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, which we have included beneath this copy.

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 your 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

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 host is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6(1)(b) GDPR) and in the interest of secure, fast, and efficient provision of our online services by a professional provider (Art. 6(1)(f) GDPR). If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TTDSG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TTDSG. This consent can be revoked at any time. Our host will only process your data to the extent necessary to fulfill its performance obligations and to follow our instructions with respect to such data. We are using the following host: hostnet De Ruijterkade 6, 1013 AA Amsterdam, Niederlande

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.

3. General information 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 e-mail 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: B2G Naxxar Road 152 San Gwann SGN 9030 Malta Phone: +356 99666333 E-mail: [E-Mail-Adresse der verantwortlichen Stelle] 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, e-mail 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(1)(a) GDPR or Art. 9 (2)(a) GDPR, if special categories of data are processed according to Art. 9 (1) DSGVO. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR. If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based on § 25 (1) TTDSG. The consent can be revoked at any time. 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(1)(b) GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(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.

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(1)(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(1) GDPR). IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING AT ANY TIME. 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(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 demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

Information about, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. 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 in lieu 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(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.

4. Recording of data on this website

Cookies

Our websites and pages use what the industry refers to as "cookies." Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser. In some cases, it is possible that third-party cookies are stored on your device once you enter our site (third-party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g., cookies for the processing of payment services). Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g., the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages. Cookies, which are required for the performance of electronic communication transactions, or for the provision of certain functions you want to use (e.g., for the shopping cart function) or those that are necessary for the optimization (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6(1)(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 consent to the storage of the cookies and similar recognition technologies has been requested, processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TTDSG); this consent may be revoked at any time. You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited. In the event that thirdparty cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

Consent with Borlabs Cookie

Our website uses the Borlabs consent technology to obtain 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 provider of this technology is Borlabs GmbH, Rübenkamp 32, 22305 Hamburg, Germany (hereinafter referred to as Borlabs). Whenever you visit our website, a Borlabs cookie will be stored in your browser, which archives any declarations or revocations of consent you have entered. 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 <u>https://de.borlabs.io/kb/welche-daten-speichert-borlabs-cookie/</u> We use the Borlabs cookie consent technology to obtain the declarations of consent mandated by law for the use of cookies. The legal basis for the use of such cookies is Art. 6(1)(c) GDPR.

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(1)(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(1)(f) GDPR) or on your agreement (Art. 6(1)(a) GDPR) if this has been requested; the consent can be revoked at any time. 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.

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 assigned to the respective end device of the user. An assignment to a device-ID does not take place. 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 that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored. The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time. Data transmission 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/.

Browser plug-in

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link: 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 at: https://support.google.com/analytics/answer/6004245?hl=en.

Facebook Pixel

To measure conversion rates, this website uses the visitor activity pixel of Facebook. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too. This tool allows the tracking of page visitors after they have been linked to the website of the provider after clicking on a Facebook ad. This makes it possible to analyze the effectiveness of Facebook ads for statistical and market research purposes and to optimize future advertising campaigns. For us as the operators of this website, the collected data is anonymous. We are not in a position to arrive at any conclusions as to the identity of users. However, Facebook archives the information and processes it, so that it is possible to make a connection to the respective user profile and Facebook is in a position to use the data for its own promotional purposes in compliance with the Facebook Data Usage Policy. This enables Facebook to display ads on Facebook pages as well as in locations outside of Facebook. We as the operator of this website have no control over the use of such data. The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TTDSG. You may revoke your consent at any time. Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found

here: https://www.facebook.com/legal/EU data transfer addendum und https://dede.facebook.com/help/56699466033381. Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found

under: <u>https://www.facebook.com/legal/controller_addendum</u>. According to this agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our website. Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook. In Facebook's Data Privacy Policies, you will find additional information about the protection of your privacy at: <u>https://www.facebook.com/about/privacy/</u>. You also have the option to deactivate the remarketing function "Custom Audiences" in the ad settings section

under <u>https://www.facebook.com/ads/preferences/?entry_product=ad_settings_scree</u> <u>n</u>. To do this, you first have to log into Facebook. If you do not have a Facebook account, you can deactivate any user-based advertising by Facebook on the website of the European Interactive Digital Advertising

Alliance: http://www.youronlinechoices.com/de/praferenzmanagement/.

Facebook Conversion API

We have integrated Facebook Conversion API into this website. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. However, based on the information provided by Facebook, the recorded data is also transmitted to the United States and other Non-EU and Non-EEZ countries. Facebook Conversion API enables us to record the interactions of our website visitors with our website and to share this information with Facebook to improve the promotional performance with Facebook. To do this, in particular the time you accessed the site, the website you accessed, your IP address and your user agent, as well as, if applicable, other specific data (e.g., purchased products, value of the shopping cart and currency) are tracked. For a complete overview of the tracked data, please visit: https://developers.facebook.com/docs/marketing-api/conversionsapi/parameters. The use of this service occurs on the basis of your consent pursuant to Art. 6 Sect. 1 lit. a GDPR and § 25 Sect. 1 TTDSG. You may revoke your consent at any time. If personal data is collected on our website with the assistance of the tool described herein and if it is shared with Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland shall be jointly responsible for the processing of your data, i.e., we are the data controllers (Art. 26 GDPR). This shared responsibility is limited exclusively to the recording of your data and its sharing with Facebook. The processing that occurs after the data has been shared with Facebook is not part of this shared responsibility. The obligations we share responsibility for have been documented in an agreement on joint processing. The concrete wording of this agreement can be found at: https://www.facebook.com/legal/controller addendum. According to this agreement, we are responsible for the provision of the data protection information when using the Facebook tool and for the data protection law compliant secure implementation of the tool on our website. Facebook is liable for the data security of Facebook products. You may request information on your rights as a data subject (e.g., request for information) related to the data processed by Facebook directly from Facebook. If you claim any data subject rights with us, we are required to forward your request to Facebook. The transfer of data to the United States is based on the standard contract clauses of the EU commission. For details please visit: https://www.facebook.com/legal/EU data transfer addendum and https://dede.facebook.com/help/566994660333381. In Facebook's data privacy policy, you will find additional information pertaining to the protection of your privacy: https://dede.facebook.com/about/privacy/.

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.

Facebook Custom Audiences

We use Facebook Custom Audiences. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. Whenever you visit or use our website and apps, utilize our portfolio (e.g., participation in sweepstakes), transfer data to us or interact with the Facebook content of our company, we record related personal data. In the event that you have given us your consent to the use of Facebook Custom Audiences, we will share these data with Facebook to put Facebook in a position to send you compatible ads. These data may also be used to defined target audiences (Lookalike Audiences). Facebook processes these data as our contract processor. For details, please consult the user agreement of Facebook: https://www.facebook.com/legal/terms/customaudience. The use of these services occurs on the basis of your consent at any time. The transfer of date to the USA is based on the standard contract clauses of the EU Commission. For details please see: https://www.facebook.com/legal/terms/customaudience and <a href="https://ww

6. Plug-ins and Tools

Google Web Fonts (local embedding)

This website uses so-called Web Fonts provided by Google to ensure the uniform use of fonts on this site. These Google fonts are locally installed so that a connection to Google's servers will not be established in conjunction with this application. For more information on Google Web Fonts, please follow this link: <u>https://developers.google.com/fonts/faq</u> and consult Google's Data Privacy Declaration under: <u>https://policies.google.com/privacy?hl=en</u>.