephone or fax

If you contact us by e-mail, telephone or fax, we will store and process your inquiry, including all personal data (name, inquiry), for the purpose of processing your request. We will not pass on this data without your consent.

This data is processed on the basis of Art. 6 para. 1 lit. b GDPR if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the inquiries addressed to us (Art. 6 para. 1 lit. f GDPR) or on your consent (Art. 6 para. 1 lit. a GDPR) if this has been requested; consent can be revoked at any time.
The data you send to us via contact requests will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage no longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

XIV) Communication via WhatsApp

For communication with our customers and other third parties, we use the instant messaging service WhatsApp, among others. The provider is WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.
Communication takes place via end-to-end encryption (peer-to-peer), which prevents WhatsApp or other third parties from gaining access to the communication content. However, WhatsApp receives access to metadata that is created in the course of the communication process (e.g. sender, recipient and time). We would also like to point out that WhatsApp states that it shares the personal data of its users with its parent company Meta, which is based in the USA. Further details on data processing can be found in WhatsApp's privacy policy at: https://www.whatsapp.com/legal/#privacy-policy.

WhatsApp is used on the basis of our legitimate interest in communicating as quickly and effectively as possible with customers, interested parties and other business and contractual partners (Art. 6 para. 1 lit. f GDPR). If a corresponding consent has been requested, the data processing takes place exclusively on the basis of the consent; this can be revoked at any time with effect for the future.

The communication content exchanged between you and us on WhatsApp will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage no longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular retention periods - remain unaffected.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/7735.

We use WhatsApp in the "WhatsApp Business" version.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:
https://www.whatsapp.com/legal/business-data-transfer-addendum.

We have set our WhatsApp accounts so that it does not automatically synchronize data with the address book on the smartphones in use.

We have concluded an order processing contract (AVV) with the above-mentioned provider

XV) Calendly

You can make appointments with us on our website. We use the "Calendly" tool to book appointments. The provider is Calendly LLC, 271 17th St NW, 10th Floor, Atlanta, Georgia 30363, USA (hereinafter "Calendly").

To book an appointment, enter the requested data and the desired date in the form provided. The data entered will be used for the planning, execution and, if necessary, follow-up of the appointment. The appointment data is stored for us on the servers of Calendly, whose privacy policy you can view here: https://calendly.com/privacy.

The data you enter will remain with us until you ask us to delete it, revoke your consent to storage or the purpose for data storage no longer applies. Mandatory statutory provisions - in particular retention periods - remain unaffected.

The legal basis for data processing is Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in making appointments with interested parties and customers as uncomplicated as possible. 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 Section 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 TDDDG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here: https://calendly.com/pages/dpa.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/6050.

Order processing
We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract prescribed by data protection law, which ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

Section IV. Your rights

I) What rights do you have with regard to your data?

You have the right to receive information about the origin, recipient and purpose of your stored personal data free of charge at any time. You also have the right to request the correction or deletion of this data. If you have given your consent to data processing, you can revoke this consent at any time for the future. You also have the right to request the restriction of the processing of your personal data under certain circumstances. You also have the right to lodge a complaint with the competent supervisory authority.

II) Revocation of your consent to data processing

You can revoke any consent you have already given us at any time by sending an email todatenschutz@roadsurfer.com or, if it concerns consent in connection with cookies, here. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

III) Right to object in special cases and to direct marketing (Art. 21 GDPR)

IF THE DATA PROCESSING IS BASED ON ART. 6 ABS. 1 LIT. E OR F GDPR, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA AT ANY TIME ON GROUNDS RELATING TO YOUR PARTICULAR SITUATION; THIS ALSO APPLIES TO PROFILING BASED ON THESE PROVISIONS. THE RESPECTIVE LEGAL BASIS ON WHICH PROCESSING IS BASED CAN BE FOUND IN THIS PRIVACY POLICY. IF YOU OBJECT, WE WILL NO LONGER PROCESS YOUR PERSONAL DATA CONCERNED UNLESS WE CAN DEMONSTRATE COMPELLING LEGITIMATE GROUNDS FOR THE PROCESSING WHICH OVERRIDE YOUR INTERESTS, RIGHTS AND FREEDOMS OR THE PROCESSING SERVES THE ESTABLISHMENT, EXERCISE OR DEFENSE OF LEGAL CLAIMS (OBJECTION PURSUANT TO ART. 21 PARA. 1 GDPR).

IF YOUR PERSONAL DATA ARE PROCESSED FOR THE PURPOSE OF DIRECT MARKETING, YOU HAVE THE RIGHT TO OBJECT AT ANY TIME TO THE PROCESSING OF PERSONAL DATA CONCERNING YOU FOR THE PURPOSE OF SUCH MARKETING; THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS RELATED TO SUCH DIRECT MARKETING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR THE PURPOSE OF DIRECT MARKETING (OBJECTION PURSUANT TO ART. 21 PARA. 2 GDPR).
TO EXERCISE YOUR RIGHT OF OBJECTION, SIMPLY SEND AN E-MAIL TO
DATENSCHUTZ@ROADSURFER.COM

IV) Right to lodge a complaint with the competent supervisory authority

In the event of breaches of the GDPR, data subjects have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement. The right to lodge a complaint is without prejudice to other administrative or judicial remedies.
The data protection authority responsible for us is

Bavarian State Office for Data Protection Supervision (BayLDA)
Promenade 18
91522 Ansbach
E-Mail: poststelle@lda.bayern.de

V) Right to data portability

You have the right to have data that we process automatically on the basis of your consent or in fulfillment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only take place if it is technically feasible.

VI) Information, deletion and correction

Within the framework of the applicable legal provisions, you have the right to free information about your stored personal data, its origin and recipients and the purpose of the data processing and, if necessary, a right to correction or deletion of this data at any time. You can contact us at any time if you have further questions on the subject of personal data.

VII) Right to restriction of processing

You have the right to request the restriction of the processing of your personal data. You can contact us at any time to do this. The right to restriction of processing exists in the following cases:

- If you dispute the accuracy of your personal data stored by us, we generally need time to check this. You have the right to request the restriction of the processing of your personal data for the duration of the review.
- If the processing of your personal data was/is carried out unlawfully, you can request the restriction of data processing instead of erasure.
- If we no longer need your personal data, but you need it for the exercise, defense or assertion of legal claims, you have the right to request the restriction of the processing of your personal data instead of deletion.
- If you have lodged an objection pursuant to Art. 21 (1) GDPR, a balance must be struck between your interests and ours. As long as it has not yet been determined whose interests prevail, you have the right to request the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, this data - apart from its storage - may only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

Section V. Analysis tools, plugins/pixels, advertising, support and contact, payment service providers, Trusted Shops

I) Analysis tools

1. Google Tag Manager

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create any user profiles, does not store any cookies and does not carry out any independent analyses. It is only used to manage and display the tools integrated via it. However, Google Tag Manager records your IP address, which may also be transmitted to Google's parent company in the United States.

The Google Tag Manager is used on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the fast and uncomplicated integration and management of various tools on its website. 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 TDDDG. Consent can be revoked at any time.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5780.

2. Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior of website visitors. The website operator receives various usage data, such as page views, length of visit, operating systems used and origin of the user. This data is assigned to the user's end device. It is not assigned to a device ID.

We can also use Google Analytics to record your mouse and scroll movements and clicks, among other things. Google Analytics also uses various modeling approaches to supplement the collected data records and uses machine learning technologies for data analysis.

Google Analytics uses technologies that enable the recognition of the user for the purpose of analyzing user behavior (e.g. cookies or device fingerprinting). The information collected by Google about the use of this website is generally transmitted to a Google server in the USA and stored there. The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG. Consent can be revoked at any time.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5780.

