

Data Protection

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Data Protection at www.betzold-group.com

Data protection is a matter of trust, and your trust is important to us. Of course, data processing by **Vinco educational GmbH**, represented by its managing directors, Arnulf Betzold, Albrecht Betzold and Ulrich Betzold (hereinafter also “we” or “us”) as controller within the meaning of Art. 4(7) GDPR is based on legal provisions.

Your Information

These terms of data use inform visitors and customers who conclude contracts on our website on data collection, processing and use upon visit, registration and conclusion of contracts as well as on objection, withdrawal and other rights you have as a data subject affected by data collection and use.

The headings linked below are aimed at facilitating your access to the desired information.

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I. What do we do with your personal data?

1. What is personal data?

Personal data is any information relating to an identified or identifiable natural person (hereinafter “data subject”). Identifiability does not necessarily require the specification of a name. Indirect identifiability is also sufficient, e.g. by assignment to an ID number, location data, online ID or one or several other characteristic(s). So, this is about your identity. This includes, for example, your name, but also your telephone number, your address, as well as other data you provide to us.

Many legal bases for our data processing can be found in the European General Data Protection Regulation (GDPR); its text and the related recitals [can, inter alia, be found here](#). In the following notices, we refer to corresponding regulations as the relevant legal basis of our processing.

2. Use of data to implement contracts

When you address a request to us or conclude a contract with us, we need and process certain data, such as information on the order envisaged or placed, your address, e-mail address and payment processing data for pre-contractual review, contract implementation and any later warranty or guarantee handling (as basis, see Art. 6(1) Sentence 1 Point (b) GDPR). Within the framework of handling the order and payment, the service providers engaged by us to this end (e.g. logistics companies, payment agents) are provided with the respective necessary data about your identity and/or order. We also carry out credit checks (see also clause IV below). If the relevant correct information is not available, we cannot accept orders or offer you certain payment options.

Moreover, we are obliged by commercial and tax law to archive data from the transactions concluded for the duration of the legal retention periods. The legal basis for the relevant data uses is Art. 6(1) Point (c) GDPR.

3. Contacting

If you contact us using our contact options (e.g. by e-mail or via the contact form), we retain your name and contact details and your request. The data is used to process your request and to communicate with you. If you have questions about specific orders or want us to do anything personally for you, we need your real name. For other questions, you can also indicate an alias. Once your request has been finally settled and if no other retention obligations exist, the data will be erased again.

4. Use of data for advertisement and market research

We are interested in maintaining the customer relationship with you, acquiring new customers, reactivating existing ones and providing our customers with information and offers. To safeguard these legitimate interests, we process your data based on Art. 6(1) Point (f) GDPR (also assisted by service providers) to send information and personalised offers of ours to you and to improve our information and services.

When taking our advertising measures, we are interested in protecting you, where possible, against advertising that is not desired or does not fit your interests. In order to take your interests into account, we include such data in the selection of any

information where you are aware that it is known to us. This includes, but is not limited to, orders, information already received or your responses to corresponding commercial information, on advertising by mail or our newsletters and e-mail information. Where this is technically and economically viable to pursue these purposes, we separate relevant data from your identity, pseudonymise it and, before any evaluation is made, form groups (clusters), in which the individual information will merge, to safeguard your interests.

We make the following data uses based on the aforementioned legal basis without separately asking you to give your consent (regarding your respective right to object, see the legal information in I. clause 6 below):

- **Advertising by mail**

We use your first name and surname, postal address and, where we have received such additional information from you, your title, academic degree, date of birth and your professional, industry or business title to send you offers and information on our enterprise and our services and products by letter if we expect that such information is of interest to you, following any evaluation of the data specified at the beginning of this paragraph.

In addition, your address is disclosed, at best occasionally, via a neutral trustee for one-time use for advertising purposes to any carefully selected companies that are interested themselves in informing you about offers of presumed interest to you.

The advertising partners do not directly receive any data from us in this context. We only make your address available to a confidentially operating service provider for the imprint for delivery of the selected advertising mail. Only if you respond to the advertising partner's advertisement, the partner will receive your data by your response. It is thus entirely in your hands whether our advertising partner receives data from you.

