

# Privacy policy

### Information on the collection of personal data & the purpose of this policy

In this data protection declaration, VOSS GmbH & Co. KG (" **we**" or " **our**") will explain how we collect and process the personal data that is transmitted to us when you use our website, sign up for our newsletter or purchase a product. Personal data is all data that can be related to you personally, e.g., name, address, email addresses or user behaviour.

This website is not intended for children, and we do not knowingly collect data relating to children. Unless otherwise stated below, the provision of your personal data is neither legally or contractually required nor necessary for the conclusion of a contract. You are not obliged to provide the data. Failure to provide the data on your part will have no consequences. This only applies as far as no other indication is made in the subsequent processing operations.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### Controller

VOSS GmbH & Co. KG is the controller and responsible for your personal data.

### Person responsible and data protection officer

VOSS GmbH & Co. KG Ohrstedt-Bhf. Nord 5 25885 Wester-Ohrstedt Germany Telephone: 01452 346 204 (https://www.electric-fence.co.uk/data-protection-declaration) Email: shop@electric-fence.co.uk We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below. You can reach the company's internal data protection officer at the following email address: anonymous@voss-group.eu or via the address Ohrstedt-Bhf. Nord 5, 25885 Wester-Ohrstedt, Germany. Our UK-GDPR Representative is **Rickert Services Ltd UK** - Voss GmbH & Co KG -PO Box 1487 Peterborough PE19XX United Kingdom art-27-rep-voss@rickert-services.uk (mailto:art-27-rep-voss@rickert-services.uk)

#### Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

As the security of your data is important to us, your personal data is transmitted using a secure SSL or TLS encryption / connection. TLS (Transport Layer Security) or its predecessor SSL (Secure Socket Layer) is a protocol for encrypting data transfers on the Internet. This protects your personal data from unauthorised access.

You can recognise the encryption of the connection in the browser line by the sign "https//:" or the lock symbol. In addition, we secure our website and other systems through technical and organisational measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or unauthorised access by third parties. However, despite regular checks, complete protection against all dangers is not possible. Our security measures are continuously improved in line with technological developments.

### **Data Retention**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

Details of retention periods for different aspects of your personal data are set out below and also available in our retention policy which you can request from us by contacting us on the details provided above.

#### Visiting our website and server log files

During the mere informative use of our website www.electric-fence.co.uk, i.e., if you do not register or otherwise transmit information to us,

information is automatically sent to the server of our website by the browser used on your end device. This information is temporarily stored in a so-called log file.

The following information is collected without your intervention and stored until automated deletion:

- the name of the file,

- the date and time of the request
- the amount of data transferred in each case, the access status / HTTP status code (i.e., whether the file was transferred or possibly not found, etc.),
- a description of the type as well as the version of the web browser used,
- the operating system installed, the language of the operating system and the resolution set,
- the IP address used,
- the location (provider region)

This data is necessary for us to display our website to you and to ensure the stability and security of the website. You can visit our website without providing any personal information. Without disclosing personal data such as the IP address, the use of our website is technically not possible. You therefore do not have the option to object.

Furthermore, this data is evaluated for internal statistical purposes and for the technical administration of the website. It is not possible to assign this data to a specific person. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended. In the case of storage of data in log files, this is the case after 30 days at the latest. Storage beyond this period is possible. In this case, the above-mentioned data is deleted or alienated so that it is no longer possible to assign the calling client.

## Contacting us by email

When contacting us by email, the following personal data is collected and stored by us: salutation, first name and surname, email address and email text as well as other data provided voluntarily. The data processing serves to process your contact request. In this context, the data will not be passed on to third parties. The processing of personal data is solely for the purpose of processing your contact request. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. This is the case when the respective contact with you has ended, and the deletion does not conflict with any statutory retention periods unless you have expressly consented to further processing and use. The contact is terminated when the circumstances indicate that the matter in question has been conclusively clarified. If there is a legal obligation to retain data, processing is limited to this purpose.

# Contacting us by telephone

When initiating contact by telephone, the following personal data is collected and stored by us: telephone number, date, time, and other data provided voluntarily. The data processing serves the purpose of processing and answering your contact request. In this context, the data will not be passed on to third parties. The processing of personal data is solely for the purpose of handling your contact request. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected, but at the latest within a regular interval of three months. The purpose has been achieved when the respective contact with you has ended and there are no legal retention periods that prevent the deletion. The contact is terminated when the circumstances indicate that the matter in question has been conclusively clarified. If there is a legal obligation to retain data, processing is limited to this purpose.

# Collection, processing and forwarding of personal data when placing orders

When you place an order, we collect and process your personal data only insofar as this is necessary to fulfil and process your order and to deal with your enquiries. These are title, first name and surname, delivery and invoice address, telephone and/or mobile phone number if applicable, email address and payment data as well as other data provided voluntarily. We process your data to process your order and prepare it for dispatch. The processing is necessary for the fulfilment of a contract with you. Your data is passed on, for example, to the shipping companies and dropshipping providers you have chosen, as well as to payment service providers, provided you have given your consent. Your data is also passed on to service providers who are required to process the underlying contractual relationship, such as service providers for order processing and IT service providers. In all cases, we strictly observe the legal requirements. The scope of data transfer is limited to a minimum. The collected data will not be passed on for advertising purposes. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected and there is no legal retention period. If there is a legal obligation to retain data, processing will be limited to this purpose. If you create a customer account with us when placing an order, you will find additional explanations in the next section "Customer account".

