

# Data Privacy Statement PTV Logistics GmbH (US)

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Shorttitle	Data Privacy Statement PTV Logistics GmbH (US)
Template history	V1.0.0 dated 2023-08-22

# Data Privacy Statement PTV Logistics GmbH (US)

PTV Logistics GmbH is committed to Internet-based business models and to developing an Internet-based offering of our applications and solutions. Thank you for visiting one of our websites and for your interest in our company and our solutions and services.

This Data Privacy Statement describes how we collect and record, use, disclose, transmit and store ("process") your personal data. The personal data collected depends on the context of your interaction with us. We always treat your personal data confidentially and in accordance with the legal data protection regulations and this Data Privacy Statement.

This Data Privacy Statement refers to our offer:

- [www.ptvlogistics.com](http://www.ptvlogistics.com) (including subdomains)
- [www.myptv.com](http://www.myptv.com) (including subdomains)

The applicable Data Privacy Statement can be accessed at any time on the mentioned websites. As a result of the further development of our websites and services, or due to legal or regulatory requirements, the data privacy statement of PTV Logistics Group is subject to continuous updates.

## 1. General information

### 1.1. Information about the responsible party (referred to as the "controller" in the GDPR)

The data processing controller on this website is:

**PTV Logistics GmbH**

Stumpfstraße 1

76131 Karlsruhe, Germany

Email: [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com)

PTV Logistics GmbH together with the companies affiliated within the meaning of Sections 15 et seq. Stock Corporation Act (AktG) form the PTV Logistics Group. PTV Logistics GmbH is also affiliated within the meaning of Sections 15 et seq. Stock Corporation Act (AktG) with PTV Planung Transport Verkehr GmbH, Conundra BV (Belgium) and Conundra B.V. (Netherlands). We may share contact information of customers and interested parties with affiliated companies of PTV Logistics Group and the other affiliated companies mentioned as part of your business relationship (contractual or pre-contractual relationship according to Art. 6 Sect. 1 Sent. 1 lit. b GDPR). We and the affiliated companies are jointly responsible for the protection of your personal data (Art. 26 GDPR). To ensure that you can easily and reliably exercise your data protection rights within the scope of this joint responsibility, we have agreed with our affiliated companies that you can assert your data protection rights described in 1.3, not only against the respective PTV Logistics Group company, but also centrally against PTV Logistics GmbH.

**We have appointed an external data protection officer for our company.**

You can reach our external Data Protection Officer at:

Email: [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com)

## 1.2. Processing of personal data when using our websites

### 1.2.1 What personal data is collected?

Our websites are generally freely accessible. Personal information is only collected if it is necessary for the execution of the services available on the website. When you visit PTV Logistics Group's websites, certain information is stored, particularly about your browser, operating system and IP address.

If you use a contact or registration form, the information you provide is recorded.

We also collect:

- IP addresses in anonymous form
- Data required for the anonymous determination and analysis of your user behavior; this includes the IP address as well as meta information such as the browser you use, the browser language, date and time, user preferences, e.g. by setting cookies.

This does not include information whose content does not directly indicate the identity or the factual circumstances of an individual person, e.g. the number of visitors to a website.

### 1.2.2 Recipients of your personal data are for example:

- Affiliated companies of the PTV Logistics Group and the other companies mentioned in Section 1.1
- Service providers who are processors within the meaning of Art. 4 No. 8 GDPR
- Advertising partner
- Social media services
- Companies that determine the behaviour of internet users from anonymised user data, analyse it and exploit it for marketing purposes. This does not concern your personal contact data

### 1.2.3 For what purposes do we process your data?

We process your personal data

- to ensure the faultless provision of the websites,
- to enable you to use the services and functions of the website, such as trial versions or orders,
- to process your enquiry, and
- to constantly improve our services by analysing user behaviour,
- to enforce our terms of use, to assert or defend against legal claims, and to ward off and prevent fraudulent and similar acts, including attacks on our IT infrastructure.

## 1.3. What rights do you have as far as your information is concerned?

You have the right to receive information about the origin, recipient and purpose of your stored personal data at any time. You may also have the right to demand the correction, blocking or deletion of this data. For this purpose, as well as for further questions regarding data protection, you can contact us at any time at the address given in the imprint. Furthermore, you have a right of appeal to the responsible supervisory authority.

### 1.3.1 Right to restriction of processing

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

- If you dispute the accuracy of your personal data stored by us, we usually need time to check this. For the duration of the verification, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data happened/is happening unlawfully, you can request the restriction of data processing instead of erasure.
- If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request restriction of the processing of your personal data instead of erasure.
- If you have lodged an objection pursuant to Art. 21 Sect. 1 Sent. 1 GDPR, a balancing of your and our interests must be carried out. As long as it has not yet been determined whose interests prevail, you have the right to demand the restriction of the processing of your personal data.
- If you have restricted the processing of your personal data, this data may - apart from being stored - only be processed with your consent or for the assertion, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of an important public interest of the European Union or a Member State

### **1.3.2 Revocation of your consent to the processing of data**

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6 SECT. 1 SENT. 1 LIT. E OR F GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21 SECT. 1 SENT. 1 GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21 SECT. 2 GDPR).

### **1.3.3 Right to log a complaint with the competent supervisory agency**

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a

complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

#### **1.3.4 Right to data portability**

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

#### **1.4. Your obligation to provide data**

In principle, you are not obliged to provide us with personal data. However, the provision of your data is necessary for the establishment of pre-contractual and the implementation of contractual business relationships, as well as in the event of a legal obligation to collect your data by us. Without this data, we cannot conclude or execute a contract with you. This may also apply to data required later in the course of the business relationship.

#### **1.5. Storage duration**

Unless a more specific storage period has been specified in this Data Privacy Statement, your personal data will remain with us until the purpose for which it was collected 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. tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

#### **1.6. SSL encryption**

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses an SSL encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from "http://" to "https://" and also by the appearance of the lock icon in the browser line.

If the SSL encryption is activated, data you transmit to us cannot be read by third parties.

#### **1.7. Information on data transfer to the USA**

Our website uses, in particular, tools from companies based in the USA. When these tools are active, your personal information may be transferred to the US servers of these companies. We must point out that that the USA is not a safe third country within the meaning of EU data protection law US companies are required to release personal data to security authorities without you as the data subject being able to take legal action against this. The possibility cannot therefore be excluded that US authorities (e.g. secret services) may process, evaluate and permanently store your data on US servers for monitoring purposes. We have no influence over these processing activities.

#### **1.8. Objection to receiving promotional emails**

We hereby expressly object to the use of contact details, which have been published in accordance with editorial requirements, for sending advertising and promotional material which has not been explicitly requested. The same applies to the e-mail address [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com). Website operators reserve the right to take legal action in the event of unsolicited mailing of promotional information, for example in the form of spam emails.

