

## Privacy Policy

### 1. An overview of data protection

#### General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration below.

#### Data recording on this website

##### Who is the responsible party for the recording of data on this website (i.e. the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the GDPR)” in this Privacy Policy.

##### How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g. web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website.

##### What are the purposes we use your data for?

A portion of the information is generated to guarantee the error-free provision of the website. Other data may be used to analyze your user patterns.

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

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a

complaint with the competent supervising agency.

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

## **Analysis tools and tools provided by third parties**

There is a possibility that your browsing patterns will be statistically analyzed when you visit this website. Such analyses are performed primarily with what we refer to as analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

## **2. Hosting and Content Delivery Networks (CDN)**

### **External Hosting**

This website is hosted by an external service provider (host). Personal data collected on this website are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site.

The external hosting serves the purpose of fulfilling the contract with our potential and existing customers (Art. 6 para. 1 lit. b GDPR) and in the interest of secure, fast, and efficient provision of our online services by a professional provider (Art. 6 para. 1 lit. f GDPR).

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

We are using the following host:

Cloudways Ltd., Junction Business Centre, 1st Floor Sqaq Lourdes, St Julians STJ3334, Malta.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

Cloudways Ltd. has been acquired by DigitalOcean, LLC, 101 6th Avenue of the Americas, 10th Floor, New York, NY 10013 USA.

### **Sub-processors**

Cloudways is a managed cloud hosting solution, and they provide the platform for hosting our website on Amazon Web Services (AWS) infrastructure. A detailed list of Cloudways Ltd.'s sub-processors is available upon request.

Personal data will be shared with Amazon.com, Inc. (Headquartered in Seattle, Washington,

United States, Amazon.com, Inc. is an international organization with locations in the USA and all around the world.).

Here is a link to a page about Amazon.com, Inc.'s sub-processors: <https://aws.amazon.com/compliance/sub-processors/>

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission.

Privacy Policy (Amazon AWS): <https://aws.amazon.com/privacy/>

For more information about the handling of user data by Cloudways Ltd., please consult their Privacy Policy on: <https://www.cloudways.com/en/terms.php#privacy> (<https://www.cloudways.com/en/terms.php#privacy>).

As an alternative secondary solution, we may use InMotion Hosting, Inc., 360 N. Pacific Coast Highway, Suite 1055 El Segundo, CA 90245, USA.

## **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **Sub-processors**

InMotion Hosting, Inc. keep a public list of their sub-processors on this page: <https://www.inmotionhosting.com/compliance/sub-processors> (<https://www.inmotionhosting.com/compliance/sub-processors>).

For more information about the handling of user data by InMotion Hosting, Inc., please consult their Privacy Policy on: <https://www.inmotionhosting.com/privacy/> (<https://www.inmotionhosting.com/privacy/>).

## **Cloudflare**

We use the “Cloudflare” service provided by Cloudflare Inc., 101 Townsend St., San Francisco, CA 94107, USA (hereinafter referred to as “Cloudflare”).

Cloudflare offers a content delivery network with DNS that is available worldwide. As a result, the information transfer that occurs between your browser and our website is technically routed via Cloudflare’s network. This enables Cloudflare to analyze data transactions between your browser and our website and to work as a filter between our servers and potentially malicious data traffic from the Internet. In this context, Cloudflare may also use cookies or other technologies deployed to recognize Internet users, which shall, however, only be used for the herein described purpose.

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

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.cloudflare.com/privacypolicy/>

(<https://www.cloudflare.com/privacypolicy/>) and <https://www.cloudflare.com/cloudflare-customer-scc/> (<https://www.cloudflare.com/cloudflare-customer-scc/>).

## **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **Sub-processors**

Cloudflare Inc. keep a public list of their sub-processors for the Cloudflare service on this page: <https://www.cloudflare.com/gdpr/subprocessors/> (<https://www.cloudflare.com/gdpr/subprocessors/>).

For more information on Cloudflare's security precautions and data privacy policies, please follow this link: <https://www.cloudflare.com/privacypolicy/> (<https://www.cloudflare.com/privacypolicy/>).

# **3. General and mandatory information**

## **Data protection**

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e. through email communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

## **Information about the responsible party (referred to as the “controller” in the GDPR)**

The data processing controller on this website is:

Patrick Todorov

SYMPLACT LTD

Wilna zona trakata, ul. 28-ma no. 16

9006 Varna, Bulgaria

Phone: +359885580379

Email: patrick.todorov@symlact.org

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, email addresses, etc.).

## **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 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.

## **General information on the legal basis for the data processing on this website**

If you have consented to data processing, we process your personal data on the basis of Art. 6 para. 1 lit. a GDPR, or Art. 9 para. 2 lit. a GDPR, if special categories of data are processed according to Art. 9 para. 1 GDPR. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 para. 1 lit. a GDPR. The given consent can be revoked at any time for the future. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6 para. 1 lit. b GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6 para. 1 lit. c GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6 para. 1 lit. f GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

## **Information on data transfer to the USA and other non-EU countries**

Among other things, we use tools of companies domiciled in the United States or other from a data protection perspective non-secure non-EU countries. If these tools are active, your personal data may potentially be transferred to these non-EU countries and may be processed there. We must point out that in these countries, a data protection level that is comparable to that in the EU cannot be guaranteed. For instance, U.S. enterprises are under a mandate to release personal data to the security agencies and you as the data subject do not have any litigation options to defend yourself in court. Hence, it cannot be ruled out that U.S. agencies (e.g., the Secret Service) may process, analyze, and permanently archive your personal data for surveillance purposes. We have no control over these processing activities.

## **Recipients of personal data**

In the scope of our business activities, we cooperate with various external parties. In some cases, this also requires the transfer of personal data to these external parties. We only disclose personal data to external parties if this is required as part of the fulfillment of a contract, if we are legally obligated to do so (e.g., disclosure of data to tax authorities), if we have a legitimate interest in the disclosure pursuant to Art. 6 (1)(f) GDPR, or if another legal basis permits the disclosure of this data. When using processors, we only disclose personal data of our customers on the basis of a valid contract on data processing. In the case of joint processing, a joint processing agreement is concluded.

## **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 PARA. 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 PARA. 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 PARA. 2 GDPR).**

## **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.

## **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 should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

## **Information about, rectification and eradication of data**

Within the scope of the applicable statutory provisions, you have the right to demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data at any time. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

## **Right to demand processing restrictions**

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data instead of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21 para. 1 GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

## **SSL and/or TLS 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 either an SSL or a TLS 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 or TLS encryption is activated, data you transmit to us cannot be read by third parties.

## **Encrypted payment transactions on this website**

If you are under an obligation to share your payment information (e.g. account number if you give us the authority to debit your bank account) with us after you have entered into a fee-based contract with us, this information is required to process payments.

Payment transactions using common modes of paying (Visa/MasterCard, debit to your bank account) are processed exclusively via encrypted SSL or TLS connections. 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 communication with us is encrypted, third parties will not be able to read the payment information you share with us.

## **Rejection of unsolicited emails**

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in our legal policies to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

# **4. Recording of data on this website**

## **Cookies**

Our websites and pages use what the industry refers to as “cookies”. Cookies are small data packages 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.

Cookies can be issued by us (first-party cookies) or by third-party companies (so-called third-party cookies). Third-party cookies enable the integration of certain services of third-party companies into websites (e.g., cookies for handling payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of these cookies (e.g., the shopping cart



function or the display of videos). Other cookies may be used to analyze user behavior or for promotional purposes.

Cookies which are required for the performance of electronic communication transactions, 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) (required cookies), shall be stored on the basis of Art. 6 para. 1 lit. f GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error-free and optimized provision of the operator's services. If your appropriate consent to the storage of the cookies and similar recognition technologies has been obtained, processing occurs exclusively on the basis of the consent obtained (Art. 6 para. 1 lit. a GDPR); the given consent may be revoked at any time for the future.

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. Please refer to the following link to find instructions on how to deactivate browser cookies on your device:

<https://www.cookiesandyou.com/disable-cookies/> (<https://www.cookiesandyou.com/disable-cookies/>)

This privacy policy informs you about the cookies and services that are used on this website.

## **Borlabs consent technology**

Our website uses the Borlabs consent technology to obtain and document your agreement to our Terms and Conditions of Service, as well as to process your privacy settings (including obtaining your consent to the use of services which establish connections to third-party servers and your consent to the storage of certain cookies in your browser or for the use of certain technologies) and for their data privacy protection compliant documentation. The Borlabs Privacy Settings box is also used to inform website visitors about our privacy practices. The provider of this technology is Borlabs GmbH, Rübenkamp 32, 22305 Hamburg, Germany (hereinafter referred to as "Borlabs").

Whenever you submit your Privacy Settings on this website, a Borlabs cookie, which archives any declarations or revocations of consent you may have entered, will be set in your browser (unless a Borlabs cookie for this website is already set in your browser). These data are not shared with the provider of the Borlabs technology.

The recorded data shall remain archived until you ask us to eradicate them, delete the Borlabs cookie on your own, or the purpose of storing the data no longer exists. This shall be without prejudice to any retention obligations mandated by law. To review the details of Borlabs' data processing policies, please visit <https://borlabs.io/kb/what-information-does-borlabs-cookie-store/> (<https://borlabs.io/kb/what-information-does-borlabs-cookie-store/>).

We use the Borlabs consent technology to inform website visitors about our privacy practices,

to obtain and document the declarations of consent mandated by law regarding user privacy, and to obtain and document declarations of agreement to our Terms and Conditions of Service. The legal basis for the processing of personal data and use of such cookies is Art. 6 para. 1 Sentence 1 lit. c GDPR.

## **Server log files**

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used;
- The used operating system;
- Referrer URL;
- The hostname of the accessing computer;
- The time of the server inquiry;
- The IP address.

This data is not merged with other data sources.

This data is recorded on the basis of Art. 6 para. 1 lit. f GDPR. The operator of the website has a legitimate interest in the technically error-free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.

## **Contact form**

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6 para. 1 lit. b GDPR if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 para. 1 lit. f GDPR), or on your consent (Art. 6 para. 1 lit. a GDPR) only if appropriate consent has been obtained; the given consent may be revoked at any time for the future.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

## **Request by email, telephone, or fax**

If you contact us by email, telephone, or fax, your request, including all resulting personal data (e.g. name, request, user id) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent. If you contact us through the contact form on “members.symplact.org/contact-us/”, your user id will be attached to your request and shared with us so that we can easily identify the user account from which the request is sent.

These data are processed on the basis of Art. 6 para. 1 lit. b GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6 para. 1 lit. f GDPR) or on the basis of your consent (Art. 6 para. 1 lit. a GDPR) if it has been obtained; the given consent can be revoked at any time.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

## **Registration on this website, Account Information**

You have the option to register on this website to be able to use additional website functions. If you make a purchase on this website without being logged into an existing user account, your checkout information will be used to create a new user account (from which you will be making the purchase), and the checkout process will coincide with the registration process. We shall use the data you enter only for the purpose of using the respective offer or service you have registered for. The required information we request at the time of registration must be entered in full. Otherwise, we shall reject the registration.

The data you submit during the registration process will become part of your Account Information, which you may have the option to modify. If you request to change your account's email address, a verification email will be sent to the new email address to verify your request.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use your account's email address.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. b GDPR (contract). The provision of personal data as specified herein is necessary for the performance of a purchase contract.

The data recorded during the registration process (and your Account Information) shall be stored by us as long as you are registered on this website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

## **Email Notifications**

We shall use your account's email address to send you notification emails (service emails) about specific events relating to your account. You can at any time adjust your account

settings (under “Account Settings” -> “Email Preferences”) to stop receiving some of these emails.

Here is a list of some of the possible triggers for such notification emails:

#### Mentions:

- A member mentions you using “@YourNickname”.

#### Account Settings:

- Your password is changed.

#### Activity Feeds:

- A member replies to your post or comment.

