

# **Privacy policy**

We process your personal data exclusively in accordance with applicable law, in particular the European General Data Protection Regulation (GDPR). The following information explains how we handle your personal data.

# A. Overview

## 1. Data controller and data protection officer

This privacy policy applies to data processing by Lautsprecher Teufel GmbH, Budapester Straße 44, 10787 Berlin (hereinafter referred to as "Teufel").

Teufel's data protection officer is Mr Mario Arndt, DEUDAT GmbH, Zehntenhofstr. 5b, 65201 Wiesbaden, Germany Tel.: +49 611 950008-40 Fax: +49 611 950008-59 Email: <u>teufel@deudat.de</u>

Our data protection officer is always available for any questions or suggestions about data protection.

# 2. Personal data

Personal data is any data that is directly or indirectly attributable to you or that can be attributable to you.

## 3. Purposes

We process this data primarily for two purposes: the performance of the contract and marketing purposes (advertising, newsletters, analysis of our website and of your use).

## 4. Your rights

It's your data! You have various rights in relation to your data that you can exercise against us. We clearly indicate these rights to you hereafter whenever they appear and where relevant. An overview of your rights can also be found in section **J**.

## 5. Your protection

Our entire web presence, i.e. all forms in which you enter data, the ordering process and other functions, are secured by SSL (Secure Socket Layer). This widely used system for protecting data transmissions (this is also used in online banking) guarantees secure and reliable handling of your data. You can recognise an SSL connection by the "s" at the beginning of the http or by a lock icon on your browser. We also use other suitable technical and organisational measures to protect your personal data.

## 6. Your contact with us

If you contact us by e-mail or via a contact form, the personal data you provide will be automatically stored. This data, which you transmit to us of your own accord, is stored for the purpose of processing your request or for relevant communication. The processing is based on your consent or on a contractual basis in accordance with Art. 6 (1) lit. a, f GDPR.

# **B.** Hosting

For the hosting of our website, we employ the services of Metaways (Metaways Infosystems GmbH, Pickhuben 2, 20457 Hamburg). This means some personal data related to the usage of our website is processed on Metaways' servers. This includes, for instance, your IP address and device identifiers (MAC addresses, IMEI, etc.), information about the start and end of communication processes and, if applicable, location data derivable from network communications. In so doing, Metaways is acting on our behalf and is subject to our instructions. We use the hosting services for the provision of a secure website based on article 6(1)(f) GDPR for the initiation, execution, and settlement of contracts with our (potential) customers (article 6(1)(b) GDPR).

# C. Data processing for the purpose of contract conclusion and order processing

# I. General data processing



Teufel sells products via distance selling and over-the-counter retail. Any personal data that you provide us with for the purpose of the purchase and its execution will be processed by us for the execution of the contract. This may include the following data:

- First name, surname (mandatory information for the conclusion of the contract),
- Billing and delivery address (mandatory information for the conclusion of the contract),
- E-mail address (mandatory information for the conclusion of the contract),
- Payment information (mandatory information for the conclusion of the contract),
- If appropriate, date of birth (mandatory information for the conclusion of the contract for purchase on account),
- If appropriate, telephone number (optional).

We also process data that we need for the execution and processing of the contract of sale with you, such as an order number for your order, a customer number and an invoice number. We process this data on the basis of Art. 6 (1) lit. b GDPR for the performance of a contract. With regard to your e-mail address, we are obliged to process this in order to send you an order confirmation (Art. 6 (1) lit. c GDPR). In addition, we store your IP address for an initiated order. This processing is based on our legitimate interest in protecting ourselves against internet fraud, Art. 6 (1) lit. f GDPR.

For the shipment of the ordered goods, we transmit your first name, surname, delivery address and if necessary your telephone number to our logistics service providers as well as our transport service providers. The telephone number is required for the transport service provider's coordination with you. For the handling of repairs, we transfer your name, address and contact details to our service provider Minitec (Minitec BTD Service GmbH, Kronsaalsweg 20, 22525 Hamburg). In both cases, your personal data is processed in order to implement the contractual relationship with you, in accordance with Art. 6 (1) lit. b GDPR.

If you set up a customer account, we process the above data to create your customer account. The legal basis for this is your given consent and, if applicable, our contractual relationship (Art. 6 (1) lit. a and b GDPR). You can withdraw your consent to this at any time with effect for the future by e-mailing <u>unsubscribe@teufel.de</u>.

Once the contract has been implemented in full, the purchase price has been paid in full and any warranty or guarantee periods have expired, your data will be blocked from further use and deleted after expiry of the tax and commercial law regulations, unless you have expressly consented to the further use of your data.

## II. Online appointment bookings for our stores

If you would like to make an appointment in one of our stores for a personal consultation on our products without obligation, you can do so via the online appointment booking tool. For this purpose, we use software from Shore GmbH (Ridlerstr. 31, 80339 Munich). When you confirm the appointment booking via the "Book now" button, Shore processes the data entered in the contact form (such as your first name, surname and email address). Shore acts on our behalf and is subject to our instructions. The data is processed on the basis of Art. 6 (1) lit. b GDPR because it is necessary to send you an appointment confirmation or reminder or to inform you about changes to the appointment. The data will be deleted after the appointment has been held and three months have elapsed.

For more information on Shore's data processing, please visit https://www.shore.com/en/data-protection/.

## III. Processing of payment data

For all payment methods, except payments in advance, we must forward the information required for payment to the payment service providers. This only happens if we have your payment data and only to the extent that it is necessary for the fulfilment of the contract and serves the same, Art. 6 (1) lit. b GDPR. Some payment service providers process your payment data under their own responsibility. This will be brought to your attention in the ordering process.

## D. Data processing by customer services

## I. General data processing by customer services

In order to provide you with the best possible customer service before, during and after the order, we use the services of the Zendesk platform. The operator is Zendesk Inc, 1019 Market Street, San Francisco, CA 94102 USA. Zendesk aggregates various processes (e-mail, telephone) relating to a particular customer so that in any consultation with the customer, the previous history is clearly laid out for us. If you contact our customer services or write us a private message on our social media presence on Facebook, then these entries will be stored in connection with your enquiry in Zendesk. The processing of your data for these purposes is based either on Art. 6 (1) lit. b GDPR, wherein it takes place insofar as is necessary for the performance of the contract, or lit. f, we comply with our contractual obligations, for example, under the warranty, or we



process your data with Zendesk for the traceability and documentation of processes, for the clarification of issues and for the internal evaluation and improvement of our service, in each of which we have a legitimate interest. Zendesk contractually assures us that your personal data will be stored within the EU. However, data may also be transferred to the United States, Australia, Brazil, Canada, Japan, Philippines, Singapore and the United Kingdom for Zendesk service and support purposes on our behalf. We have entered into an agreement incorporating standard data protection clauses with Zendesk in accordance with Art. 46 GDPR. In addition, Zendesk is one of the few software vendors in the world to introduce so-called binding corporate company-wide (available https://d1eipm3vz40hv0.cloudfront.net/pdf/ZENDESK%20rules at: %20BCR%20Processor%20Policy.pdf) which were approved by the EU Commission, Article 47 GDPR. Australia, Brazil, the Philippines, Singapore and the USA are nevertheless countries that do not provide adequate protection for personal data under EU Regulation 2016/679; this means, for example, that it cannot be ruled out that government authorities in the countries may be able to access your data without effective remedies being in place. For more information about data privacy at Zendesk, visit https://www.zendesk.com/company/customers-partners/privacy-policy/

The data will be stored for as long as is necessary to fulfil the purpose or as long as you do not object to processing.