# Customer account

When opening a customer account, we collect your personal data to the extent specified there, such as customer number, title, first and last name, delivery and billing address, telephone and/or mobile phone number, email address, order history and the associated order and billing documents, as well as other data provided voluntarily. The data is processed for the purpose of improving your shopping experience and simplifying order processing. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. This is the case if you no longer wish to have a customer account. The processing is conducted with your consent. You can revoke your consent at any time by notifying us, without affecting the lawfulness of the processing conducted based on your consent until revocation. Your customer account will then be deleted, provided that the deletion does not conflict with any statutory retention periods.

# Data collection when writing a comment

Commenting on an article or a contribution is only possible if you have already created a customer account. In addition to your comment, information on the time of submission of the comment as well as the name you may have chosen will be stored and published on the website. The purpose of this processing is to enable comments to be made and to display comments. By sending the comment,

you consent to the processing of the transmitted data. You can revoke your consent at any time by notifying us, without affecting the lawfulness of the processing conducted based on the consent until revocation. Your personal data within the commenting process will subsequently be anonymised or deleted. The comment and the associated data are stored and remain on our website until the commented content has been completely deleted or the comments must be deleted for legal reasons. We reserve the right to delete comments if they are objected to by third parties as unlawful.

### International Transfers

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, please see below.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. For further details, please see below. Please contact us if you want further information on the specific mechanism used by us when

transferring your personal data out of the UK.

#### Data processing for advertising purposes

### Use of email address for sending newsletters

If you have expressly consented, we will use your email address to send you our free newsletter on a regular basis. The registration takes place via the so-called double opt-in procedure. After you have registered, we will send you a confirmation email asking you to confirm that you wish to receive future newsletters by clicking on a corresponding link in the email. To receive the newsletter, it is sufficient to provide an email address. If you have a customer account with us, we will link this to the email address you registered for the newsletter. The link is made by matching the email address provided in the customer account. This is done to be able to address you personally. In addition, the following further data is collected during registration: date of registration as well as the activity status of the newsletter. You can revoke your consent at any time by notifying us without affecting the legality of the processing conducted based on the consent until revocation. Your email address will then be deleted from our newsletter distribution list without delay, provided that the deletion does not conflict with any statutory retention periods. In the latter case, your email address will be blocked for the newsletter.

Your data will be passed on to a service provider, Emarsys Interactive Services GmbH, Willi-Schwabe-Straße 1, 12489 Berlin, Germany, for email marketing as part of order processing. Your data will not be passed on to any other third parties. The collection of your email address is used to deliver the newsletter. The collection of other personal data during the registration process serves to prevent misuse of the services or the email address used. If you leave a filled shopping basket on our website without completing a purchase, we will also use your email address to remind you of the completion of the purchase with a maximum of two automatic emails. You can unsubscribe from the newsletter for the future at any time, for example via a link at the end of each newsletter. Alternatively, you can also send your unsubscribe request at any time by email to anonymous@voss-group.eu. After unsubscribing, your email address will be deleted from our newsletter distribution list immediately. If there is a legal obligation to retain data, processing will be limited to this purpose and your email address will be blocked from the newsletter.

#### Use of email address for the sending of direct advertising

We use your name and email address, which we have received in connection with the sale of a good or service, to send you electronic advertising for our own goods or services that are like those you have already purchased from us, unless you have objected to this use. The provision of the email address is necessary for the conclusion of the contract. Failure to provide it will result in no contract being concluded. Your data will be passed on to a service provider, Emarsys Interactive Services GmbH, Willi-Schwabe-Straße 1, 12489 Berlin, Germany, for email marketing as part of order processing. Your data will not be passed on to any other third parties. The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. Your email address will therefore be stored until you object to its use. You can object to the use of your data at any time without incurring any costs other than the transmission costs according to the basic rates. To do so, send an email to anonymous@voss-group.eu. You can also use the link provided for this purpose in the advertising email. After unsubscribing, your email address will be deleted immediately from the distribution list for direct advertising. If there is a legal obligation to retain data, processing will be limited to this purpose.

### Use of an external merchandise management system

We use an enterprise resource planning system for contract processing within the scope of order processing. For this purpose, your personal data collected as part of the order will be transmitted to Sage GmbH, Franklinstraße 61-63, 60486 Frankfurt am Main, Germany.

### Shipping service provider

## Disclosure of data to DPD Deutschland GmbH

If the delivery is made by the transport service provider DPD Deutschland GmbH, Wailandtstraße 1, 63741 Aschaffenburg, we will pass on your email address and your telephone number to DPD Deutschland GmbH before the delivery of the goods for the purpose of agreeing a delivery date or for delivery notification, if you have given your express consent to this in the ordering process. Otherwise, we will only pass on the name of the recipient and the delivery address to DPD Deutschland GmbH for the purpose of delivery. This information will only be passed on if it is necessary for the delivery of the goods. In this case, prior coordination of the delivery date with DPD Deutschland GmbH or notification of delivery is not possible. The provision of the data is necessary for the conclusion of the contract with the delivery method requested by you. Failure to provide the data will result in the item not being delivered. The consent can be revoked at any time with effect for the future vis-à-vis us [anonymous@voss-group.eu] or vis-à-vis the transport service provider DPD Deutschland GmbH [datenschutz@dpd.de] or with each electronic parcel information via a link.