#### Social Groups:

- The details of a group you manage are updated.
- You're promoted in a group.
- You receive a new invite to join a group.
- A member requests to join a group you manage.
- Your request to join a group is accepted.
- Your request to join a group is rejected.
- You receive a new group message.
- There's a new post in a group you're subscribed to.
- There's a new discussion in a group you're subscribed to.

#### Discussion Forums:

- There's a new discussion in a forum you're subscribed to.
- There's a new reply in a discussion you're subscribed to.

#### Messages:

- You receive a new private message.

#### Member Connections:

- You receive a new connection request.
- Your connection request is accepted.

#### Moderation:

- You have been automatically suspended due to reaching the reporting threshold.
- Content posted by you is automatically hidden due to reaching the reporting threshold.

The legal basis for the aforementioned processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We have a legitimate interest in providing our customers with relevant service emails relating to their account. **You have the right to at any time lodge an objection to the processing of your personal data as specified herein (relating to the aforementioned) on grounds relating to your particular situation. Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

Moreover, you may subscribe to receive additional notification emails. If you subscribe to additionally receive such notification emails, we will use your account's email address to provide you with the requested service.

If you subscribe to a specific forum, you will receive notification emails about new discussions created in that forum. If you subscribe to a specific forum discussion, you will receive notification emails about new replies in that discussion.

Personal data (relating to subscriptions to additional email notifications) is processed on the basis of your consent (Art. 6 para. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. You can revoke your consent and deactivate this function at any time by simply clicking the respective unsubscribe link on the specific forum or forum discussion page. This shall be without prejudice to the lawfulness of any data processing that occurred prior to your revocation.

Furthermore, we shall use your account's email address to notify you of any legal updates (e.g. in the case of a data breach, changes to our Terms and Conditions of Service, changes to our Privacy Policy, etc.).

Personal data (relating to the sending of legal updates) is processed on the legal basis of Art. 6 para. 1 lit. c GDPR (compliance with a legal obligation).

## **Profile Information**

Some of the profile information (e.g. name, nickname) of registered users on this website may be automatically adopted from your registration information. You may have the option to modify your profile information.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. b GDPR (contract). The provision of personal data as specified herein is necessary for the performance of a purchase contract (providing membership profile features).

Your Profile Information shall be stored by us as long as you are registered on this website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

## **The comment function on this website**

When you use the comment function on this website, information on the time the comment was generated and your email address and, if you are not posting anonymously, the username you have selected will be archived in addition to your comments. The term “comment(s)” also refers to any timeline/activity posts and any forum discussion posts.

### **Storage of the IP address**

Our comment function stores the IP addresses of all users who enter comments. Given that we do not review the comments prior to publishing them, we need this information in order to take action against the author in the event of rights violations, such as defamation or propaganda.

### **Subscribing to comments**

You have the option to subscribe to receive notification emails about new comments on this website. You may be sent a confirmation email, the purpose of which is to verify whether you are the actual holder of the provided email address. Personal data is processed on the basis of your consent (Art. 6 para. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. You can revoke your consent and deactivate this function at any time by following a respective unsubscribe link in any of the notification emails. This shall be without prejudice to the lawfulness of any data processing that occurred prior to your revocation.

### **Storage period for comments**

Comments and any affiliated information shall be stored by us and remain on this website until the content the comment pertained to has been deleted in its entirety or if the comments had to be deleted for legal reasons (e.g. insulting comments).

### **Legal basis**

Comments are stored on the basis of your consent (Art. 6 para. 1 lit. a GDPR). By clicking to submit your comment, you are agreeing that we process your personal data in order to adequately process and present your comment. You have the right to revoke at any time any consent you have already given us. To do so, all you are required to do is send us an informal notification via email. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation. You may also have the ability to remove your comment yourself.

*Please refer to section 11.3 of this privacy policy for more information regarding our privacy practices and the recording of data on this website.*

## **5. Analysis tools and advertising**

### **Google Analytics**

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

Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user's origin. This data is summarized in a user-ID and assigned to the respective end device of the website visitor.

Furthermore, Google Analytics allows us to record your mouse and scroll movements and clicks, among other things. Google Analytics uses various modeling approaches to augment the collected data sets and uses machine learning technologies in data analysis.

Google Analytics uses technologies for the recognition of the users for the purpose of analyzing user behavior patterns (e.g. cookies or device fingerprinting). The website user information recorded by Google is transferred to a Google server in the United States, where it is stored.

This analysis tool is used on the basis of Art. 6 para. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator's advertising activities. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent can be revoked at any time for the future.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://privacy.google.com/businesses/controllerterms/mccs/> (<https://privacy.google.com/businesses/controllerterms/mccs/>).

### **Objection to the recording of data**

You can prevent the recording and processing of your data by Google by downloading and installing the browser plug-in available on this page: <https://tools.google.com/dlpage/gaoptout?hl=en> (<https://tools.google.com/dlpage/gaoptout?hl=en>).

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration on: <https://support.google.com/analytics/answer/6004245?hl=en> (<https://support.google.com/analytics/answer/6004245?hl=en>).

### **Contract data processing**

We have executed a contract data processing agreement with Google and are implementing all provisions of the Bulgarian data protection agencies to the fullest when using Google Analytics.

### **Archiving period**

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) will be anonymized or deleted after 2 months.

For more information about Google Analytics, please review Google's data protection policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>)

## **Google Ads**

The website operator uses Google Ads. Google Ads is an online promotional program of Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display ads in the Google search engine or on third-party websites, if the user enters certain search terms into Google (keyword targeting). It is also possible to place targeted ads based on the user data Google has in its possession (e.g. location data and interests; target group targeting). As the website operator, we can analyze these data quantitatively, for instance by analyzing which search terms resulted in the display of our ads and how many ads led to respective clicks.

The use of Google Ads is based on Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in marketing the operator’s services and products as effectively as possible.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://policies.google.com/privacy/frameworks> (<https://policies.google.com/privacy/frameworks>) and <https://privacy.google.com/businesses/controllerterms/mccs/> (<https://privacy.google.com/businesses/controllerterms/mccs/>).

## **Google Ads Remarketing**

This website uses Google Ads Remarketing. Google Ads Remarketing is a feature of Google Ads. The provider of these solutions is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

With Google Ads Remarketing, we can assign people who interact with our online offering to specific target groups in order to subsequently display interest-based advertising to them in the Google advertising network (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Ads 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 on this page: <https://www.google.com/settings/ads/onweb/> (<https://www.google.com/settings/ads/onweb/>).

The use of Google Ads Remarketing is based on Art. 6 para. 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 appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://policies.google.com/privacy/frameworks> (<https://policies.google.com/privacy/frameworks>) and <https://privacy.google.com>



/businesses/controllerterms/mccs/ (<https://privacy.google.com/businesses/controllerterms/mccs/>).

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

For more information about Google Ads Remarketing, please review Google's data protection policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>)

### **Google Ads Conversion Tracking**

This website uses Google Ads Conversion Tracking. Google Ads Conversion Tracking is a feature of Google Ads. The provider of these solutions is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google Ads Conversion Tracking, we are in a position to recognize whether the user has completed certain actions. For instance, we can analyze the how frequently which buttons on our website have been clicked and which products are reviewed or purchased with particular frequency. The purpose of this information is to compile conversion statistics. We learn how many users have clicked on our ads and which actions they have completed. We do not receive any information that would allow us to personally identify the users. Google as such uses cookies or comparable recognition technologies for identification purposes.

We use Google Ads Conversion Tracking on the basis of Art. 6 para. 1 lit. f GDPR. The operator of the website has a legitimate interest in the analysis of the user patterns with the aim of optimizing both, the operator's web presentation and advertising. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://policies.google.com/privacy/frameworks> (<https://policies.google.com/privacy/frameworks>) and <https://privacy.google.com/businesses/controllerterms/mccs/> (<https://privacy.google.com/businesses/controllerterms/mccs/>).

For more information about Google Ads Conversion Tracking, please review Google's data protection policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>)

## **Google DoubleClick**

This website may use features of Google DoubleClick. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland, (hereinafter referred to as “DoubleClick”).

DoubleClick is used to show you interest-based ads across the Google Network. Advertisements can be tailored to the interests of the viewer using DoubleClick. For example, our ads may appear in Google search results or in banners associated with DoubleClick.

To be able to display interest adequate promotional content to users, DoubleClick must recognize the respective visitor so that it can allocate the websites visited, the clicks and other user pattern information to the user. To do this, DoubleClick deploys cookies or comparable recognition technologies (e.g. device fingerprinting). The recorded information is consolidated into a pseudonym user profile so that the respective user can be shown interest adequate advertising.

The use of Google DoubleClick takes place in the interest of targeted advertising measures. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

For further information on how to object to the advertisements displayed by Google, please refer to the following links: <https://policies.google.com/technologies/ads> (<https://policies.google.com/technologies/ads>) and <https://adssettings.google.com/authenticated> (<https://adssettings.google.com/authenticated>).

For more information about Google DoubleClick, please review Google’s data protection policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>)

*Please refer to section 11.3 of this privacy policy for more information regarding our privacy practices and these services.*

## **6. Newsletter**

### **Newsletter data**

In order for you to receive a newsletter offered on this website, we require from you an email address as well as some information that allows us to verify that you are the owner of the email address provided, and that you agree to receive the newsletter. Further data other than what is described herein shall not be collected or shall be collected only on a voluntary basis. For the handling of the newsletter(s), we use the newsletter service providers which are described below.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6 para. 1 lit. a GDPR). You may revoke the consent you have given to the archiving of data (e.g. the email address) and the use of this information for the sending of the newsletter at any time by clicking on the “Unsubscribe”

link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter or after the purpose has ceased to apply. We reserve the right to delete or block email addresses from our newsletter distribution list at our own discretion within the scope of our legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR.

After you unsubscribe from the newsletter distribution list, your email address may be stored by us or the newsletter service provider in a blacklist if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not 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). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

## **MailChimp**

We use the services of MailChimp for our “SymplAct Availability In Your Country” newsletter. The provider is the Rocket Science Group LLC d/b/a Mailchimp, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA (hereinafter referred to as “MailChimp”). Mailchimp is part of the Intuit group of companies and their parent entity is Intuit Inc.

Among other things, MailChimp is a service that can be deployed to organize and analyze the sending of newsletters. Whenever you enter data for the purpose of subscribing to the “SymplAct Availability In Your Country” newsletter (e.g. your email address), the information is stored on MailChimp servers in the United States.

With the assistance of the MailChimp tool, we can analyze the performance of our newsletter campaigns. If you open an email that has been sent through the MailChimp tool, a file that has been integrated into the email (a so-called web-beacon) connects to MailChimp’s servers in the United States. As a result, it can be determined whether a newsletter message has been opened and which links the recipient possibly clicked on. Technical information is also recorded at that time (e.g. the time of access, the IP address, type of browser and operating system). This information cannot be allocated to the respective newsletter recipient. Their sole purpose is the performance of statistical analyses of newsletter campaigns. The results of such analyses can be used to tailor future newsletters to the interests of their recipients more effectively.

If you do not want to permit an analysis by MailChimp, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message.

The data is processed based on your consent (Art. 6 para. 1 lit. a GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

Here is a link to a page about Mailchimp's sub-processors: <https://mailchimp.com/legal/subprocessors/> (<https://mailchimp.com/legal/subprocessors/>).

After you unsubscribe from the newsletter distribution list, your email address may be stored by us or the newsletter service provider in a blacklist if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not 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). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

For more details, please consult MailChimp's Policies on: <https://mailchimp.com/legal/> (<https://mailchimp.com/legal/>), <https://mailchimp.com/legal/additional-terms/> (<https://mailchimp.com/legal/additional-terms/>) and <https://mailchimp.com/legal/cookies/> (<https://mailchimp.com/legal/cookies/>), as well as Inuit's Global Privacy Statement at <https://www.intuit.com/privacy/statement/> (<https://www.intuit.com/privacy/statement/>).

