# **Privacy Policy**

# **StoneX Bullion GmbH**

### **Privacy Notice**

This privacy notice explains how we process your personal data (hereinafter referred to as "**data**") and which rights you have in this respect under the EU General Data Protection Regulation ("**GDPR**") when you visit, engage or otherwise interact with our online offer and the associated websites, functions and contents as well as external online presences, e.g. our social media profile (together "**online offer**").

If the processing of your data is not subject to the GDPR, different rules may apply under your applicable law.

This Privacy Notice covers the following topics.

- <u>Responsible controller</u>
- <u>Types of data processed</u>
- Purposes of processing
- Sharing with service providers and third parties
- Transfers to third countries
- Protecting your data
- Your rights
- Deletion of data
- <u>Cookies</u>
- <u>16 or under</u>
- <u>Updates to this Privacy Notice</u>

# **Responsible controller**

A 'controller' is the entity which decides how and for which purposes your data is processed. The responsible controller for your data processed by us is:

StoneX Bullion GmbH Taunustor 1 60310 Frankfurt am Main Germany

customercare@stonexbullion.com

Represented by:

Torsten Hörnis, Daniel Marburger, Ramon Jesus Martul-Franco, Philip Smith

Link to Imprint: Legal Notice

# **Data Protection Officer**

Neil O'Gorman 1<sup>st</sup> Floor Moor House, 120 London Wall London EC2Y 5ET

If you have any questions about data protection or data security, you can contact our data protection officer by e-mail at <u>dpo@stonex.com</u>

# Types of data processed

- Inventory data (e.g., names, addresses).
- Contract data (e.g., contract object, term, customer category).
- Payment data (e.g., bank details, payment history).
- Contact details (e.g., e-mail, telephone numbers).
- Content data (e.g., text input, photographs, videos).
- Usage data (e.g., visited websites, interest in content, access times).
- Meta/communication data (e.g., device information, IP addresses)

# **Purposes of processing**

Depending on the nature of our business relationship with you or your organization (if applicable), we may process your data for the following purposes ("**Permitted Purposes**").

The following table sets out the Permitted Purposes and the legal basis we rely upon:

#### PERMITTED PURPOSES

To enter into, perform, manage and administer your relationship with us (for individuals) or your organization's business relationship with us, e.g. by by providing our online offer, its functions and contents, customer care, providing technical, computing capacity, storage, database and platform services, performing accounting, auditing, billing and collection activities, arranging shipments and deliveries, providing support services or providing you with other services or things you may have requested.

Answer contact requests and communicate with users

Maintain and protect the security of our premises and facilities, IT systems, databases, websites or other digital infrastructure

To **conduct market research, surveys, and** Your consent (where required) similar inquiries to help us understand trends, customer and website visitor needs and to test and upgrade our systems and processes to improve and enhance our online offer and services

To ensure that content from our **website is** presented in the most effective manner for you and your device

To establish, exercise and defend legal claims, investigate and resolve disputes and enforce our website terms of use and other agreements

To ensure compliance with our legal and regulatory obligations, such as record keeping, disclosures to tax or other regulatory authorities, enforcing and complying with legal judgements, and including auditing relating to interactions, transactions and other compliance activities

To prevent and detect crime, including fraud or criminal activity and misuses of our online offer

#### LEGAL BASIS

Enter or perform our contract with you

Legitimate interest: to perform our contract with you or your organization including to provide our online offer

Enter or perform our contract with you Legitimate interest: to respond

to your enquiries

Legitimate interest: to maintain our IT systems, network and security

Legitimate interest: to improve our online offer and technologies

Legitimate interest: to ensure our website is effectively presented

Legitimate interest: to protect and enforce our legal rights and claims

Legal or regulatory obligation Legitimate Interest: to comply with our legal obligations

Legal or regulatory Obligation Legitimate interest: to comply with our legal obligations

# PERMITTED PURPOSES

To communicate with you through the channels you have approved to provide you with **updates about our company and online offer, special promotions, invite you to participate in surveys, our conferences and events, and other news about us**. You may opt out at any time by clicking the opt-out links in any electronic communication we send to you or by using the contact details under the "Responsible controller" section above

# LEGAL BASIS

Your consent through double opt-in (where required) Legitimate interest: to provide you with updates about our company and promote our online offer

# Sharing with service providers and third parties

We may share your data with:

- Our affiliates within the StoneX Group if so required for the Permitted Purposes;
- Our service providers (so called data processors) domestically or abroad (e.g. hosting service providers) to process data for the Permitted Purposes on our behalf and in accordance with our instructions only. We will retain control over and will remain fully responsible for your data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your data when engaging such service providers;
- **Third parties** where that is required and permitted by law to execute a contract or otherwise in connection with our relationship with you or your organization;
- **Public authorities or governmental bodies** such as regulatory or enforcement authorities, attorneys or courts where we are required to do so by applicable law or regulation or at their request if legally permitted and necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims;
- Any prospective purchaser in the event we sell any part of our business or assets;
- Otherwise, we will only disclose your data when you direct or give us permission, when we are required by applicable law or regulations or judicial or official request to do so, or when we suspect fraudulent or criminal activities.

You can revoke your consent to use of your data for services from delivery providers (e.g. package arrival and desired date) at any time in writing by using the following contact details:

- DHL: Deutsche Post AG, P.O. Box 101414, 40005 Düsseldorf.
- UPS: United Parcel Service Deutschland S.à r.l. & Co. OHG, Görlitzer Straße 1, 41460 Neuss.
- Malca Amit: Malca-Amit (Germany) GmbH, Sophienstraße 1, 51149 Cologne.
- FedEx: FedEx Express Germany GmbH, Langer Kornweg 34 k, 65451 Kelsterbach.

# **Transfers to third countries**

Your data will be processed primarily in the European Union (**EU**), the European Economic Area (**EEA**), the United Kingdom or the United States. If we process or transfer your data to a third country (i.e. a country outside the EU or the EEA in which applicable laws do not offer the same level of data protection as the laws of your home country), we will apply appropriate safeguards to ensure the security and integrity of your data, in particular by entering into the EU Standard Contractual Clauses. You may contact us anytime using the contact details under the "Responsible controller" section above if you would like further information on such safeguards.

# **Protecting your data**

Data held by us will be kept confidential and protected in accordance with the GDPR and our data security policies and procedures. We will use commercially reasonable efforts to ensure that your data is kept secure and safe from any loss or unauthorised disclosure or use.

# Your rights

Subject to certain legal conditions, you have the following rights:

- the right to request confirmation as to whether the data concerned are being processed and to request information about these data as well as further information and a copy of the data
- the right to request the completion of data concerning you or the correction of inaccurate data concerning you
- the right to demand that relevant data be deleted immediately
- the right to demand a restriction on the processing of the data
- the right to request that the data that you have provided to us is transmitted to other controllers
- if you have provided your consent for the processing of data, the right to revoke your consent with future effect
- the right to object to the processing of your data, in particular you have the right to object at any time to the use of your data for direct marketing purposes

We will not use your data for taking any automated decisions materially affecting you or creating profiles of you.

For any of the above requests, please send a description of your data concerned stating your name and your relationship with us (if applicable) to the contact details above. We may require proof of identity to verify your request and to protect your data against unauthorised access. We will carefully consider your request and may discuss with you how it can best be fulfilled. Where your consent is required for any direct marketing-related communication such as our newsletters, we will only provide you with such information if you have opted in. You may opt out at any time by clicking the unsubscribe or opt-out links in any electronic marketing communication we send to you or by using the contact details under the "Responsible controller" section above.

You have the right to lodge a complaint with the competent data protection supervisory authority in your country if you believe we are not processing your data in compliance with the GDPR. However, if you have any concerns about how your data is handled by us or wish to raise a complaint, we kindly ask you to contact us first to have the matter investigated and resolved. A list of the national data protection supervisory authorities in the EEA can be found <u>here</u>.

# **Deletion of data**

The data processed by us will be deleted or their processing restricted in accordance with Articles 17 and 18 GDPR. Unless expressly stated in this privacy notice, the data stored by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory storage obligations. If the data are not deleted because they are necessary for other and legally permissible purposes, their processing is restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax reasons.

In accordance with statutory requirements in Germany, the records are kept in particular for 6 years in accordance with § 257 (1) HGB (trading books, inventories, opening balance sheets, annual financial statements, commercial letters, accounting documents, etc.) and for 10 years in accordance with § 147 (1) AO (books, records, management reports, accounting documents, commercial and business letters, documents relevant for taxation, etc.).