## II. Call centre

We use Amazon Connect, a service provided by Amazon Web Services EMEA SARL, 38 John F. Kennedy, L-1855 Luxembourg (hereinafter referred to as Amazon), in our call centre. Amazon Connect is a call centre service that enables us to handle your requests in the best possible way. The service is provided via a cloud from Amazon.

In order for us to be able to deal with your request, the personal data provided for your call will be processed. This includes, in particular, your call number as well as the date and time of the call. Other personal data will only be processed with your consent to help us further optimise our customer service. This includes, for example, recording and machine evaluation of your conversation content. The processing of your data for these purposes is based either on Art. 6 (1) lit. a, b or f GDPR, whereby we process your data with your consent, for the performance of a contract or we process data in the course of the technically necessary call set-up.

If you use the callback function to reduce unnecessary waiting times, we offer a callback appointment service via our website as well as a waiting service when contacting us by telephone. You can arrange a personal callback appointment with our customer services via our contact form. For this, you need only provide your telephone number and your preferred date and time. A member of staff from our customer services will call you at your preferred date and time. Our call queuing service will be offered to you automatically whenever you contact us by phone and are waiting in a queue. In this case, you can agree to the waiting service using the dialling keys on your telephone number specified as soon as you have reached the top of the queue. The processing of your telephone number, which you provided to us of your own accord for the use of our callback and call queuing service, is based on Art. 6 (1) lit. a GDPR.

Amazon processes data on our behalf, unless you expressly and separately consent to Amazon processing data. You can find more information about Amazon's processing of your personal data in Amazon's privacy policy (<u>https://docs.aws.amazon.com/connect/latest/adminguide/data-protection.html</u>).

Amazon contractually assures us that your personal data will be stored within the EU. However, data may also be transferred to the USA for individual service functions. We have entered into an agreement incorporating standard data protection clauses with Amazon in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

The data will be erased as soon as it is no longer required to achieve its purpose or if you have objected to its processing.

## III. Online returns portal

So that we can also provide you with the best possible customer service with respect to the exercise of the 8-week right of return, we have integrated an online returns portal onto our website. You can conveniently initiate the return of your goods online and print out the parcel label via the portal by providing your order confirmation number and your e-mail address. The data is entered voluntarily and can be limited to the processing of data necessary for the cancellation of your contract of sale. It is carried out on the basis of Art. 6 (1) lit. b GDPR. The data entered will only be processed to fulfil your contract of sale. Following the successful cancellation of the contract of sale, the data will be erased. The data entered by you in the portal will be processed by Metapack Ltd, 200 Gray's Inn Road, London WC1X 8XZ on our behalf.



The data processing on Metapack's website by means of cookies and other tracking technologies takes place independently of this and is Metapack's own responsibility. For setting options and information on this, please refer to Metapack's privacy policy: https://www.metapack.com/legal/privacy-policy/.

# E. Data processing via cookies and other tracking technologies

# I. General information

Teufel uses cookies and other tracking technologies on these websites – including those provided by third parties – to offer customers a safe and reliable browsing experience and to display relevant content and personalised advertising to them.

For this purpose, Teufel collects information and data on customers' behaviour on this website – including via third-party tracking technologies – and shares it with third parties; in addition, information is read from or stored on customers' end devices. Before visiting the website, customers can decide which cookies or other tracking technologies should be enabled.

Teufel uses software from Tealium Inc, 9605 Scranton Rd., Ste. 600 San Diego, CA 92121 ("Tealium") to manage and control cookies and other tracking technologies. The use of the service is based on Art. 6 (1) lit. f GDPR and is done in order to control centrally the use of cookies and pixels within the company. We also use the software to control your browser settings for cookies and pixels. We can use the software to set when a cookie or pixel will be loaded and what data will be processed in the cookie or pixel. Tealium itself does not have access to the content of the cookies and pixels, but places a cookie in your browser to enable cookie and pixel management (see below under **II**.).

# II. Functionality cookies and pixels: Technically necessary data processing

When visiting our website, information is automatically sent from your end device to our servers and applications and stored in a so-called log file.

The information is as follows:

- Browser/browser version; operating system, name of your internet provider
- Website, application that brought you to us
- Your device's IP address
- URL and name of the site visited
- Date and time of the server request

This data is processed to provide the technical basis for your connection to the website, the proper display of the website on your device and an evaluation of the system's security and stability. Our legal basis for processing the information is the contract execution or initiation according to Art. 6 (1) lit. b GDPR or our legitimate interest according to Art. 6 (1) lit. f GDPR.

In addition, we set cookies in your browser, which we need to ensure that our website is technically secure and functions smoothly. They enable navigation on the website and the use of essential features, such as the shopping cart function or the user account. Specifically, these are the following cookies:

## Google reCAPTCHA v.2

Provider of the service: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 (USA)

Privacy policy: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

Purposes of the data processing and legal bases for the same:

## Protecting our website against bots:

We use Google's reCaptcha technology on our website to check whether orders are being placed on our website by people or whether improper, automated machine processing of data is being done by so-called bots. For this purpose, certain information about the browsing behaviour of the visitor to our website is transmitted to Google, information that Google uses to evaluate whether the browsing behaviour matches that of a person. The information transmitted to Google includes, inter alia, three bytes of the IP address of the system used by you to view the site (anonymised IP address). Google may moreover use the data for its own purposes and link it to other data from you, e.g. the history of your searches in the Google search engine, your personal account within your Google account or data about usage behaviour on other devices.



Legal basis: Our legitimate interests according to Art. 6 (1) lit. f GDPR, because as an e-commerce company we need to protect our website from attacks by bots and your interests and fundamental rights do not override our interests in this type of processing.

#### Data processing locations:

EU/EEA, USA

We have entered into a contract incorporating standard data protection clauses with Google in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

#### Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

## New Relic

Provider of the service: New Relic Inc., 188 Spear St., Suite 1000, San Francisco, CA USA 94105 (USA)

Data privacy notice for this service: <u>https://docs.newrelic.com/docs/security/security-privacy/data-privacy/data-privacy/data-privacy-new-relic</u>

#### Purposes of the data processing and legal bases for the same:

#### Monitoring of our website and detection of programming errors:

If you use our website, we transmit certain information about your browsing behaviour, such as e.g. your user agent identifier, to New Relic. New Relic will evaluate the information and process it for us for statistical purposes. We can use this information to monitor the functionality of our website and to detect programming errors. We cannot exclude the possibility of New Relic also using the data in pseudonymous form for its own purposes.