### **Brevo**

We use Brevo (formerly Sendinblue) for our newsletters, as well as for other (email) communication (e.g. for the provision of our chatbox feature, for responding to chatbox requests, or for sending out emails via SMTP), for Customer Relationship Management, and for marketing automation features and tracking. The service provider is Sendinblue, a simplified joint stock company registered with the Paris Trade and Companies Register under number 498 019 298 and whose registered office is located at 106 boulevard Haussmann, 75008 Paris, France (hereinafter referred to as "Brevo").

Brevo services can, among other things, be used to organize and analyze the sending of newsletters. Organizing the sending of newsletters includes, for example, that transactional emails can be set up to be sent out automatically when certain conditions, which are selected by us, are met. The data you enter for the purpose of subscribing to the newsletter are archived on Brevo's servers.

### **Data analysis by Brevo**

Brevo enables us to analyze our newsletter campaigns. For instance, it allows us to see whether a newsletter message has been opened and, if so, which links may have been clicked (thereby for example enabling us to determine the total number of clicks for each link).

Moreover, we are also able to see whether once the email was opened or a link was clicked, any previously defined actions have taken place. This lets us know, for example, if you have made a purchase after clicking on our newsletter, thereby enabling us to determine conversion rates. Brevo tracks certain events (e.g. when one of our Brevo contacts opens a page on one of our websites), and also stores such contact information in the Brevo contact profile assigned to that individual user.

Brevo also enables us to divide the subscribers to our newsletter into various categories (i.e., to “cluster” recipients). For instance, newsletter recipients can be categorized based on age, gender, or place of residence. This enables us to tailor our newsletter more effectively to the needs of the respective target groups.

If you do not want to permit an analysis by Brevo, you must unsubscribe from the newsletter. We provide a link for you to do this at the bottom of every newsletter message.

For more detailed information about how Brevo works, please follow this link: <https://www.brevo.com/newsletter-software/> (<https://www.brevo.com/newsletter-software/>).

## **Legal basis**

The data is processed based on your consent (Art. 6 para. 1 lit. a GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

## **Storage period**

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your email address may be stored by us or the newsletter service provider in a blacklist if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not 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). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

For more information, please consult Brevo’s Privacy Policy on: <https://www.brevo.com/legal/privacypolicy/> (<https://www.brevo.com/legal/privacypolicy/>).

## **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider.

This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

*Please refer to section 11.3 of this privacy policy for more information regarding our privacy practices and these services.*

## **7. Plug-ins and Tools**

### **Brevo Chat**

In addition to the functionalities described at the end of Section 6 of this Privacy Policy, Brevo also provides a chatbox feature which we make use of on our website. You can enter your contact details (e.g. name and email address) and message(s) into the chatbox fields to start and hold a conversation with our staff.

If you contact us via chatbox, your request, including all resulting personal data (e.g. name, email address and messages) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6 para. 1 lit. b GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6 para. 1 lit. f GDPR) or on the basis of your consent (Art. 6 para. 1 lit. a GDPR) if it has been obtained; the given consent can be revoked at any time.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

For more information about Brevo, please refer to the text above, titled "Brevo" (under section 6 of this privacy policy).

### **YouTube with expanded data protection integration**

Our website may have embedded videos of the website "YouTube". The operator of the YouTube website is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

We use YouTube in the expanded data protection mode. According to YouTube, this mode ensures that YouTube does not store any information about visitors to this website before they watch the video. Nevertheless, this does not necessarily mean that the sharing of data with YouTube partners can be ruled out as a result of the expanded data protection mode. For instance, regardless of whether you are watching a video, YouTube will always establish a connection with the Google DoubleClick network.

As soon as you start to play a YouTube video on this website, a connection to YouTube's servers will be established. As a result, the YouTube server will be notified, which of our

pages you have visited. If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

Furthermore, after you have started to play a video, YouTube will be able to place various cookies or comparable technologies for recognition (e.g. device fingerprinting) on your device. In this way YouTube will be able to obtain information about this website's visitors. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud.

Under certain circumstances, additional data processing transactions may be triggered after you have started to play a YouTube video, which are beyond our control.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6 para. 1 lit. f GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>).

## **Vimeo**

This website may use plug-ins of the video portal Vimeo. The provider is Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

If you visit one of the pages on our website into which a Vimeo video has been integrated, a connection to Vimeo's servers will be established. As a consequence, the Vimeo server will receive information as to which of our pages you have visited. Moreover, Vimeo will receive your IP address. This will also happen if you are not logged into Vimeo or do not have an account with Vimeo. The information recorded by Vimeo will be transmitted to Vimeo's server in the United States.

If you are logged into your Vimeo account, you enable Vimeo to directly allocate your browsing patterns to your personal profile. You can prevent this by logging out of your Vimeo account.

Vimeo uses cookies or comparable recognition technologies (e.g. device fingerprinting) to recognize website visitors.

The use of Vimeo is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6 para. 1 lit. f GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission and, according to Vimeo, on "legitimate business interests". Details can be found here: <https://vimeo.com/privacy> (<https://vimeo.com/privacy>).

For more information on how Vimeo handles user data, please consult the Vimeo Data Privacy Policy on: <https://vimeo.com/privacy> (<https://vimeo.com/privacy>).

## **Bunny Stream**

This website uses plug-ins of the video hosting solution Bunny Stream. The provider is BunnyWay d.o.o., Dunajska cesta 165, 1000 Ljubljana, Slovenia (hereinafter referred to as “Bunny.net”). The browser you use will establish a connection with Bunny.net servers whenever you visit pages on our website on which Bunny.net-hosted videos are embedded. As a result, Bunny.net will process personal data of yours.

Bunny Stream functions with Bunny.net’s video storage, transcoding, and streaming of video content via the Bunny Content Delivery Network (CDN).

Bunny.net may collect how many (unique) views our “Bunny Stream”-hosted videos get at any point in time. Bunny Stream also create statistics on users’ watch time, as well as how much streaming bandwidth is used in total on each of our “Bunny Stream”-hosted videos at any point in time. This data is anonymized and aggregated across all users. We have access to that data.

Bunny.net may process your IP address, technical information about your browser type, your operating system and basic device information. Bunny Stream can send back information about the stream quality, errors, buffering metrics, etc., to ensure good performance. Additionally, the iframes which are embedded on our pages might ping various Bunny.net CDN servers globally anonymously to collect performance statistics which are used to automatically adjust routing logic and optimize performance. Bunny.net servers will also receive information as to which of our pages, that have “Bunny Stream”-hosted videos embedded on them, you have visited.

The use of Bunny Stream is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6 para. 1 lit. f GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

## **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **Sub-processors**

Bunny.net keep a public list of their sub-processors on this page: <https://bunny.net/gdpr/sub-processors/> (<https://bunny.net/gdpr/sub-processors/>).

For more information about Bunny Stream’s privacy practices, please refer to this page: <https://bunny.net/gdpr/> (<https://bunny.net/gdpr/>).

Link to Bunny.net’s Privacy & Data Policy: <https://bunny.net/privacy/>



## VdoCipher

This website uses plug-ins of the video hosting solution VdoCipher. The provider is VdoCipher Media Solutions Pvt. Ltd., 91Springboard, Building no. 145 Sector 44 Gurgaon, India - 1220.

The browser you use will establish a connection with third-party servers whenever you visit pages on our website in which VdoCipher-hosted videos are embedded. As a result, these third parties will process personal data of yours. The third parties are Amazon.com, Inc. and Google.

These third parties may collect your IP address, technical information about your browser type, your operating system, basic device information, and process information about the pages you have visited on our website.

VdoCipher uses Global AWS Cloud Infrastructure that consists of three primary components: Storage on AWS S3, Transcoding via VdoCipher algorithms on AWS EC2, and Streaming of video content via Cloudfront CDN. Apart from these, there are over 10 other AWS services that are built into VdoCipher's video hosting infrastructure.

Cloudfront.net is part of a Content Delivery Network (CDN). CloudFront is an Amazon AWS service. Connections to CloudFront servers will be established (to cloudfront.net and/or to subdomains of cloudfront.net).

Personal data will be shared with Amazon.com, Inc. (Headquartered in Seattle, Washington, United States, Amazon.com, Inc. is an international organization with locations in the USA and all around the world.).

Here is a link to a page about Amazon.com, Inc.'s sub-processors: <https://aws.amazon.com/compliance/sub-processors/>

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission..

Privacy Policy (Amazon AWS): <https://aws.amazon.com/privacy/>

Connections to ajax.googleapis.com (Google servers) will be established. This way, Google can run scripts on our website.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's sub-processors: <https://privacy.google.com/businesses/subprocessors/>

Privacy Policy (Google): <https://policies.google.com/privacy>

The first-party cookie "uid" has a 20 year expiry time and is only loaded onto the domain path(s) of the respective video(s).

VdoCipher may collect how many (unique) views our VdoCipher videos get at any point in time. VdoCipher create statistics on how much streaming bandwidth is used in total on each of our VdoCipher-hosted videos at any point in time. This data is anonymized and aggregated across all users. We have access to that data. VdoCipher also collect the IP addresses of users who watch VdoCipher-hosted videos (IP-logging), receive information as to which of our pages you have visited, receive information about your user account on the website, and are able to collect insights into your browsing patterns.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. b GDPR (contract). The establishment of connections to third-party servers and the provision of personal data as specified herein is necessary for the performance of a Membership purchase contract (providing the customer with piracy-protected video content).

## **hCaptcha**

We use the hCaptcha anti-bot service (hereinafter referred to as "hCaptcha") on our website. This service is provided by Intuition Machines, Inc., a Delaware US Corporation (hereinafter referred to as "IMI").

hCaptcha is used to check whether the data entered on our website (such as on a comment form or password reset form) has been entered by a human or by an automated program. To do this, hCaptcha analyzes the behavior of the website or mobile app visitor based on various characteristics. This analysis starts automatically as soon as the website or mobile app visitor enters a part of the website where hCaptcha is enabled. For the analysis, hCaptcha evaluates various information (e.g. IP address, how long the visitor has been on the website or app, or mouse actions taken by the user). The data collected during the analysis is forwarded to IMI. hCaptcha analysis in the "invisible mode" may take place completely in the background. Website visitors are not alerted that such an analysis is taking place if the user is not shown a challenge.

Data processing is based on Art. 6 para. 1 lit. f GDPR: the website or mobile app operator has a legitimate interest in protecting their web presentations against abusive automated crawling and spam. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future. IMI acts as a "data processor" acting on behalf of its customers as defined under the GDPR, and a "service provider" for the purposes of the California Consumer Privacy Act (CCPA).

The processing of data is based on Standard Contract Clauses, included in the Data Processing Supplement to the General Terms and Conditions of IMI or in the data processing agreements.

For more information about hCaptcha and IMI's privacy policy and terms of use, please visit the following links: <https://hcaptcha.com/privacy/> and <https://hcaptcha.com/terms/>.

## **Akismet**

We use Akismet on this website to reduce spam. This service is provided by Aut O'Mattic A8C Ireland Ltd., 25 Herbert Pl, Dublin, D02 AY86, Ireland, whose parent company is based in the US.

Akismet is used to check whether form entries on our website (such as on a comment form or contact form) are spam. For this purpose, we process the provided visitor name, mail address, IP address, comment text, browser type and access time. When Akismet is enabled on this site, only the personal data needed to carry out Akismet's core function of protecting us against spam is collected. For detailed insights into which types of your personal data Akismet may process, please refer to their special Privacy Notice for visitors to their users' sites: "<https://automattic.com/privacy-notice/>". There are short retention periods of between two weeks and ninety days for the vast majority of the spam-related data collected for the provision of the Akismet service, at which point it is automatically deleted from their companies' databases. Anyone can opt-out of all long-term tracking for the very small subset of data they do keep longer by using the contact form on "<https://akismet.com/contact/>".