IP anonymization

Google Analytics IP anonymization is activated. As a result, your IP address will be shortened by Google within member states of the European Union or in other contracting states of the Agreement

on the European Economic Area before being transmitted to the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and truncated there. Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data

Browser plugin

You can prevent the collection and processing of your data by Google by downloading and installing the browser plug-in available at the following link: https://tools.google.com/dlpage/gaoptout?hl=de.

You can find more information on how Google Analytics handles user data in Google's privacy policy: https://support.google.com/analytics/answer/6004245?hl=de.

3. Google Ads

This website uses Google Ads. Google Ads is an online advertising program of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland

Google Ads enables us to display advertisements in the Google search engine or on third-party websites when the user enters certain search terms on Google (keyword targeting). Furthermore, targeted advertisements can be displayed based on the user data available at Google (e.g. location data and interests) (target group targeting). As the website operator, we can evaluate this data quantitatively, for example by analyzing which search terms led to the display of our advertisements and how many advertisements led to corresponding clicks.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:
https://policies.google.com/privacy/frameworks and
https://business.safety.google/controllerterms/.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5780

4. Google Conversion Tracking

This website uses Google Conversion Tracking. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With the help of Google conversion tracking, Google and we can recognize whether the user has performed certain actions. For example, we can evaluate which buttons on our website were clicked how often and which products were viewed or purchased particularly frequently. This information is used to create conversion statistics. We find out the total number of users who have clicked on our ads and what actions they have taken. We do not receive any information with which we can

personally identify the user. Google itself uses cookies or comparable recognition technologies for identification purposes.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG. Consent can be revoked at any time.
You can find more information about Google Conversion Tracking in Google's privacy policy: https://policies.google.com/privacy?hl=de.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5780

5. Google DoubleClick

This website uses functions of Google DoubleClick. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland, (hereinafter "DoubleClick").
DoubleClick is used to show you interest-based advertisements throughout the Google advertising network. With the help of DoubleClick, the advertisements can be targeted to the interests of the respective viewer. For example, our advertising can be displayed in Google search results or in advertising banners linked to DoubleClick.

In order to be able to display interest-based advertising to users, DoubleClick must be able to recognize the respective viewer and assign the websites visited, clicks and other information on user behavior to them. For this purpose, DoubleClick uses cookies or comparable recognition technologies (e.g. device fingerprinting). The information collected is combined into a pseudonymous user profile in order to display interest-based advertising to the user concerned.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG. Consent can be revoked at any time.
For more information on how to object to the advertisements displayed by Google, please refer to the following links: https://policies.google.com/technologies/ads and https://adssettings.google.com/authenticated.

6. Google Web Fonts

This website uses so-called web fonts provided by Google for the uniform display of fonts. When you access a page, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly. For this purpose, the browser you are using must connect to Google's servers. This informs Google that this website has been accessed via your IP address. The data processing takes place exclusively on the basis of Art. 6 para. 1 lit. f GDPR. If your browser does not support web fonts, a standard font will be used by your computer. Further information on Google Web Fonts can be found at https://developers.google.com/fonts/faq and in Google's privacy policy: https://policies.google.com/privacy?hl=de

7. Hotjar

This website uses Hotjar. The provider is Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe (website: https://www.hotjar.com).

Hotjar is a tool for analyzing your user behavior on this website. Hotjar allows us to record your mouse and scroll movements and clicks, among other things. Hotjar can also determine how long you remain with the mouse pointer in a certain position. Hotjar uses this information to create so-called heat maps, which can be used to determine which areas of the website visitors prefer to look at.

Furthermore, we can determine how long you stayed on a page and when you left it. We can also determine at which point you abandoned your entries in a contact form (so-called conversion funnels).
Hotjar can also be used to obtain direct feedback from website visitors. This function serves to improve the website operator's web offerings.

Hotjar uses technologies that enable the recognition of the user for the purpose of analyzing user behavior (e.g. cookies or the use of device fingerprinting).
If consent has been obtained, the above-mentioned service is used exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 TDDDG. Consent can be revoked at any time. If no consent has been obtained, this service is used on the basis of Art. 6 para. 1 lit. f GDPR; the website operator has a legitimate interest in analyzing user behavior in order to optimize both its website and its advertising.

Deactivating Hotjar
If you wish to deactivate data collection by Hotjar, click on the following link and follow the instructions there: https://www.hotjar.com/policies/do-not-track/

Please note that Hotjar must be deactivated separately for each browser or end device.

For more information about Hotjar and the data collected, please refer to Hotjar's privacy policy at the following link: https://www.hotjar.com/privacy

Order processing
We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract prescribed by data protection law, which guarantees that it will only process the personal data of our website visitors in accordance with our instructions and in compliance with the GDPR.

II) Social media pixels and plugins

1. Meta Pixel (formerly Facebook Pixel)

This website uses the visitor action pixel from Meta to measure conversions. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. However, according to Meta, the data collected is also transferred to the USA and other third countries.

This allows the behavior of site visitors to be tracked after they have been redirected to the provider's website by clicking on a meta ad. This allows the effectiveness of the meta ads to be evaluated for statistical and market research purposes and future advertising measures to be optimized.

The data collected is anonymous to us as the operator of this website; we cannot draw any conclusions about the identity of the user. However, the data is stored and processed by Meta so that a connection to the respective user profile on Facebook or Instagram is possible and Meta can use the data for its own advertising purposes in accordance with the Meta Data Usage Policy

(https://de-de.facebook.com/about/privacy/). This enables Meta to place advertisements on Facebook or Instagram pages and other advertising channels. This use of the data cannot be influenced by us as the website operator.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG. Consent can be revoked at any time.

We use the advanced matching function within the meta pixels.

Advanced matching enables us to transmit various types of data (e.g. place of residence, state, zip code, hashed email addresses, name, gender, date of birth or telephone number) of our customers and prospects that we collect via our website to Meta. This allows us to tailor our advertising campaigns on Facebook and Instagram even more precisely to people who are interested in our offers. In addition, the extended comparison improves the allocation of website conversions and expands custom audiences

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Meta, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 GDPR). The joint responsibility is limited exclusively to the collection of the data and its transfer to Meta. The processing carried out by Meta after forwarding is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The text of the agreement can be found at: https://www.facebook.com/legal/controller_addendum. According to this agreement, we are responsible for providing the data protection information when using the Meta tool and for the secure implementation of the tool on our website in accordance with data protection law. Meta is responsible for the data security of the Meta products. You can assert data subject rights (e.g. requests for information) regarding the data processed by Facebook or Instagram directly with Meta. If you assert your data subject rights with us, we are obliged to forward them to Meta.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:
https://www.facebook.com/legal/EU_data_transfer_addendum and
https://de-de.facebook.com/help/566994660333381.

You can find further information on the protection of your privacy in Meta's data protection information: https://de-de.facebook.com/about/privacy/.

You can also deactivate the remarketing function "Custom Audiences" in the settings for advertisements at https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen. You must be logged in to Facebook to do this.

If you do not have a Facebook or Instagram account, you can deactivate usage-based advertising from Meta on the website of the European Interactive Digital Advertising Alliance:
http://www.youronlinechoices.com/de/praferenzmanagement/.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/4452

2. Pinterest tag

We have integrated Pinterest tags on this website. The provider is Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland.

Pinterest Tag is used to record certain actions that you perform on our website. The data can then be used to show you interest-based advertising on our website or on another page of the Pinterest Tag advertising network.

For this purpose, the Pinterest tag records, among other things, a tag ID, your location and the referrer URL. Furthermore, campaign-specific data such as order value, order quantity, order number, category of purchased items and video views can be recorded.

Pinterest Tag uses technologies that enable cross-page recognition of the user to analyze user behavior (e.g. cookies or device fingerprinting).

