Privacy & Cookies

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1. General information

a) Operator

Provider, operator and person responsible for the Internet pages of *"Exportpages"* (e.g. at <u>www.exportpages.com</u>) as well as the Internet pages of *"Exportpages"* in social networks (www.facebook.com/Exportpages, and twitter.com/exportpages.com) -together also referred to as *"Exportpages Web Offerings"* - are - as stated in the imprint - Exportpages International GmbH with its registered office at Becker-Göring-Straße 15, D-76307 Karlsbad, Germany, Fon: +49 7248 9179-0, Fax: +49 7248 9179-50, Mail: service@exportpages.com, Internet: www. exportpages.com, registered in the Commercial Register of the Mannheim District Court under HR B 706489. The operator is active in the business areas of marketing and Internet services such as procurement, research, acquisition of new customers for international companies, provider services and the sale of advertisements and the marketing of Internet portals. This "Data Protection Declaration" - hereinafter also referred to as the "Declaration" - (available at: <u>www.exportpages.com/privacy"</u>) applies to the use of the Operator's website, which can be accessed worldwide.

b) Purpose of the declaration

The Operator respects the privacy of its customers and that of the visitors or users of its Internet offer - hereinafter collectively referred to as Users - as well as the right to appropriate control of personal data. With this declaration, the Operator provides transparent information about which data is collected from Users, for what purpose and on what legal basis. The Operator protects the data of its Users as if they were the Operator's own data.

c) Definition

<u>Personal data</u> is any information relating to an identified or identifiable natural person (data subject). Customer data is just as much part of personal data as personal data of employees. For example, the name of a contact person can be used to identify a natural person, as can his or her e-mail address. It is sufficient if the respective information is linked to the name of the data subject or can be established independently of this from the context. Similarly, a person can be identifiable if the information must first be linked to additional knowledge, e.g. in the case of car registration numbers. The origin of the information is irrelevant for a personal reference. Photos, video or sound recordings can also represent personal data.

<u>Specific types of personal data</u> include information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership, genetic data, biometric data, health data or data concerning the sex life or sexual orientation of a natural person. Processing is any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

<u>Restriction of processing</u> is the marking of stored personal data with a view to limiting their processing in the future.

<u>Profiling</u> means any automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular with a view to analysing or predicting aspects relating to the performance of work, the economic situation, health, personal preferences, interests, reliability, conduct, whereabouts or movements of that natural person.

<u>Pseudonymisation</u> is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without additional information, provided that this additional information is kept separately and is subject to technical and organisational measures which ensure that the personal data is not attributed to an identified or identifiable natural person.

<u>Responsible</u> person is the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

<u>Processor</u> is the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

<u>The recipient</u> is any natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not that person is a third party.

<u>A third party</u> is a natural or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or the processor, are authorised to process the personal data.

<u>Consent</u> by the data subject means any voluntary, informed and unequivocal expression of will in the specific case, in the form of a statement or other unequivocal affirmative act by which the data subject signifies his or her consent to the processing of personal data relating to him or her.

d) Subject of the declaration

Within the framework of the legal information obligations, this declaration provides information about which personal data is collected either directly or indirectly from users via the latter and how it is used. This declaration also indicates which decisions users can make about the data collected by the operator and how these decisions are influenced. The declaration applies to all products and services of the Operator - hereinafter referred to as "product(s)". In addition, it applies to all top-level domains owned by the Operator as well as other interactions outside the Internet, e.g. in personal or telephone conversations with the sales or support of the Operator. This declaration also provides information about when personal data is provided by customers and how the operator uses the personal data provided by users.

e) Declaration of consent by the user in accordance with Art. 6 (1), sentence 1 letter a) GDPR

By actively and voluntarily using the operator's website and its products or services, the user expressly agrees that the personal data provided by him/her may be used as specified and described in this declaration.

If personal data is processed without the express consent of the person concerned but in accordance with Art. 6 (1), sentence 1 letter f) GDPR, our legitimate interest follows from the purposes described in more detail below. In none of these cases does the operator use the collected data for the purpose of drawing conclusions about your person.

f) Structure of the declaration

The following data protection-related issues will be addressed in particular: Responsible under Art. 4 (7) of the EU General Data Protection Regulation - hereinafter referred to as the GDPR -, data protection officer, collection and use of personal data, transfer and disclosure, access to and control of personal data, use of cookies and other technologies, in particular analysis technologies, social media plug-ins used, data security, data subjects' rights and other important information on data protection.