# Cookies

"Cookies" are small text files that are stored on your device when you visit our online offer. Different data can be stored within the cookies. A cookie is primarily used to store information about you (or the device on which the cookie is stored) during or after you visit our online offer.

We use first party cookies, which are set by us on our online offer and can only be read by online offer. We also use third party cookies which are cookies that are offered by our approved third party providers to enable third party features or functionalities to be provided on or through our online offer. The third parties that set these third party cookies can recognise your device both when you visit our online offer and also when you visit certain other platforms and its corresponding services.

# **TYPES OF COOKIES**

We use the following types of first-party and third party cookies. Please see the cookies table below for details on individual cookies we use.

### **Essential cookies**

These cookies are strictly necessary to ensure the proper functioning of our online offer, for example, to maintain the security, safety, and integrity of our website, to remember the permissions and consents you have granted, or to make use of e-billing services.

#### **Functional cookies**

These cookies are used to recognise you when you return to our online offer. This enables us to personalise our content for you, keeping yourself logged in and remember your preferences (for example, your choice of language or region).

#### **Analytics cookies**

These cookies allow us to count the number of visitors and see how visitors move around our online offer. This helps us measure and improve the performance of our online offer, for example by ensuring visitors are finding what they are looking for easily.

#### **Marketing cookies**

These cookies track details such as the number of unique visitors, the number of times particular ads have been displayed, and the number of clicks the ads have received. This information is used to display ads more relevant to your interest and to help us understand the effectiveness of the ads on our online offer. These cookies remain on your device and enable us and other providers to recognize you the next time you use our services.

#### **Embedded content**

Some features you can find on our online offer use third party applications and services to enhance your experience (e.g. social media plugins like Facebook, Twitter share buttons, as well as embedded content from Vimeo, Youtube etc.). As a result, cookies may be set by these third parties, and used by them to track your online activity. We have no direct control over the information that is collected by these cookies.

You can find more information about the individual cookies we use in the table below:

PROVIDER	COOKIE NAME	COOKIE TYPE	PURPOSE	FURTHER INFORMATION
StoneX Bullion	_hjFirstSeen _hjAbsoluteSessionInProgress	Essential	The cookie is set so Hotjar can track the beginning of your journey for a total session count. It does not contain any identifiable information.	Expiry: 30 minutes
StoneX Bullion	XSRF-TOKEN	Essential	This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks.	Expiry: 10 days
StoneX Bullion	_clsk	Marketing	Microsoft Clarity sets this cookie to store and consolidate a user's pageviews into a single session recording.	Expiry: 1 day Privacy-Policy Opt-Out
StoneX Bullion	_hjSession_*	Marketing	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	Expiry: 30 minutes Privacy Policy Cookie Policy
StoneX Bullion	_hjIncludedInSessionSample_	* Marketing	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's daily session limit.	Expiry: 30 minutes
StoneX Bullion	_clck	Marketing	Microsoft Clarity sets this cookie to retain the browser's Clarity User ID and settings exclusive to that website. This guarantees that actions taken during subsequent visits to the same website will be linked to the same user ID.	Expiry: 1 year Privacy-Policy Opt-Out
StoneX Bullion	_hjSessionUser_*	Marketing	Hotjar sets this cookie to ensure data from subsequent visits to the same site is attributed to the same user ID, which persists in the Hotjar User ID, which is unique to that site.	Expiry: 1 year Privacy Policy Cookie Policy
Google Analytics	_ga_*	Marketing	This cookie is used by Google Analytics to persist session state.	Expiry: 1 year 1 month 4 days Privacy Policy Cookie Policy