If consent has been obtained, the above-mentioned service is used exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 TDDDG. Consent can be revoked at any time. If consent has not been obtained, this service is used on the basis of Art. 6 para. 1 lit. f GDPR; the website operator has a legitimate interest in the most effective marketing measures possible.

Pinterest is a global company, which means that data may also be transferred to the USA. According to Pinterest, this data transfer is based on the standard contractual clauses of the EU Commission. You can find details here: https://policy.pinterest.com/de/privacy-policy.

You can find more information about Pinterest Tag here: https://help.pinterest.com/de/business/article/track-conversions-with-pinterest-tag.

Order processing
We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract prescribed by data protection law, which ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

3. TikTok Pixel

We use the pixel of the provider TikTok Information Technologies UK Limited, Aviation House, 125 Kingsway Holborn, London, WC2B 6NH ("TikTok") on our website.

With the help of TikTok Pixel, we can display interest-based advertising on TikTok to website visitors who have viewed our offers (TikTok Ads). At the same time, we can use the TikTok Pixel to determine how effective our advertising on TikTok is. This allows the effectiveness of TikTok ads to be evaluated for statistical and market research purposes and optimized for future advertising measures. Various usage data is processed, such as IP address, page views, length of stay, operating systems used and origin of the user, information about the ad that a person clicked on TikTok or an event that was triggered (timestamp). This data is summarized in a user ID and assigned to the respective end device of the website visitor.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and §25 para. 1 TDDDG. Consent can be revoked at any time.

Data transfer to third countries is based on the standard contractual clauses of the EU Commission. Details can be found here:

https://www.tiktok.com/legal/page/eea/privacy-policy/de-DE and
https://ads.tiktok.com/i18n/official/policy/controller-to-controller.

Order processing
We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract prescribed by data protection law, which ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

4. YouTube

This website integrates videos from the YouTube website. The operator of the website is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

When you visit one of our websites on which YouTube is integrated, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited.

Furthermore, YouTube may store various cookies on your device or use comparable technologies to recognize you (e.g. device fingerprinting). In this way, YouTube can obtain information about visitors to this website. This information is used, among other things, to record video statistics, improve user-friendliness and prevent fraud attempts. Furthermore, the data collected is processed in the Google advertising network.

If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account.

The use of YouTube is in the interest of an appealing presentation of our online offers. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. 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 end device (e.g. device fingerprinting) within the meaning of the TDDDG. Consent can be revoked at any time.
Further information on the handling of user data can be found in YouTube's privacy policy at: https://policies.google.com/privacy?hl=de.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5780.

5. Social media plug-ins of the social media platforms

On our website, we have integrated so-called social media buttons (plug-ins) from the social media platforms Instagram, YouTube and Facebook, which, when clicked, take you directly to our respective social media profile.
Further information on the processing of personal data can be found on the website of the respective social media platform and in our privacy policy for data processing in relation to social media. The respective provider is responsible for the processing of your personal data.

6. Google Maps

This site uses the map service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. With the help of this service, we can integrate map material on our website.

To use the functions of Google Maps, it is necessary to save your IP address. This information is usually transmitted to a Google server in the USA and stored there. The provider of this site has no influence on this data transfer. If Google Maps is activated, Google may use Google Web Fonts for the purpose of uniform display of fonts. When you call up Google Maps, your browser loads the required web fonts into your browser cache in order to display texts and fonts correctly.

The use of Google Maps is in the interest of an appealing presentation of our online offers and to make it easy to find the places we have indicated on the website. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. 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 TDDDG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:
https://privacy.google.com/businesses/gdprcontrollerterms/ and
https://privacy.google.com/businesses/gdprcontrollerterms/sccs/.

You can find more information on the handling of user data in Google's privacy policy:
https://policies.google.com/privacy?hl=de

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, which guarantees compliance with European data protection standards for data processing in the USA. Every company certified in accordance with the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5780.

7. Google Photos

We use the online service of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to store images that are embedded on our homepage.

Embedding is the integration of specific third-party content (text, video or image data) that is provided by another website (Google Photos) and then appears on your own website (our website). An embed code is used for embedding. If we have integrated an embed code, the external content from Google Photos is displayed immediately by default as soon as one of our web pages is visited.

Your IP address is transmitted to Google Photos via the technical implementation of the embedding code that enables the display of images from Google Photos. Google Photos also records our website, the type of browser used, the browser language, the time and length of access. In addition, Google Photos may collect information about which of our subpages you have visited and which links

you have clicked on, as well as other interactions you have carried out when visiting our site. This data may be stored and analyzed by Google Photos.

These processing operations are only carried out if express consent has been granted in accordance with Art. 6 para. 1 lit. a GDPR.

You can view Google's privacy policy at: https://www.google.com/policies/privacy/

8. Spotify

Functions of the Spotify music service are integrated on this website. The provider is Spotify AB, Birger Jarlsgatan 61, 113 56 Stockholm, Sweden. You can recognize the Spotify plugins by the green logo on this website. You can find an overview of the Spotify plugins at: https://developer.spotify.com

This allows a direct connection to be established between your browser and the Spotify server via the plugin when you visit this website. Spotify receives the information that you have visited this website with your IP address. If you click on the Spotify button while you are logged into your Spotify account, you can link the content of this website to your Spotify profile. This allows Spotify to associate your visit to this website with your user account.
We would like to point out that cookies from Google Analytics are used when using Spotify, so that your usage data can also be passed on to Google when using Spotify. Google Analytics is a tool of the Google Group for analyzing user behavior based in the USA. Spotify is solely responsible for this integration. We as the website operator have no influence on this processing.

The data is stored and analyzed on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the appealing acoustic design of its website. 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 TDDDG. Consent can be revoked at any time.

You can find more information on this in Spotify's privacy policy:
https://www.spotify.com/de/legal/privacy-policy/

If you do not want Spotify to be able to associate your visit to this website with your Spotify user account, please log out of your Spotify user account.

III) Advertising

1. Microsoft Advertising Bing

On the website, we use Bing Ads technologies (bingads.microsoft.com), which are provided and operated by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA ("Microsoft"), with your consent in accordance with Art. 6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG. Microsoft places a cookie on your device if you have reached our website via a MicrosoftBing ad. In this way, Microsoft and we can recognize that someone has clicked on an ad, has been redirected to our website and has reached a previously determined target page ("conversion site"). We only learn the total number of users who clicked on a Bing ad and were then redirected to the conversion site. Microsoft collects, processes and uses information via the cookie, from which user profiles are created using pseudonyms. These user profiles are used to analyze visitor behavior and are used to display advertisements. No personal information about the identity of the user is processed.

2. Mailchimp

This website uses the services of Mailchimp to send newsletters. The provider is Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

Mailchimp is a service that can be used to organize and analyse the sending of newsletters, among other things. If you enter data for the purpose of subscribing to the newsletter (e.g. email address), this data is stored on Mailchimp's servers in the USA.

With the help of Mailchimp, we can analyze our newsletter campaigns. When you open an email sent with Mailchimp, a file contained in the email (known as a web beacon) connects to Mailchimp's servers in the USA. This makes it possible to determine whether a newsletter message has been opened and which links, if any, have been clicked on. Technical information is also collected (e.g. time of access, 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 wish to be analyzed by Mailchimp, you must unsubscribe from the newsletter. We provide a link for this purpose in every newsletter message.

The data processing takes place on the basis of your consent (Art. 6 para. 1 lit. a GDPR). You can revoke this consent at any time by unsubscribing from the newsletter. The legality of the data processing operations already carried out remains unaffected by the revocation.