<u>Legal basis:</u> Our legitimate interests according to Art. 6 (1) lit. f GDPR, because as an e-commerce company we depend on a strong performance of our website and your interests and fundamental rights do not override our interests in this type of processing.

#### Data processing locations:

EU/EEA, USA

We have entered into an agreement incorporating standard data protection clauses with New Relic in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

## Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

## Tealium Tag Manager

Provider of the service: Tealium Inc., 9605 Scranton Rd., Ste. 600 San Diego, CA 92121 (USA)

Privacy notice: <u>https://tealium.com/privacy-policy/</u>

#### Purposes of the data processing and legal bases for the same:

Management and control of cookies:



Tealium permits us to manage and control the setting of cookies on our website. Tealium's software also allows us to control your browser settings about cookies and pixels and to take into account your privacy preferences. We use the software to set when a cookie or pixel will be loaded and what data will be processed in the cookie or pixel. Tealium itself is not aware of the content of the cookies and pixels, but does itself place a cookie in your browser, through which information is transmitted, e.g. your browser settings or your IP address in pseudonymous form, to permit the management of cookies and pixels.

<u>Legal basis</u>: Our legitimate interests according to Art. 6 (1) lit. f GDPR, since we as an e-commerce business rely on a management tool to manage cookies and pixels and your interests and fundamental rights do not override our interests in this type of processing.

## Data processing locations:

## EU/EEA, USA

We have entered into an agreement incorporating standard data protection clauses with Tealium in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

## Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

## III. Analysis cookies or pixels: Data processing for web analysis

With analysis cookies, we or third parties primarily collect information about how our websites are used. In this context, for example, information on the number of visitors, search terms entered and the region from which our customers access the website is processed. We also measure the impact that certain pages have on our customers. We or third parties use this information to compile statistics in order to tailor the content of our websites more specifically to the needs of our customers and to optimise our offer. We or third parties also collect information across devices to some extent to get a better overall view. Specifically, these are the following cookies:

# **Exactag Analytics**

Provider of the service: Exactag GmbH, Wanheimer Str. 68, 40468 Düsseldorf (Germany)

Privacy notice: <a href="https://www.exactag.com/datenschutz/">https://www.exactag.com/datenschutz/</a>

## Purposes of the data processing and legal bases for the same:

## Evaluation of the effectiveness of advertisements and optimisation of advertising campaigns:

Exactag creates pseudonymous user profiles based on your browsing behaviour on our website. Information such as, for example, the type of device used by you, the operating system, browser version, information about your order, your geographic location or information about your interaction with advertising (e.g. number of clicks or views) on our website is collected in the user profile and passed on to Exactag. This information permits us to evaluate the effectiveness of our advertisements and to optimise our advertising campaigns. To rule out any possibility of your being personally identified or to preclude this to a large extent, you will be allocated an ID number when you visit our website.

<u>Legal basis</u>: Our legitimate interests according to Art. 6 (1) lit. f GDPR, since we as an e-commerce business rely on an evaluation of our advertising campaigns through pseudonymous user profiles and your interests and fundamental rights do not override our interests in this type of processing.

#### Display of suitable advertising across multiple devices:

Exactag will assign a random code to the device that you use to view our website to display personalised advertising across multiple devices. If you have also set up an account with us and if you log into this account, then irrespective of the device used, we allocate a further ID number to you, which we also communicate to Exactag. Exactag subsequently enables us to display personalised advertising on the devices used by you. Exactag provides us moreover with information about usage



behaviour for our website across various types of device. It is not, however, possible for us to evaluate your personal browsing behaviour on the various different devices, since the data we receive for statistical purposes from Exactag is aggregated data only. Due to the random identification, neither we nor Exactag can identify you personally.

Legal basis: Your consent according to Art. 6 (1) lit. a GDPR.

Data processing locations:

EU/EEA

Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

#### Rights of withdrawal and/or possibilities for objection:

Withdrawal and objection with effect for the future: <a href="https://www.exactag.com/en/confirmation/">https://www.exactag.com/en/confirmation/</a>

#### **Kameleoon**

Provider of the service: Kameleoon GmbH, Beim Alten Ausbesserungswerk 4, 77654 Offenburg (Germany)

Privacy policy: https://www.kameleoon.com/en/privacy-policy

#### Purposes of the data processing and legal bases for the same:

#### Evaluation of the use of our website and optimisation of our website:

Kameleoon uses cookies to collect information about your browsing behaviour on our website. This requires data about the use of our website to be processed. Kameleoon stores your IP address in an abbreviated, anonymised form only, so that Kameleoon cannot trace the information stored for your cookie ID back to you. We use data from Kameleoon to conduct A/B and multivariate tests, through which we hope to gain an understanding of how we can better design our website.

Legal basis: Your consent according to Art. 6 (1) lit. a GDPR.

Data processing locations:

EU/EEA

#### Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

Rights of withdrawal and/or possibilities for objection:

Withdrawal and objection with effect for the future: Opt-out by disabling the category

## Mapp Intelligence (formerly: Webtrekk Analytics)

Provider of the service: Mapp Digital c/o Webtrekk GmbH, Robert-Koch-Platz 4, 10115 Berlin (Germany)

Privacy notice: https://www.webtrekk.com/privacy-notice.html

Purposes of the data processing and legal bases for the same:



# Evaluation of the use of our website and optimisation of the website (across multiple devices) and transmission of pseudonymized data to advertising partners:

Webtrekk uses cookies to create anonymous or pseudonymous user profiles based on your browsing behaviour on our website. Data such as, for example, your operating system, the browser version, your IP address, the geographic location, the website that you viewed beforehand (referrer URL), information about your order and the data and time of your visit to our website is collected and passed on to Webtrekk. This information permits us to evaluate the use of our website and to optimise our advertising campaigns. To rule out any possibility of your being personally identified or to preclude this to a large extent, you will be allocated an ID number when you visit our website and the IP address, which was stored in truncated form only, will be deleted following the session identification for the purposes of geolocation.

If you have placed an order with us and given consent to the use of advertising cookies in this consent banner, we will transmit your hashed email address to our advertising partner Google for the purpose of showing you more personalized advertisements on Google pages. Details can be found in our section on Google Customer Match under Advertising.

<u>Legal basis:</u> Your consent as outlined in article 6(1)(a) TTDSG paragraph 25(1) and our legitimate interests according to Art. 6 (1) lit. f GDPR, since we as an e-commerce business rely on an evaluation of the use of our website through pseudonymous data and your interests and fundamental rights do not override our interests in this type of processing.