## Disclosure of data to United Parcel Service Deutschland S.à r.l. & Co. OHG

If delivery is made by the transport service provider United Parcel Service Deutschland S.à r.I. & Co. OHG, Görlitzer Straße 1, 41460 Neuss, we will pass on your email address and your telephone number to United Parcel Service Deutschland S.à r.I. & Co. OHG prior to delivery of the goods for the purpose of agreeing a delivery date or for delivery notification, provided that you have given your express consent to this in the ordering process. Otherwise, we will only pass on the name of the recipient and the delivery address to United Parcel Service Deutschland S.à r.I. & Co. OHG for the purpose of delivery. This information will only be passed on if it is necessary for the delivery of the goods. In this case, prior coordination of the delivery date with United Parcel Service Deutschland S.à r.I. & Co. OHG or notification of delivery method requested by you. Failure to provide the data will result in the item not being delivered. The consent can be revoked at any time with effect for the future vis-à-vis us [anonymous@voss-group.eu] or vis-à-vis the transport service provider United Parcel Service Deutschland S.à r.I. & Co. OHG at <a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN</a> (<a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN</a> (<a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN</a> (<a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN</a> (<a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN</a> (<a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN</a> (<a href="https://www.ups.com/upsemail/input?privacy=true&loc=EN\_EN">https://www.ups.com/upsemail/input?privacy=tr

## Transfer of data to BTG Internationale Spedition GmbH

As part of the shipment processing, we transmit the name of the recipient and the delivery address as well as other shipment-related data to BTG Internationale Spedition GmbH, Peutestrasse 16, 20539 Hamburg. There is an order processing agreement with BTG Internationale Spedition GmbH. All organisational and technical measures are taken to protect your data. You can object to the transmission of the name of the recipient and the delivery address both with us [anonymous@vossgroup.eu] and with BTG Internationale Spedition [datenschutzbeauftragter@btg.de]. However, we would like to point out that the provision of the data is necessary for the conclusion of the contract. Failure to provide the data will result in the item not being delivered. If you have given your express consent in the ordering process, contact data (email address and/or mobile phone or telephone number) will be transmitted to BTG Internationale Spedition GmbH for the purpose of coordinating a delivery date or announcing delivery. The consent can be revoked at any time with effect for the future vis-à-vis us [anonymous@voss-group.eu] or vis-à-vis BTG Internationale Spedition [datenschutzbeauftragter@btg.de]. In this case, prior coordination of a delivery date with the commissioned logistics partner or notification of delivery is not possible.

#### Payment provider

### Use of PayPal

All PayPal transactions are subject to the PayPal privacy policy. You can find this at <u>https://www.paypal.com/uk/smarthelp/contact-us/privacy</u> (<u>https://www.paypal.com/uk/smarthelp/contact-us/privacy</u>)

#### Use of PayPal Express

For more information on data processing when using the PayPal Express payment service, please see the associated privacy policy at <u>https://www.paypal.com/uk/webapps/mpp/ua/legalhub-full?</u> <u>locale.x=en\_GB (https://www.paypal.com/uk/webapps/mpp/ua/legalhub-full?locale.x=en\_GB)</u>

### Use of Saferpay

If you have opted for the Saferpay payment method, the payment will be processed by the payment service provider SIX Payment Services AG, Hardturmstrasse 201, 8005 Zurich, Switzerland, to whom we pass on not only the information about your order (name, email address, address, account number, bank sort code, credit card number if applicable, invoice amount, currency and transaction number) but also the data you provided during the ordering process. Your data will only be passed on to the payment service provider SIX Payment Services AG for the purpose of payment processing. You can find more information in the Saferpay data protection declaration.

#### Cookies

Our website uses cookies. Cookies are text files that the provider of a website stores on the computer of the user of the website and can retrieve again when the user calls it up again, to facilitate navigation on the internet or transactions or to obtain information about user behaviour. When a user accesses a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string that enables the browser to be uniquely identified when the website is called up again. We use cookies for the purpose of making our website more user-friendly, effective, and secure.

We distinguish between the following cookies:

#### **Necessary cookies**

Required cookies ensure the essential functions and security of our website and cannot be deactivated. You can set your browser to block these cookies or to notify you of these cookies. However, some areas of our website may not work if you do so. The data will not be stored together with any other personal data about you. You have the right to object to this processing of your personal data at any time on grounds relating to your situation.

#### **Functional cookies**

In addition, we also use temporary cookies to optimise user-friendliness, which are stored on your end device for a certain fixed period. If you visit our site again to use our services, it is automatically recognised that you have already been to our site and which entries and settings you have made so that you do not have to enter them again. The following data, among others, is stored and transmitted in the cookies: location data, log-in information, IP addresses, website settings. We also use these cookies, for example, to be able to advise you during a telephone call and to provide you with the best possible support in selecting the right products by assigning you your personal consultation number. Some functions of our website cannot be offered without the use of functional cookies, as these require that the browser is recognised even after a page change. **Marketing cookies**  Marketing cookies grant us information about your visits to our website and the content you have viewed. They help us identify content that is relevant to you and display it to you. They also enable us to tailor offers and advertisements to your interests. As far as we use cookies that enable an analysis of your surfing behaviour, the following data may also be transmitted: search terms entered, frequency of page views, use of website functions. Analysis cookies are used to improve the quality of our website and its content. Through the analysis cookies, we learn how the website is used and can thus constantly optimise our offer. These cookies are used to show you personalised content according to the products or topics you have viewed. This allows us to present you with articles and offers that are particularly relevant to you. Furthermore, we use these cookies for the purpose of subsequently targeting you on other websites with targeted, interest-related advertising. You can find instructions on how to delete and control cookies here: <a href="https://www.aboutcookies.org/">https://www.aboutcookies.org/</a>).