The data you provide us with for the purpose of subscribing to the newsletter will be stored by us or the newsletter service provider until you unsubscribe from the newsletter and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored by us for other purposes remains unaffected by this.
Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:
https://mailchimp.com/eu-us-data-transfer-statement/ andhttps://mailchimp.com/legal/data-processing-addendum/#Annex_C_-_Standard_Contractual_Clauses.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist if this is necessary to prevent future mailings. The data from the blacklist 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.**

For more information, please refer to Mailchimp's privacy policy at:
https://mailchimp.com/legal/terms/.

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 in accordance with the DPF undertakes to comply with these data protection standards.
More

Information on this can be obtained from the provider under the following link:
https://www.dataprivacyframework.gov/participant/7693.

Order processing
We have concluded a data processing agreement (DPA) for the use of the above-mentioned service concluded. This is a contract prescribed by data protection law, which
ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.
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3. Outbrain

We have integrated Outbrain on this website. The provider is Outbrain Inc, 39 West 13th Street, 3rd floor, New York, NY 10011, USA (hereinafter "Outbrain").

When you visit a website on which Outbrain is integrated, Outbrain creates a pseudonymous user profile (user ID) in which the content you have viewed or read is stored. You can then be recommended further interest-based content or shown advertising on our website or on other websites on which Outbrain is integrated. For this purpose, your device type, IP address, browser type, websites visited and articles read, time of access and device ID are stored and summarized in your user ID.
If consent has been obtained, the above-mentioned service is used exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 TDDDG. Consent can be revoked at any time. If consent has not been obtained, this service is used on the basis of Art. 6 para. 1 lit. f GDPR; the website operator has a legitimate interest in analyzing user behavior in order to optimize both its website and its advertising.

Further information can be found in Outbrain's privacy policy at:
https://www.outbrain.com/legal/privacy#privacy-policy.

You can also find a list of all cookies used by Outbrain at the following link:
https://www.outbrain.com/privacy/cookies/.

If you would like to view or customize your interest profile on Outbrain, click on the following link:
https://my.outbrain.com/recommendations-settings/home.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/6439.

Order processing
We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract prescribed by data protection law, which ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

4. Criteo

This website uses Criteo functions. The provider is Criteo SA, 32 Rue Blanche, 75009 Paris (hereinafter "Criteo").

Criteo is used to show you interest-based advertisements within the Criteo advertising network. Your interests are determined on the basis of your previous usage behavior. For example, Criteo records which products you have viewed, placed in your shopping cart or purchased. Further details on the data collected by Criteo can be found here: https://www.criteo.com/de/privacy/how-we-use-your-data/.

In order to be able to show you interest-based advertising, we or other Criteo partners must be able to recognize you. For this purpose, a cookie is stored on your end device or a comparable identifier is used, which links your user behavior with a pseudonymous user profile. For details, please refer to Criteo's privacy policy at: https://www.criteo.com/de/privacy/.

Your personal data and the Criteo cookies stored in your browser are stored for a maximum of 13 months from the date of collection.

If consent has been obtained, the above-mentioned service is used exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 TDDDG. Consent can be revoked at any time. If consent has not been obtained, this service is used on the basis of Art. 6 para. 1 lit. f GDPR; the website operator has a legitimate interest in targeted advertising measures.

Criteo and we are joint controllers within the meaning of Art. 26 GDPR. An agreement on joint processing has been concluded between Criteo and us, the main contents of which Criteo describes under the following link: https://www.criteo.com/de/privacy/how-we-use-your-data/.

IV) Support and contact

1. Zendesk

We use the CRM system Zendesk to process user inquiries. The provider is Zendesk, Inc, 1019 Market Street in San Francisco, CA 94103 USA.

We use Zendesk to process your requests quickly and efficiently. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

You can only send inquiries with your e-mail address and without giving your name.

The messages sent to us will remain with us until you ask us to delete them or the purpose for data storage no longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular retention periods - remain unaffected.

Zendesk has Binding Corporate Rules (BCR) that have been approved by the Irish Data Protection Authority. These are binding corporate rules that legitimize the internal transfer of data to third countries outside the EU and the EEA . Details can be found here: https://www.zendesk.de/blog/update-privacy-shield-invalidation-european-court-justice/.

If you do not agree to us processing your request via Zendesk, you can alternatively communicate with us by e-mail, telephone or fax.

Further information can be found in Zendesk's privacy policy:
https://www.zendesk.de/company/customers-partners/privacy-policy/.

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/5304

Order processing
We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract prescribed by data protection law, which ensures that the provider only processes the personal data of our website visitors in accordance with our instructions and in compliance with the GDPR.

2. Airtable

We use the database software Airtable from the provider Formagrid, Inc., 799 Market St, Floor 8 San Francisco, CA 94103, USA, to process contract data, in particular the data on users' purchase contracts, and to make it available if interested.

Data processing is based on Art. 6 para. 1 lit. b and c GDPR. Airtable only uses the user's data for technical processing and does not pass it on to third parties. The following data is transmitted to Airtable: first name, last name, address, email, telephone number, ID data, driving license data, date of birth, place of birth, creditworthiness, SEPA information and other data voluntarily entered by the user. In the course of processing, it may be necessary for us to collect further data and also process it in the database provided by Airtable. We have concluded an order processing contract with this company. This involves standard data protection clauses in which Airtable undertakes to protect the data of our users, to process it on our behalf in accordance with its data protection provisions and, in particular, not to pass it on to third parties. AirTable processes data on servers outside the EU. You can find more information here: https://airtable.com/privacy

3. Setmore
We use Setmore Calender on our website to make it easy for you to book appointments. The service is operated by Setmore, Inc, 1033 SE Main St 5 Portland, OR 97214. Setmore also uses cookies on our website to collect information about user behavior. The use of Setmore is based on your consent, which can be revoked at any time, in accordance with Art.

6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG. When you visit a page with Setmore, a connection to the Setmore servers is established. You are free to arrange such a appointment at any time, e.g. by telephone or e-mail. Against this background, all entries, including personal data, are voluntary. The data collected includes
Name, telephone number, e-mail and address and are used by us to arrange appointments and, if necessary, for invoicing. This information is generally transmitted to and stored on a setmore.com server in the USA. As the provider of this website, we have no influence on this data transfer. You can find more information on the handling of user data in the privacy policy of setmore.com:

https://www.setmore.com/newhomepage/jsp/privacy.jsp,
https://support.setmore.com/en/articles/1784801-setmoreand-gdpr and in the terms of use:
https://www.setmore.com/terms

4. Pipedrive

When you contact us (via contact form or email), your details will be processed to handle the contact request and process it in accordance with your consent. In order to process and respond to your requests and messages as quickly as possible, we have linked our contact form to our customer relationship management tool Pipedrive. The data transmitted when you fill out the form is transmitted to Pipedrive and stored there on Pipedrive servers. We use Pipedrive on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG, which you gave us at the beginning of the communication, so that we can process user inquiries, existing customer management and new customer business efficiently and quickly. The address of Pipedrive OÜ is Mustamäe tee 3a, 10615 Tallinn, Estonia. The company is a subsidiary of Pipedrive US. For this purpose, we have concluded a contract with Pipedrive with so-called standard data protection clauses, in which Pipedrive undertakes to process user data only in accordance with our instructions and to comply with the EU data protection level. Pipedrive US is also obliged to comply with European data protection law. You can access Pipedrive's privacy policy here:
https://www.pipedrive.com/en/privacy your data will be deleted once we have processed your request and the purpose of storage no longer applies and there are no other legal exceptions to the contrary.

5. Zapier
We have integrated Zapier on this website. The provider is Zapier Inc, Market St. #62411, San Francisco, CA 94104-5401, USA (hereinafter referred to as Zapier).