- **E-mail advertising for our own similar offers**

If we are provided with your e-mail address in connection with the sale of goods, we use the e-mail address to promote our own similar products. You may also object to any commercial use at any time without incurring any expenses other than the transfer costs according to the basic rates (regarding your right to object, see the legal information below). In the commercial domain, we also use the phone number for advertising purposes in case of a presumed consent.

We make the following data uses only after we have asked you to give your consent outside this Policy. Art. 6(1) Point I(a) GDPR serves our company as a legal basis for processing operations for which we obtain consent for a specific processing purpose. (Acceptance of these notices does not yet represent a consent on your part to the relevant use of your data for advertising purposes!)

- **Contact by phone for order requests**

We do not call you without your separate consent to advertising purposes. If you have given us such consent, we use your name and phone number as well as information on

the contact frequency and the previous order history to contact you by phone within a period of twelve months, approx. four to six times, at the times indicated by you as preferable, if applicable, and to provide you with relevant information about offers and campaigns related to our services in this context.

- **E-mail advertising with separate consent**

If you have separately subscribed to our newsletter, your e-mail address and, as appropriate, further personal data voluntarily provided by you to us upon registration (e.g. your name for contacting) are used for our own advertising purposes and, as appropriate, for advertising partner offers contained in the newsletter.

We evaluate statistically when any such e-mail is read and, as appropriate, what information it offers and in which intensity this information attracts interest (e.g. when a link is accessed). Such evaluation serves to improve delivery times and to optimise the contents of our offers and commercial information.

- **Use of data for newsletters and other e-mail advertising**

If you use our newsletters or other e-mail advertising, we statistically evaluate when such an e-mail is read and, as appropriate, what information it offers and in which intensity this information attracts interest (e.g. when a link is accessed). Such evaluation serves to improve delivery times and to optimise the contents of our offers and commercial information.

- **Use of your order data for personalised marketing**

If you have given us your consent, we use your order data as well as data from information about interests, website visits and desired information according to your indications or via cookies for our market research and for commercial information customised to your identity (e.g. insertion of offers when our websites are visited, mail advertising, but not calls, faxes or e-mails without your separate consent, not data transfer). Without your separate consent, the data is evaluated statistically only after prior anonymisation, which also does not allow us to draw any further conclusion about your identity, to ensure that we can improve our information, offers and their presentation within the framework of market research and promotion.

- **Use of your data when visiting our webpages**

Where we collect and/or have collected data using web analytics tools and where we use web advertising tools, you can find related details under [II.Data collection when visiting our webpages](#). There, you can also find information as to how you can use your right to object and what technical possibilities you have to counter data collections.

5. Right to withdraw consent and to object to advertisement

You can, of course, object at any time and/or withdraw any consent given to any use of your data for advertising purposes (see clause 3 and clause 5), also where such use is legally permissible without your consent, by sending a formal notification to us. Any such objection and withdrawal stops all future use. Following the establishment of your right, any previous uses remain unaffected. Of course, we do not charge any separate costs for any objection or withdrawal. (Especially if you notify us by e-mail, you do not

incur any further costs, except for the transfer costs according to the basic rates of your provider.) Please simply address your objection and/or withdrawal to one of the contact options specified at the end of these notices.

Each of our commercial e-mails and newsletters contains a link with an address or a link to easily unsubscribe from receiving such information.

Please note that you might still receive advertising in individual cases even after such objection or withdrawal. It is not possible in all cases to stop contracted advertising within the scope of normal efforts before the next delivery or a comparable other measure.

Your objection options also cover profiling (for this term, see II. clause 2) and the use of data collected within the framework of data collection upon your visit to our websites for direct advertising purposes. Detailed explanations on the technical possibilities to exercise the right to object and to prevent data collection can be found under the information on the web tools used under II. clause 3. "Web analysis and advertising details". Where you exercise the right to object, we will no longer process the collected data for such purposes. Further notices on your rights can be found under [V. What are my rights?](#)

6. Erasure and blocking

Your personal data will be retained until the purposes indicated have been achieved and/or as long as we have a legitimate interest in such retention.

Subsequently, it will be erased, unless any other understandings have been reached with you or unless legal archiving obligations (e.g. based on commercial or tax law) exist. If archiving is required by law, the data will be blocked against other accesses. After expiry of the legal retention periods, these documents will be erased or destroyed according to data protection requirements within the scope of regular operations.