Personal data will be shared with Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA, and Aut O'Mattic A8C Ireland Ltd., 25 Herbert Pl, Dublin, D02 AY86, Ireland. Automattic Inc. is also the controller for some of the processing activities related to Services provided by Aut O'Mattic A8C Ireland Ltd.

Here is a link to a page about Automattic Inc.'s sub-processors: "<https://automattic.com/subprocessor-list/>".

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We have a legitimate interest in using the Akismet service to protect our website against spam attacks. It is common practice for website operators to use third-party spam protection solutions for such purposes. It is necessary for the third-party service provider to process certain personal data of yours in order for their solutions to function properly. In GDPR terms, this is a "legitimate interest" use of that data.

You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.

Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Data transfer to the US is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://wordpress.com/support/data-processing-agreements/> (<https://wordpress.com/support/data-processing-agreements/>).

## **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

For more information about Akismet's and Automattic's privacy practices and terms of use, please visit the following links: <https://automattic.com/privacy/> ; <https://akismet.com/gdpr/> ; and <https://akismet.com/tos/>.

## **Google reCAPTCHA**

We may use “Google reCAPTCHA” (hereinafter referred to as “reCAPTCHA”) on this website. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to determine whether data entered on this website (e.g. information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyzes the behavior of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g. IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google.

reCAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway.

Data are stored and analyzed on the basis of Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the protection of the operator’s websites against abusive automated spying and against SPAM. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

For more information about Google reCAPTCHA please refer to the Google Data Privacy Policy and Terms Of Use on these pages: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>) and <https://policies.google.com/terms?hl=en> (<https://policies.google.com/terms?hl=en>).

## **Google Fonts**

Google reCAPTCHA uses so-called Google Fonts provided by Google. When you access a page on our website that uses Google reCAPTCHA, only if you have given prior consent for the use of reCAPTCHA, your browser will load the required fonts into your browser cache to correctly display text and fonts.

To do this, the browser you use will have to establish a connection with Google’s servers. As a result, Google will learn that your IP address was used to access this website. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

If your browser should not support Google Fonts, a standard font installed on your computer will be used.

We have made a reasonable effort to avoid using Google Fonts on the website in any way other than as specified herein.

For more information on Google Fonts, please follow this link:

<https://developers.google.com/fonts/faq> (<https://developers.google.com/fonts/faq>) and consult Google's Data Privacy Policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>).

## **Google Maps**

This website uses the mapping service Google Maps. The provider is Google Cloud EMEA Limited ("Google"), 70 Sir John Rogerson's Quay, D02 R296, Dublin 2, Ireland.

We use the "Places API", the "Geocoding API", and the "Maps JavaScript API". To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer. Google Maps features may use Google fonts for the purpose of uniform depiction of fonts. When you access Google Maps features, your browser will load the required fonts into your browser cache, to correctly display text and fonts.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6 para. 1 lit. f GDPR. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: [https://workspace.google.com/terms/mcc\\_terms.html](https://workspace.google.com/terms/mcc_terms.html) ([https://workspace.google.com/terms/mcc\\_terms.html](https://workspace.google.com/terms/mcc_terms.html)) and [https://workspace.google.com/terms/dpa\\_terms.html](https://workspace.google.com/terms/dpa_terms.html) ([https://workspace.google.com/terms/dpa\\_terms.html](https://workspace.google.com/terms/dpa_terms.html)).

## **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

Page with a list of Google's sub-processors for these services: <https://cloud.google.com/terms/subprocessors> (<https://cloud.google.com/terms/subprocessors>).

For more information on the handling of user data, please review Google's Data Privacy Policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>).

## **Wordfence**

We use the "Wordfence" service provided by Defiant Inc, Defiant, Inc, 800 5th Ave Ste 4100, Seattle, WA 98104, USA (hereinafter referred to as "Wordfence").

Wordfence is designed to protect our website from unwanted access or malicious cyberattacks. To accomplish this, our website establishes a permanent connection with Wordfence's servers, which check and block their databases against access to our website.

The use of Wordfence is based on Art. 6 para. 1 lit. f GDPR. The website operator has a legitimate interest in the most effective protection of his website against cyberattacks. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the given consent may be revoked at any time for the future.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://www.wordfence.com/help/general-data-protection-regulation/> (<https://www.wordfence.com/help/general-data-protection-regulation/>).

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

For more information on the handling of user data, please review Wordfence's Privacy Policy on: <https://wordfence.com/privacy-policy/> (<https://wordfence.com/privacy-policy/>).

## **AWS SES (Simple Email Service)**

We use AWS SES to send out transactional and service emails. Personal data will be shared with Amazon.com, Inc. (Headquartered in Seattle, Washington, United States, Amazon.com, Inc. is an international organization with locations in the USA and all around the world.), the provider of this service.

Here is a link to a page about Amazon.com, Inc.'s sub-processors: <https://aws.amazon.com/compliance/sub-processors/>

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission..

### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

For more information, please consult Amazon's Privacy Notice regarding AWS Services: <https://aws.amazon.com/privacy/>

The processing of personal data is based on Art. 6 para. 1 lit. b GDPR if the email, which is sent out, is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in sending out service emails / transactional emails (Art. 6 para. 1 lit. f GDPR).

## **Google Workspace**

We use Google Workspace to send and receive emails. The provider is Google Cloud EMEA Limited (“Google”), 70 Sir John Rogerson's Quay, D02 R296, Dublin 2, Ireland.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: [https://workspace.google.com/terms/mcc\\_terms.html](https://workspace.google.com/terms/mcc_terms.html) ([https://workspace.google.com/terms/mcc\\_terms.html](https://workspace.google.com/terms/mcc_terms.html)) and [https://workspace.google.com/terms/dpa\\_terms.html](https://workspace.google.com/terms/dpa_terms.html) ([https://workspace.google.com/terms/dpa\\_terms.html](https://workspace.google.com/terms/dpa_terms.html)).

### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

Page with a list of Google's sub-processors for these services: <https://workspace.google.com/terms/subprocessors.html> (<https://workspace.google.com/terms/subprocessors.html>).

For more information on the handling of user data, please review Google’s Data Privacy Policy on: <https://policies.google.com/privacy?hl=en> (<https://policies.google.com/privacy?hl=en>).

*Please refer to section 11.3 of this privacy policy for more information regarding our privacy practices and these services.*

## **8. eCommerce, payment service providers, and accounting**

### **Processing of Customer and Contract Data**

We collect, process, and use personal customer and contract data for the establishment, content arrangement and modification of our contractual relationships. Data with personal references to the use of this website (usage data) will be collected, processed, and used only if this is necessary to enable the user to use our services or required for billing purposes. The legal basis for these processes is Art. 6 para. 1 lit. b GDPR.

The collected customer data shall be deleted upon completion of the order or termination of the business relationship and upon expiration of any existing statutory archiving periods. This shall be without prejudice to any statutory archiving periods.

### **Data transfer upon closing of contracts for online stores, retailers, and the shipment of merchandise**

Whenever you order merchandise from us, we will share your personal data with the

transportation company entrusted with the delivery as well as the payment service commissioned to handle the payment transactions. Only the data these respective service providers require to meet their obligations will be shared. The legal basis for this sharing is Art. 6 para. 1 lit. b GDPR, which permits the processing of data for the fulfillment of contractual or pre-contractual obligations. If you give us your respective consent pursuant to Art. 6 para. 1 lit. a GDPR, we will share your email address with the transportation company entrusted with the delivery so that this company can notify you on the shipping status for your order via email. You have the option to revoke your consent at any time.

## **Data transfer upon closing of contracts for services and digital content**

We share personal data with third parties only if this is necessary in conjunction with the handling of the contract; for instance, with the financial institution tasked with the processing of payments.

Any further transfer of data which has not been specified in this privacy policy shall not occur or shall only occur if you have expressly consented to the transfer. Any sharing of your data with third parties in the absence of your express consent, for instance for advertising purposes, shall not occur unless specified in this Privacy Policy.

The basis for the processing of data is Art. 6 para. 1 lit. b GDPR, which permits the processing of data for the fulfillment of a contract or for pre-contractual actions.

## **Payment services**

We integrate payment services of third-party companies on our website. When you make a purchase from us, your payment data (e.g. name, payment amount, bank account details, credit card number) are processed by the payment service provider for the purpose of payment processing. For these transactions, the respective contractual and data protection provisions of the respective providers apply. The processing of personal data as specified herein is based on Art. 6 para. 1 lit. b GDPR (contract processing) and on the interest of a smooth, convenient, and secure payment transaction (Art. 6 para. 1 lit. f GDPR). Insofar as your appropriate consent has been obtained for certain actions, Art. 6 para. 1 lit. a GDPR is the legal basis for data processing; the given consent may be revoked at any time for the future.

We use the following payment services / payment service providers within the scope of this website:

### **Stripe**

The provider for customers within the EU is Stripe Payments Europe, Ltd, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland (hereinafter referred to as "Stripe").

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://stripe.com/de/privacy> (<https://stripe.com/de/privacy>) and <https://stripe.com/de/guides/general-data-protection-regulation>



(<https://stripe.com/de/guides/general-data-protection-regulation>).

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

Details on data processing practices can be found in Stripe's Privacy Policy:

<https://stripe.com/de/privacy> (<https://stripe.com/de/privacy>).

### **Apple Pay**

We use Apple Pay through Stripe. The provider is Apple Inc, Infinite Loop, Cupertino, CA 95014, USA. The Apple privacy policy can be found here: <https://www.apple.com/legal/privacy/> (<https://www.apple.com/legal/privacy/>).

### **Google Pay**

We use Google Pay through Stripe. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. You can find Google's privacy policy here: <https://policies.google.com/privacy> (<https://policies.google.com/privacy>).

### **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 US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.paypal.com/de/webapps/mpp/ua/pocpsa-full> (<https://www.paypal.com/de/webapps/mpp/ua/pocpsa-full>).

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

Details on data processing practices can be found in PayPal's privacy policy:

<https://www.paypal.com/de/webapps/mpp/ua/privacy-full> (<https://www.paypal.com/de/webapps/mpp/ua/privacy-full>).

*Please refer to section 11.3 of this privacy policy for more information regarding our privacy practices and these services.*

## **9. Online-based Audio and Video Conferences (Conference tools)**

### **Data processing**

We use online conference tools, among other things, for communication with our customers.

The tools we use are listed in detail below. If you communicate with us by video or audio conference using the Internet, your personal data will be collected and processed by the provider of the respective conference tool and by us. The conferencing tools collect all information that you provide/access to use the tools (email address and/or your phone number). Furthermore, the conference tools process the duration of the conference, start and end (time) of participation in the conference, number of participants and other “context information” related to the communication process (metadata).

Furthermore, the provider of the tool processes all the technical data required for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Should content be exchanged, uploaded, or otherwise made available within the tool, it is also stored on the servers of the tool provider. Such content includes, but is not limited to, cloud recordings, chat/ instant messages, voicemail uploaded photos and videos, files, whiteboards, and other information shared while using the service.

Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

### **Purpose and legal bases**

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6 para. 1 sentence 1 lit. b GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art. 6 para. 1 lit. f GDPR). Insofar as appropriate consent has been obtained, the tools in question will be used on the legal basis of Art. 6 para. 1 lit. a GDPR (consent); the given consent may be revoked at any time for the future.

### **Duration of storage**

Data collected directly by us via the video and conference tools will be deleted from our systems immediately after you request us to delete it, revoke your consent to storage, or the reason for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the duration of storage of your data that is stored by the operators of the conference tools for their own purposes. For details, please directly contact the operators of the conference tools.

### **Conference tools used**

We employ the following conference tools:

#### **Zoom**

We use Zoom. The provider of this service is Zoom Communications Inc, San Jose, 55 Almaden Boulevard, 6th Floor, San Jose, CA 95113, USA. For details on data processing practices, please refer to Zoom's privacy policy: <https://zoom.us/en-us/privacy.html>.

