

# **Data Privacy Statement (Privacy Policy) for registrations on landing pages operated by us**



As of Mai 31, 2021

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## 1 General Information

This data privacy statement is intended to inform about the nature, scope and purpose of the collection and the use of personal data by michael seefeldt. DirectMarketing GmbH regarding registrations on landing pages operated by us.

The michael seefeldt. DirektMarketing GmbH takes the protection of personal data very seriously and treats them confidentially and in accordance with the legal regulations. Since new technologies and the continuous development of data processing procedures and methods can lead to changes to this Privacy Policy, we recommend that you review the Privacy Policy on a regular basis.

Definitions of the terms used (e.g., "personal data" or "processing") can be found in Article 4 GDPR.

## 2 How to contact us

michael seefeldt. DirectMarketing GmbH is responsible for the collection and processing of your personal data and therefore also for the compliance with the data protection regulations. Our contact details are as follows:

### Responsible for the purpose of the GDPR

Managing Director: Mr. Michael Seefeldt

michael seefeldt. DirectMarketing GmbH  
Beim Erlenwäldchen 20  
71522 Backnang

Fon +49 (0)71 91. 34 43-0  
Fax +49 (0)71 91. 34 43-44  
E-Mail: [info@seefeldt-direktmarketing.de](mailto:info@seefeldt-direktmarketing.de)  
Web: [www.seefeldt-direktmarketing.de](http://www.seefeldt-direktmarketing.de)

### External data protection officer of michael seefeldt. DirectMarketing GmbH:

Mr. Jürgen Hornberger

Cooperation partner of TÜV SÜD Sec-IT GmbH  
Hornberger ICT  
Augustenstraße 2  
70178 Stuttgart  
Phone: +49 (0)173 4650149  
E-Mail: [juergen.hornberger@hornberger-ict.de](mailto:juergen.hornberger@hornberger-ict.de)

### 3 Type of data collected/purpose of the data collection

In general, we differentiate between two types of data collection. Personal data collection via telephone, e-mail, post or by registering on one of our landing pages and the automated data collection while visiting our landing pages.

Data while accessing the landing pages is stored as "server log files" on the server of the landing page. The following data is logged:

- visited landing page
- time of access
- amount of data sent in bytes
- Source/reference how you came to the landing page
- used browser (type and version)
- used operating system
- used IP address

The server log files are saved at the most for the duration of the couponing campaign and deleted afterwards. This data cannot be allocated to specific persons. This data is not merged with other data sources. The data is stored for security reasons to be able to investigate e.g., in case of abuse. We reserve the right to check this data retroactively if we become aware of concrete indications of illegal use. If data must be saved for reasons of proof, they are excluded from deletion until the incident is finally resolved.

#### Use of cookies

Our landing page uses so-called cookies. These are small text files that are stored on your device with the help of the browser. They do not cause any harm. The location of the cookies is determined by the user's browser settings. We use cookies to make our offer user-friendly. Some cookies remain stored on your device until you delete them. They allow us to recognize your browser the next time you visit us. The information is not provided to a third party, as cookies are only used for the above-mentioned purposes. Most browsers are set to automatically accept cookies. If you do not wish to do so, you can set up your browser to inform you about the setting of cookies and to allow you to do so only on a case-by-case basis. When disabling cookies, the functionality of our landing page may be limited.

## The following cookies are used:

### Functional and Session Cookies

Purpose: These cookies are necessary for the execution of specific functions of a landing page. For example, these cookies are used when a user registers and then continues to browse the site (or other sites) before uploading their data. In this case, even after closing the browser window, the user's information will not be deleted.

### Performance/Analysis Cookies

Not used on the landing pages.

### Advertising cookies

Not used on the landing pages.

### Web analysis using Google Analytics

After consent this website uses functions from Google Analytics for usage analysis. Provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland("Google).

Google Analytics uses "cookies". These are textfiles which are saved on your computer. These textfiles help to analyse the Usage of the website. The information created by using this website is usually transferred to remote servers in the USA, owned by Google.

Function: Analysis of user behavior (page retrievals, number of visitors and visits, downloads), creation of pseudonymous user profiles based on cross-device information of logged-in Google users (cross-device tracking), enrichment of pseudonymous user data with target group-specific information provided by Google, retargeting, UX testing, conversion tracking and retargeting in conjunction with Google Ads

### IP anonymization

When a customer of Analytics requests IP address anonymization, Analytics anonymizes the address as soon as technically feasible. The IP anonymization feature in Analytics sets the last octet of IPv4 user IP addresses and the last 80 bits of IPv6 addresses to zeros in memory shortly after being sent to Google Analytics. The full IP address is never written to disk in this case.