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2. The name and contact details of the controller and the company data protection officer

This privacy policy applies to the data processing by:

<u>Responsible</u>: Exportpages International GmbH, headquartered at Becker-Göring-Straße 15, D-76307 Karlsbad, Germany, Fon: +49 7248 917923, Fax: +49 7248 9179-50, legally represented by the Managing Director Michael Gossenberger, Becker-Göring-Straße 15, D-76307 Karlsbad, Germany, <u>gossenberger@exportpages.com</u>, Internet: <u>www.exportpages.com</u>, registered in the commercial register of the district court of Mannheim under HRB 706489 - hereinafter also referred to as Exportpages or Operator.

A company data protection officer has not yet been appointed at Exportpages, as the operator has fewer than 10 persons responsible for processing personal data. All questions in connection with data protection should therefore be addressed to the management, Mr. Michael Gossenberger, at the e-mail address: gossenberger@exportpages.com.

3. General information on the collection and storage of personal data and the nature and purpose of their use

If users wish to obtain information about the Operator itself or the dealer and/or product information stored on its websites, they may visit an Operator website or contact the Operator personally or by telephone. This is usually done by surfing an operator's website using an internet browser, by making a telephone call to a sales representative or by visiting a trade fair stand where the operator presents itself and its services.

a) Visiting our Internet pages

When you call up our website www.exportpages.com and all other international TOP-level domains maintained by us, information is automatically sent to the delivering server of our website by the Internet browser used on your terminal device. This information is temporarily stored in a so-called log file. The following information is recorded without your intervention and stored until it is automatically deleted.

<u>Recorded data</u>: IP address of the requesting computer, date and time of access, time zone difference to Greenwich Mean Time (GMT), name and URL of the retrieved file or Content of the request (concrete page), access status/HTTP status code, access status/HTTP status code, amount of data transferred in each case, website from which access is made (referrer URL), browser used, operating system and its interface of your computer, language and version of the browser software, if applicable the name of your access provider and information passed on by cookies or comparable technologies.

<u>Purpose of collection</u>: The aforementioned data is processed by us for the following purposes: a) to ensure a smooth connection to our Internet pages, b) to ensure convenient use of our Internet pages, c) to evaluate system security and stability and d) for other administrative purposes.

<u>Legal basis for data processing</u>: The legal basis for data processing is Art. 6 (1), sentence 1 letter f) GDPR.

b) Personal contact

For questions of any kind we offer you the possibility to contact us personally.

<u>Recorded data</u>: Your first and last name, telephone, fax and e-mail address. Further information can be provided voluntarily, but is not required for communication purposes.

<u>Purpose of collection</u>: The collection of data is necessary so that we know who the enquiry comes from and can respond to it.

<u>Legal basis for data processing</u>: Data processing for the purpose of contacting us is carried out in accordance with Art. 6 (1), sentence 1 letter a) GDPR on the basis of your voluntarily given consent. The personal data collected by us for establishing contact will be automatically and immediately deleted once the request you have made has been dealt with.

c) Newsletter

With your consent, you can subscribe to our newsletter, with which we inform you about our current offers and novelties. The goods and services advertised are specifically named in the declaration of consent. We use the so-called Double-opt-in (DOI) procedure to subscribe to our newsletter. This means that after your registration, we will send you an e-mail to the e-mail address you have provided, in which we ask you to confirm that you wish to receive our newsletter. If you do not confirm your registration within 24 hours, the information you have provided us with will be blocked and automatically deleted after one month.

Preparation and dispatch of our newsletter is carried out by the third party provider *"mailchimp"* (<u>https://mailchimp.com</u>) based in the USA (third country). The provider *"mailchimp"* is certified as a service under the EU/Switzerland-US-Privacy-Shield. In order to guarantee the strict European data protection law, we have concluded an agreement with the provider *"mailchimp"* on the contract data agreement in accordance with the legal requirements. Your consent also includes the use of the service *"mailchimp"* to receive our newsletter. Furthermore you agree with your consent that the success and popularity of our newsletter will be measured and statistically evaluated.

Your e-mail address is the only mandatory information for the sending of the newsletter. The provision of further, separately marked data is voluntary and is used to address you personally. After your confirmation we will save your e-mail address for the purpose of sending you the newsletter. You can revoke your consent to the sending of the newsletter at any time and unsubscribe from the newsletter. You can revoke your consent by clicking on the link provided in each newsletter e-mail, by sending an e-mail to newsletter@exportpages.de or by sending a message to the contact details given in the imprint.

<u>Recorded data</u>: IP address of the inquiring computer, date and time of access as well as time of registration and confirmation and the e-mail address you provided to receive our newsletter. In addition, we store the content of your confirmation e-mail to prove that you have given your consent to receive our newsletter. Finally, we measure whether you have opened our newsletter and clicked on any links contained therein.

