

# Privacy Policy

## I. General Information

As the operator of the website [www.centropix.com](http://www.centropix.com), [www.centropix.eu](http://www.centropix.eu) oder [www.centropix.eu/first-lastname](http://www.centropix.eu/first-lastname), CENTROPIX GmbH takes the protection of personal data very seriously. We treat personal data confidentially and in accordance with legal data protection regulations and on the basis of this privacy policy. The legal bases can be found in the General Data Protection Regulation (GDPR).

When you use this website, various personal data are processed depending on the manner and the extent of use. Personal data is information that relates to an identified or identifiable natural person (hereinafter referred to as “data subject”); an identifiable natural person is someone who can be identified directly or indirectly (e.g. associated with an online identifier). This includes information such as the person’s name, address, telephone number and date of birth.

In accordance with Art. 12 et seq. GDPR, this privacy policy details how we handle your personal data when you use our website and as a customer of CENTROPIX GmbH. In particular, it explains what data we collect, what we use it for and the legal basis for the respective data processing.

## II. Name and Contact Details of the Data Controller

A data controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data (e.g. name, contact details, date of birth, etc.). Within the meaning of GDPR, the applicable national data protection laws and other data protection regulations, the data controller is:

CENTROPIX GmbH	
Münkafeld 1	
6800 Feldkirch	E-Mail: <a href="mailto:office@centropix.com">office@centropix.com</a>
Austria	Telefon: +423 220 29 50

## III. Data Protection Officer

We have appointed a Data Protection Officer for our company. They can be contacted using the following details:

Thilo Noack	
SharedIT Professional GmbH & Co. KG	
Seabystrasse 17a	
24576 Bramstedt	E-Mail: <a href="mailto:Thilo.noack@sharedit-pro.de">Thilo.noack@sharedit-pro.de</a>
Germany	Telefon: +49 177 64 22 164

## IV. Purpose and Legal Basis for Processing Data

### 1. Accessing and Visiting our Website – Server Log Files

For the purpose of the technical provision of the website, we need to process certain information that is automatically shared by your browser so that our website is correctly displayed, and you can use the website. This information is automatically collected each time you connect to our website and is automatically stored in so-called server log files. These are:

- Browser type and version
- Operating system used
- Website accessed from (Referrer URL)
- Host name of the accessing computer
- Date and time of access
- IP address of the accessing computer

The storage of the previously mentioned access data is required for the technical provision of a functional website and to ensure system security. This also applies to the storage of your IP address, which is necessary and can theoretically enable you to be associated with an identified, subject to further requirements. In addition to the purposes mentioned above, we use server log files exclusively for the needs-based design and optimization of our online service in a purely statistical way and without any link being made to your personal data. This data is not merged with other data sources or evaluated for marketing purposes.

The access data collected in relation to the use of our website is only stored for a duration for which this data is required to achieve the purposes mentioned previously. Your IP address is stored on our web server for a maximum of 7 days for IT security purposes.

If you visit our website to find information about our range of products and services or to use them, the legal basis for the temporary storage and processing of access data is Art. 6 (1)(b) GDPR, which states that the processing of data for the performance of a contract or for the implementation of pre-contractual measures is permitted. In addition, Art. 6 (1)(f) GDPR is the legal basis for the temporary storage of technical access data. Our legitimate interest here is being able to provide a technically functioning and user-friendly website and to ensure our systems are secure.

## 2. Contact Form

If you send us inquiries using our contact form, your message/communication (comment) including the contact details you provided there will be stored and processed accordingly for the purpose of processing and answering the inquiry and also for any follow-up questions. We do not share this data with third parties unless it is necessary for processing purposes and answering your inquiry or if you have given us your consent to do so.

If you contact us in connection to an existing contractual relationship or contact us in advance for information about our range of services or our other offerings, the data and information you provide will be processed for the purpose of processing and responding to your inquiry in accordance with Art. 6 (1)(b) GDPR (legal basis). Otherwise, such processing shall take place for the protection of our legitimate interests pursuant to Art. 6 (1) (f) GDPR for the proper response to customer/contact inquiries.

We will store the details you provide in the contact form until the purpose for data storage/processing no longer applies (e.g. after processing of your inquiry has been completed). Mandatory legal provisions, particularly in relation to storage periods, remain unaffected.