## 2. Information and Policies for Users in the USA

The terms of this section 2 are applicable to users in the USA and are in addition to the provisions of this Data Privacy Statement.

**By visiting our websites, registering and/or using our websites, you accept and consent to the practices described in this Data Privacy Statement. If you do not agree to the terms in this Data Privacy Statement, please do not use any of our websites. You may also be required to consent to the collection of information. If you do not consent, certain aspects of the websites may not be available to you and you should not use the websites.**

If you are in the United States, our services and the processing of data may be undertaken by PTV Logistics US Inc. or PTV Logistics GmbH.

We and the affiliated companies of PTV Logistics Group have responsibility for the protection of your personal data (Art. 26 General Data Protection Regulation (EU 2016/679 - GDPR)) and under other laws that may be applicable to the processing of personal and consumer information.

### 2.1. Your California Privacy Rights

If you are a California resident, you have the right under to the California Consumer Privacy Act (CCPA) to request:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information is collected;
- The business or commercial purpose of collecting or selling personal information;
- The categories of third parties with whom we share or sell personal information
- The categories of personal information about you that we have sold; and
- The specific pieces of personal information we have collected about you.

Additionally, you have the right to request deletion of your personal information, the right to opt out of the sale of your information (if applicable) and the right not to be discriminated against for exercising any of your CCPA rights.

In the twelve (12) months preceding the Effective Date of this Data Privacy Statement, we may have collected or received from you and from third parties in connection with providing our services, information about California consumers in each of the following categories and disclosed the information to our service providers, distributors and resellers for business purposes as described in this Policy:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- Any categories of personal information described in subdivision (e) of Section 1798.80.
- Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Geolocation data.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet websites, application, or advertisement.
- Audio, electronic, visual, thermal, olfactory, or similar information.
- Professional or employment-related information.

- Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We do not sell personal information for monetary consideration under CCPA. Personal data may be provided to our services providers and to third parties under Section 1798.140(t)(2)(A) of the CCPA. In the event that the use of third-party cookies constitutes a "sale" under CCPA, you may opt out of the use of such cookies

Our contact information is listed at the end of this section. You may submit a request by e-mail or hard copy form. We will ask for your name, address and state of residence. If your name and email address are insufficient to verify your identity and assess your privacy request, we may need to ask for additional information. You may also designate an authorized agent to make a CCPA privacy request.

California "Shine the Light" Information-Sharing Disclosure: California residents may request a list of all third parties with respect to which we have disclosed any information about you for direct marketing purposes and the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to [info@ptvlogistics.com](mailto:info@ptvlogistics.com) with "California Shine The Light Rights" in the subject line.

## **2.2. Do Not Track Technologies**

Some browsers may have settings to request that websites "Do Not Track" your activity or usage. At this time, our websites may not accommodate these technologies and your requests may not be able to be honored on our websites. We do use cookies and other technologies to track your usage and other information about your visit to our websites.

## **2.3. COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

The websites are not general audience websites. We do not sell products to individuals under 18 years of age. No one under the age of 18 may provide any Information to or on the websites. We do not knowingly collect personally identifiable information from individuals under 18. If you are under 18, do not use or provide any Information on this Websites or on or through any of its features, do not register on the websites, use any of the features of the websites, or provide any Information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

## **2.4. CAN SPAM Act**

We may collect your email address from our websites in order to identify visitors and to communicate with you. If at any time you would like to unsubscribe from receiving future emails, please click the "unsubscribe link at the bottom of the email or tell us on the 'Contact us' page and we will promptly remove you from all correspondence.

## **2.5. Contact**

Customers in the USA can contact us at:



**PTV Logistics US Inc.**

E-Mail address: [info.us@ptvlogistics.com](mailto:info.us@ptvlogistics.com)

### **3. Information and Policies for Users in Canada**

The following policy terms of section 3 are applicable to users in Canada and are in addition to the provisions of this Data Privacy Statement.

This Data Privacy Statement describes our practices for collecting, using, disclosing, transferring and storing your personal information through our websites. By visiting our websites, registering and/or using our websites, you accept and consent to the practices described in this Data Privacy Statement. If you do not agree to the terms in this Data Privacy Statement, please do not use any of our websites or provide us with your personal information. You may also be required to consent to the collection of certain personal information. If you do not consent, certain aspects of the websites may not be available to you and you should not use the websites.

If you are in Canada, our services and the processing of data may be undertaken by PTV Logistics GmbH.

We and the affiliated companies of PTV Logistics Group have responsibility for the protection of your personal data (Art. 26 General Data Protection Regulation (EU 2016/679 - GDPR)) and under other laws that may be applicable to the processing of personal and consumer information.

#### **3.1. Data Transfers**

Our website uses, in particular, tools from companies based in other countries, such as the United States of America, and we may also engage external service providers and other third parties (collectively, “service providers”) on our behalf to perform certain services on our behalf and to otherwise provide our service and solution. These service providers may store, process and transfer your personal information on servers located outside of Canada in jurisdictions whose data protection laws may differ from those of Canada, such as the United States of America. As a result, personal information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to the laws in those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries. Subject to applicable laws in such other jurisdictions, we will use reasonable efforts to ensure that appropriate protections are in place to require our service providers to maintain protections on personal information that are equivalent to those that apply in Canada.

If you have questions regarding our policies and practices with respect to our use of service providers outside of Canada, including with respect to the collection, use, disclosure or storage of personal information by service providers outside of Canada for us or on our behalf, please contact us as set out in section 3.4 below.

#### **3.2. Canada’s Anti-spam Legislation**

We understand and support our obligations under Canada’s anti-spam legislation (CASL). As part of signing up to receive our services, you may have also opted in to receive commercial electronic communications from us. If you opted-in to receive such communications, we may use the information to: communicate with you regarding our products, services and promotions; provide you with other information that you request; and/or improve our product and service offerings.

You will always have the opportunity to "unsubscribe" from receiving any of our e-mail or other communications at any time and we will ensure that our e-mails or other communications include instructions on how to unsubscribe if you no longer wish to receive future correspondence from us. We provide an on-going opportunity to unsubscribe or opt-out of contact by us by accessing our website or by e-mail to [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com).

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under CASL; (ii) to send you notices of changes to our Data Privacy Statement; or (iii) to receive service related messages.

### **3.3. Individual Access and Accuracy of Personal Information**

You may request access to your personal information which we may hold by contacting us at the contact information set forth below, and we will respond within the time periods provided for under applicable laws. We will need to verify your identity before providing you with the personal information we hold about you. There is no cost for such access request unless you require copies of records. We may not be able to provide you with access to your personal information if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we cannot provide you with access to your personal information, we will advise you of the reasons access is being denied, unless we are prohibited by law from doing so.