Data processing locations:

EU/EEA

## Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

## Rights of withdrawal and/or possibilities for objection:

Withdrawal and objection with effect for the future: <u>https://mapp.com/opt-out-mapp/</u>

# IV. Advertising cookies or pixels: Data processing for online advertising

We use advertising or marketing cookies to display relevant content and personalised advertising to our customers on our website or on third party websites. For this purpose, we collect information on their browsing behaviour or the products preferred by our customers and completed orders. We or third parties link our customers' activities across devices and share certain information (such as an encrypted email address or order number) with third parties such as Facebook, Google or Rakuten. In this context, we also process information about our advertising campaigns (e.g. whether and which advertisements our customers have clicked on) in order to optimise them and to enable invoicing for the campaigns. Specifically, these are the following cookies:

# Emarsys

Provider of the service: Emarsys eMarketing Systems GmbH, Hans- Fischer Straße 10, 80339 Munich (Germany)

Privacy notice: <u>https://emarsys.com/privacy-policy/</u>

## Purposes of the data processing and legal bases for the same:

## Display of suitable advertising in the newsletter:

Whenever you view our website, Emarsys sets a cookie which stores information about your usage behaviour on our website. This might for example include which offers you are interested in and which products you have clicked on. We use this data in our newsletter – subject to your consent – to display suitable advertising to you. The merging of the data collected in the cookies with the newsletter is done with the aid of pseudonyms, which are created by means of a so-called hash function.



Legal basis: Your consent according to Art. 6 (1) lit. a GDPR.

Data processing locations:

EU/EEA

Storage period or criteria for determining the storage period:

Erasure on achievement of purpose

## Rights of withdrawal and/or possibilities for objection:

Revocation and objection with effect for the future: by e-mail unsubscribe@teufel.de

# **Google Ads**

Provider of the service: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4 (Ireland)

Privacy policy: <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>

## Purposes of the data processing and legal bases for the same:

## Evaluation of advertisements on Google, display of suitable advertising in the Google search engine and on other websites:

Google Ads enables us to display our advertisements to you in the Google search engine and on websites relevant to the subject matter concerned whenever you enter certain key words. Should one of our Google Ads adverts bring you to our website, a cookie will be placed in your browser. The information contained in the cookie includes the fact that you were redirected to our website as the result of the Google Ads advert and tells us how you use our website (whether you have for example purchased the advertised product and/or one of the advertised products). We share the information about your browsing behaviour – which also includes your IP address – with Google and Google may also pass this information on to other companies. The IP address will, however, be passed on to Google in an abbreviated form only. Google Ads also enables us to show you advertising relating to your interests on other websites. For this, information about your usage behaviour – e.g. which offers you were interested in – is passed on to and evaluated by Google. Whenever Google recognises you again on other websites, it may show you personalised advertising from us. Google may also use the information about your usage behaviour for its own purposes and link it to other data from you, e.g. the history of your searches in the Google search engine, your personal account within your Google account or data about usage behaviour on other devices.

Legal basis: Your consent according to Art. 6 (1) lit. a GDPR.

## Data processing locations:

## EU/EEA, USA

We have entered into a contract incorporating standard data protection clauses with Google in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

## Storage period or criteria for determining the storage period:

The cookies have a lifespan of up to 180 days. At Google, your data will be anonymised after 18 months at the latest.

## Rights of withdrawal and/or possibilities for objection:

Withdrawal and objection with effect for the future: https://adssettings.google.com/



# **Google Customer Match**

Service provider: Google Ireland LTD, Gordon House, Barrow Street, Dublin 4 (Ireland)

Privacy policy: https://policies.google.com/privacy

#### Purposes of data processing and legal basis:

#### The display of personalized advertisements in the Google search engine and on other websites:

Google Customer Match allows us to show you more relevant ads in a more targeted way. For Google Customer Match, we transmit your email address in pseudonymized form to Google after a purchase in our webshop so that Google can match this email address with that of a registered Gmail or YouTube user. Google uses this data for more targeted ad placement and as a source for smart bidding strategies (ad bidding strategies). In addition to exporting email addresses, we may also transfer your name in pseudonymized form to Google, as well as the country your order was placed from. You may edit your personal data and privacy settings under Google "My Account:" https://myaccount.google.com/intro. You can find information from Google about how they process data as part of Customer Match here: https://support.google.com/google.ads/answer/7474263 and for Smart Bidding here: https://support.google.com/google.ads/answer/7065882.

Legal basis: Your consent as laid out in article 6(1) (a) GDPR and paragraph 25(1) TTDSG (German Telecommunication-Telemedia Data Protection Act).

## Locations of data processing:

#### EU/EEA, USA

We have a contract with Google containing standard data protection clauses as laid out in article 46 GDPR. Nevertheless, the USA is a country that does not provide adequate protection for personal data in accordance with EU Regulation 2016/679. This means, among other things, that government authorities in the USA may be able to gain access to your data without effective recourse.

#### Length of storage and criteria for determining duration:

Deletion takes place after matching has been performed, i.e. after a few days at most.

## Rights of withdrawal and/or objection:

You may opt-out or object to future processing at any time by visiting: https://www.google.com/settings/ads

## V. Our affiliate partner Rakuten

Our affiliate partner Rakuten Marketing France SAS, 92 Rue de Réaumur, 75002 Paris (France) processes personal data from your visit to our website for the purposes of charging commission. Should an advertising link from Rakuten bring you to our website. Rakuten sets a cookie in your browser and receives a commission from us if you successfully complete an order. In order to settle the commission, we pass on information to Rakuten about your order and your visit to our website. This includes e.g. your order number in pseudonymous form and information about which of Rakuten's partners brought you to our website. The processing is done based on our legitimate interest, as an e-commerce business, in working together with partners in affiliate marketing and in advertising products across their networks. Your interests and fundamental rights do not override our interests in this type of processing, and so we can base the processing on Art. 6 (1) lit. f. We cannot rule out the possibility of the data being processed by Rakuten in countries outside the EU/EEA. In particular, Rakuten reserves the right to transfer the data to the USA. We have entered into an agreement incorporating standard data protection clauses with Rakuten in accordance with Art. 46 GDPR. Rakuten has moreover introduced so-called binding corporate rules company-wide (available for viewing at: https://corp.rakuten.co.jp/privacy/en/bcr.html), which were approved by the Luxemburg Data Protection Authority, Article 47 GDPR. You can find details about Rakuten's data processing at: https://rakutenadvertising.com/legal-notices/services-privacy-policy/. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place. The data is stored as long you do not object to its storage. An objection may be made at any time, with effect for the future, at: https://optout.networkadvertising.org/?c=1 or https://optout.aboutads.info/?c=2&lang=EN.