If you have given your consent to any collection, processing and use of your data, we will retain and use your data for an unlimited period until notice of withdrawal is given or until the purpose for which you have given your consent no longer exists. Subsequently, the consent and processing data will be archived up to the statute of limitations (generally three years) for legal defence purposes (legal basis: Art. 17(3) Point (e) GDPR).

If you no longer want to receive advertising from us, we use your name, address and, as appropriate, e-mail address for blocking in corresponding lists used in our advertising measures, to ensure that you do not receive any further advertising. 'Erasure' in this sense thus primarily means that your data will be blocked in our systems, in particular for advertising and marketing activities (legal basis: Art. 6(1) Point (f) GDPR). Where required, the data continues to be processed for purposes other than advertising, for ex. for contract implementation and, as appropriate, warranty purposes as well as documentation under commercial and tax law (legal basis: Art. 6(1) Points (b) and (c) GDPR).

II. Is data collected when you visit our site?

1. Data collection and use when you visit our services, cookies

You can visit our site without making entries related to your identity. If you visit our website, including, for ex., via a link in a newsletter or an advertisement, certain data is still gathered and retained in log files. Even if the visit is made, as appropriate, via

newsletter links or advertising links on the Internet, such gathering only includes access data without any direct reference to persons, e.g.

- the website from which our site is used;
- the site accessed and/or the name of a requested file;
- your browser type and version;
- access time and date;
- the operating system used on which the browser runs;
- the name of your Internet service provider;
- the web address of the accessing user (IP address);
- products and contents that the user is interested in and the degree of such interest, such as duration, frequency, interaction with forms, navigation elements and links.

Any conclusion concerning your identity based on such data cannot be drawn by us and will not be drawn without your consent, which must be given separately.

If we integrate third-party contents into our sites (e.g. embedded films or other information), they will obtain your IP address only for such purpose; otherwise, the contents cannot be delivered to your browser.

· **Cookies**

We use cookies on our website. Cookies are small files which are stored on your terminal and retain certain settings and data for interaction with our system and/or the systems of service providers via your browser. Such storage allows us to design the website for you appropriately and facilitates your use, e.g. in that certain entries of yours are retained in such a way that you are not required to re-enter them time and again. To this end, most cookies contain identification tags. As a result, users and/or the browsers (software for displaying the Internet contents) can be identified and distinguished from other users and browsers and re-identified if they access the site again. Many cookies are automatically erased from your hard disk again after the end of the browser session (session end) (this is why they are called 'session cookies'). However, there are also cookies which remain permanently stored in your system. For your convenience, the expiration time has been set to a future date. If you visit the site again, it will automatically be recognised that you have already visited our site and what your preferred entries and settings are (long-term cookies). Some of these cookies serve to display information specifically customised to your interests on our website or on the website of our partners.

· **Cookies not requiring consent**

Cookies ensuring functionalities without which you could not use this website as intended are only used by us and their contents will not be made available to third parties. We use such cookies not requiring consent based on Art. 6(1) Point (b) GDPR.

· **Other cookies**

Reference to any cookies that must not be placed without your consent, according to the legislator's intention, is already made upon any visit to our site, including to this Privacy Policy.

We use third-party services, e.g. to integrate videos or other contents, and to provide you with interesting contents. Such third parties may likewise use cookies. Cookies of

third parties (third-party cookies) are placed by the partners which, in turn, are interested in informing you about offers of presumed interest to you. Information about the use of cookies can be found on the websites of the third-party providers. If you block the cookies, it will no longer be possible to make all contents and functionalities available to you. To use the site without limitation, you must give your consent again and remove corresponding blockages.

· **Your technical objection options**

Irrespective of the duration set, you can manually erase cookies on your browser. For some browsers, acceptance of cookies without limitation has been pre-set. You can accept or refuse temporary and stored cookies in the security settings of your browser independently of one another. As well as via browser settings generally disabling the automatic placement of cookies, you can also disable cookies by setting your browser in such a way that cookies from a certain domain will be blocked, e.g. those from "googleadservices.com". Such setting will then prevent the execution of any services that use cookies from this domain.

Some web services use opt-out cookies. With the cookie to be placed by you ("blocking cookie") a web analytics service, for ex., recognises that you do not want any data to be gathered. Options to place a blocking cookie are separately listed for the web services used by us under II. clause 3. Google, for ex., allows corresponding settings at <https://myaccount.google.com/intro>. Options for various other networks to make advertising settings can be found at <http://www.youronlinechoices.com/uk/your-ad-choices/>. If you use the option on your browser to erase all cookies, please bear in mind that you might then be required to make corresponding settings and/or to place blocking cookies again!