The use of cookies or similar technologies is with your consent. The processing of your personal data takes place with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted based on your consent up to the time of revocation. Cookies are stored on your computer. Therefore, you have full control over the use of cookies. By selecting the appropriate technical settings in your internet browser, you can be notified before cookies are set and decide individually on their acceptance as well as prevent the storage of cookies and transmission of the data they contain. Cookies that have already been stored can be deleted at any time. However, we would like to point out that you may then not be able to use all the functions of our website to their full extent.

The cookie settings in the respective browser can be set individually. Each browser (e.g. Microsoft Edge<sup>™</sup>, Chrome<sup>™</sup>, Firefox<sup>™</sup>, Safari<sup>™</sup> or Opera<sup>™</sup>) differs in the way it manages the cookie settings. This is described in the help menu of each browser, which explains how you can change your cookie settings.

#### Use of Consentmanager

We use the consent management tool "Consentmanager" by Consentmanager AB (Håltegelvägen 1b, 72348 Västerås, Sweden; "Consentmanager") on our website.

The tool enables you to give consent to data processing via our website, to the setting of cookies, and to exercise your right to withdraw consent already given. Data processing serves the purpose of obtaining and documenting required consents to data processing and thus complying with legal obligations.

Cookies may be used for this purpose. The following information, among others, may be collected and transmitted to Consentmanager: date and time of the page view, information on the browser you are using and the device you are using, anonymised IP address, opt-in, and opt-out data as well as the time zone.

The information collected is stored until you leave our website.

Data processing is conducted to comply with a legal obligation. You have the right to object to this processing of personal data relating to you at any time on grounds relating to your situation. Further information on data protection at Consentmanager can be found at: https://www.consentmanager.net/privacy.php

#### Use of the chat bot system moinAl

We use the chat bot system "moinAl" of knowhere GmbH, Karolinenstraße 9, 20357 Hamburg, Germany, on our website. An order processing agreement has been concluded with this company. The system serves the purpose of answering your enquiries.

The so-called local storage technology (also called "local data" and "local memory") is used for this purpose. In this process, data is stored locally in the cache of your browser, which continues to exist and can be read even after you close the browser window or exit the programme - unless you delete the cache. Local Storage allows your preferences when using the chatbot to be stored on your computer and used by you. The data from Local Storage is used to store the chat history - after it has been taken over by a real customer advisor.

Third parties cannot access the data stored in the Local Storage. It is not passed on to third parties and is not used for advertising purposes. We use these techniques with your consent.

The tool works completely automatically and only requires your personal data, such as your email address or customer number, if this is necessary to process your request. If the chatbot is unable to clarify your request, the entire content of the chat can be forwarded to an employee of our company for further clarification with your consent.

The information collected is stored for a maximum of 30 days.

The processing of your personal data is carried out with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing carried out based on the consent until revocation.

Your data will then be deleted, provided that no legal retention periods prevent the deletion. If there is a legal obligation to retain data, processing will be limited to this purpose.

For the provision of its offer, knowhere GmbH uses services of various subcontractors, which you can access at <u>https://www.moin.ai/subunternehmer (https://www.moin.ai/subunternehmer)</u>. You can access the privacy policy of knowhere GmbH at <u>https://www.moin.ai/chatbots-dsgvo (https://www.moin.ai/chatbots-dsgvo)</u>.

### 4Sellers shop system

For the operation and functionality of the website we use technologies of 4SELLERS GmbH, Nelkenweg 6a, 86641 Rain am Lech. Cookies are set when you use our website. These are technically necessary. They make the website technically accessible, secure, and usable and provide essential and basic functionalities, such as navigating the website, displaying the website correctly in the internet browser, providing a secure login, saving the contents of your shopping basket, saving the progress of your order, or remembering your login details. You can set your browser to block these cookies or to notify you of these cookies. However, some areas of our website may then not function. The information collected is stored for a maximum of 390 days. The information collected by 4Sellers in this way is stored on servers in the European Union.

The data will not be stored together with any other personal data about you. You have the right to object to this processing of your personal data at any time on grounds relating to your situation. You can find more information on data protection at 4Sellers GmbH at:

https://www.4sellers.de/rechtliches/datenschutz/

(https://www.4sellers.de/rechtliches/datenschutz/)

For the meaningful execution of the services, Criteo may transmit data to subsidiaries and partner companies. You can find all partners here: <u>Our partners I Criteo (https://www.criteo.com/privacy/our-partners/)</u>

## Econda

We use the analysis tool of econda GmbH, Zimmerstraße 6, 76137 Karlsruhe, Germany on our website. To design and optimise this website in line with requirements, anonymised data, namely timestamp, conversion tracking, IP address, time zone, time and date, user location, user agent, language and website visited, are collected, and stored by solutions and technologies of econda GmbH and user profiles are created from this data using pseudonyms.

The information collected is stored for a maximum of 1095 days. Cookies may be used for this purpose, which enable the recognition of an internet browser. However, usage profiles are not merged with data about the bearer of the pseudonym without the express consent of the visitor. IP addresses are rendered unrecognisable immediately after receipt, making it impossible to assign usage profiles to IP addresses. The use of the pseudonymised data takes place with your consent. You can revoke your consent at any time for the future without affecting the lawfulness of the processing conducted based on the consent up to the revocation.

The revocation only applies to the device and the web browser on which it was set. If necessary, please repeat the process on all devices and for all browsers you use. If you delete the opt-out cookie, requests will be sent to econda GmbH again.