Data transfer to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://zoom.us/de-de/privacy.html>.

### **Data processing**

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **10. Custom Services**

### **Handling applicant data**

We offer website visitors the opportunity to submit job applications to us (e.g. via email, via postal services or by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

### **Scope and purpose of the collection of data**

If you submit a job application to us, we will process any affiliated personal data (e.g. contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment of an employment relationship. The legal grounds for the aforementioned are Art. 6 para. 1 lit. b GDPR (General Contract Negotiations) and – provided you have given us your consent – Art. 6 para. 1 lit. a GDPR. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application.

If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of Art. 6 para. 1 lit. b GDPR for the purpose of implementing the employment relationship in our data processing system.

### **Data Archiving Period**

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6 para. 1 lit. f GDPR) for up to 6 months from the end of the application procedure (rejection or withdrawal of the application). Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g. due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your agreement (Article 6 para. 1 lit. a GDPR) or if statutory data retention requirements preclude the deletion.

## 11. Borlabs Privacy Settings and Overview

### 11.1 Your personal User ID (Used for the recording of your personal Consent History):

Please visit the specific website's privacy policy page to see your personal User ID for that website.

### 11.2 Your personal Consent History:

Please visit the specific website's privacy policy page to see your personal Consent History for that website.

### 11.3 Privacy Settings Overview:

#### Essential & Marketing

Essential cookies enable basic functions and are necessary for the proper function of the website. Marketing cookies are used by third-party advertisers or publishers to display personalized ads. They do this by tracking visitors across websites. Marketing cookies are also used by us to track website visitors for marketing purposes.

#### Borlabs Cookie

Name Borlabs Cookie

Provider SYMPLACT LTD

Info Stores the visitors' settings selected in the Borlabs Privacy Settings Box.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. c GDPR (compliance with a legal obligation).

This is a first-party cookie.

You may at any time deactivate/remove the cookie via your web browser settings. As a result, it will no longer be active until you again click on "Accept All" or "Save" in the Borlabs Privacy Settings Box.

Privacy Policy <https://members.symplact.org/privacy-policy/>

Host(s) .members.symplact.org, members.symplact.org

Cookie Nameborlabs-cookie

Cookie Expiry 1 Year

## WooCommerce

Name WooCommerce

Provider SYMPLACT LTD

Info These cookies secure the functionality of the online shop and shopping cart.

- woocommerce\_cart\_hash and woocommerce\_items\_in\_cart contain information about the cart and help WooCommerce determine when cart contents/data change(s) (expiry time: 48 hours)

- wp\_woocommerce\_session\_ contains a unique code for each customer so that it knows where to find the cart data in the database for each customer (expiry time: 48 hours)

- woocommerce\_recently\_viewed powers the Recent Viewed Products widget (duration: session)

- store\_notice[notice id] allows customers to dismiss the store notifications/notice (duration: session)

According to an article by Automattic Inc., the company which provides us with these cookies, "No personal information is stored within these cookies.". Source: <https://docs.woocommerce.com/document/woocommerce-cookies/>.

You may at any time deactivate/remove the cookies via your web browser settings. As a result, they will no longer be active until you take an action which would trigger the cookies to be set again.

Privacy Policy <https://members.symplact.org/privacy-policy/>

Host(s) members.symplact.org

Cookie Name woocommerce\_cart\_hash, woocommerce\_items\_in\_cart, wp\_woocommerce\_session\_, woocommerce\_recently\_viewed, store\_notice[notice id]

## PayPal

Name PayPal

Provider PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

Info These cookies are used to allow for the proper function of PayPal transactions.

PayPal (cookies) may process the following types of your personal data: Unique payment identifier, Payment provider identifier, Registration and user information provided by you (your name, postal address, city/state/zip, email address, phone number, etc.); and transaction and experience information (such as purchase amount, payment method, payment method information, payment information, date of purchase, merchant information, including information about any funding instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information).

Cookies set by default when you visit any checkout page on this website:

"l7\_az" is a third-party cookie (domain: .paypal.com) with a 30 minute expiry time.

"ts" is a third-party cookie (domain: .paypal.com) with a 3 year expiry time.

"ts\_c" is a third-party cookie (domain: .paypal.com) with a 3 year expiry time.

"tsrce" is a third-party cookie (domain: .paypal.com) with a 3 day expiry time.

Cookies set when the PayPal Button "Debit or Credit Card" is clicked on any checkout page on this website:

"sc\_f" is a third-party cookie (domain: .c.paypal.com) with a 5 year expiry time.

"enforce\_policy" is a third-party cookie (domain: .paypal.com) with a 1 year expiry time.

"KHcl0EuY7AKSMgfvHI7J5E7hPtK" is a third-party cookie (domain: .paypal.com) with a 40 year expiry time.

"LANG" is a third-party cookie (domain: .paypal.com) with a 3 day expiry time.

"x-pp-s" is a third-party session cookie (domain: .paypal.com).

"nsid" is a third-party session cookie (domain: www.paypal.com).

When you click on "PayPal" on any checkout page on this website, you will be redirected to a page which is operated by PayPal and hosted on their own domain. This page will be opened in the form of a pop-up window. PayPal set cookies on that page.

Personal data will be shared with PayPal Holdings Inc., with Corporate Headquarters at 2211 North First Street San Jose, California 95131, and PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (PayPal is an international organization with locations in the USA, Luxembourg etc.).

Here is a link to a page about PayPal's subprocessors:

<https://www.paypal.com/uk/webapps/mpp/ua/third-parties-list>

SYMPLACT LTD and PayPal (Europe) S.à r.l. et Cie, S.C.A. are subject to the PayPal Online Card Payment Services Agreement (link:

<https://www.paypal.com/ie/webapps/mpp/ua/pocpsa-full>), which includes a section about the EU standard contractual clauses called "EU STANDARD CONTRACTUAL CLAUSES RELATED TERMS". International data transfer compliance measures put in place by this agreement include the EU Commission's approved Standard Contractual Clauses (SCCs) to accommodate international data transfers.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. b GDPR (contract). The provision of personal data as specified herein is necessary to use our online store to make a purchase from us if you want to pay via PayPal. These are strictly necessary cookies, as the website would not be able to provide basic functions of the website (payments/ e-billing) without them.

You may at any time deactivate/remove the cookies via your web browser settings. As a result, they will no longer be active until you take an action which would trigger the cookies to be set again.

Privacy Policy <https://www.paypal.com/en/webapps/mpp/ua/privacy-full>

Host(s) .c.paypal.com, .paypal.com, paypal.com, www.paypal.com

Cookie Name akavpau\_ppsd, AKDC, X-PP-L7, X-PP-SILOVER, l7\_az, ts, ts\_c, tsrce, sc\_f, enforce\_policy, KHcl0EuY7AKSMgfvHI7J5E7hPtK, LANG, x-pp-s, nsid

## WordPress Cookies

Name WordPress Cookies

Provider SYMPLACT LTD

Info WordPress uses the session cookie `wordpress_[hash]` to store the authentication details on login. The authentication details include the username and double hashed copy of the password. However, this usage of the cookie is limited to the admin console area, the backend dashboard of the website. They cannot be seen on front-end of the website, even when logged in.

The session cookie `wordpress_logged_in_[hash]` is used to indicate when you are logged in, and who you are, for most interface use. This cookie is maintained on the front-end of the website as well when logged in.

The session cookie `wordpress_sec_[hash]` helps Wordpress keep users logged in.

WordPress also sets another session cookie named `wordpress_test_cookie` to check whether your web browser is set to allow or reject cookies. The purpose of the use this cookie is to provide the users of the website with an appropriate user experience. This cookie is used on the front-end, even if you are not logged in. WordPress sets this cookie when you navigate to the login page.

`wporg_logged_in`, `wporg_sec` checks if the current visitor is a logged-in WordPress user. The expiration period of this cookie is 14 days if the user has consented to let the site remember the login credentials. Else, it acts as a session cookie.

All these cookies are first-party cookies.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). Processing of your personal data as specified herein is necessary for providing the users of the website with an appropriate user experience (`wordpress_test_cookie`) and for the login function of the website to work properly (`wordpress__[hash]`, `wordpress_logged_in_[hash]`, `wporg_logged_in`, `wporg_sec`). These are strictly necessary cookies, as this website would not be able to provide basic functions of the website without them.

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the**

**processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

You may at any time deactivate/remove the cookies via your web browser settings. As a result, they will no longer be active until you take an action which would trigger the cookies to be set again.

Privacy Policy <https://members.symplact.org/privacy-policy/>

Host(s) members.symplact.org

Cookie Name wordpress\_[hash], wordpress\_logged\_in\_[hash], wordpress\_sec\_[hash], wordpress\_test\_cookie, wporg\_logged\_in, wporg\_sec

## **Wordfence**

Name Wordfence

Provider Defiant Inc., 800 5th Ave Ste 4100, Seattle, WA 98104

Info The purpose of the processing of personal data by Wordfence is to prevent unauthorized access and code manipulation.

Wordfence processes personal data on user behavior on the website.

--- About wfwaf-authcookie-[hash]:

- What it does: This cookie is used by the Wordfence firewall to perform a capability check of the current user before WordPress has been loaded.
- Who gets this cookie: This is only set for users that are able to log into WordPress.
- How this cookie helps: This cookie allows the Wordfence firewall to detect logged in users and allow them increased access. It also allows Wordfence to detect non-logged in users and restrict their access to secure areas. The cookie also lets the firewall know what level of access a visitor has to help the firewall make smart decisions about who to allow and who to block.
- This is a first-party cookie.

--- About wf\_loginalerted\_[hash]:

- What it does: This cookie is used to notify the Wordfence admin when an administrator logs in from a new device or location.
- Who gets this cookie: This is only set for administrators.
- How this cookie helps: This cookie helps site owners know whether there has been an admin login from a new device or location.
- This is a first-party cookie.

Moreover, Wordfence needs to receive personal data in order to secure the website such as being able to apply the IP blacklist.



Our website running Wordfence will also be collecting personal data and using it locally (such as rate limiting).

Wordfence (cookies) may process the following types of your personal data: search queries; date and time of request; referral URL; IP address; MAC address; Device make, model and operating system version; mobile network information; internet service provider; browser type and language; country and time zone in which the Device is located; metadata stored on the Device; data about a User's geographic location.

According to the data processing agreement and standard contractual clauses which were signed by Defiant Inc. and SYMPLACT LTD., Wordfence keep the data until they no longer have a business need for it, which is appropriate under GDPR as it was collected under the legitimate interests to provide security and prevent fraud. It is necessary to keep some data such as malicious IPs until they stop being malicious. Generally they delete data after 90 days as it's no longer needed. Per GDPR, when they no longer have a business need for it, it's deleted. But some IPs are kept longer such as those on the IP Blacklist until they stop being malicious.

Personal data will be shared with Defiant Inc., located in the United States. Here's a link to access an unsigned version of the data processing agreement and standard contractual clauses which were signed by Defiant Inc. and SYMPLACT LTD. :  
<https://wordfence.com/gdpr/dpa.pdf>

Defiant (located in the United States) uses the following subprocessors in the performance of the Service:

Amazon Web Services, location: United States;

ByteGrid, location: United States;

Twilio, location: United States;

Freshworks, location: United States;

Mode Analytics, location: United States.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). Preventing fraud and increasing website security (network and information security, including security of private data stored on the website) constitute legitimate interests (Recital 49 EU GDPR) which are not to be overridden by the interests, rights and freedoms of the individual (the data subject), as providing increased website security (network and information security, including security of private data stored on the website) and preventing fraud to the degree to which Wordfence does constitutes an interest that far outweighs the interest of not processing the data necessary to provide us with that level of increased security. Processing of (personal) data is necessary for the protection of the website, the network, and the information stored within, and for fraud prevention.