The acceptance of cookies is not a condition for visiting our online services. If you do not accept or disable cookies, however, certain possibilities (e.g. services, purchasing options, shopping cart saving and information) on our site might not be available to you in some circumstances and some websites might not be displayed correctly.

If you want to conclude contracts with us, you have to accept certain cookies. Otherwise, a contract cannot be concluded.

Further information about the use of cookies can be found on the webpages of Bundesverband Digitale Wirtschaft (BVDW) e.V. <http://www.meine-cookies.org>. If you do not want cookies requiring consent to be used, you can exercise your related rights by using the technical means we have explained to you under II. clause 1. "Your technical objection options"; regarding special cookies, please read our notices under II. clause 3.

2. Profiling of user profiles

In legislation, the development of automated data pools in relation to an individual is defined as 'profiling'. Acc. to Art. 4(4) GDPR, 'profiling' means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location. We develop pseudonymised, i.e. user profiles of a statistical nature which are separated from attributes related to your identity, to make evaluations enabling us to draw

conclusions

to interests in our contents and offers and to customise corresponding information and offers to users with related interests.

To analyse the user's behaviour, we use corresponding web analytics tools. Detailed information can be found below under "Web analysis and advertising details".

You can also object to profiling with personal data as well as to any further use of the profile data for advertising purposes and withdraw any consents given by you in this context (see also I. clause 6). The right to object to profiling by web analysis and advertising measures, where they make use of personal data, is exercised by technical measures individually explained under II. clause 3 below.

3. Web analysis and advertising details

Web analytics tools

Google Universal Analytics

This website uses Google Analytics for web analyses in the form of UniversalAnalytics. This is a service Google Ireland Limited („Google“), a company incorporated and operated under Irish law (register number: 368047), located in Gordon House, Barrow Street, Dublin 4, Ireland („Google“). Google Analytics uses cookies. The information generated by the cookie about your use of our web services (incl. your IP address) is transferred to Google computers and retained there. It cannot be excluded that data will be processed outside the scope of EU law in this context. Google has joined the Privacy Shield and thus guarantees compliance with EU data protection standards.

(<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

To protect your privacy, we have chosen settings according to which Google abbreviate the last section of any IP addresses of the visitors to our website that contain IP addresses from the EU or from one of the signatory states to 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 abbreviated there. Moreover, we have concluded an order processing contract with Google.

Using an identification, for ex. upon any login at Google services, the data specified above may also be gathered and used across multiple devices. This allows, for ex., to save the information that you start your visit to our site on a PC and continue it on a mobile device, while the data of both devices can be linked.

Google will use this information to evaluate your use of the website on our account to compile reports about the website activities for us, to form interest-oriented target groups and to provide us with additional services relating to the use of the website and the Internet. This information may also be provided by Google to third parties if legally required or if third parties process this data on behalf of Google. Google will not associate your IP address with any other Google data. The erasure period for the Analytics data has been set to 26 months.

This period is motivated by our interest in being able to make temporal comparisons with statistical data.

You can prevent the installation of the cookies by changing the settings of your browser software accordingly; however, please note that you might not be able to use all functions of this website and of the desired services to the fullest extent in this case.

• Use of demographic characteristics with Google Analytics

Google offers the “demographic characteristics” function which can be used to create compilations about the site visitors with statements on age, gender and interests. Google gains such data from interest-related advertising and from visitor data of thirdparty providers. The data has not been assigned to a specific individual and is anonymised.

- **Your technical objection options**

If you do not want information about your website visit to be transferred to Google Analytics, you have the possibility to install an “opt-out add-on” for your browser”. This add-on can be downloaded [here](#). We have provided for a special switch-off option on our website for mobile browsers.

If you do not want to receive interest-based advertising, you can disable the use of cookies by Google for these purposes at <https://myaccount.google.com/intro>. Moreover, you can disable the use of cookies by Google by using the link below to download and install the plug-in provided there: <https://www.google.com/settings/ads/plugin?hl=en>. As an alternative or in browsers on mobile devices, you can object to the use of Google Analytics by clicking on the link below. By enabling the link, an opt-out cookie is placed to prevent future data gathering by Google Analytics on this website. Please note that this opt-out cookie only works in this browser and only for this domain. Once you erase your cookies in this browser, you have to click on the link again: Disable Google Analytics.