You may request to update and change your personal information at the contact information set forth below. We will endeavor to correct or complete any personal information which you advise us is inaccurate or incomplete. Where appropriate, the amended information will be transmitted to third parties having access to such information.

### **3.4. Contact Us**

Customers in Canada can contact our external data protection officer as follows:

Email: [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com)

## **4. Hosting of our websites**

Unless otherwise stated, our websites are hosted on servers of the PTV Logistics Group. These are located in an external computer center (housing). For the [myptv.com](http://myptv.com) the hosting is done by an external provider. You will find information on this in section 6.1.3.

## **5. Legal basis of the processing**

Unless otherwise expressly stated in the collection of personal data, the legal basis for data processing is

- the execution and performance of a contract with you (Art. 6 Sect. 1 lit. b GDPR) ("Contract Implementation"),
- the fulfilment of legal obligations to which we are subject (Art. 6 Sect. 1 lit c. GDPR), ("fulfilment of legal obligations") or
- Protection of our legitimate interests (Art. 6 Sect. 1 lit. f GDPR) ("legitimate interest in processing"). Our legitimate interest lies in the processing of your personal data for the purpose of (i) offering and operating the online services and (ii) initiating, implementing and handling our business relationship. To the extent that, according to the table below, our legitimate interest in processing is indicated as the legal basis for the processing of your personal data, we believe that your interests, fundamental rights and freedoms are sufficiently taken into account because (i) we regularly review the processing

activities and underlying processes described in this Data Privacy Statement, (ii) we take the protection of your personal data into account in our processes, (iii) we guarantee the transparency of our processing activities and (iv) you are entitled to the aforementioned rights with regard to our processing activities. If you would like more information about the described balancing of interests, please contact our privacy organization at [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com).

- If you have expressly given your consent to the processing of your personal data in individual cases, this consent is the legal basis for the processing (Art. 6 Sect. 1 lit. a GDPR) ("Consent").

## 5.1. Processing purposes and their legal basis

Contact form, order a newsletter

- Consent when given voluntarily (Art. 6 Sect. 1 lit. a GDPR)
- Legitimate interest in processing (Art. 6 Sect. 1 lit. f GDPR)

Registration and implementation of PTV Logistics Group events

- Consent when given voluntarily (Art. 6 Sect. 1 lit. a GDPR)
- In the case of paid events, also contract performance (Art. 6 Sect. 1 lit. b GDPR)
- Legitimate interest in processing (Art. 6 Sect. 1 lit. f GDPR)

Enforcement of our terms of use, assertion and defense of legal claims, defense and prevention of fraudulent and similar acts, including attacks on our IT infrastructure

- Compliance with legal obligations (Art. 6 Sect. 1 lit. c GDPR)
- Legitimate interest in processing (Art. 6 Sect. 1 lit. f GDPR)

Communication with customers and suppliers about products, services and projects, e.g. to process enquiries from the contractual partner or to provide technical information about products.

- Performance of the contract (Art. 6 Sect. 1 lit. b GDPR)
- Legitimate interest of PTV Logistics Group in the processing (Art. 6 Sect. 1 lit. f GDPR)

Planning, execution and administration of the (contractual) business relationship between the customer and us, e.g. to process orders for products and services, to collect payments, for accounting and billing purposes and to carry out deliveries and support services

- Performance of the contract (Art. 6 Sect. 1 lit. a GDPR)
- Compliance with legal obligations (Art. 6 Sect. 1 lit. a GDPR)

To carry out customer satisfaction surveys and direct marketing

Within the framework of applicable laws, we may use your contact details for direct marketing purposes (e.g. invitations to trade fairs, information and offers on our products and services) and to carry out customer satisfaction surveys, in each case also by e-mail. You have the right to object to the use of your contact data for these purposes at any time by sending an e-mail to [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com) or by making use of the objection option in the message you received.

- Consent of the user, if given voluntarily (Art. 6 Sect. 1 lit. a GDPR).
- Legitimate interest of PTV Logistics Group in the processing (Art. 6 Sect. 1 lit. f GDPR)

Maintaining and protecting the security of our products and services and our websites, preventing and detecting security risks, fraudulent activity or other criminal or harmful activity

- Legitimate interest of PTV Logistics Group in the processing (Art. 6 Sect. 1 lit. f GDPR)

Compliance with (i) legal requirements (e.g. tax and commercial retention obligations), (ii) existing compliance screening obligations (to prevent economic crime or money laundering) and (iii) our policies and industry standards

- Fulfilment of legal obligations (Art. 6 Sect. 1 lit. c GDPR).
- Legitimate interest of PTV Logistics Group in the processing (Ar. 6 Sect. 1 lit. f GDPR)

Settlement of legal disputes, enforcement of existing contracts and for the assertion, exercise and defence of legal claims

- Fulfilment of legal obligations (Art. 6 Sect. 1 lit. c GDPR)
- Legitimate interest of PTV Logistics Group in the processing (Art. 6 Sect. 1 lit. f GPDR)

## 6. Special Notes

### 6.1. myptv website (myptv.com)

#### 6.1.1 Registration and use of myptv.com

On myptv.com, you have the option of using PTV Logistics Group products in free or paid versions (PTV cloud services), receiving information about our products and you can register for events.

##### 6.1.1.1 6.1.1.1ID registration and use of product instances of existing customers

Use of myptv.com is only possible after successful registration. Upon registration, you will be provided with a myPTV ID as an ID token. Then you can log in with your username and password at any time.

To register, we need information on the following categories:

- Personal data (first name, last name)
- Your chosen password
- Company information (name of the company)
- Contact details (e-mail address)
- Country/Region

This allows you to view the portfolio of services on myptv.com, to register for events and, at the initiative of existing customers, to be activated as a user to product instances of the PTV Cloud service and to activate a trial period phase of a PTV Cloud service.

The storage of this personal data takes place in the European Union in accordance with section 5.1.3. of this declaration and on the basis of an existing order processing. Should a transfer of your data to third parties become necessary in the context of an event registration, you will be informed separately.

In your avatar menu you can change your password at any time and enter further data voluntarily. You can also upload a profile picture there, which is used as an identifier for logged-in users, e.g. for comment functions.

We delete your data if it is no longer required to fulfill your requests. The review of the necessity takes place at regular intervals. Furthermore, the legal archiving obligations apply.

### **6.1.1.2 6.1.1.2 Collection of further data for the use of a chargeable PTV Cloud Service**

As soon as you want to use paid services, you have to provide additional information about your company, such as company address, VAT ID, information for electronic invoicing (e.g. Peppol Participant ID), credit card or bank details (IBAN, BIC).

We point out that no contract can be concluded or executed without this information (see 1.4). You will be informed separately about the processing of your data collected in this context when concluding the respective contract.

All information about the company is stored as customer data in our internal systems and processed for a specific purpose. We delete this data if it is no longer required to fulfill your requests. The review of the necessity takes place at regular intervals. Furthermore, the legal archiving obligations apply.