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

You may at any time deactivate/remove the cookies via your web browser settings. As a result, they will no longer be active until you take an action which would trigger the cookies to be set again.

Privacy Policy <https://wordfence.com/privacy-policy/>

Host(s) members.symplact.org

Cookie Name wfwaf-authcookie-[hash], wf\_loginalerted\_[hash]

Cookie Expiry wfwaf-authcookie-[hash] expires after 24 Hours;  
wf\_loginalerted\_[hash] expires after 1 Year

## **Stripe**

Name Stripe

Provider Stripe Payments Europe, Ltd., C/O A & L Goodbody, International Financial Services Centre, North Wal

Info Personal data is processed to allow for the proper and secure function of payment transactions via Stripe. In order to process payments transactions, it is necessary for Stripe to collect information about the transaction and the customer. To help secure these transactions and minimize fraud, they collect additional information through the use of cookies and other technologies in helping to identify bad actors and prevent them from making fraudulent transactions.

When you make payments or conduct transactions on our website through Stripe, Stripe will receive your transaction information. The information that Stripe collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method. Different payment methods may require the collection of different categories of information. The payment method information that Stripe collect will depend upon the payment method that you choose to use from the list of available payment methods that are offered to you on our website. When you make a transaction, Stripe may also receive your name, email, billing or shipping address and in some cases your transaction history to authenticate you.

When Stripe conduct fraud monitoring, prevention, detection, and financial compliance activities on our website, Stripe will receive Personal Data from you (and your device) and about you through their Service and from us, Stripe cookies on our website, their business partners, financial service providers, identity verification services, and publicly available sources (e.g. name, address, phone number, country), as necessary to confirm your identity and prevent fraud. Stripe fraud monitoring, detection and prevention services may collect Personal Data about you and use technology to help them assess the risk associated with an attempted transaction by you with us.

"\_stripe\_mid" and "\_stripe\_sid" are both first-party cookies. "m" is a third-party cookie which is set by "m.stripe.com". These three cookies ("\_stripe\_mid", "\_stripe\_sid" and "m") are used for fraud prevention and detection. "\_stripe\_mid" has a 1 year expiry time. "\_stripe\_sid" has a 30 minute expiry time. "m" has a 2 year expiry time.

"wp\_woocommerce\_session\_" is a first party cookie which contains a unique code for each customer so that it knows where to find the cart data in the database for each customer (expiry time: 48 hours).

Personal data will be shared with Stripe, Inc. 510 Townsend Street, San Francisco, CA 94103, USA and Stripe Payments Europe, Ltd., C/O A & L Goodbody, International Financial Services Centre, North Wall Quay, Dublin D01 H104, Ireland (Stripe is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Stripe's subprocessors: <https://stripe.com/service-providers/legal>

SYMPLACT LTD has accepted the Stripe Data Processing Addendum.

Stripe has international data transfer compliance measures in place governing all of Stripe's global entities' processing of the personal data of EU individuals. These measures are based on the EU Standard Contractual Clauses (SCCs). Stripe's existing measures include the EU Commission's approved Standard Contractual Clauses (SCCs) to accommodate international data transfers. You can request a copy of any documentation showing the data transfer safeguards that have been taken by making a request to [applicant-privacy@stripe.com](mailto:applicant-privacy@stripe.com).

The legal basis for the processing of personal data through these cookies required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). Preventing and detecting fraud constitute legitimate interests (Recital 49 EU GDPR) which are not to be overridden by the interests, rights and freedoms of the individual (the data subject), as preventing and detecting fraud constitutes an interest that far outweighs the interest of not processing the data necessary to potentially prevent and detect fraud. Processing of (personal) data is necessary for fraud prevention and detection. These are strictly necessary cookies, as the website would not be able to provide basic functions of the website (secure payments/ e-billing) without them.

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

Stripe Payments Europe, Ltd. have offices at 1 Grand Canal Street Lower, Grand Canal Dock, Dublin D02 H210, Ireland.

You may at any time deactivate/remove the cookies via your web browser settings. As a result, they will no longer be active until you take an action which would trigger the cookies to be set again.

Privacy Policy <https://stripe.com/privacy>

Host(s) .members.symplact.org, m.stripe.com

Cookie Name wp\_woocommerce\_session\_HASH, \_stripe\_mid, \_stripe\_sid, m

## (Marketing) CartFlows

Name (Marketing) CartFlows

Provider SYMPLACT LTD

Info We use checkout forms built with the services of CartFlows, which use WooCommerce checkout forms and save the data from the checkout forms in the local storage feature of modern browsers, so if users accidentally refresh the page, the data users have typed in the form won't be lost. Furthermore, your email & cart are saved so we can send email reminders about your order.

"cartflows\_session\_" is a first-party cookie with a 30 minute expiry time.

"wcf\_ca\_skip\_track\_data" is a first-party session cookie which is set when you opt out of receiving email reminders about your order by clicking on "No Thanks" on the checkout page. It prevents your email and cart to be used for the sending of email reminders about orders placed by you when the cookie was active in your browser.

No personal data will be shared with CartFlows.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests).

Us saving the data from the checkout forms in the local storage feature of modern browsers, so if users accidentally refresh the page, the data users have typed in the form won't be lost, poses a great potential benefit for our customers in case they do accidentally refresh the page during checkout. It may also slightly increase our conversion rates for our direct marketing campaign. Furthermore, we save your email & cart for direct marketing purposes. Specifically, for sending email reminders about your order.

**If you do not want us to save your email & cart for sending email reminders about your cart contents on members.symplact.org, you have the option and right to object at any time to the processing of your personal data for such use as specified herein by simply deactivating/removing the "cartflows\_session\_" cookie via your web browser settings and by simply clicking on "No Thanks" next to the associated message on any checkout page on members.symplact.org to set a "wcf\_ca\_skip\_track\_data" cookie. As a result of deactivating/removing the "cartflows\_session\_" cookie and setting a "wcf\_ca\_skip\_track\_data" cookie, your personal data will no longer be processed by the "cartflows\_session\_" cookie until you again open a checkout page on members.symplact.org and thereby activate it. You may also at any time unsubscribe from receiving further email reminders about your current cart contents on members.symplact.org by simply clicking on the unsubscribe link at the bottom of such an email.**

**Furthermore, you have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

You may also at any time deactivate/remove the "wcf\_ca\_skip\_track\_data" cookie via your web browser settings. As a result, it will no longer be active until you again click on "No Thanks" next to the associated message on a checkout page on members.symplact.org.

Privacy Policy      <https://members.symplact.org/privacy-policy/>

Host(s)      members.symplact.org

Cookie Name cartflows\_session\_\*, wcf\_ca\_skip\_track\_data

### **(Marketing) Brevio**

Name (Marketing) Brevio

Provider      Sendinblue, 106 boulevard Haussmann, 75008 Paris, France

Info      We use Brevio (formerly Sendinblue) for our newsletters, as well as for other (email) communication (e.g. for the provision of our chatbox feature, for responding to chatbox requests, or for sending out emails via SMTP), for Customer Relationship Management, and for marketing automation features and tracking. The service provider is Sendinblue, a simplified joint stock company registered with the Paris Trade and Companies Register under number 498 019 298 and whose registered office is located at 106 boulevard Haussmann, 75008 Paris, France.

"sib\_cuid" is a first-party cookie with an expiry time of 13 months. It collects information on the user's website navigation, use and preferences. We target email campaigns based on this information.

"uuid" is a third-party cookie (set by sibautomation.com) with an expiry time of 13 months. It's an universally unique identifier and used to optimize email marketing campaign relevance by collecting visitor data from multiple websites such as what pages have been loaded.

"email\_id" is a first-party cookie with a 24 hour expiry time which stores your email address.

"session\_id" is a first-party cookie with a 24 hour expiry time.

We use these cookies to track user data. This user data is used by us for sending (automated) marketing campaigns. It allows us to (automatically) send emails to users who have visited specific pages on our website or have taken specific actions on the website.

When you subscribe to the SymplAct Newsletter or the Legal Updates email list, or when you create a user account when making a purchase from us, the "uuid" cookie will process

your email address and Brevo will save your email address as an identified email address in our contact list.

Brevo (cookies) may process the following types of your personal data: shop transaction data (such as which products you purchased and when), pages visited, other data on use of websites, IP address, email address, operating system, browser ID, date and time of email access, metrics related to the performance of services (and all data submitted via opt-in forms, e.g.: first name, email address).

Personal data will be shared with Sendinblue, headquartered at 106 boulevard Haussmann, 75008 Paris, France.

Brevo keep a public list of their sub-processors under section 3 of their terms and conditions (link: <https://www.brevo.com/legal/termsofuse/>).

SYMPLACT LTD has accepted the Brevo Data Processing Agreement as a means of meeting the adequacy and security requirements of the European Parliament and Council of the European Union's Data Protection Directive and the General Data Protection Regulation (GDPR).

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We use these Brevo services for direct marketing purposes.

**You have the right to at any time object to the processing of your personal data for such use as specified herein. Should you lodge an objection, we shall no longer process your personal data as specified herein. To object, simply visit our privacy policy page and uncheck the Brevo switch at the bottom of the page (so that it says "Off" next to it). Your objection will be stored in the Borlabs Cookie on your browser. If the Borlabs Cookie expires on your browser, you will have to submit your objection again.**

**If you do not want your personal data to be processed by the cookies "email\_id" and/or "session\_id", you have the additional option to deactivate/remove the cookies via your web browser settings. As a result, your personal data will no longer be processed by these cookies as specified herein until you take an action which would trigger the cookies to be set again.**

We also process the email addresses of our members in the Brevo software in order to send out required legal notices to our customers (e.g. about changes to our privacy policy or terms and conditions of service). We do this on the legal basis of Art. 6 para. 1 lit. c GDPR (compliance with a legal obligation).

Privacy Policy      <https://www.brevo.com/legal/privacypolicy/>

Host(s)      .members.symplact.org, sibautomation.com

Cookie Namesib\_cuid, uuid, email\_id, session\_id

### **(Marketing) Google Ads Conversion Tracking**

Name (Marketing) Google Ads Conversion Tracking

Provider Google

Info We use the online promotional program "Google Ads". In conjunction with Google Ads, we use "Conversion Tracking" provided by Google. If you click on an ad served by Google, first-party Conversion Tracking cookies ("\_gcl\_au", which contains a randomly generated user id; the conversion linker "\_gcl\_aw"; and "\_gac\_xxx") will be set. These cookies have an expiry time of 90 days and are not used to personally identify users. If you visit certain pages on this website and the cookie has not yet expired, both Google and we will be able to recognise that you have clicked on a specific ad, have visited the respective page(s), and have taken specific actions on the respective page(s) (e.g. any purchases made + product(s) purchased and purchase amount).

Different cookies are set for every Google Ads customer. These cookies cannot be tracked via websites of Google Ads customers. The information obtained using the conversion tracking cookies is used to generate conversion statistics for Google Ads advertisers who have opted to use conversion tracking (such as us, SYMPLACT LTD). As Google Ads advertisers, we are provided with information on the total number of users who clicked on any ad of ours and have afterwards visited any pages on our website which contained an active Conversion Tracking tag. We are also provided with information on the total number of users who have taken specific actions on those pages and further information regarding those actions (e.g. any purchases made + product(s) purchased and purchase amount). However, we do not receive any information that would allow us to personally identify you, the user.

Google Ads Conversion Tracking lets us identify how well our ad campaigns are generating leads, sales, downloads, email sign-ups, and other key actions for our business.

"test\_cookie" is a third-party cookie (hosted by doubleclick.net) which is sometimes set to check if a browser allows cookies to be set. It does not contain any identifiers and automatically expires after 15 minutes.

Google Ads Conversion Tracking (cookies) may process the following types of your personal data: pages visited, IP address, other data on use of the website.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's subprocessors:

<https://privacy.google.com/businesses/subprocessors/>

SYMPLACT LTD has accepted the Google Ads Data Processing Terms. As part of these Data Processing Terms, SYMPLACT LTD and Google have agreed on Google's Model Contract Clauses (Standard Contractual Clauses) for "the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection".