## 3. Use of the KLOUD App

- a) Before you can install the app, you may have to conclude a usage agreement with an app store operator (e.g. Google, Apple) for access to its portal (e.g. Google Play Store, App Store). The app store operator collects and processes data in connection with the use of the app store, such as user name, email address and individual device identification number as the responsible party. We are not party to the usage agreement with the app store operator and have no influence on its data processing. In this respect, the privacy policy of the respective app store operator applies.
- b) To use the app, you must register in advance at [www.centropix.com](http://www.centropix.com) and create a user profile; you can then use this user profile to log in for the purpose of using the app. With the registration by the user, the following data may be collected (insofar as these are entered by the user himself/herself):

Sex,  
First name, Last name,  
Birth date,  
Email address,  
Address,  
Phone number.

The personal data provided by you during registration will be collected, processed and used by CENTROPIX for the purpose of establishing the contract for the use of the KLOUD app, for the performance and processing of the contract and for billing purposes. Legal basis for the aforementioned data processing is Art. 6 para. 1 p. lit. a, b GDPR.

- c) In the KLOUD app you have the possibility to share your current location. The use of the location data (e.g. display of the current position or centering of the map) usually takes place on your mobile device. To use the location services, they must be activated in your mobile operating system. Once they are enabled and the app is launched for the first time, access to the location information is requested. Confirmation will result in the app being allowed to access your location information. You can disable the app's access to your location at any time in the corresponding settings of your mobile device. This data processing is based on your granted consent, legal basis is Art. 6 para. 1 p. 1 lit. a GDPR.
- d) You can give the app access to your camera and photo/video gallery. If you give the app this permission, it is possible for you to upload your own pictures or videos. However, the camera data will only be stored locally. If in the future it should be possible to share these pictures/videos, an additional explicit permission on your part will be necessary. You can deactivate access to the camera in the device settings of your end device at any time and thus revoke your consent at any time. This data processing is based on your granted consent, legal basis is Art. 6 para. 1 p. 1 lit. a GDPR.
- e) In addition, we automatically collect certain data as part of your use of the app, which is necessary for the use of the app. This includes: internal device ID, version of your operating system, time of access. This data is automatically transmitted to us, but not stored, in order to provide you with the service and related functions; to improve the functions and performance features of the app and to prevent and eliminate misuse and malfunctions. This data processing is justified by the fact that the processing is necessary for the performance of the contract between you as the data subject and us pursuant to Art. 6 (1) p. 1 lit. b GDPR for the use of the app, or we have a legitimate interest in ensuring the functionality and error-free operation of the app and to be able to offer a service that is in line with the market and interests within the meaning of Art. 6 (1) p. 1 lit. f GDPR.

#### 4. E-mail or Telephone Inquiries

If you contact us by e-mail or telephone, your inquiry including all resulting personal data (name, inquiry details) will be stored and processed by us for the purpose of dealing with your query. We do not share this data without your consent.

The basis for the processing of this data is Art. 6 (1)(b) GDPR if your inquiry is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing takes place on the basis of our legitimate interest in the effective processing of the inquiries we receive (Art. 6 (1)(f) GDPR) or on your consent if it requested (Art. 6 (1)(a) GDPR).

We will store the data you send to us via contact inquiries until you request that we delete it, withdraw your consent to store it, or the purpose for storing the data no longer applies (e.g. after your request has been processed). Mandatory legal provisions, particularly in relation to storage periods, remain unaffected.

## 5. Use of Cookies and Similar Functions/Technologies

Our website sometimes uses cookies. Cookies are not harmful for your computer and do not contain viruses. Cookies help make our website more user-friendly, effective, and secure and are required for certain features to work correctly. Cookies are small text files that are stored on your computer and saved by your browser. A cookie contains a characteristic string that allows your browser to be uniquely identified when you visit the website again.

Most of the cookies that our website uses are a type known as “session cookies”. They are automatically deleted at the end of your site visit or browser session (also called “transient cookies”). Other cookies remain stored on your device for a specified period of time or until you delete them (“persistent cookies”). These cookies mean that we can recognize your browser when you visit our website again. We are happy to provide more information on the functional cookies that we use if you make an inquiry in writing. Please contact us using the contact details above to do so.