## **6.1.2 Processing of personal data - overview, purpose and legal basis**

Enabling the use of the services and functions of myptv.com such as

- Create and administer your user account;
- implementing updates, security and troubleshooting measures;
- providing customer support;
- Processing your activation/order and making related information and offers available;
- Billing for the use of the myptv website service you have selected;
- establishing your identity and user authentication;
- improving and further developing our services.
- Determining the entrepreneurial status

The legal basis for the processing is the performance of the contract (Art. 6 Sect. 1 Sent. 1 lit. b GDPR), fulfillment of legal obligations (Art. 6 Sect.1 Sent. 1 lit. c) GDPR), as well as the legitimate interest of PTV Logistics Group (Art. 6 Sect. 1 Sent. 1 lit. f) GDPR) to improve and further develop the offer and, if applicable, the consent of the user if it has been given voluntarily (Art. 6 Sect. 1 Sent. 1 lit. a) GDPR).

## **6.1.3 External Hosting**

The website [www.myptv.com](http://www.myptv.com) is hosted by an external service provider (hosting provider). The personal data collected via the website (exclusively the IP address) is stored on the servers of the hosting provider.

PTV Logistics Group products that can be accessed at [www.myptv.com](http://www.myptv.com) are also hosted by an external service provider. The personal data processed within these products is stored on the servers of the hosting provider. This may include IP addresses, contact requests, meta and communication data, contractual data, contact data, names, website accesses and other data.

The hosting provider is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 Sect. 1 Sent. 1 lit. b GDPR) and in the interest of a secure, fast and efficient provision of our online offer by a professional hosting provider (Art. 6 Sect. 1 Sent. 1 lit. f GDPR).

Our hosting provider will only process your data to the extent that this is necessary for the fulfilment of its service obligations and in order to comply with our instructions regarding this data.

We use the following hosting provider for [www.myptv.com](http://www.myptv.com):

- UEBERBIT GmbH, Rheinvorlandstraße 7, 68159 Mannheim, Germany. Hosting takes place in Frankfurt, Germany.
- We use the following hosting provider for the PTV Logistics Group products: The myptv website is operated in the Microsoft Azure Cloud, which is provided by Microsoft Ireland Operations Ltd, Carmenhall Road, Sandyford, Dublin 18, Ireland ("Microsoft Ireland"). Hosting takes place in Amsterdam. There is an order processing agreement between PTV and Microsoft Ireland.

#### **6.1.4 Disclosure of personal data (myptv.com)**

Your personal data collected on myptv.com will only be passed on to third parties, i.e. to natural and legal persons other than you, the person responsible and the processor, if:

- you have given your express consent in accordance with Art. 6 Sect. 1 Sent. 1 lit. a GDPR; or
- this is necessary in accordance with Art. 6 Sect. 1 Sent. 1 lit. b GDPR to fulfil a contract with you (e.g. transfer of data to payment service providers or credit institutions), or
- there is a legal obligation to pass on data in accordance with Art. 6 Sect. 1 Sent. 1 lit. c GDPR (e.g. to law enforcement or financial authorities), or
- the disclosure is necessary in accordance with Art. 6 Sect. 1 Sent. 1 lit. f GDPR for the assertion, exercise or defense of legal claims and there is no reason to assume that they have an overriding interest worthy of protection in not disclosing your data (e.g. in the event of attacks on our IT systems).

The third parties may only use your data for the specified purpose.

## **6.2. Data protection in eCommerce**

### **6.2.1 Processing of data (customer and contract data)**

We collect, process and use personal data only insofar as is necessary for the establishment, content-related structuring or alteration of a contractual relationship (inventory data). This takes place on the basis of Art. 6 Sect. 1 Sent. 1 lit. b GDPR, which permits the processing of data in order to fulfil a contract or take steps prior to entering into a contract. We only collect, process and use personal data regarding the use of our website (usage data) insofar as this is required for users to use the service or to bill them.

The customer data collected is deleted upon completion of an order or termination of the business relationship. Statutory retention periods will remain unaffected.

### **6.2.2 Data transfer upon conclusion of a contract for online shops, traders and product dispatch**

We only send personal data to third parties if this is necessary as part of contract processing, for instance to companies entrusted with the delivery of products or a financial institution commissioned to process payments. No further transfer of data takes place or only if you have given explicit consent to the transfer. Your data will not be passed on to third parties, for advertising purposes, for example, without explicit consent.

The basis for data processing is Article 6 Sect. 1 Sent. 1 lit. b GDPR, which permits the processing of data in order to fulfil a contract or take steps prior to entering into a contract.

### **6.2.3 Encrypted payment transactions on our websites**

If there is an obligation to provide us with your payment data (e.g. account number for direct debit authorization) after the conclusion of a chargeable contract, this data is required for payment processing.

The payment transactions via the usual means of payment (especially Visa/MasterCard, direct debit) are exclusively carried out via an encrypted SSL or TLS connection. 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.

In the case of encrypted communication, your payment data that you transmit to us cannot be read by third parties.

### **6.3. Data protection in the case of applications and application processes**

We collect and process personal data from applicants for the purpose of executing an application process in PTV Logistics GmbH and its associated companies. Data may be processed electronically. This is the case particularly if applicants send us application documents electronically, for example by email, or via the career pages on our website.

Once your data has been entered and sent, it goes directly to the servers of our external service providers rexx systems GmbH, Süderstraße 77, 20097 Hamburg, Germany, via an encrypted connection. All data is encrypted based on the TLS method. If you log on after you have registered using the user data provided, the TLS encryption method is also used.

Further information about data protection with our external service provider can be found in the rexx systems GmbH data privacy statement at <https://www.rexx-systems.com/data-protection/>.Data security for applications

Your data is hosted by a provider within the context of contract processing pursuant to Art. 28 GDPR. Both PTV Logistics GmbH and the provider use technical and organizational security measures to protect your data against accidental or deliberate manipulation, loss, destruction or access by unauthorized persons. Our security measures are constantly being improved in accordance with technological developments.

Processing of data at the end of the application process

If a PTV Logistics Group company concludes an employment contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If no employment contract is concluded with the applicant, the application documents are automatically deleted six months after notification of the rejection decision, provided that no other legitimate interests prevent deletion. Other legitimate interests in this sense include, for example, a duty to provide evidence in proceedings under the General Equal Treatment Act (AGG).

The basis for data processing is Art. 6 Sect 1 Sent. 1 lit. b GDPR, which permits the processing of data in order to fulfil a contract or take steps prior to entering into a contract.

### **6.4. Comment function on [blog.ptvlogistics.com](https://blog.ptvlogistics.com)**

For the comment function on [blog.ptvlogistics.com](https://blog.ptvlogistics.com), unless you post anonymously, your comment will be stored along with information at the time the comment was created, your email address and the username you chose.