## Use of BeezUp

We use technology from BeezUP S.A.S. (BeezUP S.A.S., 10 rue de Penthièvre - 75008 Paris, France) on our website. The purpose of the data processing is to analyse our website and its visitors. For this purpose, data, namely mouse movement, time stamp, user location, user agent, language, website visited, and time zone are collected and stored. From this data, user profiles can be created under a pseudonym.

Cookies can be used for this purpose. The cookies enable the recognition of the internet browser. The data collected with BeezUp technologies will not be used to personally identify the visitor to our website without the separately granted consent of the person concerned and will not be merged with personal data about the bearer of the pseudonym. The use of cookies or comparable technologies takes place with your consent. The processing of your personal data takes place with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted based on the consent until revocation. You can prevent the setting of cookies by means of an appropriate setting of the Internet browser used and thus object to the setting of cookies permanently and in the future. In addition, cookies already set by BeezUP S.A.S. can be deleted at any time via the settings of the Internet browser you are using or other software programmes.

#### Emarsys

We use services of Emarsys Interactive Services GmbH, Willi-Schwabe-Straße 1, 12489, Berlin, Germany, to store cookies on your computer through your web browser. The cookies and the identification numbers stored in them are not merged with your name, address, email address or other personally identifiable information, unless you have specifically allowed us to send you information specifically targeted to your interests. Emarsys uses these cookies to recognise your browser so that we can track your movements around our website and record and measure the success of certain marketing activities. We use this information to improve our website and email newsletters, by tailoring our information and offers to users' individual interests and needs. With the data obtained in this way, we create a pseudonymous user profile to be able to provide you with the newsletter tailored to your interests. The following data is collected in the process: Timestamp, user device tracking, user location, user agent, language, website visited and time zone. We link this data to your user account if you have logged in. The information collected by Emarsys in this way is stored on a server in the European Union.

The information collected is stored for a maximum of 365 days, 5 hours, and 49 minutes. The use of cookies or similar technologies takes place with your consent. The processing of your personal data takes place with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted on the basis of the consent until revocation. It is possible to make advanced settings directly on our website via the Consent Manager tool. The tool enables you to give consent to data processing via the website, in particular the setting of cookies, as well as to exercise your right of revocation for consent already given. Alternatively, you can set your browser software accordingly or make a general browser setting so that it does not accept cookies.

You can find more information about Emarsys at: <u>https://help.emarsys.com/hc/en-</u> us/sections/360001104413-Data-Protection-Compliance (<u>https://help.emarsys.com/hc/en-</u> us/sections/360001104413-Data-Protection-Compliance)

#### Use of Google Ads conversion tracking

We use the online advertising programme "Google Ads" on our website and in this context conversion tracking (visit action evaluation). Google Conversion Tracking is an analysis service provided by Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). When you click on an ad placed by Google, a cookie for conversion tracking is placed on your computer. These cookies have a maximum validity of 390 days. The following data is collected: click path, measure ad visibility, mouse movement, timestamp, track clicks on ads, conversion tracking, IP, time and date, user location, visitor behaviour, user agent, language, website visited, time zone. If you visit certain pages of our website and the cookie has not yet expired, Google and we will be able to recognise that you clicked on the ad and were redirected to that page. Each Google Ads customer receives a different cookie. Thus, there is no way that cookies can be tracked across Ads customers' websites.

The information obtained with the help of the conversion cookie is used to create conversion statistics. This tells us the total number of users who clicked on one of our ads and were redirected to a page tagged with a conversion tracking tag. However, we do not receive any information with which users can be personally identified.

Your data may be transferred to the USA. There is no EU Commission adequacy decision for the USA. The data transfer takes place, among other things, based on standard contractual clauses as appropriate safeguards for the protection of personal data, viewable at: https://policies.google.com/privacy/frameworks?hl=en-GB.

The use of cookies or comparable technologies takes place with your consent. The processing of your personal data is conducted with your consent. You can revoke your consent at any time without

affecting the lawfulness of the processing conducted based on the consent until revocation. Last update: August 2023

### Use of Google Analytics

We use the web analysis service Google Analytics of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google") on our website.

The data processing serves the purpose of analysing our website and its visitors as well as for marketing and advertising purposes. To this end, Google will use the information obtained on behalf of the operator of our website for the purpose of evaluating your use of the website, compiling reports on website activity, and providing us with other services relating to website activity and internet usage. In doing so, the following information may be collected, among others: IP address, date, and time of page view, click path, information about the browser you are using and the device you are using, pages visited, referrer URL (website from which you accessed our website), location data, purchase activities. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

The information collected is stored for a maximum of 730 days.

Google Analytics uses technologies such as cookies, web storage in the browser and tracking pixels, which enable an analysis of your use of the website. The information generated by this about your use of our website is usually transferred to a Google server in the USA and stored there. There is no EU Commission adequacy decision for the USA. The data transfer takes place, among other things, on the basis of standard contractual clauses as appropriate guarantees for the protection of personal data, viewable at: https://policies.google.com/privacy/frameworks?hl=en-GB. Both Google and US government authorities have access to your data. Your data may be linked by Google to other data, such as your search history, your personal accounts, your usage data from other devices and any other data Google may have about you.

IP anonymisation is activated on our website. This means that your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.