You can configure your browser settings to be informed about cookies settings, allow, or block the use of cookies in specific circumstances or in general, and activate the automatic deletion of cookies when closing your browser. You can usually find the process for disabling cookies via the “Help” section of your Internet browser. If cookies are disabled, the functionality of this website may be limited and/or not available in full. For additional cookie-specific settings and opt out options, please also see below the individual explanations of the cookies and associated functions/technologies specifically used when visiting our website.

Some of the cookies used on our website come from third parties that help us analyze the effectiveness of our web content and the interests of our visitors, measure the performance of our website, or create personalized advertising and other content for our website or other websites. For the provision of our website, we use both first-party cookies (only visible from the domain you are visiting) and third party cookies (visible across domains and usually placed by third parties).

The cookie-based data processing is performed on the basis of the consent you provide pursuant to Art. 6 (1)(a) GDPR (legal basis) or on the basis of Art. 6 (1)(f) GDPR (legal basis) to protect our legitimate interests.

Our legitimate interests here are being able to provide a technically optimized website that is user-friendly and adapted to your needs, and to ensure our systems are secure. You can withdraw your consent at any time, e.g. by disabling the cookie-based tools/plugins listed in the following detailed overview. By configuring the appropriate settings, you can also object to processing based on legitimate interests.

Specifically, the following cookie-based tools/plugins are used by this website:

#### **a) Google Analytics**

This website uses Google Analytics features with your consent (Art. 6 (1)(a) GDPR), which is a web analytics service offered by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. You can choose to give your consent when you visit our website by clicking the corresponding button in the “cookie banner”. Data is also regularly transferred to Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) as part of the processing described below. Google Ireland Limited and Google LLC are hereinafter jointly referred to as “Google”. Google Analytics uses cookies (first-party cookies), which allows us to analyze your use of the website. However, the use of cookies here does not provide us with direct knowledge of your identity as a result. Google uses the information generated by the cookies on our behalf for the purpose of analyzing your use of the website, generating reports on website activity, and providing other services relating to website and internet usage. This helps us improve the quality of our website and its content. Using statistical analyses, we can learn how the website is used and can therefore continually optimize our online services.

The information generated by the Google Analytics cookies about your use of this website (for example, time, place, and frequency of your website visits, including IP address) is transferred to a Google server in the USA and stored there. We have set the data retention period for corresponding Google Analytics data at user and event level to 14 months (shortest possible option).

#### **IP Anonymization**

We have activated the IP anonymization feature on this website. This means that your IP address is shortened by Google within EU member states or in other signatory states of the Agreement on the European Economic Area before being sent to the USA and anonymized as a result. Only in exceptional cases will the full IP address be sent to a Google server in the USA and shortened there. According to Google’s own information, the IP address transferred by your browser in relation to Google Analytics is not merged with other personal Google data.

#### **Browser Plugin**

You can prevent Google Analytics cookies from being stored by configuring the corresponding settings in your browser (see above). You can also prevent Google from collecting data generated by the cookies and data related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plugin available via the following link:

<https://tools.google.com/dlpage/gaoptout>

#### **Objecting to Data Collection**

Alternatively, you can opt in or out of the collection of your data by Google Analytics, in particular on mobile devices, by clicking on the following link: [Opt out of Google Analytics](#)

When you opt out, a cookie will be set that prevents the collection of your data during future visits to this website.

Specifically, the following tracking cookies are used by Google Analytics:

\_\_utmsz, \_\_utma, \_\_utmb, \_\_utmc, \_\_utmt.

For more information on how Google Analytics handles user data, security and data protection practices and settings and opt out options, please refer to Google's Privacy Policy via the following link:

<https://support.google.com/analytics/answer/6004245>

#### **b) Google Ads and Google Ads Conversion Tracking**

This website uses Google Ads. Google Ads is an online advertising platform developed by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

In the context of Google Ads, we use conversion tracking. A conversion tracking cookie is set when you click on an ad delivered by Google. Cookies are small text files that the web browser stores on the user's computer. These cookies lose their validity after 30 days and are not used for the personal identification of users. If the user visits certain pages of this website and the cookie has not yet expired, CENTROPIX GmbH and Google can recognize that the user clicked on the ad and was redirected to this page.

Each Google Ads customer receives a different cookie. The cookies cannot be tracked through the websites of Google Ads customers.