Storage of the IP address

The blog's comment function stores the IP addresses of users who post comments. This is for our security, as we may be held responsible for illegal content (such as insults or propaganda) on the site, even if it is created by users. IP addresses are not processed beyond this purpose.

Storage period of comments

The comments and related data are stored and remain on our website until the commented content has been completely deleted or the comments have to be deleted for legal reasons.

#### Legal basis

The comments are stored on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You can revoke your consent at any time. An informal e-mail notification to us is sufficient for this purpose. The legality of the data processing operations that have already taken place remains unaffected by the revocation.

### 6.5. Live Chat

In certain areas of our website we offer contact and advice via live chat. With the help of the Live Chat function, you can communicate with one of our employees via text messages. When you open and start using the Live Chat, your browser automatically transmits the following data for technical reasons, which we store separately from other data you may transmit to us:

- Date and time of access,
- Duration of the visit to our website,
- Type of web browser including version,
- Operating system used,
- Amount of data sent,
- Type of event,
- IP address (anonymized).

The legal basis for this data processing is Art. 6 Sect. 1 lit. f GDPR, whereby our legitimate interest is directed towards guaranteeing and maintaining the operation and security of our offer as well as an error-free service. Within this framework, the data is also processed by us for analysis purposes - without allocation to a specific person.

If you provide us with additional personal data via the live chat, this is done on a voluntary basis. We do not actively request personal data from you. The texts you enter in the chat widget during the live chat are stored on our behalf on the external service provider's server. The legal basis for this data processing is Art. 6 Sect. 1 lit. b and f GDPR, as we have a legitimate interest in offering you an optimal prospect and customer service within the framework of a (pre)contractual relationship.

## 7. Used tools

### 7.1. Appointment Bookings

We use the appointment booking tool "Bookings" (part of the Microsoft Office 365 service) of the provider Microsoft Ireland Operations Limited, One Microsoft Place, South Country Business Park, Leopardstown, Dublin 18 D18 P521 for online appointment scheduling.

By using this tool, it is possible for you to book yourself a consultation appointment with one of our employees. You will only be connected to the service if you actually make an appointment booking through the service. For the appointment booking, your entered data will be transferred to Microsoft. The data is processed as part of the cloud service Microsoft 365 in Microsoft data centers in the EU. We have concluded a contract with Microsoft which stipulates that the data will not leave the EU and will not be evaluated or processed by Microsoft, and we have also concluded an order processing agreement with Microsoft. At this point, we would like to point out that there are currently no GDPR compliant data protection guarantees for the use of Microsoft 365, as the European Court of Justice has declared the EU-US Privacy Shield to be invalid as suitable data protection guarantees in a ruling of 16.7.2020. More information and a



statement from Microsoft can be found at [Assuring Customers About Cross-Border Data Flows \(microsoft.com\)](#). The use of Microsoft 365 is, under the condition of your voluntary consent to the data processing GDPR compliant, if you do not agree with the data processing by Microsoft Bookings, you have the option to book an appointment by using other contact options offered.

Information on Microsoft's handling of personal data can be found in Microsoft's privacy policy at: [Microsoft Privacy Statement – Microsoft privacy](#)

In order to make an appointment booking, you must provide your name and email address, in addition you can voluntarily provide your telephone number, as well as additional information you wish to provide to the PTV employee for the preparation of your appointment.

The legal basis for the processing of your data is your consent, which you give by clicking on "Book" (Art. 6 Sect. 1 Sent. 1 lit. a of the GDPR).

You can revoke your consent to data processing at any time by sending an informal e-mail to [data-protection@ptvlogistics.com](mailto:data-protection@ptvlogistics.com).

Your data will only be processed for the purpose of handling the appointment and subsequently deleted after the appointment, unless a pre-contractual business relationship arises from the consultation, which constitutes a legal basis for further data processing (Art. 6 Sect. 1 Sent. 1 lit. b of the GDPR).

## **7.2. Online Marketing**

Use of Eloqua

We use Eloqua from the third-party provider Oracle, Redwood City, CA, USA ([www.eloqua.com](http://www.eloqua.com)) for marketing purposes. Eloqua allows us to tailor content to the exact visitors and subscribers to our website and how we communicate with them.

Eloqua cookies gather anonymized data about the user behavior of visitors to our website, for example the number of visitors to the website, how they came to the site and which pages they have visited. This data feeds into analyses and helps us to improve our website. We may also gather personal identification data when you use certain services or parts of the website. When you sign up for a service or subscribe to one of our newsletters, for example, we can identify you when you visit our website and navigate through the individual pages. This data is stored securely at Eloqua.

If you wish to prevent the use of Eloqua tracking technologies on your device completely, you can do so on the Eloqua opt-out page available at <https://www.oracle.com/marketingcloud/opt-status.html>.

Further information on data protection in connection with the use of Eloqua can be found here: [Oracle Privacy Policy](#)

## **7.3. Social Media, Social Media Plugins**

### **7.3.1 Facebook-Plugins (Like & Share-Button)**

We have integrated plug-ins of the social network Facebook on this website. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Meta Platforms's statement the collected data will be transferred to the USA and other third-party countries too.

You will be able to recognize Facebook plug-ins by the Facebook logo or the "Like" button on this website. An overview of the Facebook plug-ins is available under the following link: <https://developers.facebook.com/docs/plugins/>.

Whenever you visit this website and its pages, the plug-in will establish a direct connection between your browser and the Facebook server. As a result, Meta Platforms will receive the information that you have visited this website with your plug-in. However, if you click the Facebook “Like” button while you are logged into your Facebook account, you can link the content of this website and its pages with your Facebook profile. As a result, Meta Platforms will be able to allocate the visit to this website and its pages to your Facebook user account. We have to point out, that we as the provider of the website do not have any knowledge of the transferred data and its use by Meta Platforms. For more detailed information, please consult the Data Privacy Declaration of Facebook at: <https://www.facebook.com/privacy/explanation>.

If you do not want Meta Platforms to be able to allocate your visit to this website and its pages to your Facebook user account, please log out of your Facebook account while you are on this website.

The use of the Facebook plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

### **7.3.2 Twitter Plugin**

We have integrated functions of the social media platform Twitter into this website. These functions are provided by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland. While you use Twitter and the “Re-Tweet” function, websites you visit are linked to your Twitter account and disclosed to other users. During this process, data are transferred to Twitter as well. We must point out, that we, the providers of the website and its pages do not know anything about the content of the data transferred and the use of this information by Twitter. For more details, please consult Twitter’s Data Privacy Declaration at: <https://twitter.com/en/privacy>.

The use of Twitter plug-ins is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

You have the option to change your data protection settings on Twitter in the account settings at <https://twitter.com/account/settings>.