Zapier enables us to link various functionalities, databases and tools to our website and synchronize them with each other. In this way, it is possible, for example, to automatically display content that we publish on our website on our social media channels or to export content from marketing and analysis tools. Depending on the functionality, Zapier may also collect various personal data.
The use of Zapier is based on Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in integrating the tools used as effectively as possible. 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 end device (e.g. device fingerprinting) within the meaning of the TDDDG. Consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here: https://zapier.com/tos

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 undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:
https://www.dataprivacyframework.gov/participant/4425.

Order processing
We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract prescribed by data protection law, which ensures that the provider only processes the

personal data of our website visitors in accordance with our instructions and in compliance with the GDPR.

6. Sentry

We use the Sentry service (provider Sentry, 1501 Mariposa St #408, San Francisco, CA 94107, USA) within the scope of our legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR to improve the technical stability of our service by monitoring system stability and detecting code errors. Sentry serves these purposes alone and does not evaluate data for advertising purposes. User data, such as information on the device or time of error, is collected anonymously and is not used for personal purposes and is subsequently deleted. Further information on this can be found in Sentry's privacy policy: https://sentry.io/privacy/.

V) Payment service provider

We integrate payment services from third-party companies on our website. When you make a purchase from us, your payment details (e.g. name, payment amount, account details, credit card number) are processed by the payment service provider 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.

We use the following payment services / payment service providers on this website

1. Adyen

We use the payment service provider Adyen, Simon Carmiggeltstraat 6 - 50, 1011 DJ Amsterdam, Netherlands ("Adyen") - a payment service provider regulated by the Dutch Central Bank (De Nederlandsche Bank NV (DNB)) - to process payments on our website. In the event of an order and the associated order, the following data will be communicated to Adyen: Your information provided during the ordering process together with information about your order (name, address, IBAN, BIC, invoice amount, currency and transaction number).
The legal basis for the aforementioned data processing is the fulfillment of the contract pursuant to Art. 6 para. 1 lit. b GDPR.

Your data will only be passed on for the purpose of payment processing and only to the extent that it is necessary for this purpose. Further information can be found in Adyen's privacy policy (https://www.adyen.com/de_DE/richtlinien-undhaftungsausschluss/privacy-policy).

2. PayPal

The provider of this payment service is PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter referred to as "PayPal").

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here:
https://www.paypal.com/de/webapps/mpp/ua/pocpsa-full.

Details can be found in PayPal's privacy policy:
https://www.paypal.com/de/webapps/mpp/ua/privacy-full.

3. Mastercard

The provider of this payment service is Mastercard Europe SA, Chaussée de Tervuren 198A, B-1410 Waterloo, Belgium (hereinafter referred to as "Mastercard").

Mastercard may transfer data to its parent company in the USA. The data transfer to the USA is based on Mastercard's Binding Corporate Rules. Details can be found here: https://www.mastercard.de/de-de/datenschutz.html and https://www.mastercard.us/content/dam/mccom/global/documents/mastercard-bcrs.pdf.

4. VISA

The provider of this payment service is Visa Europe Services Inc, London Branch, 1 Sheldon Square, London W2 6TT, United Kingdom (hereinafter referred to as "VISA").

The UK is considered a safe third country under data protection law. This means that the UK has a level of data protection that corresponds to the level of data protection in the European Union.

VISA may transfer data to its parent company in the USA. The data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here: https://www.visa.de/nutzungsbedingungen/visa-globale-datenschutzmitteilung/mitteilung-zu-zustandigkeitsfragen-fur-den-ewr.html.

Further information can be found in VISA's privacy policy: https://www.visa.de/nutzungsbedingungen/visa-privacy-center.html.

VI) Trusted Shops Trustbadge & Trusted Shops Buyer Protection

We have integrated the Trusted Shops trust badge of the provider Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Cologne, Germany, on our website in order to display the Trusted Shops seal of approval and, if applicable, collected reviews and offers of Trusted Shops products for buyers after an order. Together with Trusted Shops GmbH, we are jointly responsible for data protection in accordance with Art. 26 GDPR. In the context of this data protection information, we inform you below about the essential contents of the contract in accordance with Art. 26 para. 2 GDPR.

This serves to safeguard our legitimate interests, which predominate in the context of a balancing of interests, in optimal marketing by enabling secure shopping in accordance with Art. 6 para. 1 lit. f GDPR. Trusted Shops GmbH also uses service providers from the USA. An appropriate level of data protection is ensured by standard data protection clauses and other contractual measures. Further information on data protection at Trusted Shops GmbH can be found here: https://www.trustedshops.de/impressum/#datenschutz.

When the Trustbadge is accessed, the web server automatically saves a so-called server log file, which also contains your IP address, the date and time of access, the amount of data transferred and the requesting provider (access data) and documents the access. The IP address is anonymized immediately after collection so that the stored data cannot be assigned to your person. The anonymized data is used in particular for statistical purposes and for error analysis.

After completing your order, your e-mail address hashed using the cryptographic one-way function will be transmitted to Trusted Shops GmbH. The legal basis is Art. 6 para. 1 sentence 1 lit. f GDPR. This serves to check whether you are already registered for services with Trusted Shops GmbH and is

therefore necessary for the fulfillment of our and Trusted Shops' overriding legitimate interests in the provision of the buyer protection linked to the specific order and the transactional evaluation services in accordance with Art. 6 Para. 1 S. 1 lit. f GDPR. If this is the case, further processing will be carried out in accordance with the contractual agreement concluded between you and Trusted Shops. If you are not yet registered for the services, you will then receive the possibility to do this for the first time. Further processing after registration also depends on the contractual agreement with Trusted Shops GmbH. If you do not register, all transmitted data will be automatically deleted by Trusted Shops GmbH and a personal reference is then no longer possible.

Within the framework of the joint responsibility existing between us and Trusted Shops GmbH, please contact Trusted Shops GmbH in the event of data protection issues and to assert your rights using the contact options provided in the data protection information linked above. Irrespective of this, you can always contact the controller of your choice. If necessary, your request will then be forwarded to the other responsible party for a response.

VII) Segment

On the one hand, our website uses software from Segment.com (Segment.io, Inc. 101 15th St San Francisco, CA 94103 USA). Data is collected and stored, from which usage profiles are created using pseudonyms. These user profiles are used to analyze visitor behavior and are evaluated to improve our offer. Cookies may be used for this purpose (see above). These are small text files that are stored locally on the end device of the site visitor and thus enable recognition when visiting our website again. The pseudonymized user profiles are not merged with personal data about the bearer of the pseudonym without separate, express consent. You can find out more about Segment.io's privacy policy and data protection guidelines and object to the anonymous analysis of your surfing behavior (opt-out) at https://segment.com/docs/legal/privacy/ and revoke your consent via the "Usercentrics" consent management system provided on our website.

We also use Segment to process and send our newsletter. In particular, we process your email address for this purpose and make it available to the Segment service. Your personal data is processed for the purpose of sending newsletters exclusively on the basis of your consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR. You can revoke your consent at any time with effect for the future via the unsubscribe option linked at the end of each newsletter.

VIII) Use of AI-Supported Services (Anthropic / "Claude")

To support our customer communication and the handling of your requests, we use AI-supported language models of the "Claude" model family. The provider is Anthropic PBC, 548 Market Street, PMB 90375, San Francisco, California 94104-5401, USA (hereinafter "Anthropic").

In the course of this use, personal data arising in connection with the initiation, conclusion and performance of the contractual relationship, with our communication with you and with the handling of any enquiries may be transmitted to Anthropic and processed there for the purpose of providing the service. Anthropic processes such data solely as a processor acting on our instructions. We have concluded a data processing agreement (DPA) with Anthropic, which is incorporated into Anthropic's Commercial Terms of Service. Inputs and outputs transmitted in connection with the commercial services (API, Team, Enterprise) are contractually not used by Anthropic to train AI models.