# F. Data processing for other marketing purposes

# I. Competitions

If you participate in our competitions, we will generally only process the data you have provided for these purposes in order to carry out the competition. Depending on how the competition is organised, the processing of personal data for conducting the competition includes notably a prize notification or a message to the effect that you did not win. If you receive a prize from us and this needs to be sent to you, we use your data for these purposes as well and pass the data on to shipping service providers. The data processing for our competitions is based on Art. 6 (1) lit. b and, where appropriate, Art. 6 (1) lit. a GDPR.

# II. E-mail and newsletter

We use your e-mail address, in addition to the above indicated purposes, for the following purposes too.

## 1. Advertising for our own, similar products and customer satisfaction

In accordance with the information we provide when collecting your e-mail address during the ordering process, we take the liberty of sending you advertising for our own, similar products from Teufel and to ask you once after a purchase about your customer satisfaction. The data processing is based on Art. 6 (1) lit. f GDPR, since we have a legitimate interest in having a direct advertising appeal to our customers. You can object to the use of your e-mail address for this purpose at any time by sending a message to <u>unsubscribe@teufel.de</u> or via a link in the e-mail with effect for the future.

## 2. Newsletter

If you have given us your consent and have subsequently clicked on the confirmation link sent (double opt-in procedure), you will regularly receive our newsletter with product recommendations, practical tips, surveys and background information. We use the help of the service provider Emarsys eMarketing Systems GmbH (Hans- Fischer Straße 10, 80339 Munich) to send out the newsletter and to target your interests. Further information on data processing by Emarsys can be found at <u>https://www.emarsys.com/privacy-policy/</u>.

Based on your consent, Art. 6 (1) lit. a GDPR, we use your e-mail address, your usage behaviour in the newsletter and your purchasing behaviour in the web shop to store a personal profile assigned to your e-mail address, and to inform you within the newsletter only about offers that are of interest to you. For this purpose, the newsletters contain a tracking pixel – a miniature graphic that triggers a server request to permit a log file to be written.

Based on your consent, we also combine the data in the newsletter with your data from our merchandise management system in a software solution of Microsoft Corporation (One Microsoft Way, Redmond, WA 98052-6399, USA) and evaluate it therein on an anonymised basis to optimise newsletter management.

Your pseudonymised personal data is therefore only used for comparison, so that we can no longer draw any conclusions about you as a person in the Microsoft software solution. In this way, we can, for example, carry out automated analyses of the browsing and purchasing behaviour of newsletter subscribers and also incorporate (tracking) data from other service providers (e.g. Mapp Intelligence) into the analyses on an anonymous basis. Further information on data processing by Microsoft can be found at <a href="https://privacy.microsoft.com/en-GB/">https://privacy.microsoft.com/en-GB/</a>

In order to show you more suitable advertising outside of our newsletter, we transmit your e-mail address in pseudonymous form to Google Ireland LTD, Gordon House, Barrow Street, Dublin 4 (Ireland). Google matches these hashed email addresses with the email addresses of registered G-Mail or YouTube users and utilizes the data to improve ad placement targeting, and as a source for its own smart bidding strategies. In addition to your email address, we also transmit your name in pseudonymized form to Google as well as the country your order was placed from.

Your personal data that we have stored in this context will be deleted as soon as it is no longer required to achieve its purpose. You may withdraw your consent to receive the newsletter at any time with effect for the future at <u>unsubscribe@teufel.de</u> or via a link in the e-mail.

The processing of the data takes place in the territory of the European Union and/or the European Economic Area, the United Kingdom and, where applicable, the USA. The transfer of data to the UK is permitted on the basis of an adequacy decision of the European Commission pursuant to Art. 45 GDPR. We have concluded a contract with Microsoft with regard to data transfers to the USA incorporating standard data protection clauses in accordance with Art. 46 GDPR. In this context, we would nevertheless like to point out that the USA is a country that does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.



# 3. Product and shop reviews

If, after completing your order, you gave us your consent to offer you various opportunities to review our shop or our products by e-mail, we will also process your e-mail address for this purpose, for which we rely on your consent, Art. 6 (1) lit. a GDPR. You may withdraw your consent to receive this e-mail at any time with effect for the future at <u>unsubscribe@teufel.de</u> or via a link in the e-mail.

# G. Data processing via social media

# I. Our blog

For further information about the processing of personal data via our blog, please see: <u>https://blog.teufelaudio.com/</u>.

# II. Our social media presences

To remain in touch with our customers, we maintain a presence on several social networks. The processing of our customers' data is based on our legitimate interests according to Art. 6 (1) lit. f GDPR. Where the providers of the respective platform (such as e.g. Facebook or Twitter) obtain the user's consent to the processing of personal data, such data is processed on the basis of Art. 6 (1) lit. a, Art. 7 GDPR. We cannot rule out the possibility that personal data may be processed by the respective operator of the social network outside the European Union and/or the European Economic Area. This may make it difficult to enforce data subjects' rights (such as e.g. the right of access).

The processing of personal data via the social networks is done for analysis and marketing purposes (advertising, newsletter, analysis of our website and of your usage). The operator of the social network provides us with information about our customers' interests and with general statistics containing demographic characteristics. We are jointly responsible, together with the operator of the social network, for such data processing operations. However, overall, we only have a limited influence on the scope, nature and purposes of the processing operations; these are largely determined by the respective operator of the social network. For example, the operators of the social networks use the collected data to create profiles that enable advertising campaigns to be targeted to the users. For this purpose, the operators of the social networks place cookies on your device. The operators of the social networks are solely responsible for the processing operations. With regard to these data processing operations, you should exercise your rights as a data subject (such as e.g. rights of access) directly with the respective operator of the social network, since only these operators have access to your personal data and can take appropriate measures and provide information.

Should you need help in exercising your rights, you can of course also contact us. The operators of the social media platforms on which we maintain a presence are as follows:

- Meta Platforms Ireland Ltd. (Facebook und Instagram), 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, Privacy Policy Facebook: https://www.facebook.com/about/privacy/; Privacy Policy Instagram: <u>https://help.instagram.com/155833707900388</u>,
- Twitter International Company (Twitter), One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland, Privacy Policy https://twitter.com/privacy, Opt-Out Possibilities https://twitter.com/personalization
- TikTok Technology Limited (TikTok), 10 Earlsfort Terrace, Dublin, D02 T380, Ireland, Privacy Policy: https://www.tiktok.com/legal/page/eea/privacy-policy/en
- Pinterest Europe Ltd. (Pinterest), Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland, Da Privacy Policy: <u>https://policy.pinterest.com/en/privacy-policy</u>
- Google Ireland Limited (Youtube), Gordon House, Barrow Street, Dublin 4, Ireland, Privacy Policy: https://policies.google.com/privacy

We use the content management tool of Facelift brand building technologies GmbH (Gerhofstr. 19, 20354 Hamburg; https://facelift-bbt.com/en/data-protection) to contact and process contracts for the use of content on Instagram. The tool provides us with basic information on Instagram users and informs us of their uploads, descriptions and comments, as well as names and where appropriate business contact details. As our commissioned data processor, Facelift brand building technologies GmbH acts under our instructions with regard to data processing. The data is processed on the basis of Art. 6 (1) lit. b or f GDPR. We process the data initially just to establish contact. Any further processing requires the Instagram user to give us permission to use their uploads.