<u>Purpose of collection</u>: The purpose of data collection is to verify your registration to our newsletter and, if necessary, to be able to clarify any misuse of your personal data. We need your e-mail address to send our newsletter. The statistical evaluation of success serves to optimise and adapt our newsletter to the needs and interests of our subscribers. <u>Legal basis for data processing</u>: The legal basis for data processing for the purpose of using our newsletter service is Art. 6 (1), sentence 1 letter a) GDPR on the basis of your voluntarily given consent. The personal data collected by us will be automatically deleted when you cancel your newsletter subscription. The success of our newsletter is measured on the basis of Art. 6 (1), sentence 1 letter f) GDPR.

4. Specials of collection and storage of personal data and the nature and purpose of their use

a) Use of the operator's services

If (possibly after a visit to our website) the decision has been made to use the services of the operator free of charge or for a fee, e.g. an insertion order, a contractual relationship may be established between the operator and its users regarding the details of the service and consideration of the operator and its users. In connection with the intended conclusion of the contract, the User is asked to provide the Operator with general information and other personal data so that the Operator can conclude and execute the contractual relationship.

<u>Recorded data</u>: VFirst name and surname, company, legal representative, country, type of company, export region, certifications, company size by employees, year of foundation, product descriptions and pictures, homepage, telephone number, fax number, e-mail address, billing and delivery address, sales tax identification number and payment information.

<u>Purpose of collection</u>: The Operator uses personal data in order to conclude and execute the contract, provide support, receive or forward notices of defects and to solve other problems related to the operation of the Operator's Internet services.

<u>Note</u>: The operator only processes payment or credit card information for the purpose of processing payments for chargeable services

<u>Legal basis for data processing</u>: The legal basis for the processing of personal data is Article 6 (1), sentence 1 letter b) GDPR.

b) Support and sales assistance

It may be necessary for users to contact the operator's customer service or sales department to request assistance in using the operator's products or to clarify or modify contractual matters. In order to offer customers the best possible service, the Operator may collect data from users and/or on the product used.

<u>Recorded data</u>: Contact details such as first and last name, company, e-mail address, telephone number, fax number, social media data (if the Customer contacts the Operator via a social media channel), customer number, invoice number, VAT number and the content of the conversations and other communications with the Operator's customer service and sales (including voice recordings if the Customer calls the customer service or sales department). In certain cases it may be helpful for customer service and sales to have access to diagnostic data of a customer account. This is a memory dump of everything that has taken place in a customer account and resulted in an incident, including information such as product configuration, access data, router information, error codes, device information such as the operating system used, the version of the software used, etc.

<u>Purpose of collection</u>: The operator collects this information in order to provide the customer with the best and most efficient support.

<u>Legal basis for data processing</u>: The legal basis for the processing of personal data is Article 6 (1), sentence 1 letter b) GDPR.

c) Information obtained by the operator from third parties

The Operator ensures the protection of data received from third parties in accordance with the practices described in this statement, while observing any additional restrictions imposed on the Operator by the relevant data source. These third party sources may vary from time to time, but are inclusive:

<u>Recorded data</u>: Providers of company information, providers of product information, partner companies with whom the operator carries out joint marketing activities.

<u>Purpose of collection</u>: The operator collects this information in order to check the creditworthiness of his customers, to be able to perform his services and, if necessary, to carry out advertising measures.

<u>Legal basis for data processing</u>: The legal basis for the processing of personal data is Art. 6 (1), sentence 1 letter b) and f) GDPR.

5. How the operator uses personal data

The Operator uses collected data in order to provide or operate the products and services offered and to carry out basic business activities, including the use of data for administrative management and improvement and personalisation of manufacturer and product information of its users and the user experience. In addition, the Operator uses this data to communicate with its Users, i.e. to inform Users, for example via their account, about new products, security matters and other novelties.

a) Providing product experience

The operator uses the data provided to provide and improve the products it offers and to carry out basic business activities. This includes operating and editing the products and accounts, maintaining and improving the performance of the products, including the development of new features, research and the provision of support services.

<u>Legal basis of the data processing</u>: The legal basis for the processing of personal data is Article 6 (1), sentence 1 letter b) and f) GDPR.

b) Customer support

The Operator uses data to diagnose product problems, update, maintain, repair, restore customer accounts and provide other customer service and support.