The information collected using the conversion cookie is used to create conversion statistics for Google Ads customers who have opted in to conversion tracking. Clients can track the total number of users who clicked on their ad and were redirected to a page tagged with a conversion tracking tag. However, they are not given any information that personally identifies users. If you do not want to be included in this tracking, you can easily opt out by disabling the Google conversion tracking cookie in your web browser user settings. You will no longer be included in the conversion tracking statistics.

The basis for the storage of "conversion cookies" and the use of this tracking tool is Art. 6 (1)(f) GDPR. We have a legitimate interest in analyzing user behavior to optimize both our website and our advertising. If corresponding consent has been requested (e.g. consent to store cookies), the processing is based exclusively on Art. 6 (1)(a) GDPR; consent can be withdrawn at any time.

For more information on Google Ads and Google conversion tracking, please refer to Google's Privacy Policy:

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

You can configure your browser settings to be informed about cookies settings, allow or block the use of cookies in specific circumstances or in general, and activate the automatic deletion of cookies when closing your browser. If cookies are disabled, the functionality of this website may be limited.

#### **c) Facebook Custom Audiences (Facebook Pixel)**

Within our online offer, the so-called „Facebook Pixel“ of the social network Facebook, which is operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are a resident of the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland („Facebook“), is used.

With the help of the Facebook pixel, it is possible for Facebook, on the one hand, to determine you as a visitor to our online offer as a target group for the display of advertisements (so-called „Facebook ads“). Accordingly, we use the Facebook pixel to display the Facebook ads placed by us only to those Facebook users who have also shown an interest in our online offer or who have certain characteristics (e.g. interests in certain topics or products determined on the basis of the websites visited) that we transmit to Facebook (so-called „Custom Audiences“). With the help of the Facebook pixel, we also want to ensure that our Facebook ads correspond to the potential interest of users and do not have a harassing effect. With the help of the Facebook pixel, we can further track the effectiveness of the Facebook ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a Facebook ad (so-called „conversion“).

### **Privacy policy of Facebook**

The processing of data by Facebook takes place within the framework of Facebook’s data usage policy. Accordingly, general information on the display of Facebook ads can be found in Facebook’s data usage policy. Specific information and details about the Facebook Pixel and how it works can be found in Facebook’s help section.

The use of the Facebook Pixel as well as the storage of „conversion cookies“ is based on Art. 6 (1) p. 1 lit. a GDPR.

You can object to the collection by the Facebook pixel and use of your data to display Facebook ads. In order to set which types of advertisements are displayed to you within Facebook, you can visit the page set up by Facebook and follow the instructions there regarding the settings for usage-based advertising. The settings are done in a platform-independent manner, which means that they are applied to all devices, such as desktop computers or mobile devices. You can further object to the use of cookies that are used for reach measurement and advertising purposes via the Network Advertising Initiative deactivation page and additionally the US website [aboutads.info](https://aboutads.info) or the European website [youronlinechoices.com](https://youronlinechoices.com).

### **d) Use of Twitter Plugins (e.g. “Tweet” Button)**

Our website uses social plugins (“plugins”) of the microblogging social media network Twitter, which is operated by Twitter Inc, 1355 Market St, Suite 900, San Francisco, CA 94103, USA (“Twitter”). The plugins can be identified by the Twitter logo, for example in the form of a blue “Twitter bird”. An overview of the Twitter plugins and what they look like is available here: [https://about.twitter.com/en\\_us/company/brand-resources.html](https://about.twitter.com/en_us/company/brand-resources.html). When you visit a page on our website that contains such a plugin, your browser establishes a direct connection to Twitter’s servers. The content of the plugin is transferred by Twitter directly to your browser and integrated into the page. Twitter receives information that your browser has accessed the corresponding page of our website via the integrated plugin, even if you do not have a Twitter account or are not currently logged in to Twitter. This information (including your IP address) is transferred by your browser directly to a Twitter server in the USA and stored there.

If you are logged in to Twitter, Twitter can directly link your visit to our website to your Twitter account. If you interact with the plugins, for example by clicking the “Tweet” button, the corresponding information is also transferred directly to a Twitter server and stored there. The information is also posted on your Twitter account and displayed there to your followers.