Processing may also take place on servers located outside the European Union, in particular in the USA. The transfer of data to the USA is based on the European Commission's Standard Contractual Clauses (Art. 46 (2) (c) GDPR). According to Anthropic's own information, Anthropic is additionally certified under the "EU-US Data Privacy Framework" (DPF). Anthropic in turn engages sub-processors (including Amazon Web Services, Google Cloud and Microsoft Azure); a current overview is available at https://www.anthropic.com/legal/subprocessors.

When the application programming interface (API) is used, inputs and outputs are deleted after 7 days by default, unless a longer storage period is required by law or has been contractually agreed. No decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you within the meaning of Art. 22 GDPR takes place. Further information on data processing by Anthropic is available at https://privacy.claude.com.

Purpose and Legal Basis of Processing

We use the aforementioned AI-supported services in order to handle your requests more efficiently, more quickly and with consistent quality. This includes in particular the processing and answering of your enquiries, the preparation of draft replies and text drafts for customer correspondence, the summarisation, structuring and categorisation of incoming requests, the linguistic preparation and translation of content, as well as support with recurring standard processes in the context of contract initiation, contract performance and general communication with you.

The legal basis is Art. 6 (1) (b) GDPR insofar as the processing serves the initiation, conclusion or performance of a contract with you. In all other respects, we base the processing on our legitimate interest in the efficient, reliable and resource-saving handling of requests and in consistent, high-quality customer communication (Art. 6 (1) (f) GDPR). For further information on the right to object existing in this context, please see Section IV.

Section VI. Special features my.roadsurfer, roadsurfer spots, roadsurfer Rent, roadsurfer subscription and our online store

I) Special features of my.roadsurfer

1. Autrado

Our online presence uses the dealer management system "Autrado" ("DMS") from Matthias Mielchen Autrado, Brecherspitzenstraße 8, 81541, Germany, for marketing and managing vehicles on my.roadsurfer and for processing inquiries.
Munich, Germany. Within the scope of use, the provider processes the data as the controller. The information and provisions on data protection can be found in the provider's privacy policy for the DMS, which you can view at any time atwww.autrado.de/datenschutz .

The legal basis for this is Art. 6 para. 1 lit. b GDPR (fulfillment of contract). The data transfer is necessary for the performance of the contract between us and you in relation to my.roadsurfer.

2. Host subdomain

In connection with my.roadsurfer, we use Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany, as the host of the subdomain https://my.roadsurfer.com/. This company processes the personal data as described here.

II) Special features of roadsurfer spots

1. Data processing when using roadsurfer spots

If you use the Roadsurfer Spots platform (spots.roadsurfer.com) ("Platform") and have concluded a user agreement ("User Agreement") with roadsurfer or Roadsurfer Spots & Travel GmbH, Winzererstraße 47d, 80797 Munich ("**Roadsurfer Spots & Travel GmbH**") - a subsidiary of roadsurfer GmbH - in accordance with the Terms of Use, roadsurfer will process the following personal data in this context on the basis of Art. 6 para. 1 lit. b. GDPR. GDPR in order to fulfill the User Agreement with you and to comply with legal obligations:

- Data in connection with the creation of a user account, in particular title, first and last name, contact person if applicable, address, contact details (e.g. e-mail address, telephone number), profile photo and personal description if applicable, as well as other personal data voluntarily provided by you and - if you register as a landlord - payment information and - if you operate a business - VAT ID ("user data");
- Data in connection with the valuation of tenancies, in particular the content of the respective valuation submitted ("valuation data");
- Data in connection with communication with landlords/tenants of the platform, in particular the content of the respective communication ("communication data");
- Login data of users regarding the platform, i.e. login and hash value of the password ("login data");
- Technical analytics data; i.e. the (pseudonymous) technical communication data required to use the Platform (e.g. IP addresses, browser settings) and the (pseudonymous) data we collect about the use of the Platform (e.g. IP, cookie or device ID-based website and app usage data) to analyze and improve the Platform ("Technical Analytics Data"). Further information on cookies and tracking and analytics data can be found in the specific sections above - in particular Section V.
- Support data of users in the context of the services; i.e. the data and error messages ("support data") generated in the context of support, data management and the fulfillment of data subject rights (e.g. when processing requests for information, correction and deletion).

2. Purpose and legal basis for processing user, login and support data

Roadsurfer Spots & Travel GmbH processes the following data so that Roadsurfer Spots & Travel GmbH can offer and process the services described in the terms of use of the platform, the tenant/landlord can use the platform and the contractual relationship can be managed by Roadsurfer Spots & Travel GmbH: User data, login data and support data. The legal basis for the aforementioned data transfer is Art. 6 para. 1 lit. b GDPR. The data transfer is necessary for the fulfillment of the user contract.

3. Purpose and legal basis of the processing of communication and evaluation data

In order to assess the quality of the rental offers and to enable communication between the tenant and the landlord, Roadsurfer Spots & Travel GmbH processes the following data: Evaluation data and communication data.
The legal basis for this data processing is Art. 6 para. 1 lit. f GDPR, which permits the processing of personal data in the context of the legitimate interests of Roadsurfer Spots & Travel GmbH and the legitimate interests of users, unless the fundamental rights, freedoms or interests of the data subject prevail. The legitimate interests consist of
Quality analysis and provision of a communication option via the platform. For further information on the user's right to object in this context, see Section IV.

4. Purpose and legal basis for the processing of technical analysis data

The technical analysis data is collected and processed to analyze and improve the use and usability of the platform and its services.

The legal basis for this data processing is Art. 6 para. 1 lit. f GDPR, which permits the processing of personal data in the context of the legitimate interests of Roadsurfer Spots & Travel GmbH, unless the fundamental rights, freedoms or interests of the data subject prevail. The legitimate interest consists in measuring, analyzing and improving our own offers. For further information on the right of objection to which the user is entitled in this context, see Section IV.

5. Publication of data on the platform

The landlord's user data - with the exception of contact data, payment data and, if collected, the VAT ID - and the evaluation data are published on the platform in order to publicly advertise the landlord's rental offers and to create clarity between the parties regarding their identity and reliability.

6. Disclosure of data to third parties

The salutation, first and last name, address and telephone number or e-mail address of the renter are transmitted by Roadsurfer Spots & Travel GmbH as a contractual partner to the respective landlord of the booked rental offer in order to enable the corresponding booking of the renter via the platform. Furthermore, the payment data is transmitted to the payment service provider Adyen or PayPal as follows:

Adyen
Roadsurfer Spots uses the external payment service provider Adyen (for more information on Adyen, the underlying legal basis, the purpose of the data transfer and the privacy policy of Adyen itself, see section V, point 5 above).
If you book a spot as a guest via the platform, the corresponding rental fee is managed and secured via Adyen until the end of the rental relationship and then paid out to the landlord after deduction of the service fee agreed with the landlord. For this purpose, the following data is transmitted to Adyen in encrypted form: the data entered by the guest
Payment details, currency, order number or booking number, period of stay, total rental fee, service fee of Roadsurfer Spots & Travel GmbH and rental fee without service fee. Roadsurfer Spots & Travel GmbH does not receive your payment details. The rental fee will be collected via the means of payment selected by you as a guest (e.g. credit card).

If you offer a spot on the platform as a landlord, Adyen is used to manage the rental fees in order to ensure that the process is as secure and smooth as possible. For this purpose, a separate registration with Adyen is required after registration on the platform, which also requires photo authentication and the provision of your bank details. The personal data you provide when registering with Adyen will neither be forwarded to nor processed by Roadsurfer Spots & Travel GmbH. Only the following data will be transmitted to Adyen: Name, address, title, e-mail; optionally, if provided by you as the host, also the date of birth and telephone number. If you as the landlord are a company within the meaning of § 14 BGB, the company name, tax number and the currency in which the rental fee is to be paid will also be transmitted to Adyen.