### **7.3.3 LinkedIn Plugin**

This website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Any time you access a page of this website that contains functions of LinkedIn, a connection to LinkedIn’s servers is established. LinkedIn is notified that you have visited this website with your IP address. If you click on LinkedIn’s “Recommend” button and are logged into your LinkedIn account at the time, LinkedIn will be in a position to allocate your visit to this website to your user account. We have to point out that we as the provider of the websites do not have any knowledge of the content of the transferred data and its use by LinkedIn.

The use of the LinkedIn plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at: <https://www.linkedin.com/legal/privacy-policy>.

#### **7.3.4 YouTube**

Our website uses plug-ins of the Google operated site YouTube. The operator of the site is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit one of our pages that has a YouTube plug-in, a connection is established to the YouTube servers. The YouTube server is notified which of our pages you have visited in the process.

If you are logged in to your YouTube account, YouTube allows your surfing behavior to be associated directly to your personal profile. You can prevent this by logging out of your YouTube account.

YouTube is used in the interests of attractive presentation of our online services. This represents a legitimate interest in accordance with Art. 6 Sect. 1 lit. f GDPR.

You can find further information regarding the handling of user data in the YouTube data privacy statement at: <https://www.google.de/intl/de/policies/privacy>.

#### **7.4. Live-Chat with User-Like**

We use the Live Chat of Userlike UG, Probsteigasse 44-46, 50670 Cologne, Germany (hereafter "Userlike"). Userlike uses cookies to enable you to have a personal conversation with us in the form of a real-time chat. Live chat visitors do not have to log in with their name to use this function but can have an anonymous chat. We use the so-called privacy mode when using Userlike. This means that your IP address is stored in the cookies in anonymous form and is not used to identify you personally. If you disclose personal information about yourself during the anonymous chat, this is done voluntarily.

The data collected by Userlike is processed on our behalf and based on a contract for order processing.

The processing of your personal data is based on Art. 6 Sect. 1 lit. f GDPR, as we have a legitimate interest in the economic operation, the operability and the optimization of our website in the form of a cross-webpage operation of the chat function.

For further information, please refer to Userlike's privacy policy: <https://www.userlike.com/en/terms>.

## **8. Cookies and Analysis - Tools**

When you visit our website, your surfing behavior can be statistically evaluated. This is mainly done with so-called analysis programs and cookies.

Detailed information about these analysis programs and cookies can be found in the following section.

### **8.1. Cookies**

Our websites and pages use what the industry refers to as "cookies." Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them or they are automatically eradicated by your web browser.

In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third-party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g. cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g. the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions (required cookies) or for the provision of certain functions you want to use (functional cookies, e.g. for the shopping cart function) or those that are necessary for the optimization of the website (e.g. cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6 Sect. 1 lit. f GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of cookies to ensure the technically error free and optimized provision of the operator's services. If your consent to the storage of the cookies has been requested, the respective cookies are stored exclusively on the basis of the consent obtained (Art. 6 Sect. 1 lit. a GDPR); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third-party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

### **8.1.1 Cookie-Consent with Cookiebot**

Our websites use Cookie Content technology from Cookiebot to obtain your consent to the storage of certain cookies on your end device and to document this in a data protection-compliant manner. The provider of this technology is Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark, website: <https://www.cookiebot.com/en/> (hereinafter "Cookiebot").

Cookiebot stores a cookie in your browser in order to be able to assign the consent you have given or to revoke it. The data collected in this way is stored until you request us to delete it, delete the Cookiebot cookie itself or until the purpose for which the data is stored no longer applies. Mandatory legal storage obligations remain unaffected.

Cookiebot is used to obtain the legally required consent for the use of cookies. The legal basis for this is Art. 6 Sect. 1 lit. c GDPR.

### **8.1.2 Changing your cookie settings**

You can view and change your cookie settings at any time at <https://www.ptvlogistics.com/en/cookies/>.

## **8.2. Analytics tools and advertising**

### **8.2.1 Use of Leadlab**

Our website uses tracking pixel technology from wiredminds GmbH ([www.wiredminds.de](http://www.wiredminds.de)) to analyse visitor behavior.

Data is collected, processed and stored where appropriate from which a usage profile is created under a pseudonym. These usage profiles are anonymised in full wherever this is

possible and reasonable. Cookies may be used for this purpose. Cookies are small text files stored in the visitor's Internet browser and used to recognize the Internet browser on the next visit. Data collected, which may also include personal data, is sent to wiredminds or is collected directly by wiredminds. wiredminds may use data left on the website through visits in order to create anonymised usage profiles. Data obtained in this way will not be used without the separate consent of the data subject to identify the visitor to this website and will not be combined with personal data relating to the bearer of the pseudonym. If IP addresses are collected, they are anonymised immediately by deleting the last number block.

### **8.2.2 Google Analytics**

Our website uses Google Analytics, a web analytics service provided by Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

We would like to point out that on this website Google Analytics has been extended by the code "anonymizeIp" to ensure anonymized collection of IP addresses (so-called IP masking). By activating IP anonymization on this website, your IP address will be truncated beforehand by Google within member states of the European Union (EU) or in other contracting states of the Agreement on the European Economic Area (EEA). Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information 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 any other data held by Google.

Note: The information generated by the cookie about your use of this website will be transmitted to and stored by Google on servers in the United States. The USA is assessed by the European Court of Justice as a country with an insufficient level of data protection according to EU standards. In particular, there is a risk that your data may be processed by U.S. authorities, for control and monitoring purposes, possibly also without any legal remedy.

For more information on Google's terms of use and data protection, please visit <https://marketingplatform.google.com/about/analytics/terms/us/> or <https://policies.google.com/?hl=en-US>.

#### **Purpose of data processing**

The analysis tool or analysis cookies are used for the purpose of improving the quality of our website and its content. In this way, we learn how the website is used and can thus constantly optimize our offer.

#### **Legal basis for data processing**

The legal basis for the processing of personal data is your consent given in accordance with Art. 6 Sect. 1 lit. a GDPR.

#### **Duration of storage**

The cookies are stored on the user's terminal device and transmitted by it to our site. Therefore, you as the user have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all functions of the website in full.

In all other respects, we store the data provided on the basis of consent until you revoke it, which you can declare to us.

#### Possibility of objection and removal

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link (<https://tools.google.com/dlpage/gaoptout?hl=en>).

### **8.2.3 Google AdSense (not personalized)**

This website uses Google AdSense, an ad embedding service provided by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

We use Google AdSense in the "non-personalized" mode. Contrary to the personalized mode, the ads are not based on your previous user patterns and the service does not generate a user profile for you. Instead, the service uses so-called "context information" to choose the ads that are posted for you to view. The selected ads are thus based e.g. on your location, the content of the website you are visiting at the time or the search terms you are using. To learn more about the distinct differences between personalized targeting and targeting that has not been personalized by Google AdSense, please click on the following link: <https://support.google.com/adsense/answer/9007336>.