For information on the purpose and extent of the data collection and the further processing and use of data by Twitter, as well as your rights in relation to this and settings for protecting your privacy, please refer to Twitter's Privacy Policy: <https://twitter.com/privacy> If you do not want Twitter to link the data collected via our website directly to your Twitter account, you must log out of Twitter before visiting our website. You can also fully prevent the loading of Twitter plugins with browser add-ons, e.g. with the script blocker "NoScript" (<http://noscript.net>)

#### **e) Matomo**

We use Matomo (formerly Piwik) for web analytics, a service provided by InnoCraft Ltd, 150 Willis St, 6011 Wellington, New Zealand, NZBN 6106769, („Matomo“) using cookie technology. The protection of your data is important to us, which is why we have additionally configured Matomo in such a way that your IP address is only recorded in shortened form. We therefore process your personal usage data anonymously. It is not possible for us to draw conclusions about your person. Further information on the Matomo terms of use and the data protection regulations can be found at: <https://matomo.org/privacy>

#### **f) Hotjar**

We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the 'about Hotjar' section of Hotjar's support site:

<https://help.hotjar.com/hc/en-us/categories/115001323967-About-Hotjar>

#### **g) YouTube**

Our website uses plugins by the video platform YouTube to embed videos and play them directly on our website. The operator of the video platform is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA („YouTube“). YouTube is a joint venture with Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; „Google“) affiliated company.

The integration of YouTube videos takes place in the so-called „extended data protection mode“, which, according to the provider, only initiates the storage of user information when the video(s) is/are played. However, the transfer of data to YouTube partners is not necessarily excluded by the extended data protection mode. Thus, YouTube establishes a connection to the Google DoubleClick network - regardless of whether you watch a video.

If you activate embedded videos on our website, a connection to YouTube's servers is established and a data transmission is started. We have no influence on the scope and content of the data that is transmitted to YouTube and possibly other partners of YouTube by activating the plugin. Among other things, the YouTube server is informed which of our pages you have visited. According to YouTube, this information is used, among other things, to collect video statistics, improve user-friendliness and prevent abusive behavior. YouTube uses cookies to collect information about user behavior. The cookies remain on your terminal device until you delete them. You can prevent YouTube from storing cookies by making the appropriate settings in your browser software (see above).

If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account before activating the play button. YouTube is used in the interest of an appealing presentation of our online offers. This represents a legitimate interest within the meaning of Art. 6 para. 1 p. 1 lit. f GDPR.

For more information on the handling of user data, please refer to YouTube's privacy policy at:

<https://www.google.de/intl/de/policies/privacy>

#### **h) Pinterest**

On our site, we use social plugins by the social network Pinterest, which is operated by Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA („Pinterest“). When you call up a page that contains such a plugin, your browser establishes a direct connection to the Pinterest servers. The plugin transmits log data to the Pinterest server in the USA. This log data may contain your IP address, the address of the visited websites that also contain Pinterest functions, type and settings of the browser, date and time of the request, your use of Pinterest and cookies.

For more information on the purpose, scope and further processing and use of the data by Pinterest, as well as your rights in this regard and options for protecting your privacy, please refer to Pinterest's privacy policy:

<https://about.pinterest.com/de/privacy-policy>

## **6. Newsletter**

If you have given your express consent in accordance with Art. 6 (1)(a) GDPR, we will use your e-mail address to send you our newsletter on a regular and/or ad hoc basis. If the contents of a newsletter are specifically described as part of registration, this information is decisive for the consent of the users. In addition, our newsletters contain information about our services, offers and promotions. To receive the newsletter, you only need to provide a valid e-mail address. If additional information is requested, providing it is always voluntary.

To register for our newsletter, we use a double opt-in procedure, i.e. we will only send you a newsletter by e-mail if you have previously provided confirmation that you want us to send you our newsletter. We will send you a notification e-mail and ask you to confirm that you would like to receive our newsletter by sending a message from your registered e-mail address or by clicking on a confirmation link in this e-mail.

We store your IP address and the date of subscription when you subscribe to the newsletter. These stored details serve as proof of your registration for our newsletter. Similarly, changes to your data stored with the shipping provider are recorded.

The data processing is performed on the basis of your consent (Art. 6 (1)(a) GDPR). You can withdraw this consent at any time by unsubscribing from the newsletter. The legality of the data processing operations already performed remains unaffected by you withdrawing consent. You can withdraw your consent via a link in the newsletter itself or by sending a request using the contact details above.