# H. Data processing via apps

# I. Data processing for Teufel Remote app



The Teufel Remote app is provided by our partner Frontier Smart Technologies Ltd (Harston Mill, Harston, Cambridge, CB22 7GG, USA). No personal data is processed through the app by us or Frontier. You can view Frontier's corresponding privacy policy at the following link: <u>https://www.frontiersmart.com/privacy/</u>.

# II. Data processing for Holist app

Holist uses an app provided by our partner Linkplay Technology Inc. (Suite 130 8000 Jarvis Avenue Newark, 94560 NJ (USA)). The relevant privacy policy can be found at: <u>http://linkplay.com/privacy-policy/</u>.

# III. Data processing for the Teufel Headphones app (only concerns the Android app)

We use the Google Firebase service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, in the Teufel Headphones app. Google Firebase is a platform for developers of apps for mobile devices and websites and offers numerous features. We use the "Firebase Analytics" service, which allows us to analyse the use of our offer. Google Firebase assists us in capturing data about the interactions of our users. It captures certain events, such as e.g. when the app is launched for the first time, when it is uninstalled, updated or when it crashes, as well as the frequency, manner and method (click paths) of using the app. It also captures and analyses certain general interests of users, but without any references to individual persons. Google Firebase uses so-called "IDs", which are identifiers that are stored on your device and that permit an analysis of your use of the app.

The information about your use of the app generated by the IDs is usually transmitted to a Google server in the USA and stored there. We have entered into an agreement incorporating standard data protection clauses with Amazon in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

If IP anonymization is enabled in this app, however, Google will truncate your IP address beforehand within member states of the European Union or other contracting states of the Agreement on the European Economic Area. In this app, IP anonymization is always enabled. The information processed with the aid of Google Firebase will where required be used in combination with other Google services, such as e.g. Google Analytics and Google marketing services. In this case, only pseudonymised information, such as the Android Advertising ID or the Advertising Identifier for iOS, will be used to identify users' mobile devices. Users can find further information about the use of data for marketing purposes by Google on the following information page: <a href="https://www.google.com/policies/technologies/ads">https://www.google.com/policies/technologies/ads</a>; Google's privacy policy is available at: <a href="https://www.google.com/policies/technologies/ads">https://www.google.com/policies/technologies/ads</a>; Google are interest according to Art. 6 (1), sentence 1 lit. f GDPR (i.e. our interest in analysing and optimising our apps and in their economically efficient operation). Users who would like to object to targeted advertising by Google marketing services can use the optional settings and opt-out methods provided by Google: <a href="http://www.google.com/ads/preferences">http://www.google.com/ads/preferences</a>. Users can additionally disable Google Firebase tracking in the app under the menu item Settings/App/Privacy.

# I. Data processing in case of external content

# I. Youtube and Vimeo

To provide our customers with a better presentation of our products, we have integrated videos into our website. The processing is carried out on the basis of your consent in accordance with Art. 6 (1) lit. a GDPR. We cannot rule out the possibility that personal data may be processed by the respective provider outside the European Union and/or the European Economic Area. This may make it difficult to enforce data subjects' rights (such as e.g. the right of access). We have integrated the videos into our website to bring our customers closer to our products and to illustrate product features in a way that is more relatable. Since we have integrated the videos via external video service providers, we do not need to host the videos on our own servers and can use our resources elsewhere.

Whenever a video is clicked, a connection is established to the server of the respective video services provider. Data regarding your device settings and your interaction with the video services is transmitted to the respective provider of the video service via a plug-in. Depending on whether you have a customer account with the respective provider of any video service and have logged into this, the respective provider may also use the data processed to create a profile. The respective provider of the video service is solely responsible for these data processing operations. With regard to these data processing operations, you should exercise your rights as a data subject (such as e.g. rights of access) directly with the respective provider has access to your personal data and can take appropriate measures and provide information.

Should you need help in exercising your rights, you can of course also contact us. The providers of video services used by us are:



- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (YouTube), privacy policy: <u>https://policies.google.com/privacy</u>,
- Vimeo Inc. 555 West 18th Street, New York, New York 10011, USA (Vimeo), privacy policy: <u>https://vimeo.com/privacy</u>.

# II. Spotify, Soundcloud

We have integrated link buttons to music streaming services into our website. The processing is carried out on the basis of your consent in accordance with Art. 6 (1) lit. a GDPR. We cannot rule out the possibility that personal data may be processed by the respective provider outside the European Union and/or the European Economic Area. This may make it difficult to enforce data subjects' rights (such as e.g. the right of access). We have integrated the music streaming services into our website to use audiovisual means to advertise our products. Since we have integrated the music via external music streaming services providers, we do not need to host the songs on our own servers and can use our resources elsewhere.

Whenever you visit our website and click on the button of a music streaming services provider, a direct connection is established between your browser and the server of the music streaming services provider. As a result, the music streaming services provider obtains certain information about the device that you use to visit the website and about how you interact with the music streaming service. Depending on whether you have a customer account with the respective provider of the music streaming service and have logged into this, the respective provider may also use the data processed to create a profile. The respective provider of the music streaming service is solely responsible for these data processing operations. With regard to these data processing operations, you should exercise your rights as a data subject (such as e.g. rights of access) directly with the respective provider of the music streaming service, since only this provider has access to your personal data and can take appropriate measures and provide information.

Should you need help in exercising your rights, you can of course also contact us. The providers of music streaming services used by us are:

- SoundCloud Ltd, c/o JAG Shaw Baker, Berners House, 47-48 Berners Street, London W1T 3NF, Great Britain; for Germany: SoundCloud Limited, Rheinsberger Str. 76/77, 10115 Berlin, privacy policy: <u>https://soundcloud.com/pages/privacy</u>
- Spotify AB, Birger Jarlsgatan 61, 113 56 Stockholm, Sweden, privacy policy: <u>https://www.spotify.com/legal/privacy-policy/</u>

# III. Google Maps

Our website has an API (software interface) that allows us to use Google Maps. Google Maps is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. We use Google Maps to display interactive maps and, where necessary, route plans to assist our users in locating and finding our stores.

Use of the features offered by Google Maps requires the storage of your IP address. This information is usually transmitted to a Google server in the USA and stored there. The operator of this website has no further control over this data transmission. We have entered into a contract incorporating standard data protection clauses with Google in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place.

The use of Google Maps serves to ensure an appealing presentation of our online and offline offers and to make the locations specified on the website easier to find. Processing is only carried out with your consent on the basis of Art. 6 (1) lit. a GDPR. For this processing, we cooperate with Google based on an joint control agreement according to Art. 26 GDPR, which can be viewed at <a href="https://privacy.google.com/intl/de/businesses/mapscontrollerterms/">https://privacy.google.com/intl/de/businesses/mapscontrollerterms/</a>.