Here is a link to Google's Model Contractual Clauses:

<https://privacy.google.com/businesses/processorterms/mccs/>

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). Google Ads Conversion Tracking is a crucial tool to us, as it provides us with key analytics necessary for us to efficiently scale our direct marketing campaigns via Google Ads and thereby be able to compete with other advertisers on the platform (in terms of bidding on ads).

**If you do not wish to participate in Conversion Tracking, you have the option and right to object at any time to the processing of your personal data for such use as specified herein. To object, and prevent the recording and processing of your data by Google, simply download and install the "Google Analytics Opt-out Browser Add-on" available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.**

**You can also simply deactivate/remove the Conversion Tracking cookie via your web browser settings. As a result, your personal data will no longer be processed for Google Ads Conversion Tracking and your future actions will not be included in the Conversion Tracking statistics provided to us until you again click on an ad of ours which is served by Google Ads.**

To opt out from this processor across all domains, visit:

<https://safety.google/privacy/privacy-controls/>

Cookie Policy (Google): <https://policies.google.com/technologies/cookies>

Privacy Policy (Google): <https://policies.google.com/privacy>

Privacy Policy <https://policies.google.com/privacy>

Host(s) doubleclick.net

Cookie Expiry 90 days

### **(Marketing) Google Ads Remarketing**

Name (Marketing) Google Ads Remarketing

Provider Google

Info We use the online promotional program "Google Ads". In conjunction with Google Ads, we use "Remarketing" provided by Google. If you click on an ad served by Google, a Remarketing cookie will be set. These cookies have an expiry time of 90 days and are not used to personally identify users. If you visit certain pages on this website and the cookie has not yet expired, Google will be able to recognise that you have clicked on a specific ad, have visited the respective page(s), and have taken specific actions on the respective page(s) (e.g. any purchases made + product(s) purchased and purchase amount).

A different cookie is set for every Google Ads customer. These cookies cannot be tracked via websites of Google Ads customers. The information obtained using the remarketing cookie is used by Google to target our advertisements on the Google Ads Platform to users who have already visited our website up to a specific point in time in the past and have taken specific actions on our website.



"IDE" is a third-party cookie (hosted by doubleclick.net) which contains a randomly generated user id, through which Google can recognize a user across different domains and deliver personalized advertisements. This cookie is necessary for Remarketing and automatically expires after 1 year.

"test\_cookie" is a third-party cookie (hosted by doubleclick.net) which is sometimes set to check if a browser allows cookies to be set. It does not contain any identifiers and automatically expires after 15 minutes.

Google Ads Remarketing (cookies) may process the following types of your personal data: pages visited, IP address, duration of visit, other data on use of websites, content user is interested in.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's subprocessors:

<https://privacy.google.com/businesses/subprocessors/>

SYMPLACT LTD has accepted the Google Ads Data Processing Terms. As part of these Data Processing Terms, SYMPLACT LTD and Google have agreed on Google's Model Contract Clauses (Standard Contractual Clauses) for "the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection".

Here is a link to Google's Model Contractual Clauses:

<https://privacy.google.com/businesses/processorterms/mccs/>

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We use Google Ads Remarketing as a direct marketing tool.

**If you do not wish to participate in Remarketing, you have the option and right to object at any time to the processing of your personal data for such use as specified herein. To object, and prevent the recording and processing of your data by Google, simply download and install the "Google Analytics Opt-out Browser Add-on" available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.**

**You can also simply deactivate/remove the Remarketing cookie via your web browser settings. As a result, your personal data will no longer be processed for Google Ads Remarketing and your future actions will not be included in Google's Remarketing logic until you again click on an ad of ours which is served by Google Ads.**

To opt out from this processor across all domains, visit:

<https://safety.google/privacy/privacy-controls/>

To opt out from the automated collection of information by third-party ad networks (including Google Ads) for the purpose of delivering advertisements tailored to your interests, visit: <http://www.aboutads.info/choices/>

Cookie Policy (Google): <https://policies.google.com/technologies/cookies>

Privacy Policy (Google): <https://policies.google.com/privacy>

Privacy Policy <https://policies.google.com/privacy>

Cookie Expiry Up to 1 year

## Functional

We use functional cookies to enhance the functionality of the website.

### reCAPTCHA (+Google Web Fonts)

Name reCAPTCHA (+Google Web Fonts)

Provider Google

Info This is a service that checks whether data entered on a site is entered by a human or by an automated program.

Google reCAPTCHA (cookies) may process the following types of your personal data: IP address; click path; time spent on page; website visitor behaviour; browser language; user input; javascript objects; browser plug-ins; a complete snapshot of the user's browser window; number of mouse clicks/touches you've made on the screen; all cookies set by Google on your browser over the last 6 months; CSS information for the page; the date.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's subprocessors:

<https://privacy.google.com/businesses/subprocessors/>

SYMPLACT LTD has accepted the Google Ads Data Processing Terms. As part of these Data Processing Terms, SYMPLACT LTD and Google have agreed on Google's Model Contract Clauses (Standard Contractual Clauses) for "the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection".

Here is a link to Google's Model Contractual Clauses:

<https://privacy.google.com/businesses/processorterms/mccs/>

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. a GDPR (consent). You have the option to at any time revoke your consent to the processing of your data. Such a revocation shall not have any impact on the effectiveness of data processing transactions that occurred in the past.

Google reCAPTCHA uses Google Web Fonts to display text and fonts. By allowing the use of reCAPTCHA on the website, you also allow for Google Web Fonts to be loaded into your browser cache whenever you access pages on the website that use reCAPTCHA. To do this, the browser you use will have to establish a connection with Google's servers. As a result,

Google will learn that your IP address was used to access this website. Since you must have already given consent for the use of reCAPTCHA on the website for this to happen, considering that reCAPTCHA collects your IP address as well, this does not entail additional sharing of new data with Google.

To opt out from this processor across all domains, visit:

<https://safety.google/privacy/privacy-controls/>

Cookie Policy (Google): <https://policies.google.com/technologies/cookies>

Privacy Policy (Google): <https://policies.google.com/privacy>

Privacy Policy <https://policies.google.com/privacy>

Host(s) [fonts.gstatic.com](https://fonts.gstatic.com), [google.com](https://google.com), [www.google.com](https://www.google.com), [www.gstatic.com](https://www.gstatic.com)

Cookie Name [recaptcha-api](#)

Cookie Expiry Data will be deleted as soon as they are no longer needed for the processing purposes.

### **Coaching Appointments Time Zone Cookie**

Name Coaching Appointments Time Zone Cookie

Provider SYMPLACT LTD

Info "appointments\_time\_zone" is a first-party cookie which recognizes and stores the users time zone when they open the "Coaching Call" product page. This is done so that the user can schedule appointments for Coaching Calls with any times and dates displayed to them being adjusted for their time zone, and for the time and date of any made appointments to be displayed to them adjusted for their time zone. The user can also manually change their time zone. This cookie has a 1 month expiry time. The user data collected by this cookie is not shared with us and therefore not attributable to their user account by us or any third party until the user submits a Coaching Call purchase order. For this reason, any data collected by this cookie is not to be considered personal data until a Coaching Call purchase order is submitted by the user.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. b GDPR (contract). The provision of personal data as specified herein is a necessary to use our online store to make a Coaching Call purchase from us, and for the performance of a Coaching Call purchase contract.

If you do not wish for your personal data to be processed by this cookie as specified herein, you may simply not submit any purchase order for a Coaching Call. You may also at any time simply deactivate/remove the cookie via your web browser settings. As a result, your (personal) data will no longer be processed by the cookie until you again open the "Coaching Call" product page.

Privacy Policy <https://members.symplact.org/privacy-policy/>

Host(s) [members.symplact.org](https://members.symplact.org)

Cookie Nameappointments\_time\_zone

Cookie Expiry 1 Month

## Google Maps

Name Google Maps

Provider Google

Info Most Google users will have a preferences cookie called 'NID' in their browsers. A browser sends this cookie with requests to Google's sites. The NID cookie contains a unique ID Google uses to remember your preferences and other information.

Moreover, Google may process your IP address and any search terms and geolocation data (such as addresses or latitude/longitude coordinates) you may request or submit.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, D02 R296, Dublin 2, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's subprocessors:

<https://privacy.google.com/businesses/subprocessors/>

Here is another link to a page about subprocessors regarding the Google Cloud Platform (including Google Maps): <https://cloud.google.com/terms/subprocessors>

As part of the Google Maps Platform Terms of Service, SYMPLACT LTD and Google agree to the Google Maps Controller-Controller Data Protection Terms at "<https://cloud.google.com/maps-platform/terms/maps-controller-terms>". These include a binding agreement to the "Standard Contractual Clauses for the transfer of personal data from the Community to third countries (controller to controller transfers)" at "<https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>".

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. b GDPR (contract). The establishment of connections to third-party servers and the provision of personal data as specified herein is necessary for the performance of a Membership purchase contract (providing the customer with geolocation-related features).

To opt out from this processor across all domains, visit:

<https://safety.google/privacy/privacy-controls/>

Cookie Policy (Google): <https://policies.google.com/technologies/cookies>

Privacy Policy (Google): <https://policies.google.com/privacy>

Privacy Policy <https://policies.google.com/privacy?hl=en&gl=en>

Host(s) .google.com

Cookie NameNID

Cookie Expiry      6 Months

## **hCaptcha**

Name hCaptcha

Provider      Intuition Machines, Inc., a Delaware US Corporation (#6393793), 350 Alabama St, San Francisco, CA 94

Info      This is a service that checks whether data entered on a site is entered by a human or by an automated program.

HCaptcha may process the following types of your personal data:

- Information collected as a result of End-Users answering prompts through the Service ("Labeled Data"), such as image labeling data, text converted from audio files played to those End-Users, answers to questions, and other prompts generated by the Service for purposes of labeling data for use in machine learning applications. Note that Labeled Data is not tied to any identified individual.
- Other information collected from End-Users as part of the Service to that is required to determine whether they are human, such as IP address, how long the visitor has been on the website or app, mouse movements, scroll position, keypress events, touch events, and gyroscope / accelerometer information as applicable.
- HCaptcha may collect additional information from End-Users who wish to work with them as Individual Data Labelers.

Connections to the following third-party servers will be established:

- 1) "wasm"
- 2) "hcaptcha.com" and subdomains like "imgs.hcaptcha.com" and "assets.hcaptcha.com".

Information collected via technical means such as cookies, webpage counters and other analytics tools is discarded as soon as practical, but may be kept for a limited period of up to one year from expiry of the cookie, typically in a de-identified and aggregated form unless hCaptcha detect potential abuse of their service, in which case they will retain that information to aid them in preventing future abuse. They are unable to link this anonymized and aggregated information to you, your household, an IP address, or any personal information based on the information stored.

Personal data will be shared with Intuition Machines, Inc., a Delaware US Corporation (#6393793), 350 Alabama St, San Francisco, CA 94110, USA.

As part of the Data Processing Agreement (Data Processing Addendum) between SYMPLACT LTD and Intuition Machines, Inc., both parties have agreed to use the Standard Contractual Clauses in Exhibit B of the Data Processing Agreement (Data Processing Addendum) as the adequacy mechanism for the transfer and processing of personal data in the event the EU-US Privacy Shield Program is no longer considered a valid adequacy mechanism supporting such transfer and processing of personal data.

Here is a link to the Data Processing Agreement (Data Processing Addendum) between SYMPLACT LTD and Intuition Machines, Inc.:

"[https://assets.hcaptcha.com/dpa/5f1316cd98a06fb5d8ef4fee\\_IMI\\_DPA\\_7.18.2020\\_v1.pdf](https://assets.hcaptcha.com/dpa/5f1316cd98a06fb5d8ef4fee_IMI_DPA_7.18.2020_v1.pdf)".