- **Google Remarketing**

We use the remarketing technology of Google Ireland Limited Google LLC (Gordon House, Barrow Street, Dublin 4, Ireland). This relates to the insertion of commercial information on our website and on websites of third parties as parties of the Google network. Here, the user can be divided into different segments. This division depends on the actions performed by the respective user on our website. Using this technology, users who have already visited our webpages and online services and demonstrated interest in the services are addressed again with commercial offers by targeted advertising on the sites of the Google Display Network. To insert advertising, interests are gathered using cookies or comparable technologies initiated via small graphics not visible for the visitor (pixels or tags) or by a code (web beacons). The information collected on the contents accessed by the visitor, referring websites, time information and technical information on the visitor’s browser and operating system can help to analyse the user’s behaviour when visiting the website and can subsequently be used for targeted product recommendations and interest-based advertising.

Where Google uses IP addresses, they are abbreviated to ensure that no conclusion can be drawn as to your identity (see Google Analytics). According to Google, the IP address will not be merged with any data of the user within the scope of other Google services. Google may also link information with corresponding information from other sources. Unless you have explicitly authorised Google to do so, such behaviour-based advertising is made only in pseudonymised form. The data is thus not linked to your personal data (name, address, etc.).

Where we have used Google AdWords to place advertisements on websites, we are parties of the Google (AdWords) Display Network with such third parties and link Analytics and AdWords. We can use separate cookies (“conversion cookies”) to statistically record the success and reach of our ads. This informs us of the number of

users who have responded to our ad. These cookies cease to be valid after 30 days. We use Google Tag Manager to easily integrate Google services into our website and manage them there.

Google has joined the Privacy Shield and thus guarantees compliance with EU data protection standards.

(<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

Information about how Google uses data in this context can be found at <https://policies.google.com/technologies/ads>. The general Google Privacy Policy is available at <https://policies.google.com/privacy?hl=en>.

· **Your technical objection options**

If you no longer want the aforementioned data gathering and advertising either temporarily or generally, you can disable them accordingly.

The Google Advertising Privacy Policy with further notices can be found [here](#).

Alternatively, you can disable the use of such cookies by a large number of third-party providers by going to the opt-out site of the Network Advertising Initiative

(link at http://www.networkadvertising.org/managing/opt_out.asp) and making corresponding settings there.

If you do not want to receive interest-based advertising, you can disable the use of cookies by Google for these purposes at <https://myaccount.google.com/intro>. Moreover, you can disable the use of cookies by Google by using the link below to download and install the plug-in provided there: <https://www.google.com/settings/ads/plugin?hl=en>.

Facebook Custom Audience

On some of our sites we use communication tools, for which Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or, if you are domiciled in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“Facebook”) is responsible. Facebook has been certified under the Privacy Shield Framework which offers a guarantee for compliance with the European data protection legislation (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>)

With the Facebook pixel used by us, Facebook is able to mark you as a visitor of our online offer or any part of it as a target group for displaying ads. This enables us to provide contents customised to your potential interests on our website and/or to present you with corresponding ads customised to your interests on Facebook and to measure the success of the ads.

Additional information about the purpose and scope of the collection of data and further processing and use of the data by Facebook as well as the setting options you have to protect your privacy can be found in the Facebook Privacy Policy, available, inter alia, at <https://www.facebook.com/policy.php>.

· **Your technical objection options**

You can object to the use of Facebook Website Custom Audience in the settings of your Facebook account. Related notices can be found on Facebook at

<https://www.facebook.com/help/568137493302217>, or you can make the relevant settings at <https://www.facebook.com/policy.php> and/or, following your registration, at <https://www.facebook.com/settings?tab=ads>. Moreover, the Network Advertising Initiative (<http://optout.networkadvertising.org/>) and/or this site

(<http://www.aboutads.info/choices>) in the US or this site (<http://www.youronlinechoices.com/uk/your-ad-choices/>) offers possibilities to object to any use for advertising.