More information about data protection by Google can be found via the following link: <u>https://policies.google.com/privacy</u>.

# IV. Loqate

To ensure that we have our products delivered to the correct addresses, we use the address validation service loqate from GB Group PLC, The Foundation, Herons Way, Chester Business Park, Chester, CH4 9GB, United Kingdom ("GBG"). Address data entered by our customers in the webshop are checked for validity by GBG directly at the time of entry via our online interface and are not processed beyond that. Only the IP address of our customers is transmitted to GBG for billing purposes, but deleted there after 30 days.

The processing is based on your consent in accordance with Art. 6 (1) a DSGVO. We cannot rule out the possibility that personal data may be processed by the respective provider outside the European Union and/or the European Economic Area. This may



make it difficult to enforce data subjects' rights (such as e.g. the right of access). If you need assistance in exercising your rights, you can of course contact us.

Further information on data protection at GBG can be found at: https://www.loqate.com/en-us/products-services-privacy-notice/.

# **IV. User Generated Content**

We On our website, we integrate user-generated content (with the consent of our customers) via software from Facelift brand building technologies GmbH (Gerhofstrasse 19, 20354 Hamburg, Germany), e.g. Instagram pictures that our customers have taken of our products. For the appropriate display of the Instagram images on our product pages, we transmit the product ID and the respective language of your browser to our service provider. Details on data processing can be found in facelift's privacy policy: <a href="https://facelift-bbt.com/en/imprint">https://facelift-bbt.com/en/imprint</a>.

## J. Data processing via Teufel devices

## I. Data processing via voice-controlled devices

Some of our devices are voice-controlled (e.g. via the Alexa voice service from Amazon Europe). As soon as the voice-control feature is enabled, personal data is processed by the voice service providers. The processing of personal data is necessary for the seamless functioning of the voice control or direct control function. Please check with the relevant provider to learn more about the scope and legal basis of the data processing and the terms of use for the respective voice service.

When the respective voice service is enabled, our company, Lautsprecher Teufel, does not have remote access to the voice and audio signals. The ambient noise is stored locally on the device in a so-called buffer memory for a few seconds only as an infinite loop and is constantly overwritten with new ambient noise. Voice and audio signals will only be recorded when the device detects a command enabling the respective voice service. The recording will be stored in a software solution of the respective voice service provider and processed exclusively by that provider. Lautsprecher Teufel does not have access to any of the voice and audio recordings. The data processing is the sole responsibility of the respective voice-control provider (e.g. Amazon). Please check with the relevant provider with respect to the scope, purposes and legal bases of the data processing.

When using voice-controlled devices, personal data about the devices is also processed by our partner Linkplay Technology Inc. (Suite 130 8000 Jarvis Avenue Newark, 94560 NJ (USA)). The relevant privacy policy can be found at: <a href="http://linkplay.com/privacy-policy/">http://linkplay.com/privacy-policy/</a>. Our company, Lautsprecher Teufel GmbH, does not have access to this data either.

## II. Data processing via Teufel Streaming

## 1. Types and categories of data processed

If you use a streaming device from us (Teufel Streaming, or formerly Raumfeld), data from the devices and/or the corresponding app will be processed to permit the use of such devices. The data processed is:

- Device type
- Device ID
- Device version
- Installation ID (which devices are associated),
- Device (IP) addresses; these are stored in anonymised form only

## 2. Purposes and legal bases

We use this data for various purposes. The data is a prerequisite for the functioning of the product: the app must recognise the devices, the devices must recognise each other and "know" which network they are in. Because finding devices on local networks is not always reliable, Teufel Streaming devices use a database to find one another. Furthermore, the data will be used to assign the appropriate updates to a device and to provide you with important technical information regarding the music streaming services used by you. The basis of this data processing is therefore Art. 6 (1) lit. b GDPR. In addition, we also process the data provided to optimise our products and our support. This processing is based on our legitimate interest to further develop our products, to correct errors and also to create usage statistics and is therefore



based on Art. 6 (1) lit. f GDPR. The data will be erased as soon as it is no longer required to achieve the purpose of its collection.

If usage data is passed on to third parties, this will only be done in anonymous and aggregated form. Your data will be encrypted over the internet using HTTPS.

# 3. Music streaming services via Teufel Streaming

## 3.1 Services without registration

You can use certain music streaming services from an app without registering with the provider. The data controller responsible for the collection, processing and use of personal data when using these music streaming services is the respective music streaming service provider and not Teufel. Please refer to the privacy policy of the respective provider:

- Tuneln: http://tunein.com/policies/privacy/
- Spotify: https://www.spotify.com/legal/privacy-policy/

# 3.2 Services with registration

To use the services TIDAL, Rhapsody, SoundCloud and Last.fm Scrobbling, registration with the respective provider is required. Registration can be done via the provider's website/app or optionally via the app. The data controller responsible for the collection, processing and use of the data to be provided when registering is the respective music streaming service provider. Please refer to the privacy policy of the respective provider:

- TIDAL: <u>http://tidal.com/gb/privacy</u>
- SoundCloud: https://soundcloud.com/pages/privacy

It is necessary to log in to the app to use the respective music streaming services. The account data is stored for such purposes in our firmware and associated with the system ID. The account details will be used to renew the session with the relevant music streaming service. If you manually remove your account from the Teufel Streaming System, thereby disabling the music streaming service, your account details will be deleted. In the context of the production of manual and automatic reports, the log-in details may also be transmitted to us as part of the log data. We use this data only for the stated purpose. It is not disclosed to third parties.

## 4. Services used independently of the app

Once a system is set up, you can also control the Teufel Streaming devices from another third-party app. For this purpose, the third-party provider's hardware and software will be integrated into the Teufel Streaming system, and this is not something that is under our control. The data controller responsible for the processing of the personal data is the respective provider. We have no access to the data collected by the provider. If you use the Spotify Connect or Google Cast for Audio services, these providers will have access to your Teufel Streaming devices' audio controls, such as e.g. the volume. For further information, please refer to the respective provider's privacy policy:

- Spotify Connect: <u>https://www.spotify.com/uk/legal/privacy-policy/</u>
- Google Cast for Audio: https://www.google.com/policies/privacy/

To validate and authenticate existing devices for the Google Cast for Audio service, we collect your name and e-mail address. This is how we make sure that only people sign up for the service and not bots or the like. This data will not be shared or used for any purpose other than validation. The data is therefore collected in accordance with Art. 6 lit. b and f GDPR. The data will be erased as soon as it is no longer required to achieve the purpose of its collection. The Google Cast for Audio functionality is enabled with the aid of a third-party provider. StreamUnlimited Engineering GmbH. Gutheil-Schoder-Gasse 10, 1100 Vienna, Austria ("StreamUnlimited"). This provider organises and supports the cloud server necessary to access Google Cast for Audio's audio services. This third-party provider reserves the right to check the use of the licensed software for legitimacy in order to prevent illegal activities (e.g. the transfer of a copy of the licensed software to a non-licensed device). The device is identified with the aid of an individual token, the use of which you consent to for checking purposes. For monitoring purposes, every time the device is operated, the MAC address, the user's IP address, the brand, model name, and firmware version are logged to permit usage to be observed. You acknowledge that the third-party provider may store and process this data in the event of any reasonable suspicion of unlawful use. StreamUnlimited is also authorised to transfer the data in an anonymous format to the relevant developer of a feature supported by the licensed software if there is reasonable suspicion of an infringement of any right by the end user. The processing of your personal data is done on the basis of our legitimate interest in the prosecution of infringements of rights in accordance with Art. 6 (1) lit. f GDPR. The data will be erased as soon as it is no longer required to achieve the purpose of its collection.