Geographic dimensions are later derived from anonymized IP addresses.

### Cookie Management

You can manage your cookie and tracking mechanism settings in the browser and/or our privacy settings. This only affects the browser in use. If you wish to deactivate all cookies in your browser setting. Please note that this may affect functionality of this website. When visiting our website you will be asked in a cookie layer whether you consent to our using of any non functional cookies(Google Analytics). In our privacy settings you can withdraw the consent with effect for the future or grant your consent at a later point in time. To prevent data handling through Google you can also install this Browser-Plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>

### Objection to data collection

Data collection over Google-Analytics only applies after prior consent from the user through the consent tool. The consent tool will save a functional cookie to save the user setting.

## 4 Legal basis

We operate landing pages to host promotions of our business partners. To participate in a promotion, a registration with all necessary data is mandatory. We use the data only to execute the offered promotion for which you have registered. The required information requested during registration must be provided completely. Otherwise, we will decline your registration.

For important information, such as sending status information about your promotion participation, we will use the e-mail address provided at the time of registration.

The processing of the data entered during registration is based on your consent (**Art. 6 sec. 1 lit. a GDPR**). You can revoke your consent at any time. An informal message by e-mail to us is sufficient for this purpose. The legality of the data processing that has already taken place remains unaffected by the objection.

## 5 Legitimate interests of the controller

In the case of web analysis and the use of cookies, this is conducted based on a legitimate interest. The web analysis serves us to optimize our landing page and to learn more about which topics and contents are interesting for the visitors. Anonymizing the IP address ensures that inference to individual visitors is not possible during the evaluations. The visitor to the landing page may deactivate the web analysis following the steps mentioned in chapter 3.

By setting cookies, we can design our landing page more user-friendly and optimized. Cookies can be switched off following the steps in chapter 3, however this may lead to restrictions in the usage and display of the landing page content.

## 6 Internal and external disclosure of your personal data

An internal disclosure of your personal data takes place exclusively within the scope of the processing of the couponing promotion. An external disclosure of your personal data may take place under the following circumstances:

- Support from financial institutions for cashback settlements
- Support for forwarding by letter or parcel, e.g., DHL, Deutsche Post
- Within the borders of commissioned data processing

## Comissioned Data Processing

Processor is:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland

There is a Agreement on commissioned data processing. The Google LLC in in California, USA, and possibly US-authorities are able to access data saved on google servers. A transmission of data to the USA cannot be excluded.

## 7 Transfer of your data to a third country (outside of the EU) or an international organization

We do not transfer your personal data to an EU third country or to an international organization. If this is necessary, we would inform you in advance and ensure all necessary measures to comply with an adequate level of data protection.

With Google-Analytics it is not possible to rule out a data transfer to the USA.

## 8 Storage time and deletion of your personal data

The legislator has issued many retention periods, which we observe with the utmost care and seek advice to comply with these obligations. In principle, in this context, we only store your personal data for as long as this is permitted by the defined purpose, or that the legislator requires it for reasons of proof. If we wish to store your data for longer than previously described, we will have you to confirm this within the scope of a voluntary declaration of consent.

Data in connection with Google Analytics will usually be stored for 14 months. Deletion of data after retention period happens monthly.

## 9 Your rights

You are entitled to the following rights regarding your personal data under certain conditions:

- Right to information (Art. 15 GDPR)
- Right to correction (Art. 16 GDPR)
- Right to erasure (Art. 17 GDPR)
- Right to restrict processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object (Art. 21 GDPR)
- Right to withdraw consent (Art. 7 GDPR (3))

### Right to lodge complaint with the supervisory authorities

If you believe that the processing of your data violates data protection law or your data protection claims have otherwise been violated in any way, you have the right to lodge a complaint to the supervisory authority.

### The supervisory authority responsible for us:

- State Representative for Data Protection and Freedom of Information Baden-Württemberg
- <https://www.baden-wuerttemberg.datenschutz.de/>

## 10 Purpose Change

In case we intend to change the purpose for which your personal data was originally collected, we will inform you in detail and transparently in advance. In this case, we will of course provide you

with all legally required information. If the change in purpose is a processing of personal data based on the legal basis of a voluntary declaration of consent, we will inform you and ask for your formal consent accordingly.

## **11 Questions, complaints, or suggestions**

You are welcome to contact us with any questions, complaints, or suggestions regarding data protection. If necessary, you are welcome to contact our Data Protection Officer (see point 2 of this Data Protection Declaration).