Please keep in mind that if Google AdSense is used in the non-personalized mode, it is possible that cookies are stored or comparable recognition technologies (e.g. device fingerprinting) are used.

AdSense is used on the basis of Art. 6 Abs. 1 lit. f. GDPR. The website operator has a legitimate interest in making the marketing of the website as effective as possible. If a respective declaration of consent was requested, processing shall occur exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

You have the option to autonomously adjust the advertising settings in your user account. To do so, please click on the link provided below and log in: <https://adssettings.google.com/authenticated>.

For more information about Google's advertising technologies, please click here:

<https://policies.google.com/technologies/ads>

<https://www.google.de/intl/de/policies/privacy/>.

### **8.2.4 Google Remarketing**

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

Google Remarketing analyzes your user patterns on our website (e.g. clicks on specific products), to allocate a certain advertising target groups to you and to subsequently display matching online offers to you when you visit other online offers (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Remarketing to device encompassing functions of Google. This makes it possible to display

interest-based customized advertising messages, depending on your prior usage and browsing patterns on a device (e.g. cell phone) in a manner tailored to you as well as on any of your devices (e.g. tablet or PC).

If you have a Google account, you have the option to object to personalized advertising under the following link: <https://www.google.com/settings/ads/onweb/>.

The use of Google Remarketing is based on Art. 6 Sect. 1 lit. f. GDPR. The website operator has a legitimate interest in the marketing of the operator's products that is as effective as possible. If a respective declaration of consent was requested, processing shall occur exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

For further information and the pertinent data protection regulations, please consult the Data Privacy Policies of Google at: <https://policies.google.com/technologies/ads?hl=en>.

#### Formation of Target Groups with Customer Reconciliation

For the formation of target groups, we use, among other things, the Google Remarketing customer reconciliation feature. To achieve this, we transfer certain customer data (e.g. email addresses) from our customer lists to Google. If the respective customers are Google users and are logged into their Google accounts, matching advertising messages within the Google network (e.g. YouTube, Gmail or in a search engine) are displayed for them to view.

#### **8.2.5 Bing Universal Event Tracking (UET)**

On our website, data is collected and saved using the technologies of Bing Ads from which usage profiles are created using pseudonyms. This is a service of the Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. This service enables us to track the activities of users on our website if they accessed our website via advertisements from Bing Ads. If you access our website via an advertisement of this nature, a cookie is set on your computer. A Bing UET tag is integrated on our website. This is a code which, in combination with the cookie, saves some non-personal data about the usage of the website. This includes, among other things, the time spent on the website, which areas of the website were opened and via which advertisement the users accessed the website. No information about your identity is collected.

The information collected is transmitted to Microsoft servers in the USA and is there stored for a period of at most 180 days. You can prevent the collection of the data generated by the cookie with respect to your usage of the website as well as the processing of these data by deactivating the use of cookies. This could possibly lead to a restricted functionality of the website.

Furthermore, Microsoft can possibly track your usage behavior across several of your electronic devices using so-called Cross-Device Tracking and is thereby able to display personalized advertising on or in Microsoft web pages and apps. You can deactivate this behavior under <https://account.microsoft.com/privacy/ad-settings/>

Further information about the analysis services of Bing can be found on the Bing Ads website (<https://help.bingads.microsoft.com/#apex/3/de/53056/2>). Further information about data protection at Microsoft and Bing can be found in Microsoft's data protection provisions (<https://privacy.microsoft.com/de-de/privacystatement>).

#### **8.2.6 Google AdWords and Google Conversion Tracking**

This website uses Google AdWords. AdWords is an online advertising program from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

We use conversion tracking as part of Google AdWords. If you click on a Google ad, a conversion tracking cookie is placed on your computer. Cookies are small text files which an Internet browser places on a user's computer. These cookies expire after 30 days and are not used to identify users. If a user visits certain pages of this website and the cookie has not yet expired, we and Google can recognize that the user has clicked on an ad and been redirected to this page.

Every Google AdWords customer receives a different cookie. Cookies cannot be tracked via the websites of AdWords customers. Information obtained with the help of conversion cookies is used to produce conversion statistics for AdWords customers which have opted for conversion tracking. Customers learn the total number of users who have clicked on their ad and been redirected to a page provided with a conversion tracking tag. However, they do not receive any information allowing them to identify the user. If you do not wish to participate in tracking, you can object to such use by easily disabling the Google conversion tracking cookie via your Internet browser's user settings. You will then not be included in conversion tracking statistics.

Conversion cookies are stored on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in analyzing user behavior in order to optimize both its web service and its advertising.

More information about Google AdWords and Google Conversion Tracking can be found in Google's data protection regulations: <https://www.google.de/policies/privacy/>.

You can configure your browser to receive notifications about the placement of cookies and only allow cookies in individual cases, enable the acceptance of cookies in specific cases or generally refuse them and enable automatic deletion of cookies when you close your browser. Disabling cookies may limit the functionality of this website.

You may withdraw your consent to the storage of data, email address and its use for sending the newsletter at any time, for example via the 'Unsubscribe' link in the newsletter.

### **8.2.7 Facebook Pixel**

To measure conversion rates, this website uses the visitor activity pixel of Meta Platforms. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Meta Platforms's statement the collected data will be transferred to the USA and other third-party countries too.

This tool allows the tracking of page visitors after they have been linked to the website of the provider after clicking on a Facebook ad. This makes it possible to analyze the effectiveness of Facebook ads for statistical and market research purposes and to optimize future advertising campaigns.

For us as the operators of this website, the collected data is anonymous. We are not in a position to arrive at any conclusions as to the identity of users. However, Meta Platforms archives the information and processes it, so that it is possible to make a connection to the respective user profile and Meta Platforms is in a position to use the data for its own promotional purposes in compliance with the Facebook Data Usage Policy. This enables Meta Platforms to display ads on Facebook pages as well as in locations outside of Facebook. We as the operator of this website have no control over the use of such data.

The use of Facebook Pixel is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in effective advertising campaigns, which also include social media. If a corresponding agreement has been requested (e.g. an agreement to the storage of cookies),



the processing takes place exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the agreement can be revoked at any time.

In Facebook's Data Privacy Policies, you will find additional information about the protection of your privacy at: <https://www.facebook.com/about/privacy/>.

You also have the option to deactivate the remarketing function "Custom Audiences" in the ad settings section at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). To do this, you first have to log into Facebook.

If you do not have a Facebook account, you can deactivate any user based advertising by Facebook on the website of the European Interactive Digital Advertising Alliance: <http://www.youronlinechoices.com/de/praeferenzmanagement/>.

### **8.2.8 Conversion pixels from Adform**

This website uses conversion tracking from Adform (Adform A/S, Wildersgade 10B, sal. 1, DK-1408 Copenhagen, Denmark; 'Adform').