PROVIDER	COOKIE NAME	COOKIE TYPE	PURPOSE	FURTHER INFORMATION
Google Analytics	_ga	Marketing	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.	Expiry: 1 year 1 month 4 days <u>Privacy Policy</u> <u>Cookie Policy</u>
Google Analytics	_gid	Marketing	This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.	Expiry: 1 day <u>Privacy Policy</u> Cookie Policy
Google AdSense	_gcl_au	Marketing	Google Tag Manager sets the cookie to experiment advertisement efficiency of websites using their services.	Expiry: 3 months Privacy Policy Ad settings Cookie Policy Data Processing Terms
Google Analytics	_dc_gtm_UA-*	Functional	Google Analytics sets this cookie to load the Google Analytics script tag.	Expiry: 1 minute Privacy.Policy. Cookie Policy
Google Syndication		Essential	This is a domain owned by Google that is used for storing and loading ad content and other resources relating to ads for Google AdSense and DoubleClick from the Google CDN.	Expiry: session Privacy Policy Cookie Policy
gstatic.com		Essential	This is a domain used by Google to off-load static content to a different domain name in an effort to reduce bandwidth usage and increase network performance for the end user.	Expiry: session <u>Privacy Policy</u> <u>Opt-Out</u> <u>Cookie Policy</u>
Payone		Essential	This is a payment service.	Expiry: session Privacy Policy
Usercentrics Consent Management Platform	Multiple – see consent management tool	Essential	This is a consent management service. Usercentrics GmbH is used on the website as a processor for the purpose of consent management.	Expiry: 1 year Privacy Policy
Microsoft	_uetsid	Marketing	This cookie is used to determine what ads should be shown that may be relevant to you.	Expiry: 1 day Privacy-Policy Opt-Out
Microsoft	_uetvid	Marketing	This is a cookie used to engage with a user that has previously visited our website.	Expiry: 1 year Privacy-Policy Opt-Out
Microsoft	MR	Marketing	This cookie is used to measure the use of the website for internal analytics.	Expiry: 7 days Privacy-Policy
Microsoft	SM	Marketing	Microsoft Clarity cookie set this cookie for synchronizing the MUID across Microsoft domains.	Expiry: session Privacy-Policy
Doubleclick	IDE	Marketing	This cookie carries out information about how you uses our online offer and any advertising that you may have seen before visiting our online offer.	Expiry: 1 year 24 days
Microsoft	MUID	Marketing	This cookie swidely used by Microsoft as a unique user identifier. It can be set by embedded Microsoft scripts. Widely believed to sync across many different Microsoft domains, allowing user tracking.	Expiry: 1 year 24 days <u>Privacy-Policy</u> <u>Opt-Out</u>
Microsoft	SRM_B	Marketing	This cookie identifies unique web browsers visiting Microsoft sites. These cookies are used for advertising, site analytics, and other operational purposes.	Expiry: 1 year Privacy-Policy Opt-Out
DoubleClick	test_cookie	Marketing	This cookie is set by DoubleClick (which is owned by Google) to determine if your browser supports cookies.	Expiry: 15 minutes Privacy Policy Ad settings Cookie Policy Data Processing Terms
Zendesk	_cfruid & others - see consent management tool	Functional	Cloudflare cookie used in cases were multiple users are hidden behind the same client IP address. Each user will have a unique cookie to help prevent a case of rate limiting all users if one particular user hits the rate limit threshold.	Expiry: session Privacy Policy Opt-Out Cookle Policy
Microsoft	ANONCHK	Marketing	This cookie stores the session ID for a user. This cookie ensures that clicks from advertisement on the Bing search engine are verified and it is used for reporting purposes and for personalization.	
Microsoft	CLID	Marketing	This cookie stores information about how visitors use the website. The cookie contributes to the creation of an analysis report. The data collection includes numbers of visitors, where they visit the website from and pages visited on the website.	Expiry: 1 year Privacy-Policy
Facebook Social Plugins		Marketing	This is a social plug-in from Facebook, which allows the user to connect their website with the social network Facebook.	Expiry: deleted as soon as they are no longer needed for the processing purposes. <u>Privacy Policy</u> <u>Opt-Out</u> <u>Cookie Policy</u>
Meta	Multiple - see consent management tool	Marketing	This is a Tracking technology offered by Facebook and used by other Facebook services. It is used to track interactions of visitors with websites ("Events") after they have clicked on an ad placed on Facebook or other services provided by Meta ("Conversion").	Expiry: 1 year <u>Privacy Policy</u> Cookie Policy
Vimeo	Multiple – see consent management tool	Essential	This is a service for displaying video content.	Expiry: 2 years Privacy Policy Opt-Out Cookie Policy
Twitter	Multiple – see consent management tool	Marketing	This is a Twitter Plug-In. This service is used to display Tweets from Twitter	Expiry: 2 years Privacy Policy Cookie Policy
YouTube Video	Multiple – see consent management tool	Essential	This is a video player service. It can be used by user to watch, like, share, comment and upload videos.	Expiry: Max 8 months Privacy Policy Cookie Policy Opt-Out
Adobe Fonts		Essential	This is a font service. It provides access to a font library.	Expiry: deleted as soon as they are no longer needed for the processing purposes. <u>Privacy Policy</u> <u>Opt-Out</u> <u>Cookie Policy</u>
Snapchat		Functional	This is an Instant-Messaging-Service.	Expiry: deleted as soon as they are no longer needed for the processing purposes. Privacy Policy
Trustpilot		Functional	This is a review service. This service collects reviews to gain feedback.	Expiry: deleted as soon as they are no longer needed for the processing purposes. <u>Privacy Policy</u>