PayPal
As already described above, PayPal's payment services are used in the context of roadsurfer spots. For more information on PayPal, the underlying legal basis, the purpose of the data transfer and PayPal's own privacy policy, see section V (5) above.

7. Joint responsibility roadsurfer GmbH and Roadsurfer Spots & Travel GmbH
We work closely with Roadsurfer Spots & Travel GmbH within the Group. This also applies to the processing of your personal data in connection with roadsurfer Spots. We are therefore jointly responsible with Roadsurfer Spots & Travel GmbH for the protection of your personal data (so-called "joint controllers" pursuant to Art. 26 GDPR). In this context, we have clearly defined in a contract who fulfills which obligations under the GDPR. This applies in particular to the exercise of data subject rights and the fulfillment of information obligations. You can request the main contents of the underlying contract by sending an email to datenschutz@roadsurfer.com.

Your data in connection with roadsurfer Spots will be processed by roadsurfer GmbH in particular for the central administration of your customer account, for the joint processing of communication, for marketing purposes and for customer support.

To exercise your rights as a data subject, please send an email to datenschutz@roadsurfer.com. Of course, you can also contact Roadsurfer Spots & Travel GmbH directly. This will not result in any disadvantages for you.

8. Host subdomain roadsurfer spots
The host of the subdomain https://spots.roadsurfer.com/ is Bradler & Krantz GmbH & Co. KG, Kurt-Schumacher-Platz 8, 44787 Bochum. It processes the personal data as described here.

9. Mobile roadsurfer spots App: OneSignal

We use the service of OneSignal, 2194 Esperanca Avenue, Santa Clara, CA 95054 (hereinafter "OneSignal") as part of the "roadsurfer spots" mobile app to send you push messages, provided you have consented to receive them. If you have activated push messages, OneSignal receives information about the installed app and its use when you open the app. You can find out what information this currently is in OneSignal's data protection information. You can find OneSignal's privacy policy here: https://onesignal.com/privacy_policy. On 13.04.2018, the storage of the IP address of users in the EU was switched off with an update of OneSignal.

III) Special features of roadsurfer Abo and roadsurfer Rent

1. Ident procedure for the rental of vehicles

Purpose of data processing

The rental of vehicles as part of a camper subscription at https://roadsurfer.com/de-de/camper-abo/ and via roadsurfer Rent at https://roadsurfer.com/de/ requires the validation and legitimization of your person by means of an identification procedure. For this purpose, you send us a copy of your driver's license and an identification document (ID card or passport) via a secure connection. To identify identity fraud, these images are stored by us after validation for a maximum of 30 days after termination of the rental contract for a vehicle and then deleted in accordance with data protection regulations. The information that you have a driving license is stored for a maximum of 2 years and checked regularly so that we can comply with our legal obligations.
to comply with our documentation obligation that you have a valid driver's license. We store your identity card or passport number in order to protect ourselves against property crimes or to recover our property in the event of misappropriation and to comply with vehicle insurance contract requirements for claims settlement.
The aforementioned data processing operations serve the purpose of contract preparation and contract execution.

The obligation to check whether you have a driver's license is imposed on us by law. The legal basis for the processing mentioned can be found in Art. 6 para. 1 lit. b (fulfillment of contract), Art. 6 para. 1 lit. c (legal obligation) and Art. 6 para. 1 lit. f GDPR (legitimate interest).

Furthermore, we ask you as the person concerned to take note that you are fully responsible for all violations of traffic and regulatory regulations and other provisions and that roadsurfer may be obliged to name the person concerned to the competent authority so that it can issue a warning fine. If you are accused of having committed a misdemeanor or criminal offense with one of our vehicles, we process your data stored with us (surname, first name, address, date of birth and all other contract data) in accordance with our legal obligations and at the request of the competent authority, as well as the data transmitted by the competent authority in the respective country. Our legitimate interest lies in averting sanctions against our company.

Involvement of third parties for data processing: IDnow GmbH

Video identification and driver's license verification are also carried out by the service provider IDnow GmbH, Auenstraße 100, 80469 Munich. For this purpose, we transmit the user's personal data (first name and surname) to IDnow. IDnow assigns a process number to this data, which is communicated to you and which you can use to start the video identification process.

Identification is carried out by accessing the smartphone camera and capturing the machine-readable part of the ID document/driver's license as well as non-machine-readable parts, such as the address field. In the next step, other security features of the ID documents, such as holograms, are checked. The identification process is then completed with a brief "liveness detection" via the camera.

As part of the video identification process, a secure video connection is established between IDnow and your end device, as direct visual contact is required to confirm your identity. As part of the video identification process, either IDnow's systems automatically check your identity and/or an IDnow employee checks your identity using the ID document.

The IDnow employee must take and store screenshots or photos of you and the complete front and back of your ID card or the front of your passport to prove that the video identity confirmation has been carried out correctly. In addition, IDnow will also record and store the conversation between you and the IDnow employee in parallel with the video transmission. The video image transmission will not be recorded. At the beginning of the video identification, the IDnow employee will ask you for your express consent to take screenshots or photos and to record the conversation. The data will be transmitted to us by IDnow and deleted from the IDnow servers after 3 days at the latest. If you

do not wish to have screenshots or recordings made, you also have the option of having our support team identify you by calling you back.

IDnow must ensure the authenticity of the ID card or passport presented by you. For this purpose, the IDnow employee must visually check the integrity and presence of the optical security features of the respective ID document in accordance with the regulations. To do this, please follow the instructions of the IDnow employee to place the ID card or passport in certain positions in front of the camera. The IDnow employee will also ask you to read out the full serial number of your ID document.
The applicable data protection provisions can be found at https://www.idnow.io/de/regularien/datensicherheit/.

The legal basis for the processing mentioned can be found in Art. 6 para. 1 lit. c (legal obligation) and Art. 6 para. 1 lit. f GDPR (legitimate interest).

For more information on the right to object in this context with our legitimate interest, see Section IV.

2. Data processing when renting a vehicle

We process the following data when a rental contract is concluded via roadsurfer Rent or roadsurfer Abo:

- Customer data: Salutation, first name, cash on delivery, address. Contact details (e-mail, telephone number), age, data in connection with your driver's license (date of issue) ("rental customer data");
- Vehicle location data: Location information about the vehicle ("location data");
- Technical vehicle data: data collected by means of a vehicle data system, in particular with regard to opening or locking the vehicle via a remote control, collision information, information on vehicle operation (e.g. oil level, tire pressure and fuel level as well as other diagnostic and performance data), if applicable, recording of minor damage to the vehicle ("technical vehicle data").

For the purpose of verifying identity and preventing misuse, fraud, or unauthorized claims, the landlord is entitled to make a copy of the tenant’s ID card (front and back) and to store it temporarily.
The processing is based on the legitimate interest pursuant to Art. 6(1)(f) GDPR in ensuring the secure and proper execution of the rental agreement as well as in protecting the landlord’s property against misuse or damage. The copy will be marked with a watermark as “Copy,” used solely for the purposes stated above, and automatically deleted at the latest upon return of the vehicle.

The rented vehicles may contain a so-called vehicle data system that records the aforementioned location data as well as technical vehicle data and thus the vehicle condition and performance (so-called telematics).

Furthermore, vehicles in the European Union must be equipped with eCall technology. This is activated if you are involved in an accident. With the help of eCall, emergency services are automatically called and information about the accident is passed on. Telematics data is shared with emergency services and other parties who provide assistance in the event of an accident, as well as with telematics service providers or parties to whom we are legally or contractually obliged to provide this data.