The use of cookies or comparable technologies takes place with your consent. The processing of your personal data takes place with your consent. You can revoke your consent at any time without affecting the legality of the processing conducted based on the consent until revocation.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. Furthermore, you can prevent the collection of the data generated by the cookie and related to your use of the website to Google as well as the processing of this data by Google by downloading and

installing the browser plug-in available under the following link [ https://tools.google.com/dlpage/gaoptout?hl=en-GB]. To prevent the collection by Google Analytics

across devices, you can set an opt-out cookie. Opt-out cookies prevent the future collection of your data when visiting this website. You must perform the opt-out on all systems and devices used for this to be fully effective.

For more information on terms of use and data protection, please visit

https://marketingplatform.google.com/about/analytics/terms/us/

<u>(https://marketingplatform.google.com/about/analytics/terms/us/)</u> or <u>https://policies.google.com/?</u> <u>hl=en-GB&gl=de (https://policies.google.com/?hl=en-GB&gl=de)</u> and

https://policies.google.com/technologies/cookies?hl=en-GB

(https://policies.google.com/technologies/cookies?hl=en-GB).

#### Use of the Google Tag Manager

On our website, we use the Google Tag Manager of Google LLC. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google").

This application is used to manage JavaScript tags and HTML tags that are used to implement tracking and analysis tools. The data processing serves the purpose of demand-oriented design and optimisation of our website.

The use of cookies or comparable technologies takes place with your consent. The processing of your personal data is conducted with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted based on your consent up to the time of revocation.

The Google Tag Manager itself neither stores cookies nor does it process personal data. However, it enables the triggering of other tags that may collect and process personal data such as mouse movement, timestamp, IP address, media tracking, user location, visitor behaviour, user agent,

language, website visited and time zone. The information collected is stored for 90 days. You can find more information on terms of use and data protection <u>here.</u> (<u>https://marketingplatform.google.com/intl/en/about/analytics/tag-manager/use-policy/</u>)

#### **Microsoft Advertising**

We use the technologies described below from Microsoft Ireland Operations Ltd, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland ("Microsoft"). The data processing is conducted based on an agreement between jointly responsible parties. The information automatically collected by Microsoft technologies about your use of our website is transferred to a server of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA and stored there. There is no adequacy decision of the European Commission for the USA. Our cooperation with Microsoft is based on standard data protection clauses of the European Commission. Further information on data processing by Microsoft can be found in Microsoft's data protection information.

For advertising purposes in the Bing, Yahoo and MSN search results as well as on third-party websites, the so-called Microsoft Advertising Remarketing Cookie is set when you visit our website. This cookie automatically enables interest-based advertising by collecting and processing data (IP address, time of visit, device, and browser information as well as information about your use of our website) and by means of a pseudonymous CookieID and based on the pages you visit. The information collected is stored for a maximum of 390 days.

For website analysis and event tracking, we measure your subsequent usage behaviour via Microsoft Advertising Universal Event Tracking (UET) if you have accessed our website via an advertisement from Microsoft Advertising. For this purpose, cookies may be used and data (IP address, time of visit, device and browser information, and information about your use of our website based on events specified by us, such as visiting a website or subscribing to a newsletter) may be collected from which usage profiles are created using pseudonyms. If your Internet-enabled devices are linked to your Microsoft account and you have not deactivated the "Interest-based advertising" setting in your Microsoft account, Microsoft may create reports on usage behaviour (cross-device user numbers), even if you change your terminal device, so-called "cross-device tracking". We do not process personal data in this respect; we only receive statistics compiled based on Microsoft UET. The information collected is transferred to Microsoft servers in the USA and stored there for a maximum of 390 days.

Cookies or similar technologies are used with your consent. Your personal data is processed with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted based on the consent until revocation.

If you choose this option, a new cookie (opt-out cookie) will be set in your browser informing Microsoft that no data about your browsing behaviour may be stored. Please note that the setting must be made for all browsers you use. If all your cookies in a browser are deleted, the opt-out cookie from Microsoft will also be affected.

#### Kelkoo

This website uses Kelkoo Sales Tracking, a tracking technology provided by Kelkoo Group, Parc Sud Galaxie, 6 rue des Méridiens, 38130 Échirolles, France ("Kelkoo"), to track and analyse certain user actions taken after a redirect from a Kelkoo domain on our website. For this purpose, a so-called Javascript-based tracking pixel is implemented in our order confirmation pages, which can track user actions as a single-pixel file through interaction with Kelkoo. The tracking pixel establishes a connection between a user click on an advertisement (touch point) on Kelkoo and a completed order on our website. When an order is completed, your browser sends an HTTP request to Kelkoo's server via the pixel, which transmits certain information, such as timestamp, IP address, user agent, language, website visited and time zone. The IP address of the end device is anonymised by Kelkoo before storage. A collection of this information and a transmission to and storage by Kelkoo only takes place if an order has been placed after forwarding from Kelkoo to our website. The information collected is stored for a maximum of 365 days.

The use of cookies or comparable technologies takes place with your consent. The processing of your personal data takes place with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted based on your consent up to the time of revocation.

If you choose this option, a new cookie (opt-out cookie) will be set in your browser, informing Kelkoo that no data about your browsing behaviour may be stored. Please note that the setting must be made for all browsers you use. If all your cookies in a browser are deleted, this will also affect Kelkoo's opt-out cookie.