# **LEGAL BASIS FOR COOKIES**

The placement of essential cookies and the processing of data collected through them is based on our legitimate interest to operate our online platform as well as to enter into or perform the agreement we conclude with you when you use our online offer.

Apart from essential cookies, we will only use cookies if you provide consent. You can manage and revoke your consent anytime within the Privacy Settings. Your consent is stored for up to 2 years so that you do not need to consent again when you return to our online offer. We store your consent on the server side and/or in a cookie in order for your consent to be assigned to you or your device. When you provide your consent, we create and store a pseudonymous user identifier. We also store the scope of your consent (e.g., which categories of cookies), as well as the browser, system and end device you use.

# WEB ANALYTICS, TARGETED ADVERTISING AND EMBEDDED CONTENT

We use third party providers to provide web analytics, targeted advertising services and embedded content to help us analyse how our users interact with our online offer, how we can customise our advertisements and to integrate content from third parties. Please see below for further information about each web analytics and targeted advertising service provider we use.

# **Google Analytics**

We use Google Analytics, a web analysis service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland and Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("**Google**"). Google Analytics installs analytics cookies on our behalf to evaluate the use of our online offer by users, compile reports for us on your internet activity when you interact with our online offer and to provide us with other services relating to your interaction with our online offer. Pseudonymous user profiles can be created from the processed data. The information generated by these cookies, such as time, place and frequency of your visits to our online offer will be processed and stored by servers in the EU.

Google has entered into EU standard contractual clauses to ensure the security and integrity of your data when it is transferred to USA. See here: (https://support.google.com/analytics/answer/3379636?hl=en)

IP anonymization is enabled by default and cannot be switched off. This means that Google will abbreviate and therefore anonymises the IP address of EU and EEA users so that IP addresses of EU and EEA users are not processed.

You can prevent the storage of cookies by setting their browser software accordingly; you can also prevent Google from collecting the data generated by the cookie and relating to their use of the online offer and the processing of this data by Google by downloading and installing the browser plug-in available under the following link: https://tools.google.com/dlpage/gaoptout?hl=en.

# Google / Marketing Services

Google has entered into EU standard contractual clauses to ensure the security and integrity of your data when it is transferred to USA. See here: <a href="https://business.safety.google/adsprocessorterms/">https://business.safety.google/adsprocessorterms/</a>

We use Google marketing services to provide you with targeted ads on our online offer based on your interests. For example, if you sees ads for products you are interested in on other websites, this is referred to as "remarketing". For these purposes, when our and other websites on which Google marketing services are active are accessed, Google directly executes a code from Google and (re)marketing tags (invisible graphics or code, also known as "web beacons") are integrated into the website and installs a cookie on your device. Cookies can be set by various domains, including google.com, doubleclick.net, invitemedia.com, admeld.com, googlesyndication.com or googleadservices.com and includes information including which websites you visit, which content

you are interested in and which offers you have clicked on, technical information about the browser and operating system, referring websites, visiting time as well as further information about the use of the online offer. The above information may also be linked by Google to such information from other sources. If you visit other websites, the ads tailored to his interests can be displayed.

Your data is processed pseudonymously within the framework of Google marketing services. This means that Google does not store and process, for example, your name or e-mail address, but processes the relevant data cookie-related within pseudonymous user profiles. This means from Google's point of view, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if you have expressly permitted Google to process your data without pseudonymisation. The information collected by Google marketing services about you is transmitted to Google and stored on Google's servers in the USA.

One of the Google marketing services we use is the online advertising program "Google AdWords". For Google AdWords, each AdWords customer receives a different "conversion cookie". Cookies cannot therefore be traced through the websites of AdWords customers. The information collected by the cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag.