<u>Legal basis of the data processing</u>: The legal basis for the processing of personal data is Art. 6 (1), sentence 1 letter b) and f) GDPR.

c) Product improvements

The Operator uses data to continuously optimise its products and services, including the addition of new features or capabilities, such as the use of error messages to increase the level of security, the consideration of search queries and clicks to improve the relevance of search results, and the use of usage data to determine new features to be prioritised.

<u>Legal basis for data processing</u>: The legal basis for the processing of personal data is Art. 6 (1), sentence 1 letter b) and f) GDPR.

d) Security and dispute settlement

The operator uses data to ensure the safety of its products and customers, to detect and prevent fraud, to settle disputes and to enforce its agreements.

<u>Legal basis of the data processing</u>: The legal basis for the processing of personal data is Art. 6 (1), sentence 1 letter b), c) and f) GDPR.

e) Business activities

The Operator uses data to develop overall analyses and business intelligence strategies that enable the Operator to maintain its business operations, take protective measures, make informed decisions and provide information about its business performance. In addition, we receive personal data when users send us enquiries.

Data collected: Salutation, first and last name, company name, position with the visitor/user of our offer, e-mail address, subject of enquiry (offer).

<u>Purpose of the collection</u>: Core component of the offered service and proof of performance towards customers.

<u>Legal basis of the data processing</u>: The legal basis for the processing of personal data is Art. 6 (1), sentence 1 letter b) and f) GDPR.

f) Communication, marketing and advertising

The Operator uses the data collected by him to compose and personalise messages for Users. For example, Operator contacts Users by e-mail or other electronic means of communication to inform them about new products or services, new security or software updates available in the User's region, to assist Users in support matters or to invite them to take part in a survey.

<u>Legal basis of the data processing</u>: The legal basis for the processing of personal data is Art. 6 (1), sentence 1 letter b) and f) GDPR.

6. Transmission and disclosure of personal data

Your personal data will not be transferred to third parties for purposes other than those listed below. We only pass on your personal data to third parties if

- you have given your express consent to do so in accordance with Art. 6 (1) sentence 1 letter a) GDPR,

- the disclosure pursuant to Art. 6 (1) sentence 1 letter f) GDPR is necessary for the assertion, exercise or defence of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,

- in the event that there is a legal obligation to pass on the information in accordance with Art. 6 (1), sentence 1 letter c) GDPR, as well as in cases where this is legally permissible and necessary for the

processing of contractual relationships with you in accordance with Art. 6 (1), sentence 1 letter b) GDPR.

The operator only discloses data for the purposes authorised in accordance with this declaration. Under certain circumstances, the operator may pass on the data to the following categories of third parties as described below.

a) Disclosure of personal data

- <u>Third party supplier</u>: The Operator hires a number of service providers to provide its services on its own behalf; these include website programming, website administration and hosting, credit card processing. The Operator passes on personal data of Users to service providers in order to process transactions or provide products on behalf of the Operator for the purposes described in this declaration, which Users have expressly requested or authorised. In such cases, personal data is released to the respective service providers, but only for the purpose of providing services on behalf of Operator and in accordance with this Privacy Policy. Strict compliance with existing data protection regulations is guaranteed in all cases of the transfer of personal data of users to third parties via agreements on data protection-compliant commissioned data processing

- <u>Other parties</u>: Disclosure is also made to parties where the Operator deems it necessary because he can reasonably assume that disclosure is required by law or in connection with legal proceedings; to protect the Operator or his customers from harm; to prevent and detect criminal offences or to assist in the arrest or prosecution of offenders; to ensure the safety of the Operator's products or to protect the rights or property of the Operator.

- <u>Others</u>: This includes parties who need such data to process financial transactions.

Note: The contents of the Operator's Internet offer may contain links to products and services of third parties, whose data protection guidelines may differ from the Operator's standards. If users of the Operator's Internet pages provide personal data to these third parties or their goods or services, these data will be handled in accordance with their privacy policy.

<u>Legal basis of the data processing</u>: The legal basis for the processing of your personal data is Art. 6 (1), sentence 1 letter b) and f) GDPR.

b) Sharing of personal data

The operator does not offer personal data of its users to third parties for use, either now or in the future, either against payment or free of charge.

7. Access to and control of personal data

Users can view the personal data collected about them by the operator on request by sending an email to <u>gossenberger@exportpages.com</u> or request, complete, change, correct or delete them.