Adform uses a cookie mechanism on an anonymous basis to decide which ads are shown to a user. This is based on products that a visitor has already viewed on a previous occasion. This means that Adform stores no personal data of any kind, such as email addresses, names or addresses, in the cookie or in the cookie-based profile.

A cookie is a small text file that can be stored on a computer if a user views advertising or websites of an Adform customer using a browser. The cookie does not collect any names, addresses, phone numbers, email address or other data identifying the user.

Instead, the cookie contains a random identification number. Using these random identification numbers from the cookie, Adform collects and stores anonymous information, such as operating system, browser version, geographical location, URLs on which Adform shows advertising, or facts concerning reciprocal effects with advertising (for example, number of clicks or views) in cookie-based profiles.

The IP addresses of Internet users are accessible to our system during web requests on Adform web servers.

Adform acts in accordance with local data protection legislation and anonymises data in accordance with local regulations. Adform does not pass this data on to third parties and uses the data solely for analysis purposes on behalf of the website owner.

You can disable tracking by Adform at any time: <https://site.adform.com/datenschutz-opt-out/>.

### **8.2.9 Usage of Lead the Way®**

Our website uses functionalities of the French web analysis service Lead the Way®. Provider is CARTEGIE SAS based in 33522 BRUGES Cedex (France).

Lead the Way® allows us to identify customers or prospects who have visited our website after an email campaign or as part of a marketing program. Cookies may be used for this purpose. Cookies are small text files stored in the visitor's Internet browser and used to recognize the Internet browser on the next visit. In order to analyse your use of our website and to be able to contact you and offer you suitable B2B solutions, we use a cookie from our partner CARTEGIE to identify your IP address and establish the connection to your company. "Lead the Way® cookies" are stored on the basis of Art. 6 Sect. 1 lit. f GDPR. As a website operator, we have a legitimate interest in analysing user behavior in order to optimize both our website and our marketing and to be able to contact you and offer you professional solutions.

## Objection to data collection

You can object to the collection of your data by CARTEGIE cookies in accordance with the instructions on the [www.lead-the-way.fr/donnees-personnelles.html](http://www.lead-the-way.fr/donnees-personnelles.html) website. For more information on how CARTEGIE handles user data, please refer to the Lead the Way privacy policy: <https://www.lead-the-way.fr/donnees-personnelles.html>.

### **8.2.10 OptinMonster**

OptinMonster is a plugin of the company Retyp, LLC., 7732 Maywood Crest Dr., West Palm Beach, FL 33412, US (<https://optinmonster.com>).

This allows us to provide our visitors with additional offers via pop-up on our website, for example, to enable registration of the e-mail address in a newsletter or to point out actions. OptinMonster uses cookies for this purpose. Personal data is only collected through an active action of the customer (for example, the customer signs up for the newsletter via a popup). OptinMonster does not store the collected data on its own servers but forwards it to a PTV Logistics Group selected tool (Eloqua).

We have entered into an order processing contract with OptinMonster, in which we oblige OptinMonster to protect your data in accordance with the applicable provisions of the GDPR. Details on the handling of the customer's personal data by OptinMonster are described in more detail in OptinMonster's privacy policy (<https://optinmonster.com/privacy/>).

### **8.2.11 Hotjar**

Our websites use the web analytics service "Hotjar" for usage analysis. The provider of the tool is Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe. The hosting of the provider takes place within the EU. By using this tool we have the possibility to statistically analyse visitor data and to adapt our website and offers to our customers. (Privacy policy of the provider: Hotjar - Privacy Policy)

With this tool, movements on the websites on which Hotjar is used can be tracked (so-called heat maps). For example, it is possible to see how far users scroll and how often they click on which buttons. Furthermore, with the help of the tool it is also possible to obtain feedback directly from the users of the website. Most importantly, Hotjar's services can improve the functionality of the Hotjar-based website by making it more user-friendly and easier to use for end users.

When collecting feedback via Hotjar, you have the opportunity to send us a comment about your satisfaction with the functionality of our website, and no personally identifiable information is requested. Should you nevertheless enter personal data in the input window provided, this may become accessible to our employees. By storing the feedback, this voluntarily transmitted data can be processed; the legal basis for the processing is the consent you gave when entering the data (Art. 6 Sect. 1 Sent. 1 lit. a DSGVO). The consent can be revoked at any time with effect for the future, a deletion of the data transmitted in this form takes place at regular intervals. In order to also make this unintentional data processing compliant with the GDPR, we have concluded an order processing agreement with the provider.

When using this tool, we pay particular attention to the protection of your personal data and deliberately do not make use of the provider's Identify API, which would make it possible to identify users. For example, we can only track which buttons have been clicked, mouse movement history, how far scrolled, device screen size, device type and browser information, geographical location (country only) and preferred language to display our website. Areas of the websites in which personal data of you or third parties are displayed are automatically hidden by Hotjar and are therefore not traceable at any time. In order to exclude the possibility

of direct personal references, IP addresses are only stored and processed anonymously; the user profile stored by Hotjar is also anonymised for this reason.

Hotjar offers every user the option of using a "Do Not Track Header" to prevent the use of the Hotjar tool so that no data about the visit to the respective website is recorded. This is a setting that is supported by all common browsers in current versions. To do this, your browser sends a request to Hotjar with the information to deactivate the tracking of the respective user. If you use our websites with different browsers/computers, you must set up the "Do Not Track header" separately for each of these browsers/computers (Hotjar - Do Not Track).

### **8.2.12 Piwik PRO**

General information on data processing / nature and scope

We use Piwik PRO Analytics Suite, a web analytics service provided by Piwik PRO SA, ul. Św. Antoniego 2/4, 50-073 Wrocław, Poland, on our website. This is done as part of our review of European alternatives to the US service Google Analytics. Here, we collect data about website visitors based on cookies. The information collected may include the visitor's IP address, operating system, browser ID, browsing activity and other information. You can learn more about the scope of data collected by Piwik PRO here.

Piwik PRO does not transfer the data about you to other sub-processors or third parties and does not use it for its own purposes. For more information, please see Piwik PRO's privacy policy.

Purpose of data processing

We use the analytics tool to analyze visitor behavior, display personalized content and conduct online campaigns. For this purpose, we may also create visitor profiles based on browsing history. In doing so, we calculate metrics such as bounce rate, page views, sessions and the like in order to understand how our website/app is specifically used. From this, we can deduce if and how the website/app needs to be optimized for better usability.

Legal basis of data processing

The data processing described here only takes place if and as long as you give us consent to use the service. The legal basis is therefore your consent in accordance with Art. 6 Sect. 1 lit. a. GDPR.

Storage period

We store and process the data until revocation.

Revocation and elimination options

You can revoke the consent once given to us at any time with effect for the future.