We may include third-party advertisements based on the Google marketing service "AdSense". AdSense uses cookies to enable Google and its partner sites to serve ads based on users' visits to this site or other sites on the Internet.

We can also use the "Google Tag Manager" to integrate and manage Google analysis and marketing services into our website.

Please see instructions in the cookie table above and on how to opt-out or prevent cookies from being installed by Google for Google marketing services.

# **Microsoft Clarity**

We use Microsoft Clarity provided by Microsoft Corporation (One Microsoft Way, Redmond, WA 98052-6399, USA ("**Microsoft**") by to capture how you use and interact with our website to improve and market our online offer.

Microsoft Clarity uses cookies. The information generated by the cookies will be transmitted to a Microsoft Clarity server (possibly in the USA) and stored in order to enable session recording and to generate so-called heat maps. We use Microsoft Clarity in the default settings, so that the data transmitted to Microsoft does not contain any sensitive data such as names or addresses, to rule out any direct personal reference. Microsoft will use this information to evaluate your use of the website, to compile reports on website activities, and provide with further services related to website and Internet usage, including profiling for advertising purposes. Microsoft may also transfer this information to third parties where required to do so by law, or where such third

parties process the information on Microsoft's behalf.

Please see the cookie table above for further information about data collected by Microsoft and on how to opt-out or prevent cookies from being installed by Microsoft.

### Meta Pixel, Custom Audiences and Meta Conversion

Our online offer uses a tracking tool-called "Meta pixel" provided by Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin and Meta Platforms, Inc., 601 Willow Road, Menlo Park, CA,94025, USA social network Facebook, which is operated by Meta Platforms Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or, if you are based in the EU, Meta Platforms Ireland Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("**Meta**").

Meta has entered into EU standard contractual clauses to ensure the security and integrity of your data when it is transferred to USA. See here: https://www.facebook.com/legal/terms/dataprocessing

With Meta pixel, Meta is able to determine the visitors of our online offer as a target group for the presentation of ads (so-called "Meta ads"). Accordingly, we use the Meta pixel to display the Facebook ads we post only to Facebook users who have also shown an interest in our online offering or who have certain features (e.g. interests in certain topics or products that are determined by the websites visited) that we transmit to Facebook (so-called "custom audiences"). We also want to use the Meta pixel to ensure that our Facebook ads are based on your interests. The Facebook pixel also helps us understand the effectiveness of Facebook ads for statistical and market research purposes by showing whether users have been redirected to our website after clicking on a Facebook ad (so-called "conversion").

Meta processes the data in accordance with Meta Privacy Policy <u>https://en-gb.facebook.com/privacy/policy/</u>and Meta Cookie Policy <u>https://www.facebook.com/privacy/policies/cookies/?show\_versions=1#:~:text=We%20use%20co</u> <u>okies%20to%20help</u>,using%20the%20tools%20described%20below..

You can object to the collection by the Facebook pixel and use of your data to display Facebook ads. To set what types of ads you see within Facebook, you can visit the page set up by Facebook and follow the instructions on usage-based advertising settings: <u>https://www.facebook.com/settings?tab=ads</u>. The settings are platform-independent, i.e. they are applied to all devices, such as desktop computers or mobile devices.

# Newsletters, Salesforce and web-beacons

Our newsletters are sent by Salesforce Marketing Cloud, a newsletter delivery platform of the US provider Salesforce, Inc. Salesforce Tower, 415 Mission Street, 3rd Floor, San Francisco, CA 94105, United States. Salesforce will only use your data for the purpose of delivering the newsletter to your email. You can find their privacy policy here:

<u>https://www.salesforce.com/company/privacy/</u>which includes a link to their data processing addendum.

The newsletters contain a so-called "web-beacon", i.e. a pixel-sized file which is downloaded from our server when the newsletter is opened or, if we use a mail service provider, from their server. The web-beacon collects technical information, such as information about your browser and your system, as well as your IP address, time the newsletter is opened and which links are clicked. We use this technical information to review the general patterns of our users' reading habits and to improve our newsletters based on our users' interests.

# Vimeo

We can integrate the videos of the platform "Vimeo" of the provider Vimeo Inc, Attention: Legal Department, 555 West 18th Street New York, New York 10011, USA. Privacy policy: <u>https://vimeo.com/privacy</u>.