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We have a legitimate interest in using the services provided by hCaptcha to protect our website against spam attacks. It is common practice for website operators to use third-party spam protection solutions for such purposes. It is necessary for the third-party service provider to process certain personal data from you in order for their solutions to function properly.

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

Privacy Policy      <https://www.hcaptcha.com/privacy>

Host(s)      assets.hcaptcha.com, hcaptcha.com, imgs.hcaptcha.com, wasm

Cookie Expiry      Data will be deleted as soon as they are no longer needed for the processing purposes.

## **Akismet**

Name      Akismet

Provider      Automattic Inc. ; and Aut O'Mattic A8C Ireland Ltd., 25 Herbert Pl, Dublin, D02 AY86, Ireland

Info      This site uses Akismet to reduce spam.

When Akismet is enabled on this site, only the personal data needed to carry out Akismet's core function of protecting us against spam is collected. For insights into which types of your personal data Akismet may process, please refer to their special Privacy Notice for visitors to their users' sites: <https://automattic.com/privacy-notice/>.

Akismet have short retention periods of between two weeks and ninety days for the vast majority of the spam-related data they collect, at which point it is automatically deleted from their databases. Anyone can opt-out of all long-term tracking for the very small subset of data they do keep longer by using their contact form:

"<https://akismet.com/contact/>".

Personal data will be shared with Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA, and Aut O'Mattic A8C Ireland Ltd., 25 Herbert Pl, Dublin, D02 AY86, Ireland. Automattic Inc. is also the controller for some of the processing activities related to Services provided by Aut O'Mattic A8C Ireland Ltd.

Here is a link to a page about Automattic Inc.'s subprocessors:

<https://automattic.com/subprocessor-list/>.

The data collected by Akismet is stored on servers located all over the world. This allows them to offer a service that is both fast and reliable. When they transfer data to the US and other countries outside of the EU, they do so under the Standard Contractual Clauses (SCCs), which have been upheld by the EU Court of Justice as a legal means of transferring data under the requirements of the GDPR.

SYMPLACT LTD and Automattic have agreed upon the Standard Contractual Clauses set forth in the Data Processing Agreement (Data Processing Addendum) between SYMPLACT LTD and Automattic.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We have a legitimate interest in using the services provided by Akismet to protect our website against spam attacks. It is common practice for website operators to use third-party spam protection solutions for such purposes. It is necessary for the third-party service provider to process certain personal data from you in order for their solutions to function properly. In GDPR terms, this is a "legitimate interest" use of that data.

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

Also read: <https://akismet.com/gdpr/>

Privacy Policy <https://automattic.com/privacy/>

Cookie Expiry Between two weeks and ninety days for the vast majority of the spam-related data. Data will be deleted as soon as they are no longer needed for the processing purposes.

## Media

These are solutions for hosting, processing and delivering video content.

### Vimeo

Name Vimeo

Provider Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA

Info We use Vimeo to host our videos. The browser you use will establish a connection with Vimeo's servers whenever you visit pages on our website in which Vimeo videos are

embedded. As a result, Vimeo will process personal data from you. To the best of our knowledge, no cookies related to this service will be set on your browser by our website.

Vimeo servers will process information about the pages you have visited on our website. If you are logged onto Vimeo as a member, then Vimeo will automatically assign this information to your personal user account. When you start watching a Vimeo-hosted video on our website, the corresponding information is also assigned to your user account. You can prevent the automatic assignment of this information by logging out of your Vimeo account and deleting its respective cookies before using our website.

Moreover, Vimeo collect your IP address, technical information about your browser type, your operating system and basic device information.

Personal data will be shared with Vimeo, Inc. (located in the United States).

According to section 14.2 of Vimeo's Privacy Policy, they are legally bound to comply with GDPR safeguards (Standard Contractual Clauses) where appropriate.

For reference:

"14.2 GDPR (EEA Users)

This Section 14.2 applies only to natural persons residing in the European Economic Area (for the purpose of this section only, "you" or "your" shall be limited accordingly). It is Vimeo's policy to comply with the EEA's General Data Protection Regulation (GDPR). In accordance with the GDPR, we may transfer your personal information from your home country to the U.S. (or other countries) based upon the following legal bases:

Legitimate business interests: We could not provide our services or comply with our legal obligations without transferring your personal information to the U.S.

Our use of Standard Contractual Clauses (also known as "Model Clauses") where appropriate." (source: <https://vimeo.com/privacy>).

Please refer to section 5 of Vimeo's Privacy Policy for information about Vimeo's subprocessors.

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). The use of YouTube is based on our interest in presenting our online content in an appealing manner. We use video as one of the primary methods for presenting information to the users of this website. It is common practice for website operators to use third-party video hosting and delivery solutions for such purposes. It is necessary for the third-party service provider to process certain personal data from you in order for their solutions to function properly (and for optimizing their services).

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the**



**processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

Privacy Policy <https://vimeo.com/privacy>

Host(s) f.vimeocdn.com, i.vimeocdn.com, player.vimeo.com

Cookie Namevuid

## **YouTube**

Name YouTube

Provider Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Info The browser you use will establish a connection with Google's servers whenever you visit pages on our website in which YouTube videos are embedded. As a result, Google will process personal data from you.

Google servers will process information about the pages you have visited on our website. If you are logged onto your Google or YouTube Account, then Google will automatically assign this information to your personal user account. When you start watching a YouTube-hosted video on our website, the corresponding information is also assigned to your user account. You can prevent the automatic assignment of this information by logging out of your Google or YouTube account and deleting its respective cookies before using our website.

Moreover, Google collect the Referrer URL, your IP address, technical information about your browser type, your operating system and basic device information.

Most Google users will have a preferences cookie called 'NID' in their browsers. A browser sends this cookie with requests to Google's sites. The NID cookie contains a unique ID Google uses to remember your preferences and other information.

We embed youtube videos using privacy-enhanced mode, which allows us to embed YouTube videos without using cookies to track viewing behaviour. This means that viewing activity isn't collected to personalise the viewing experience. Instead, video recommendations are contextual and related to the currently played video. Videos playing in a privacy-enhanced mode embedded player won't influence the viewer's browsing experience on YouTube.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's subprocessors:  
<https://privacy.google.com/businesses/subprocessors/>

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). The use of YouTube is based on our interest

in presenting our online content in an appealing manner. We use video as one of the primary methods for presenting information to the users of this website. It is common practice for website operators to use third-party video hosting and delivery solutions for such purposes. It is necessary for the third-party service provider to process certain personal data from you in order for their solutions to function properly (and for optimizing their services).

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.**

YouTube uses Google Web Fonts to display text and fonts. Google Web Fonts will be loaded into your browser cache whenever you access pages on the website that use YouTube. To do this, the browser you use will have to establish a connection with Google's servers. As a result, Google will learn that your IP address was used to access this website. Considering that YouTube collects your IP address as well, this does not entail additional sharing of new data with Google.

To opt out from this processor across all domains, visit:  
<https://safety.google/privacy/privacy-controls/>

Cookie Policy (Google): <https://policies.google.com/technologies/cookies>

Privacy Policy (Google): <https://policies.google.com/privacy>

Privacy Policy <https://policies.google.com/privacy>

Host(s) [google.com](https://www.google.com), [i.ytimg.com](https://i.ytimg.com), [s.ytimg.com](https://s.ytimg.com), [www.google.com](https://www.google.com), [www.youtube-nocookie.com](https://www.youtube-nocookie.com), [youtu.be](https://youtu.be), [youtube-nocookie.com](https://youtube-nocookie.com), [youtube.](https://youtube.com), [youtube.com](https://youtube.com), [yt3.ggpht.com](https://yt3.ggpht.com)

Cookie Name NID

Cookie Expiry 6 Months

## Statistics

Statistics cookies collect information anonymously. This information helps us to understand how our visitors use our website.

## Google Analytics

Name Google Analytics

Provider Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Info These cookies by Google are used for website analytics. They generate statistical data on how visitors use the website.

- "\_gid" is a first-party cookie with an expiry time of 24 hours. It registers a unique ID that is used to generate statistical data on how the visitor uses the website.

- "\_ga" is a first-party cookie with an expiry time of 2 years. It registers a unique ID that is used to generate statistical data on how the visitor uses the website.

- "\_gat\_gtag\_UA\_82866544\_3" is a first-party cookie with an expiry time of 1 minute. It is used by Google Analytics to throttle request rate, which means that it limits the collection of data on high traffic sites.

- "collect" is a first-party session cookie. It is used to send data to Google Analytics about the visitor's device and behavior. It tracks the visitor across devices and marketing channels.

Google Analytics (cookies) may process the following types of your personal data: IP-Address (with IP-Anonymization), unique ID (registered by "\_gid" and "\_ga"), Referrer URL; visited sub-pages; frequency and duration of sub-page visits.

We allow Google to use this data to collate and aggregate benchmarking data, which they provide to us, about similar websites in our industry. To do this, Google further anonymizes the analytics data by removing all identifiable information about our website. It also combines the data with hundreds of other anonymous sites in comparable industries.

Personal data will be shared with Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043 USA and Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland (Google is an international organization with locations in the USA, Ireland etc.).

Here is a link to a page about Google's subprocessors:

<https://privacy.google.com/businesses/subprocessors/>

SYMPLACT LTD has accepted the Google Ads Data Processing Terms. As part of these Data Processing Terms, SYMPLACT LTD and Google have agreed on Google's Model Contract Clauses (Standard Contractual Clauses) for "the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection".

Here is a link to Google's Model Contractual Clauses:

<https://privacy.google.com/businesses/processorterms/mccs/>

The legal basis for the processing of personal data required by Art. 6 para. 1 s. 1 GDPR is Art. 6 para. 1 lit. f GDPR (legitimate interests). We have a legitimate interest in the analysis of user patterns to optimize our services.

**You have the right to at any time lodge an objection to the processing of your personal data as specified herein on grounds relating to your particular situation.**

**Should you lodge an objection, we shall no longer process your personal data as specified herein unless we can demonstrate compelling legitimate grounds for the**

processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

**You have the option and right to object at any time to the processing of your personal data for such use as specified herein. To object, and prevent the recording and processing of your data by Google, simply download and install the "Google Analytics Opt-out Browser Add-on" available under the following link:  
<https://tools.google.com/dlpage/gaoptout?hl=en>.**

To opt out from this processor across all domains, visit:  
<https://safety.google/privacy/privacy-controls/>

Cookie Policy (Google): <https://policies.google.com/technologies/cookies>

Privacy Policy (Google): <https://policies.google.com/privacy>

Privacy Policy <https://policies.google.com/privacy>

Host(s) .members.symplact.org, .symplact.org, members.symplact.org, symplact.org

Cookie Name \_gid, \_ga, \_gat\_gtag\_UA\_82866544\_3, collect

### **CartFlows Funnel Builder**

Name CartFlows Funnel Builder

Provider SYMPLACT LTD

Info CartFlows provide us with an analytics feature so we can see how our Flows are working and improve accordingly. According to CartFlows "This does not track any personal data of website visitors." (source: <https://cartflows.com/docs/gdpr-compliance/>). The analytics feature gives us insights on the following data: Total visits per flow step, unique visits per flow step, conversions per flow step, conversion rate per flow step, revenue per flow step, gross sale, average order value, bump offer revenue.

"wcf-step-visited-" and "wcf-visited-flow-" both have a 1 year expiry time.

These are first-party cookies.

You may at any time deactivate/remove the cookies via your web browser settings. As a result, they will no longer be active until you again open a CartFlows Flow page on members.symplact.org.

Privacy Policy <https://members.symplact.org/privacy-policy/>

Host(s) members.symplact.org

Cookie Name wcf-step-visited-\*, wcf-visited-flow-\*

Cookie Expiry 1 Year

Please visit the specific website's privacy policy page to find the privacy settings regarding data processing for marketing purposes for that website.

**Last updated on July 10, 2023.**