### Use of YouTube

We use the YouTube video embedding feature of Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland; "YouTube") on our website. YouTube is a company affiliated with Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). The function displays videos stored on YouTube in an iFrame on our website. The option "Extended data protection mode" is activated. This means that YouTube does not store any information about visitors to our website. Only when you watch a video is information such as ad visibility measurement, timestamp, ad click tracking, conversion tracking, IP address, time and date tracking, user device tracking, visitor behaviour, user agent, language, website visited, time zone transmitted to YouTube and stored there. The information collected is stored for a maximum of 730 days.

Your data may be transmitted to the USA. There is no EU Commission adequacy decision for the USA. The data transfer takes place, among other things, on the basis of standard contractual clauses as appropriate guarantees for the protection of personal data, viewable at:

https://policies.google.com/privacy/frameworks (https://policies.google.com/privacy/frameworks). The use of cookies or comparable technologies takes place with your consent. The processing of your personal data is conducted with your consent. You can revoke your consent at any time without affecting the lawfulness of the processing conducted based on the consent until revocation. For more information on the collection and use of data by YouTube and Google, your rights in this regard and ways to protect your privacy, please refer to YouTube's privacy policy at https://www.youtube.com/intl/ALL\_uk/howyoutubeworks/our-commitments/protecting-user-data/ (https://www.youtube.com/intl/ALL\_uk/howyoutubeworks/our-commitments/protecting-userdata/).

### PayPal

We use the PayPal Express payment service of PayPal (Europe) S.à.r.I. et Cie, S.C.A. (22-24 Boulevard Royal L-2449, Luxembourg; "PayPal") on our website. The data processing serves the purpose of being able to offer you payment via the PayPal Express payment service. To integrate this payment service, it is necessary for PayPal to collect, store and analyse data (financial information, fraud detection and prevention, timestamp, IP address, media tracking, time and date tracking, user device tracking, user network tracking, user agent, language, website visited, time zone) when you access the website. Cookies may also be used for this purpose. The cookies enable the recognition of your browser.

The information collected is stored for a maximum of 1095 days.

This data processing, in particular the setting of cookies, is conducted for our overriding legitimate interest in offering a customer-oriented range of different payment methods. You have the right to object to this processing of your personal data based on your particular situation at any time. With the selection and use of PayPal Express, the data required for payment processing is transmitted to PayPal in order to be able to fulfil the contract with you with the selected payment method. For more information on data processing when using the PayPal Express payment service, please refer to the associated data protection declaration at

<u>https://www.paypal.com/de/webapps/mpp/ua/privacy-full?locale.x=en\_uk#Updated\_PS</u> (<u>https://www.paypal.com/de/webapps/mpp/ua/privacy-full?locale.x=en\_uk#Updated\_PS</u>).

## Plug-ins and other

#### **Rating Tools**

#### Trusted Shops Trustbadge

Trusted Shops widgets are integrated on our website to display Trusted Shops services (e.g., seal of approval, collected ratings) and to offer Trusted Shops products to buyers after they have placed an order.

This serves to protect our legitimate interests in optimal marketing by enabling secure shopping, which outweigh our interests in the context of a balancing of interests.

The trust badge and the services advertised with it are an offer of Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Cologne, Germany, with whom we are jointly responsible for data protection pursuant to Article 26 DSGVO.

The trust badge is provided as part of a joint responsibility by a US CDN provider (content delivery network). An appropriate level of data protection is ensured by standard data protection clauses and further contractual measures. Further information on the data protection of Trusted Shops GmbH can be found in their data protection declaration.

When the Trustbadge is called up, the web server automatically saves a so-called server log file, which also contains your IP address, the date and time of the call-up, the amount of data transferred and the requesting provider (access data) and documents the call-up. The IP address is anonymised immediately after collection so that the stored data cannot be assigned to you personally. The anonymised data is used for statistical purposes and for error analysis.

After the order has been completed, your email address, which has been hashed using a cryptological one-way function, is transmitted to Trusted Shops GmbH. This serves to check whether you are already registered for services with Trusted Shops GmbH and is therefore necessary for the fulfilment of our and Trusted Shops' overriding legitimate interests in the provision of the buyer protection linked to the specific order in each case and the transactional evaluation services. If this is the case, further processing will be conducted in accordance with the contractual agreement between you and Trusted Shops. If you have not yet registered for the services, you will subsequently be given the opportunity to do so for the first time. Further processing after registration also depends on the contractual agreement with Trusted Shops GmbH. If you do not register, all transmitted data will be automatically deleted by Trusted Shops GmbH and a personal reference is then no longer possible.

Within the framework of the joint responsibility existing between us and Trusted Shops GmbH, please prefer to contact Trusted Shops GmbH in the event of data protection questions and to assert your rights using the contact options given in the data protection information linked above. Irrespective of this, however, you can always contact the data controller of your choice. Your request will then, if necessary, be passed on to the other responsible party for a response.

You have the right to object to the processing of your personal data at any time on grounds relating to your situation.

#### eKomi

We use technology from eKomi Holding GmbH, Unit 5 Jupiter House Calleva Park, Reading Berkshire RG7 8NN, United Kingdom, ("eKomi") for the purpose of supplier and product evaluations by our customers and for our own quality management. Therefore, we have integrated an evaluation software from eKomi on our website. Via this evaluation software, you can submit an anonymous evaluation of your experience with us after we have provided our service.

When completing your order, you can agree to be contacted once by email after delivery to rate your purchase. You can revoke the use of your data for sending this email at any time. Please send your revocation to [anonymous@voss-group.eu].