Please note that we are not responsible for any data that remains in the vehicle as a result of your use. We cannot guarantee the privacy or confidentiality of such information and therefore ask you to delete the data before returning the vehicle.

3. Purpose and legal basis for processing rental customer data

We process the rental customer data in order to process the rental agreement between you and us, to manage the contractual relationship and to comply with our legal obligations in this context.

The legal basis for the aforementioned data processing is Art. 6 para. 1 lit. b GDPR (fulfillment of the rental agreement) and Art. 6 para. 1 lit. c GDPR (fulfillment of legal requirements).

4. Purpose and legal basis for processing vehicle data

We process the location data and the technical vehicle data as follows:

- Collecting data on the condition and performance of the vehicle during the rental (including vehicle damage, mileage, fuel consumption and other operational data) to improve the accuracy of our billing processes when the vehicle is returned.

The legal basis for this is our legitimate interest (Art. 6 para. 1 lit. f GDPR) in correctly accounting for the use of the vehicle, including fuel consumption and damage, during the rental period.

- Collecting data relating to the driver's operation of the vehicle during the rental for safety and claims management purposes, including contacting the renter of the vehicle if the data indicates that there is a safety or operational issue that we need to bring to your attention.

The legal basis for this is our legitimate interest (Art. 6 para. 1 lit. f GDPR) to defend and manage claims in the event of accidents involving the shared vehicle; to ensure that we comply with our safety obligations in relation to the vehicle and any rental.

- The collection of location data during the rental period if the driver breaches the rental agreement (if he fails to return the vehicle on time or if he drives into unauthorized areas) or to defend and manage claims in the event of accidents involving the rental vehicle.

The legal basis for this is our legitimate interest (Art. 6 para. 1 lit. f GDPR) in protecting our assets, enforcing our terms and conditions and defending and managing claims.

- The location data is also processed in anonymized and aggregated form in order to improve roadsurfer's service in the areas of spots, rental stations and service. Anonymous location data does not allow us to draw any conclusions about your identity, but only to determine the location of the vehicle itself.

The legal basis for this is our legitimate interest (Art. 6 para. 1 lit. f GDPR) in improving the service and offering for our customers.

The aforementioned processing does not serve the purpose of creating a user profile. All data will be deleted after the rental agreement has been executed, unless they still need to be processed for the assertion of legal claims.

For more information on the right to object in connection with our legitimate interest, see Section IV.

If you have given your prior consent in accordance with Art. 6 para. 1 lit. a GDPR or § 25 para. 1 TDDDG, we process the location data in order to guide you to the nearest garage or to help with other location-related problems (e.g. organization of a towing service).

5. Processing your location data for product improvement and sending local offers

Product improvement and sending of local offers means the processing of the GPS data of the rented vehicle in connection with your personal customer data set in order to better tailor our offer to your personal needs and based on your location and to increase the relevance of our promotions for you and to send personalized content and offers in your area. We use e-mail addresses to transmit this content.

This processing takes place exclusively on the basis of your consent in accordance with Art. 6 para. 1 lit. a GDPR. You can withdraw your consent at any time.

We only use this data if we have received your express consent to do so. You can revoke your consent at any time with effect for the future, e.g. by e-mail or after booking a vehicle in the customer area provided by deactivating the corresponding checkbox.

6. Credit check roadsurfer subscription

If you book a camper subscription with us via roadsurfer Abo, we carry out a credit check with Schufa Holding AG in advance in order to reduce the risk of payment defaults. Whether we can grant you the subscription is decided by our employees on the basis of a forecast based on the value transmitted by Schufa Holding AG.

The legal basis for this is Art. 6 para. 1 lit. b (fulfillment of contract) and Art. 6 para. 1 lit. f GDPR (legitimate interest). Our legitimate interest is to be able to assess all payments that entail a credit risk as well as possible before granting a subscription and to verify whether you can meet your payment obligations. For further information on the right of objection in this context, see Section IV. Please note, however, that we will not be able to offer you a camper subscription in this case.

7. Transmission of data to third parties

With the exception of Schufa Holding AG, we do not transfer data to third parties. However, we may be required to disclose this data in individual cases due to requests from government agencies or private service providers (e.g. parking lot operators, tolls).

IV) Special features of our online store

1. Data processing

If you use our online store at https://shop.roadsurfer.com/ ("online store") and purchase products through it, we process the following personal data in this context:

- Customer data in connection with the purchase via the online store: Title, first and last name, address, e-mail address and other data voluntarily provided by you (e.g. telephone number) ("customer data online store");

- Data in connection with the purchase of a voucher via the online store: Date of issue, amount of the voucher, voucher number, if provided by you as part of a personalization, name of the person entitled to the voucher, time of redemption and name of the person redeeming the voucher ("voucher data");
  Login data of customers of the online store, i.e. login and hash value of the password.

2. Purpose and legal basis of the processing

We process the customer data online store and the voucher data in order to process the purchase contract between you and us, to manage the contractual relationship and to comply with our legal obligations in this context.

Your login data and online store customer data will also be processed as part of your customer account and stored for you if you create one. The data in the customer account will be stored by us for as long as there is an active customer relationship. If no more activity can be detected over a period of three years, the status of the customer relationship is set to inactive. You can delete your customer account at any time. To do so, please send a message to .datenschutz@roadsurfer.com

The legal basis for the aforementioned data transfer is Art. 6 para. 1 lit. b GDPR. The data processing is necessary for the fulfillment of the purchase contract between you and us. Furthermore, the customer and voucher data is also processed/stored by us to prevent fraud in accordance with Art. 6 para. 1 lit. f GDPR (legitimate interest). For further information on the right of objection to which the user is entitled in this context, see Section IV.
Unless you have expressly consented to further use of your data or there is a legally permitted further use of data, we will delete your data after complete fulfillment of your order or deletion of your customer account, provided that there are no retention periods under tax and commercial law to the contrary.

3. Disclosure of data to third parties

With the exception of the transfer of payment data to the payment service providers - see section V, paragraph 5 - and with regard to the dispatch of the order to Sendcloud GmbH and logistics companies - see below - your data will not be passed on to third parties.
We use the services of Sendcloud GmbH, Fürstenrieder Str. 70, 80686 Munich, Germany, to ship your order (including returns). For this purpose, your customer data online store and the purchased goods (for the calculation of the package size and weight) will be transmitted by us to Sendcloud GmbH for the fulfillment of the contract (Art. 6 para. 1 lit. b GDPR).
For its part, Sendcloud GmbH organizes the shipping of the order and transmits the data required for shipping (title, first and last name, address) to the logistics company you have selected (e.g. DPD, DHL).

Further information on data processing by Sendcloud GmbH can be found at https://www.sendcloud.de/datenschutz/ and at https://support.sendcloud.com/hc/de/sections/360003884512Datenschutz.

4. Host subdomain online store

Our online store is hosted by RAIDBOXES GmbH, Hafenstrasse 32, 48153 Münster, Germany. This company processes the personal data as described here. RAIDBOXES GmbH automatically collects and stores server log files with information that your browser transmits to us. These are

- Browser type
- Operating system
- Referrer URL (previously visited page) Host name (IP address).

RAIDBOXES GmbH cannot assign this data to specific persons. This data is not merged with other data sources. The data will be deleted after a statistical evaluation after 7 days at the latest. Further information on data processing by RAIDBOXES GmbH can be found at the following link: https://raidboxes.io/datenschutzerklaerung/

Section VII. Data security and right of modification

1. SSL or TLS encryption

Our website uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content, such as orders or inquiries that you send to us as the site operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line. If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

2. Changes to the privacy policy

We reserve the right to amend this privacy policy at any time with effect for the future in compliance with the statutory provisions. The current version can be found on our website.

3. Status of the privacy policy

June 2026