## **7. Facebook-Fanpage**

CENTROPIX GmbH uses the technical platform and services of Facebook Ireland Ltd, 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland (“Facebook”) to provide information.

According to the ECJ, there is a shared responsibility within the meaning of Art. 26 GDPR between Facebook and the operator of a Facebook Page for the personal data processed via that page. Consequently, Facebook and CENTROPIX GmbH have concluded an agreement on shared responsibility, which you can access [here](#).

CENTROPIX GmbH provides the following information on data processing on our Facebook Page::

### **(1) Data Controllers**

The processing of your personal data on the Facebook Page of CENTROPIX GmbH is performed under shared responsibility with: Facebook Ireland Ltd, 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland.

### **(2) Data Processing**

When you access a Facebook Page, the IP address of your device is transferred to Facebook. Facebook indicate that this IP address is anonymized and deleted after 90 days, provided that it is a German IP address. In addition, Facebook stores additional information about the devices of its users, e.g. the web browser used. If required, Facebook is therefore able to link IP addresses to individual users. If you are logged into your Facebook account while visiting our Facebook Page, a cookie with your Facebook ID is stored on your device. This cookies means that Facebook can track that you have visited our page and how you have used it. Facebook uses this information to deliver personalized content or advertising.

If you want to prevent this, you should log out of your Facebook account or deselect the “stay logged in” function. We also recommend that you delete the cookies on your device and close and restart your browser. This process deletes Facebook information that Facebook can use to establish a link to you.

However, if you choose to use the interactive functions on our Facebook page, you will need to log in to Facebook again using your Facebook login details. This also means that Facebook can establish a link to you again.

Facebook do not clearly state in full nor do we know how Facebook uses the data from visits to Facebook Pages for its own purposes, to what extent activities on the Facebook Page are linked to individual users, how long Facebook stores this data and whether data from a visit to the Facebook Page is passed on to third parties. As a visitor of our Facebook Page, we can only refer you to Facebook's Data Policy for guidance.

The data collected about in this instance will be processed by Facebook and transferred to countries outside the European Union if necessary.

Facebook describes in general terms what information it receives and how it is used in its data policy. In this policy, you can also find information on how to contact Facebook and on the settings options for ads. The data use policy is available via the following link:

<http://facebook.com/about/privacy>

The full version of Facebook's data policy is available here:

[https://facebook.com/full\\_data\\_use\\_policy](https://facebook.com/full_data_use_policy)

Facebook's privacy policy contains more information on data processing:

<https://www.facebook.com/about/privacy/>

You can configure opt out settings here:

<https://www.facebook.com/settings?tab=ads> and here <http://www.youronlinechoices.com>

The transfer and further processing of personal data of users to third countries, such as the USA, as well as possible risks that this carries for you as a user cannot be reasonably assessed by us as the operator of the Facebook Page

### (3) Insights Feature

Facebook also provides a range of statistical data for CENTROPIX GmbH as a Facebook Page operator as part of their "Insights" feature. These statistics are generated and provided by Facebook. As the operator of the Facebook Page, we have no influence on the generation of these statistics and therefore cannot disable this feature. As part of the "Insights" feature, an overview of the following information for a selectable time-frame is available for the categories "Likes", "Followers", "Reach", and "Engagement":

Page activities such as page views, page previews, actions on page, reach information such as "likes", post reach and recommendations, post activities such as post engagement, video views, comments, shared content.

In addition, statistical information is available about the Facebook groups that are linked to our page. In accordance with the Facebook Terms of Service, to which every user has agreed to when creating a Facebook profile, we may also identify users who have followed or liked the page and view their profiles and other information they have shared. Facebook provides more information on this here:

<http://facebook.com/help/pages/insights>.

CENTROPIX GmbH uses this aggregate data to create posts and activities on the fan page to make it more attractive to users by scheduling posts in relation to the content and timing, for example. The legal basis for this data processing is Art. 6 (1)(f) GDPR, namely our legitimate interest in optimizing our online services.

#### (4) Storage Period

We store the data transferred by Facebook until you request that it is deleted, or it is anonymized. If you want us to stop the data processing described here, please ensure that your user profile is not linked to our fan page by using the “Unlike” and/or “Unfollow” features.