Bing Ads

This website uses Bing Ads, a programme of Microsoft Corporation (“Microsoft”), One Microsoft Way Redmond, WA 98052-6399, USA, to provide advertising and for conversing tracking. This enables Microsoft and us to recognise that someone has responded to an ad via a link on Bing or Yahoo, has thus been directed to our website and has reached a defined target site (conversion site). This provides us, in particular, with information about the total number of users who have responded to an ad and were then directed to the conversion site. Any personal information on the user’s identity is not communicated. To this end, a cookie is placed on the user’s computer. The information contained in this cookie is transferred to a Microsoft server in the US, retained there for a maximum period of 180 days and then erased. By using the remarketing function, we can submit offers specifically customised to you in case of any later search in one of the search engines mentioned above.

- Your technical objection options

You can prevent the data generated by the cookie and related to your use of the website from being collected and processed by disabling the placement of cookies.

This might limit the website functions.

If you do not want Bing Ads to be used, you can stop the collection and processing of the data generated by the cookie and related to your use of the website by refusing the placement of cookies, for ex. in your browser settings. Moreover, you can disable the receipt of interest-related advertisement from Microsoft by opting out using the following link: <https://go.microsoft.com/fwlink/?LinkID=286759>.

In addition, you can also refuse to receive interest-related advertisements from Microsoft, but also from other participating companies overall, on the following site: <http://www.youronlinechoices.com/uk/>.

Further information about the Terms of Use and the Privacy Statement for this product can be found here: <https://privacy.microsoft.com/en-us/privacystatement/>. More detailed information on cross-device tracking, which can be used to track the usage behaviour across multiple devices, can be found at

<https://help.bingads.microsoft.com/#apex/3/de/53056/2>. You can disable cross-device tracking at <http://choice.microsoft.com/en-uk/opt-out>. Please also note the Microsoft Privacy Statement at <https://privacy.microsoft.com/en-us/privacystatement>.

4. Right to withdraw consent and to object for usage profiles and cookies

Acc. to Art. 21(4) GDPR, inter alia, you have the right to object to the creation of user profiles, especially when they are created for advertising purposes. Moreover, you can withdraw any consent to the placement of cookies at any time with effect for the future. Any previous uses remain unaffected. Explanations as to how you can technically assert your withdrawal can be found under the respective data collection information under “Your technical objection options”. If you have any questions regarding the aforementioned technical objection options or our

other protective measures, please do not hesitate to contact us (contact details: see below).

5. Social media

Our website contains links to social media, such as Facebook, Twitter, Pinterest and other related services. We have the possibility to place links for you there to our offers, exclusively limited to the mere linking to these services, to ensure that you alone can decide whether these services will be provided with data about your interests. Social plug-ins, i.e. programming, which frequently already transfer data to the social media service when a site is visited, are not used by us!

III. How do we protect your personal data?

1. General protective measures

Legislation requires companies to provide for an appropriate level of data protection. In this context, inter alia, the respective risk for the data, the risk of likelihood, the state of the art

and the costs must be compared. We have provided for corresponding technical and organisational measures to realise the security of your data and its processing according to the legal stipulations. If you have any security concerns regarding data entry or other questions or suggestions, you can simply contact our customer service or our data protection officer. Further contact details have been specified once again at the end of these notices.

When you place an order or log in to your personal account, your personal data is securely transferred by encryption. In this context, we use the SSL (Secure Socket Layer) coding system. We take technical and organisational measures to protect our website and other systems against loss, destruction, access, modification and dissemination of your data by unauthorised persons. You should always treat your access information confidentially and close the browser window once you have terminated the communication with us, especially if you use the computer jointly with other persons.

V. What are my rights?

As a data subject affected by data processing, you may establish certain rights by law.

1. Right of confirmation and access

Acc. to Art. 15 GDPR, you have the right to request confirmation from us as to whether personal data concerning you is processed. In case that we process such data, you have the right to information on the personal data concerning you, free of charge. Such information includes particulars as to

- the purposes of processing;

- the categories of personal data processed;
- the recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data is not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Art. 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Furthermore, the data subject has the right to obtain information as to whether personal data has been transferred to a third country or to an international organisation. Where this is the case, the data subject also has the right to be informed of the appropriate safeguards relating to the transfer. If you have any questions regarding the collection, processing or use of personal data, or for information or any other establishment of your rights, please simply contact us using the contact details specified at the end of these notices.

2. Right to rectification

You have a right to rectification and/or completion vis-à-vis the controller if the processed personal data related to you is incorrect or incomplete. The controller must perform rectification immediately.