8. Use of cookies and comparable technologies

The Operator uses cookies and similar technologies and, if necessary, additional identifiers to personalise its web pages for clients and users, in particular to remember their preferences, to understand the way clients and users use the web pages and, if necessary, to optimise, adapt, change or extend its services.

a) Cookies

Cookies are small files that are automatically created by your browser and stored on your device (laptop, tablet, smartphone or similar) when you visit our website. Cookies do not cause any damage on your terminal device, do not contain viruses, Trojans or other malware. Information is stored in a cookie that is related to the specific terminal device used. This does not mean, however, that we obtain direct knowledge of your identity. The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted after leaving our website. In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your end device for a certain fixed period of time. If you visit our website again in order to use our services, we will automatically recognise that you have already visited us and which entries and settings you have made so that you do not have to enter them again. On the other hand, we use cookies to record the use of our website statistically and to evaluate it for the purpose of optimising our offer for you (see item 9). These cookies enable us to automatically recognise that you have already visited our website when you return. These cookies are automatically deleted after a defined period of time. How long a cookie remains on a computer or mobile device depends on whether it is a "*Permanent Cookie*" or a "*Session Cookie*". The operator uses both types of cookies. Persistent cookies remain on the computer or mobile device of the customer or visitor until they expire or are deleted. Session cookies are deleted after closing the browser. The operator specifically uses the following cookies on its internet pages:

- *Mandatory cookies*: These cookies are mandatory for visiting the Operator's website and using the functions listed there. Without such cookies, services such as the "watch list" cannot be provided.

- <u>Performance cookies</u>: These cookies collect information about user behaviour on the Operator's Internet pages. This data is used, among other things, to optimise the Internet pages and to make navigation as easy as possible for the customer or visitor.

- <u>Functional cookies</u>: These cookies allow the operator's internet pages to remember the customer's or visitor's settings and to personalise their user experience. For example, the operator may save the geographical location of the customer or visitor in a cookie in order to show the customer or visitor the appropriate website for his region in the appropriate language.

- <u>Third party cookies</u>: These cookies are placed by websites and/or parties external to the Operator. These cookies may be used on the Operator's websites to improve or supplement the Operator's products and services or to provide more relevant advertising material. These cookies are subject to the data protection guidelines applicable to these external services, such as the <u>data protection</u> <u>information of facebook</u> Inc. etc.

- <u>Analytical cookies</u>: The operator uses analytical cookies such as those from Google Analytics to obtain information on how much time visitors spend on the operator's website, which pages they find most useful and how they landed on www.exportpages.*. Further information about Google Analytics and the data collected about the customer or visitor can be found on the Google website. <u>Google-Website</u>.

<u>Legal basis of data processing</u>: The data processed by, <u>Mandatory cookies</u>", <u>"Performance cookies</u>" und <u>"Functional cookies</u>" are required for the purposes mentioned above to safeguard our legitimate interests and the interests of third parties in accordance with Art. 6 (1), sentence 1 letter f) GDPR and may be collected by us without your consent in accordance with the statutory provisions. We collect the data processed by all other cookies on the basis of your express consent in accordance with Art. 6 (1), sentence 1 letter a) GDPR. When you first visit our Internet pages, you will receive more detailed

information on all types of cookies used by us and have the option (opt-in) of agreeing to the use of individual or all other cookies, or of refusing your consent (*"Cookie-Consent"*). Our system will remember your decision for a period of one month by placing an opt-out cookie on your device. After one month you will be informed again about all cookies used by us, including newly added or removed cookies, and asked for your explicit consent.

b) Check cookie settings

Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or so that a message always appears before a new cookie is created. However, disabling cookies completely may mean that you will not be able to use all the features of our website.

9. Social-Media-Plugins

The Operator does not currently use social media plug-ins from third parties to personalise or improve its Internet presence for users or to make its services better known through advertising measures. On our pages there are only external references (hyperlinks) to the services, in particular social networks of third parties, namely *facebook* and *Twitter*. We do not collect any personal data when using these links.

10. Analysis-Tools

With the tracking measures we use, we want to ensure that our website is designed to meet the needs of our customers and is continuously optimised. On the other hand, we use the tracking measure to record the use of our website statistically and to evaluate it for the purpose of optimising our offer for you. These interests are to be regarded as justified in the sense of the aforementioned regulation. The respective data processing purposes and data categories can be taken from the corresponding tracking tools:

a) Google-Analytics

For the purpose of designing and continuously optimising our Internet pages to meet your needs, we use *Google Analytics*, a web analysis service of Google Inc. (https://www.google.de/intl/de/about), 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States (hereinafter also referred to as Google). In this context, pseudonymised user profiles are created and so-called *Cookies* (for an explanation of the term *Cookie* see above) are used. The information generated by the cookie about your use of our website, such as your browser type/version, the operating system used, referrer URL (the previously visited page), host name of the accessing computer (IP address) and the time of the server enquiry is generally transferred to a *Google* server in the USA, where it is stored and evaluated. The information is used to evaluate the use of our website, to compile reports on website activities and to provide further services associated with the use of the website and the Internet for the purposes of market research and the design of these websites to meet the needs of the market. This information may also be transferred to third parties where required by law or where third parties process this data on our behalf. Under no circumstances will your IP address be merged with other Google data.