#### (5) Your Rights as a Data Subject

Should you have any information inquiries or other questions regarding your rights, which are provided at the end of this Privacy Policy, we recommend that you contact Facebook, as only Facebook has full access to the relevant user data. However, should you contact us with your inquiry, it will of course be processed still and also forwarded to Facebook.

## **8. Ordering Products**

When you order products from our online store, we process the following personal data:

First name, surname, company name and tax ID if applicable, telephone number, date of birth, delivery and billing address, e-mail, telephone number, payment information (e.g. bank and/or credit card details).

Your contact details (name, address, e-mail) will be passed on to the CENTROPIX sales partners in the upline of the sales partner through whom you have placed an order.

This processing is necessary for the fulfilment of your order for the purchase of products. The legal basis is Art. 6 (1)(b) GDPR.

## **9. Further Processing Purposes**

**Legal Compliance:** We also process your personal data to comply with other legal obligations that may apply to us in relation to our business operations. In particular, this relates to storage periods related to commercial, trade or tax laws. In doing so, we process your personal data in accordance with Art. 6 (1)(c) GDPR (legal basis) to fulfill a legal obligation that applies to us.

**Enforcement:** We also process your personal data to enforce our rights and assert our legal claims. Similarly, we process your personal data so we can defend ourselves against legal claims. In addition, we process your personal data to the extent necessary to prevent or make a prosecution from criminal offences. In this respect, we process your personal data to protect our legitimate interests pursuant to Art. 6 (1)(f) GDPR (legal basis), insofar as we assert legal claims or defend ourselves in legal disputes or we prevent or investigate criminal offences (legitimate interest).

Consent: If you have given us your consent to processing of personal data for particular purposes (e.g. sending information and offers), the lawfulness of this processing is based on your consent. Consent given can be withdrawn at any time. Please note that withdrawal only applies to future processing of personal data and previous processing remains unaffected.

## **V. Data Recipients**

Within the company CENTROPIX GmbH, we have access to your data that we need it to fulfill our contractual and legal obligations.

Service providers and subcontractors used by us (e.g. technical service providers, IT service providers, payment service providers, haulage, and shipping companies) may also receive data for these purposes. We limit the transfer of your personal data strictly to what is necessary, giving consideration to the requirements of data protection law. The legal basis is Art. 6 (1) (b) GDPR.

In some cases, the data recipients are given your personal data as processors and are then strictly bound by our instructions when handling your personal data. In other cases, the data recipients act independently under their own data protection accountability and are also obliged to comply with the requirements of GDPR and other data protection regulations.

Processors currently working for us are:

- Exigo Office, Inc, 1600 Viceroy Drive, Suite 125, Dallas, Texas 75235, USA
- Global Payroll Gateway, Inc., 2901 West Coast Hwy, Suite 200, Newport Beach, CA 92663, USA
- Metrics Global, Inc., 1160 N Town Center Dr. Suite 100, Las Vegas, NV 89144, USA
- Oracle Netsuite, 2300 Oracle Way, Austin, Texas 78741, USA

In certain cases, we transfer personal data to our consultants in relation to legal or tax issues, whereby these recipients are obligated not to disclose any confidential information due to their professional status.

## **VI. Data Transfers to Third Countries**

When using the above-mentioned service providers, we transfer your IP address as well as your personal data processed in the context of a product order to the United States (see above). The data transfer is based on standard EU contractual clauses of for the respective data transfers. Otherwise, we do not transfer your personal data to countries outside the EU or the EEA or to international organizations, unless explicitly stated elsewhere in this privacy policy.

## **VII. Automated Decision-Making/Profiling**

We do not use automated decision making that produces legal effects or affects you.

## VIII. Duration of Data Storage

We initially process and store your personal data for the duration for which the respective purpose requires corresponding storage (see above for the various processing purposes). This may also include the initiation period of a contractual relationship (pre-contractual legal relationship) and the execution of a contract. On this basis, personal data is regularly deleted as part of the fulfillment of our contractual and/or legal obligations, unless further processing is necessary for the following purposes:

- Fulfillment of legal storage obligations arising from the relevant laws. The periods specified for storage or documentation periods are up to ten years.
- Safeguarding evidence, taking into account the statute of limitations.