# 5. Manual reports via Teufel Streaming

In case of problems, you can send reports manually to Lautsprecher Teufel via your Teufel Streaming devices and apps. In this case the following data will be transferred to us: log files (which also contain information about usage behaviour), device IDs, settings, information about the infrastructure, list of active programmes, e-mail addresses and log-in details for the respective music streaming services (if the log was sent at the time of registration with the music streaming service ). This personal data and information will be used only for the purpose of optimising our product and will not be disclosed to third parties without your explicit consent. The processing of the data is based on your consent according to Art. 6. (1) lit. a GDPR. The data will be erased after 6 months.

# 6. Automatic reports via Teufel Streaming

You can also enable the systems (devices, apps, etc.) to automatically send reports. In this case, the same data as in the case of the manual reports will be transferred to Lautsprecher Teufel (see manual reports). This data and information is used only for the purpose of optimising our product and will not be disclosed to third parties without your explicit consent. By enabling this feature, you consent to the automatic processing of this data by us for the purpose of optimising Teufel Streaming products. The processing of the data is based on your consent according to Art. 6. (1) lit. a GDPR. The data will be erased after 6 months.

# 7. Google Firebase Analytics via Teufel Streaming (only applies to the Android app)

We use the Google Firebase service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, in our app. Google Firebase is a platform for developers of apps for mobile devices and websites and offers numerous features. We use the "Firebase Analytics" service, which allows us to analyse the use of our offer. Google Firebase assists us in capturing data about the interactions of our users. It captures certain events, such as e.g. when the app is launched for the first time, when it is uninstalled, updated or when it crashes, as well as the frequency, manner and method (click paths) of using the app. It also captures and analyses certain general interests of users, but without any references to individual persons.

Google Firebase uses so-called "IDs", which are identifiers that are stored on your device and that permit an analysis of your use of the app. The information about your use of the app generated by the IDs is usually transmitted to a Google server in the USA and stored there. We have entered into a contract incorporating standard data protection clauses with Google in accordance with Art. 46 GDPR. Nevertheless, the USA is a country which does not offer an adequate level of protection for personal data as provided for in EU Regulation 2016/679; this signifies inter alia that government authorities in the USA could have the opportunity to gain access to your data without effective remedies being in place. If IP anonymization is enabled in this app, however, Google will truncate your IP address beforehand within member states of the European Union or other contracting states of the Agreement on the European Economic Area. In this app, IP anonymization is always enabled.

The information processed with the aid of Google Firebase will where required be used in combination with other Google services, such as e.g. Google Analytics and Google marketing services. In this case, only pseudonymised information, such as the Android Advertising ID or the Advertising Identifier for iOS, will be used to identify users' mobile devices. Users can find further information about the use of data for marketing purposes by Google on the following information page: https://www.google.com/policies/technologies/ads; Google's privacy policy is available at: https://www.google.com/policies/privacy.

The legal basis for the use is your consent in accordance with Art. 6 (1), sentence 1 lit. a GDPR. The service is disabled by default in the settings and is only activated with your consent. Users who would like to object to targeted advertising by Google marketing services can use the settings options provided by Google: <a href="http://www.google.com/ads/preferences">http://www.google.com/ads/preferences</a>. Users can enable or disable tracking with Google Firebase at any time in the app under the menu item Settings/System Information/Analytics.

# 8. E-mail and newsletter via Teufel Streaming

If you have given your consent to this in the setup process or in the settings, we will use your e-mail address and optionally your first name and surname to keep you up-to-date on any new features relating to the products purchased by you (software updates, system extensions, system components) or to ask you about your satisfaction with the products purchased. You can object to the use of your e-mail address for the above-mentioned purposes at any time with effect for the future. To do so, either click on the unsubscribe link in the newsletter or send an informal letter by e-mail to <u>unsubscribe@teufel.de.</u> The processing of your data is based on Art. 6 (1) lit. a GDPR. Your data will be erased immediately after the consent is withdrawn.

# K. Your rights

In addition to the rights already described for the respective processing, you also have the following rights where the relevant statutory requirements apply.



# I. Right to confirmation about any data processing and to obtain information

According to Art. 15 GDPR you have the right to confirmation about whether we process personal data and to obtain information about the purposes for which we process data, which categories of personal data are processed, who may where applicable be the recipients of this data and for how long we store this data. You also have the right to request information about whether your personal data has been transferred to a third country or an international organisation and what the appropriate safeguards are for the transfer.

# II. Right to rectification

You have a right to require us to rectify inaccurate or incomplete data in our systems, Art. 16 GDPR.

# III. Right to erasure

This right (Art. 17 GDPR) assures you of the possibility of having data stored by us erased. We always comply with this request to the extent required provided no statutory retention periods are to be observed.

# IV. Right to restriction

You may require us to restrict the processing of your data if: the accuracy of the data is contested by you; the processing is unlawful, but you refuse to accept its erasure; if we no longer need the data, but it is required by you for the establishment, exercise or defence of legal claims, or you have objected to the processing in accordance with Art. 21 GDPR.

# V. Right to data portability

According to Art. 20 GDPR, you have the right to receive selected data concerning you stored in a commonly used, machinereadable data format, or to request the transmission of this data to another data controller.

# VI. Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority at any time. You can find out how to contact the Data Protection Authority here: <u>https://cnpd.public.lu/en.html</u>

# VII. Right to object

In addition to the rights to object to the processing of your data for advertising purposes described above, you have a general right to object to data processing that we carry out on the basis of Art. 6 (1) lit. f) GDPR. We are then obliged to comply with your objection if you provide us with reasons of overriding importance.

# VIII. Right to withdraw consent

You can revoke your consent to the processing of your personal data at any time with effect for the future, e.g. by e-mail at datenschutz@teufel.de

# L. Changes to our privacy policy

We reserve the right to change our security and data protection measures, inter alia, where this is required as the result of technical developments. In such cases, we shall also adapt our privacy policy accordingly. Please therefore note the current version of our data protection information.

Privacy policy as of: June 2023