# YouTube

We integrate the videos of the platform "YouTube" of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy Policy: <u>https://www.google.com/policies/privacy//</u>, Opt-Out: <u>https://adssettings.google.com/authenticated</u>.

# **Using Facebook Social Plugins**

We use Social Plugins ("**Plugins**") of the social network facebook.com, which is operated by Meta The plugins can display interaction elements or content (e.g. videos, graphics or text contributions) and are identified by one of the Facebook logos (white "f" on blue tile, the terms "like", "like" or a "thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of Facebook Social Plugins can be viewed here: <u>https://developers.facebook.com/docs/plugins/.</u>

When you use a function of our online offer that contains such a plugin, your device establishes a direct connection to the Meta servers. The content of the plugin is transmitted by Meta directly to your device and integrated into the online offer. The processed data can be used to create user profiles. We therefore have no influence on the amount of data Meta collects via this plugin and therefore can only provide you with information based on the information we have.

By integrating the plugins, Meta receives information that you have called up the corresponding page of the online offer. If you are logged in to Facebook, Meta can assign the visit to your Facebook account. When you interact with the plugins, such as pressing the Like button or posting a comment, the information is sent directly from your device to Meta and stored there. If you are not a Facebook member, it is still possible for Meta to obtain and store their IP address. According to Meta, only an anonymized IP address is stored in Germany.

The purpose and scope of the data collection and the further processing and use of the data by Meta, as well as the relevant rights and setting options for the protection of users' privacy, can be found in Meta's privacy policy information: <u>https://www.facebook.com/about/privacy/</u>.

If you are a Facebook member and do not want Meta to collect data about you via our online offer

and link it to your Facebook data, you must log out of Facebook before using our online offer and delete your cookies. Further settings and objections to the use of data for advertising purposes are possible within the Facebook profile settings: <u>https://www.facebook.com/settings?tab=ads</u>.

# Twitter

Functions and contents of the Twitter service, offered by Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, can be integrated into our online offering. This may include, for example, content such as images, videos or texts and buttons with which you can interact with the content, subscribe to the authors of the content or our contributions. If you are a Twitter user, Twitter can assign calling up the above content and functions to the users' profiles there. Privacy Policy: <u>https://twitter.com/de/privacy</u>, Opt-Out: <u>https://twitter.com/personalization</u>.

# MANAGING THE PLACEMENT OF COOKIES

You are not required to accept cookies. You can modify your browser to manage the placement of cookies, object to the placement of cookies via "opt-out" or take other preventive measures to prevent the installation of cookies. You can find further information on these options below.

Please note, that certain portions of our online offer may not work properly for you, or provide personalized or customized content, if you take these steps.

### Modify your browser settings

You can modify your browser so that it will not accept cookies. Most internet browsers allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; (iii) block certain or all cookies; or (iv) automatically delete cookies when closing the browser.

Every browser differs in the way it manages the cookie settings. Guidance on how to control cookies for common browsers is linked below.

#### **BROWSER LINK**

Firefoxhttps://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferencesChromehttps://support.google.com/chrome/answer/95647?hl=en-GB&co=GENIE.Platform%3DDesktopSafarihttps://support.apple.com/en-gb/guide/safari/sfri11471/macMicrosofthttps://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09Edgehttps://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

To find information relating to other browsers, please visit the browser's help section.

# Customise your cookie settings in the preference manager

You can choose which type of cookies we set (e.g. functional, marketing) by clicking on this symbol on any page of the website:

#### Preventive measures for your general (mobile) browsing experience

If you do not wish to have your information used for the purpose of serving you interest-based advertisements, you may decline to receive interest based ads through here <a href="http://www.youronlinechoices.com/">http://www.youronlinechoices.com/</a>

For Google Analytics, Google provides a Google Analytics <u>opt-out plug-in</u> for the web.

For Google AdSense, you can disable Google AdSense cookies by going to <u>Google Ad Settings</u>. If you are using the web, you can also install the <u>Advertising Cookie Opt-out Plugin</u> on your browser.

# 16 or under

We are committed to protecting the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with your data.

# **Updates to this Privacy Notice**

We ask you to inform yourself regularly about the contents of our Privacy Notice. We may update this Privacy Notice from time to time, in particular, in order to reflect any changes to the way in which we use your data or changing legal requirements. Any amended Privacy Notice will apply from the date it is posted on our website or otherwise made available to you.