For this technical implementation, an order processing agreement has been concluded with eKomi. eKomi takes all organisational and technical measures to protect this data. In accordance with the legal retention periods, this data is kept and then deleted. More detailed information on eKomi's data protection can be found at https://www.ekomi.co.uk/uk/privacy/. During your evaluation via eKomi, you can enter your email address, which we can use to contact you later regarding your evaluation. In this way we can, for example, respond individually to your criticism, answer your questions, or provide other assistance. We would like to point out that providing your email address is voluntary.

#### Trustami customer reviews

To display the collected ratings and feedback from social media, the Trustami trustmark is embedded on this website. When completing your order, you can agree to be contacted once by email after delivery to rate your purchase. You can revoke the use of your data for sending this email at any time. Please send your revocation to [anonymous@voss-group.eu]. When the Trustami trustmark is called up, the web server automatically saves data (access data) in the form of a server log file containing the time stamp, tracking of the user device, IP address in shortened form, tracking of the user location, user agent, language, previously visited website, time zone. This access data is not analysed and is automatically overwritten at the latest seven days after your visit to our website has ended. The Trustami trustmark and the services advertised with it are offered by Trustami GmbH, Schröderstraße 5, 10115 Berlin. The privacy policy of Trustami at https://www.trustami.com/privacy/ (https://www.trustami.com/privacy/) applies to the processing of data collected by Trustami.

### Myra Security GmbH

Our website uses the services of Myra Security GmbH (DE), Landsberger Str. 187, 80687 Munich, Germany. The purpose of the service is to ensure secure encrypted data transmission on the Internet (SSL), to optimise global website performance through the Myra Content Delivery Network (CDN) and to improve security and protection against cyber-attacks through the Myra Hyperscale Web Application Firewall (WAF).

The legal basis for data processing is our legitimate interest pursuant to Article 6 (1) sentence 1 lit. f GDPR.

The following information is collected without your intervention and stored until automated deletion: Access logs (requesting IP, port#, domain (vHost), requested path, content type, schema, request header, referrer, requesting user agent, HTTP status, transmitted bytes (request/response), response times (upstream/request), WAF status (including antibot), TLS parameters) and system logs.

The access logs (metadata) are stored for a specified time (maximum six months) that is deemed reasonable in relation to the purpose of the collection. Once the purposes of the collection have been fulfilled and further storage is no longer necessary, the data is deleted immediately. If there are retention periods that must be observed (possibly differing from six months), these take precedence, and the data is blocked for all other purposes.

According to PCI DSS, system logs must be stored for at least one year. If data is generated by automated daily analysis tools, it must also be stored/retained for at least one year.

The content of the Myra customer database is backed up in accordance with Myra Security's business processes, retention periods and legal requirements.

This data is not passed on to third parties. The logs are analysed regularly.

The service is essential for the technical security of our website. You can find more information about the GDPR and Myra Security on the Myra Security data protection page:

https://www.myrasecurity.com/en/privacy-policy/

Trusted Shops Trustbadge

You have the right to:

- to request information about your personal data processed by us. In particular, you can request
  information about the processing purposes, the category of personal data, the categories of
  recipients to whom your data have been or will be disclosed, the planned storage period, the
  existence of a right to rectification, erasure, restriction of processing or objection, the existence of
  a right of complaint, the origin of your data if it has not been collected by us, as well as the
  existence of automated decisionmaking, including profiling, and, if applicable, meaningful
  information about its details;
- demand the correction of incorrect or incomplete personal data stored by us without delay;
- request the erasure of your personal data stored by us, unless the processing is necessary for the exercise of the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the assertion, exercise, or defence of legal claims;
- request the restriction of the processing of your personal data, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure and we no longer require the data, but you need it for the assertion, exercise or defence of legal claims or you have objected to the processing;
- if you have exercised the right to rectification, erasure, or restriction of processing against the controller, the controller is obliged to communicate this rectification or erasure of the data or restriction of processing to all recipients to whom the personal data concerning you have been disclosed, unless this proves impossible or involves a disproportionate effort. Do you have the right against the controller to be informed about these recipients?
- to receive your personal data that you have provided to us in a structured, commonly used and machinereadable format or to request that it be transferred to another controller;
- not to be subject to a decision based solely on automated processing, including profiling, which
  produces legal effects concerning you or similarly significantly affects you;
- to withdraw your consent, once given, at any time. This has the consequence that we may no longer continue the data processing based on this consent in the future. If you wish to exercise

your right of revocation, an email to anonymous@vossgroup.eu will suffice;

• complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company headquarters for this purpose.

### **Right of objection**

If your personal data is processed based on legitimate interests, you have the right to object to the processing of your personal data if there are grounds for doing so that arise from your particular situation or if the objection is directed against direct advertising. In the latter case, you have a general right to object, which will be implemented by us without specifying a particular situation. If you wish to exercise your right of objection, simply send an email to anonymous@voss-group.eu.

### Disclosure of data in other respects

Unless otherwise stated in this data protection declaration, we will only pass on your personal data to third parties in the following cases:

- if you have given us your express consent to do so, or
- if there is a legal obligation for the disclosure, e.g., in the context of criminal prosecution, or
- the disclosure is necessary for the purpose of asserting or defending legal claims or exercising rights, and it cannot be assumed that the disclosure is contrary to an overriding interest of the data subject that is worthy of protection.

### Changes to this data protection declaration

We reserve the right to update this privacy policy. If we make material changes to this privacy statement, we will post those changes on our website or otherwise notify you so that you have an opportunity to review the changes before they become effective. Your continued use of our website following the posting of changes or notification of proposed changes to the Privacy Policy will mean that you accept them and agree to the updated Privacy Policy.