By activating IP anonymisation on our website (IP-Masking: Code "g_anonymizelp();") the data transmitted to Google within member states of the European Union or in other states party to the Agreement on the European Economic Area are shortened before being processed by Google. Only in exceptional cases will your complete IP address be transferred to a *Google* iserver in the USA and then shortened there before your personal data is further processed there as part of a commissioned

data processing agreed with Google. For the exceptional cases in which personal data is transferred to the USA, Google has subjected itself to the EU-US Privacy-Shield, <u>https://www.privacyshield.gov/EU-US-Framework</u>.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website. You can also prevent the collection of data generated by the cookie and related to your use of our website (including your IP address) to *Google* and the processing of this data by *Google* by downloading and installing a browser add-on (<u>https://tools.google.com/dlpage/gaoptout?hl=de</u>). In doing so, an opt-out cookie is stored on your device. If you delete your cookies afterwards, you will have to click on this link again. You can find more detailed information on this at:

https://support.google.com/analytics/answer/181881?hl=en and at:

<u>"https://policies.google.com/privacy?hl=en&gl=en"</u> (general information on *Google Analytics* and data protection at *Google*).

Further information on data protection in connection with *Google Analytics* can be found in the Google Analytics help (<u>https://support.google.com/analytics/answer/6004245?hl=de</u>).

<u>Collected data</u>: IP address of the requesting computer, date and time of access, time zone difference to Greenwich Mean Time (GMT), name and URL of the retrieved file or content of the request (specific page), access status/HTTP status code, amount of data transferred in each case, website from which access is made (referrer URL), browser used, operating system and its interface on your computer, language and version of the browser software, if applicable the name of your access provider.

<u>Purpose of collection</u>: The operator collects this information in order to statistically record the use of his Internet pages and for the purpose of optimization by way of a thematic evaluation of the accesses, in order to enable a design of the Internet pages that meets the needs.

<u>Legal basis of the data processing</u>: The legal basis for the use of Google Analytics is Art. 6 (1), sentence 1 letter f) GDPR.

b) Own analysis tools

In order to record the use of our website statistically and for the purpose of optimizing our Internet presence by means of evaluation as well as for performance verification, we also use self-developed analysis tools and cookies (see above) to record performance and range. The cookie we set loses its validity after 30 days and does not serve for personal identification. The following data is collected in a pseudo-anonymized form:

<u>Collected data</u>: IP address, date and time of the request, number of clicks on web pages of the Operator's customers, number of clicks on products of the Operator's customers, number of clicks on company profiles of the Operator's customers, number of clicks on news of the Operator's customers, number of clicks on partner searches of the Operator's customers, number of clicks on all offers of all the Operator's customers

<u>Purpose of collection</u>: The operator collects this information in order to statistically record the use of his Internet pages, for the purpose of optimizing his Internet pages by way of evaluation as well as for the performance record for his users.

<u>Legal basis of the data processing</u>: The legal basis for the use of own analysis tools is Art. 6 (1), sentence 1 letter f) GDPR.

11. Data security

The operator has committed itself to the protection of all your data and in particular your personal data. To this purpose, the operator uses a variety of security technologies and procedures to protect your data, especially your personal data, against alteration, loss, destruction, unauthorized access, unauthorized use or unauthorized disclosure. For example, data provided by you, in particular your personal data, is stored on computer systems with limited access that are located in controlled facilities in Germany. Your personal data will not be transferred abroad, with the exception of the cases expressly mentioned in this declaration. We use suitable technical and organizational security measures to protect your data against accidental or deliberate manipulation, partial or complete loss, destruction or unauthorized access by third parties. Our security measures are continuously improved in accordance with technological development. For example, the operator also ensures that service providers commissioned by us also carry out appropriate security measures in accordance with the state of the art in the context of data protection-compliant order data processing in data centers, as do all other service providers employed by us.

When data is transmitted over the Internet, it is protected by state-of-the-art encryption technology. In addition, customer and visitor data is protected during transmission over the Internet by encryption technologies such as Secure Socket Layer (SSL) or Transport Layer Security (TLS) in conjunction with the highest level of encryption supported by your browser. Typically, this is 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. You can tell whether a single page of our website or our service offering is encrypted and transmitted by the closed display of the key or lock symbol in the lower status bar of your browser.