## IX. Data Security

We protect personal data using suitable technical and organizational measures to ensure an appropriate level of protection and to safeguard the personal rights of data subjects. The measures we take serve to, among other things, prevent unauthorized access to the technical equipment used by us and to protect personal data from unauthorized disclosure by third parties. In particular, this website uses SSL or TLS encryption for security purposes and to protect the transfer of confidential content, such as the contact inquiries that you send to us as the site operator. An encrypted connection can be identified by the fact that the address line of the browser changes from “http://” to “https://” and by the lock symbol in your browser address bar. If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties. Nevertheless, it is worth noting that data transfers on the Internet (e.g. when communicating by e-mail) are subject to security gaps. It is therefore not possible to fully protect data against access by third parties.

## X. Your Rights as a Data Subject

Under the applicable data protection legislation, data subjects have the following rights:

**Right of Access:** In accordance with Art. 15 GDPR, you are entitled at any time to request confirmation from us about whether we are processing personal data relating to you; if this is the case, you are also entitled under Art. 15 GDPR to obtain information about this personal data as well as certain other information (including processing purposes, categories of personal data, categories of recipients, planned storage period, the origin of the data, the use of automated decision-making and, in the case of third country transfers, the appropriate safeguards) and a copy of your data.

**Right to Rectification:** In accordance with Art. 16 GDPR, you are entitled to request that we rectify the personal data stored about you if it is inaccurate or incorrect.

**Right to Erasure:** In accordance with Art. 17 GDPR, you are entitled to request that we delete personal data concerning you without undue delay. The right to erasure does not apply if the processing of the personal data is necessary, for example, to comply with a legal obligation (e.g. legal storage obligations) or to assert, exercise or defend legal claims.

**Right to Restriction of Processing:** In accordance with Art. 18 GDPR, you are entitled to request that we restrict the processing of your personal data.

**Right to Data Portability:** In accordance with Art. 20 GDPR, you are entitled to request a copy of the personal data that you have provided us with in a structured, commonly used, and machine-readable format.

**Right of Withdrawal:** You can withdraw the consent you give us to process your personal data at any time. This also applies to the withdrawal of declarations of consent given to us before GDPR came into force, i.e. before 5/28/2018. Please note that withdrawal only applies to future processing of personal data. Processing performed before the withdrawal remains unaffected. To withdraw consent, sending an informal message to us is sufficient e.g. by e-mail.

**Right to Object:** In accordance with Art. 21 GDPR, you are entitled to object to the processing which means we must then stop processing your personal data. The right to object only applies within the limits of Art. 21 GDPR. In addition, in cases where our interests may conflict with the stopping processing and we can demonstrate legitimate grounds, we are entitled to process your personal data despite your objection.

#### **Information on Your Right to Object According to Art. 21 GDPR:**

You have the right to object at any time to the processing of your data that is performed on the basis of Art. 6 (1)(f) GDPR (data processing on the basis of balanced legitimate interests) or Art. 6 (1)(e) GDPR (data processing in the public interest), if there are grounds for doing as a result of your particular situation.

If you object, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims. The objection can be made in any form using the following details:

CENTROPIX GmbH, Münkafeld 1, 6800 Feldkirch, Austria, E-Mail: [office@centropix.com](mailto:office@centropix.com)

**Right to Lodge a Complaint with a Supervisory Authority:** Under the conditions of Art. 77 GDPR, you have the right to lodge a complaint with a competent supervisory authority.

A list of the German data protection supervisory authorities and their contact details can be found here: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)



The Austrian Data Protection Authority can be contacted here:

<https://www.data-protection-authority.gv.at/>

The Swiss Federal Data Protection and Information Commissioner (FDPIIC) can be contacted here:

<https://www.edoeb.admin.ch/edoeb/en/home.html>

**Miscellaneous:** If you have further data protection inquiries and issues, please feel free to contact us. Corresponding inquiries and requests to exercise your aforementioned rights should, if possible, be sent in writing to our address or by e-mail using the details provided above.

## **XI. Obligation to Provide Data**

In principle, you are not obliged to provide us with your personal data. However, if you choose not to do so, we will be unable to provide you with unrestricted access to our website or answer any inquiries you send to us. Any personal data that is not mandatory for the processing purposes mentioned above are marked accordingly as voluntary information.