3. Right to object

You have the right to object to the processing of your personal data based on Art. 6(1) Point (e) or (f) GDPR; this also applies to the profiling based on these provisions (reg. the term, cf. II. clause 2).

If an objection is lodged against data processing for direct marketing purposes (Art. 21(2) GDPR), such processing is terminated as soon as reasonably practicable following receipt of the objection (for further details, see also I. clause 6). An objection against other types of processing (Art. 21(2) GDPR) based on Art. 6(1) Point (e) or (f) GDPR (e.g. identity & credit check) can be accepted only on grounds relating to your particular situation, where, in turn, compelling overriding legitimate grounds may justify our further processing.

Consent granted may be revoked (contact details: s. b.). You do not incur any special costs (except for transfer costs acc. to the basic rates of your provider).

Objection and withdrawal of consents have effect for the future. The lawfulness of past data processing remains unaffected.

As a consequence of your objection against the identity & credit check, we may generally offer you limited payment options or refuse conclusion of a contract.

4. Right to erasure (right to be forgotten)

a) Erasure conditions

You have the right to obtain the erasure of your personal data. Please note that a right to erasure without undue delay (Art. 17 GDPR) (“right to be forgotten”) exists only if one of the following reasons applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- You withdraw your consent on which the processing is based acc. to Art. 6(1) Point (a) GDPR or Art. 9(2) Point a GDPR, and there is no other legal ground for the processing.
- You object to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing for direct marketing purposes pursuant to Art. 21(2) GDPR.
- Your personal data has been unlawfully processed.
- The personal data has to be erased for compliance with a legal obligation in a Union or Member State law to which the controller is subject.
- Your personal data has been collected in relation to the offer of information society services referred to in Art. 8(1) GDPR

b) Further right to be forgotten

If we have made your personal data public and are obliged pursuant to Art. 17(1) GDPR to erase the personal data, we, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform controllers which are processing the personal data that you, as data subject, have requested the erasure by such controllers of any links to, or copy or replication of, that personal data.

c) Exemptions to the erasure

Please note that, besides the conditions above, the following exemptions may justify rejection of your erasure request:

The right to erasure does not apply to the extent that processing is necessary

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health acc. to Art. 9(2) Points (h) and (i) as well as Art. 9(3) GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Art. 89(1) GDPR in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

5. Right to restriction of processing

You have the right to restriction of processing if the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data; or the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead. You also have this right if we no longer need the data, but such personal data is required by you for the establishment, exercise or defence of legal claims. Finally, you may establish this right if you have objected to processing acc. to Art. 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of your own.

Where processing has been restricted, such data may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. The possibility of continuing retention remains unaffected.

Where processing has been restricted pursuant to the aforementioned conditions, you will be notified by us before the restriction is lifted.

6. Right to data portability

Moreover, you have the right to receive the data, which you had provided to us, which had been processed by us based on an effective consent or processing of which had been necessary to conclude and/or fulfil an effective contract, in a “structured, commonly used and machine-readable format”. You also have the right to have the personal data transmitted directly to another controller where technically feasible.

The right exists only where this does not adversely affect the rights and freedoms of others.

7. Establishing your rights

For questions or to establish your rights, please contact our customer service (contact details: see below).

You can also address our data protection officer, who is responsible for complaints. Our data protection officer can be contacted using the following e-mail address: info@betzold-group.com. Moreover, if you consider that we do not handle your request appropriately, you have, inter alia, (without prejudice to any other administrative or judicial remedy) the right to lodge a complaint with the supervisory authority responsible for data protection, especially in the Member State of your habitual residence, place of work or place of the alleged infringement.

VI. What consents have I given?

For commercial contacting or certain data uses, you have given us consent, as appropriate (for ex. for a newsletter or services within the scope of the customer login, etc.). If you have given us consent, the consent texts have been retained by us and can be retrieved. To retrieve them, please simply contact info@betzold-group.com.

We will then transmit the requested information to you by e-mail.

73479 Ellwangen
Telefon: +49 (0) 7961 92 58 10
Telefax: +49 (0) 7961 92 58 20
E-Mail: info@betzold-group.com

You can contact us:

Monday – Thursday:
8: 00 AM to 4: 00 PM

Friday:
8: 00 AM to 2: 00 PM

Managing director:

- Dipl. Kfm. (FH) Albrecht Betzold
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