In addition, an account password is stored using a one-way hash function, which means that it cannot be recovered (or revealed, but only reset) by anyone, not even by the operator himself. Although the Operator takes reasonable measures to protect personal information that it knowingly collects directly from customers and visitors, it should be noted that no security system is infallible.

Users are granted access to their account data and the services of the operator exclusively on the basis of their user name and password. In order to maintain the confidentiality of the customers' personal data, they are obliged to keep their password secret and not to disclose it to third parties. Registered customers, who have reason to believe that their password has been misused, are obliged to report this to the operator immediately. Registered customers must also ensure that they always log out of the system using the logout function and close the Internet browser used during their stay in the operator's system when a session is terminated.

Note: The operator will never ask customers for a password in an unannounced telephone call or unsolicited e-mail.

12. Affected parties rights

a) Your rights

You have the right,

- to request information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you may request information on the purposes of the processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned duration of storage, the existence of a right of rectification, cancellation, restriction, opposition or opposition to the processing of your data; the existence of a right of objection, the existence of a right of appeal, the origin of your data, if not collected by us, the existence of automated decision making, including profiling and, where applicable, the provision of relevant details. There is no right to information if the provision of the requested information would violate the obligation of secrecy pursuant to Section 83 StBerG or if the information must be kept secret for other reasons, in particular because of an overriding legitimate interest of a third party. Deviating from this, there may be an obligation to provide the information, especially if your interests outweigh the interest in secrecy, taking into account impending damages. The right to information is further excluded if the data is only stored because it cannot be deleted due to legal or statutory retention periods or if it is used exclusively for the purposes of data backup or data protection control, provided that the provision of information would require disproportionately high effort and expense and the processing for other purposes is excluded by suitable technical and organizational measures. If in your case the right to information is not excluded and your personal data are processed by us, you can request information about the following information:

- a. Purpose of processing,
- b. Categories of your processed personal data,
- c. Recipients or categories of recipients to whom your personal data is disclosed, especially if the recipients are located in third countries,
- d. if possible, the planned duration for which your personal data will be stored or, if this is not possible, the criteria for determining the storage period
- e. the existence of a right of rectification or of opposition or restriction to the processing of personal data concerning you or a right to object to such processing,
- f. the existence of a right of appeal to a supervisory authority for data protection,
- g. if the personal data has not been collected from you as a data subject, the available information about the origin of the data,
- h. where applicable, the existence of automated decision making, including profiling and meaningful information about the logic involved and the scope and intended impact of automated decision finding,
- i. if necessary, in the case of transfer to recipients in third countries, unless the EU Commission has decided on the adequacy of the level of protection pursuant to Art. 45 (3) GDPR, information on the appropriate guarantees provided for the protection of personal data pursuant to Art. 46 (2) GDPR.

- in accordance with Art. 16 GDPR, you are entitled to demand the immediate correction of incorrect or incomplete personal data stored by us;

- in accordance with Art. 17 GDPR to demand the deletion ("Right to be forgotten") your personal data stored by us, unless the processing is necessary to exercise the right to freedom of opinion and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims, and unless one of the following reasons applies

- a. The personal data are no longer necessary for the purposes for which they were processed.
- b. The justification for the processing was exclusively your consent, which you have revoked.
- c. You have lodged an objection to the processing of your personal data, which we have made public.
- d. You have lodged an objection to the processing of personal data not made public by us and there are no overriding legitimate reasons for the processing.
- e. Your personal data has been processed illegally.
- f. The deletion of personal data is necessary to fulfill a legal obligation to which we are subject.

There is no right to a refund if the refund is not possible or only possible with disproportionately high effort in the case of legal non-automated data processing due to the special type of storage and your interest in the refund is low. In this case the restriction of the processing takes the place of a limitation.

- in accordance with Art. 18 of the GDPR, to demand the restriction of the processing of your personal data, as far as:

- a. You deny the correctness of your personal data. In this case, the restriction may be requested for the time necessary to allow us to verify the accuracy of the data.
- b. The processing is unlawful and you request instead of consent the restriction of the use of your personal data.
- c. Your personal data will no longer be required by us for the purposes of processing, but which you need to assert, exercise or defend legal claims.
- d. You have lodged an objection under Art. 21 (1) GDPR. The restriction of processing may be requested as long as it is not yet clear whether our legitimate reasons outweigh your reasons.

Restriction of processing means that the personal data will only be processed with your consent or for the purpose of asserting, exercising or defending legal rights or protecting the rights of another natural or legal person or for reasons of important public interest. Before we lift the restriction, we have the duty to inform you about it.

- in accordance with 20 of the GDPR, the data may be transferred if the processing is based on your consent (Article 6 (1) sentence 1 letter a) or Article 9 (2) letter a) of the GDPR) or on a contract to which you are party and the processing is carried out using automated procedures. In this case, the right to transfer data includes the following rights, provided that the rights and freedoms of other persons are not affected. You have the right:

- a. to receive your personal data that you have provided to us in a structured, secure and machine-readable format; or,
- b. to transfer this data to another responsible person without hindrance on our part. As far as technically possible, you can
- c. request that we transfer your personal data directly to another responsible person.

- in accordance with Art. 7 (3) GDPR to revoke your once given consent against us at any time. As a result, we are no longer allowed to continue the data processing based on this consent in the future and

- in accordance with Art. 77 GDPR complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or work or our registered office as well as the seat of our branches.

b) Opposition

If the processing of your personal data is based on Art. 6 (1) sentence 1 letter e) GDPR (performance of a task in the public interest or in the exercise of public authority) or on Art. 6 (1) sentence 1 letter f) GDPR (legitimate interest of the controller or a third party), you have the right to object to the processing of your personal data at any time for reasons arising from your particular situation. This also applies to profiling based on Art. 6 (1) sentence 1 letter e) or letter f) GDPR After exercising the right of objection, we will no longer process your personal data unless we can prove that there are compelling reasons for processing which outweigh your interests, rights and freedoms, or that the

processing serves to assert, exercise or defend legal claims. You may at any time object to the processing of personal data concerning you for the purposes of direct marketing. This also applies to profiling in connection with such direct marketing. After exercising this right of objection, we will no longer use the personal data concerned for direct marketing purposes. You have the opportunity to inform us of your objection by telephone, by e-mail to <u>gossenberger@exportpages.com</u>, by fax or to our postal address listed at the beginning of this privacy statement.

c) Revocation of consent

You have the right to revoke your consent at any time with effect for the future. The revocation of the consent can be done by telephone, by e-mail to <u>gossenberger@exportpages.com</u>, by fax or to our postal address listed at the beginning of this privacy policy. The revocation does not affect the legality of the data processing, which was carried out on the basis of the consent until the receipt of the revocation. After receipt of the revocation, the data processing, which was exclusively based on your consent, will be stopped.

d) Complaint

If you believe that the processing of personal data concerning you is unlawful, you may lodge a complaint with a data protection supervisory authority competent for the place where you are staying or working, or at the place where the alleged infringement occurred.

13. Other important information on data protection

a) Guidelines for children

The offer of the operator is generally not aimed at children or young people under 18 years and is not intended for them. The operator does not knowingly ask for personal data from children or young people under 18 years of age and does not send them any request to enter such data.

Although visitors of all ages can use the operator's website, the operator does not intentionally collect personal data from persons under 18 years of age. If a parent or legal guardian informs the Operator or otherwise becomes aware that a child or adolescent under the age of 18 years has improperly registered on the Operator's website using false information, the corresponding account and the associated personal data will be deleted immediately.

b) Where personal data are stored and processed

Personal data collected by the operator is usually stored and processed at the operator's place of business in Germany. This does not include data collected during the use of our website. These data are stored and processed within the framework of a data protection compliant agreement for order data processing in a computer center of our host in Germany or in the individual cases expressly mentioned in this declaration at another location.

c) Retention period of personal data

Collected data will be retained for as long as necessary to perform the services of the operator, to fulfill a transaction you have requested, or for other reasons described in this statement, such as to comply with legal obligations, to resolve disputes, or to enforce agreements. Because retention requirements may vary for different types of data and different services, retention periods may vary significantly. Log files are automatically deleted after 14 days.

d) Changes to the privacy policy

Due to the ongoing development of our website or due to changes in legal or regulatory requirements, it may become necessary to amend this data protection declaration. Furthermore, the operator may change or update this declaration as necessary in order to take into account user feedback, services and information content; therefore, the operator recommends that this declaration be checked regularly and thoroughly. The current data protection declaration can be viewed at any time on the website at https://www.exportpages.com/privacy.aspx can be called up and printed out by you. Should the operator update this declaration, the date *"Last updated"* adjusted accordingly at the top of this explanation. In the event of fundamental changes to this declaration or the use of personal data by the operator, the operator will inform users of our Internet pages in good time before the change takes effect by publishing a notice, sending a direct message or other suitable technical measures. The operator recommends that this declaration be checked regularly to find out how the operator uses or protects data. If users continue to use our Internet pages after a change has come into effect, you thereby agree to the changes and updates.

Karlsbad October 2020