



## Data Protection Statement / Data Protection Provisions

We – Travian Games GmbH, Wilhelm-Wagenfeld-Str. 22 in 80807 Munich/Germany (hereinafter referred to as “Travian Games” or “we”) operate the Website [www.travian.com](http://www.travian.com) with the online-game Travian: Legends and are responsible for the collection, processing and use of your personal data in accordance with the EU General Data Protection Regulation (GDPR) and other national data protection laws of the Member States and other data protection regulations. Your personal data is collected and used exclusively in accordance with the legal provisions of the applicable data protection law.

We wish to provide the following data protection statement as information on how we handle your personal data. We believe the observance and maintenance of your privacy takes high priority, not only in the provision of our games, but also in connection with our websites and all other processes.

However, we would like to point out that online data transmission can entail security vulnerabilities. Seamless protection of data against access by third parties is not possible. We have taken the best possible technical and organizational measures to protect the security of your data against loss, destruction, willful manipulation and unauthorized access by third parties to the greatest extent possible.

In the event that you are being redirected to another website operated by Travian Games on another website that is not operated by Travian Games, or if you make use of the services of third parties (e.g. during a payment process), please note that this privacy policy does not apply to this third site.

### **1. Controller for the processing of data pursuant to Art.4 (7) GDPR**

Controller for the processing of data is

Travian Games GmbH  
Wilhelm-Wagenfeld-Str. 22  
80807 Munich

Telephone: +49 (0)89 324915-0  
Fax: +49 (0)89 324915-970  
E-mail: [privacy@traviangames.com](mailto:privacy@traviangames.com)

### **2. Contact to the data protection officer**

If you have any questions or suggestions regarding data protection, please do not hesitate to contact us or our data protection officer. You can contact our data protection officer via the following e-mail



address: [privacy@traviangames.com](mailto:privacy@traviangames.com) or alternatively also by post at the address mentioned above with the addition "the Data Protection Officer".

Further contact options and information can be found in our [imprint](#).

When you contact us by e-mail, we will store your e-mail address and, if you have transmitted the respective details, your name and telephone number to answer your questions. We will erase all data arising in this context after storage is no longer necessary or - in the case of statutory retention obligations - we restrict the processing.

### **3. Collection and use of your personal data**

Personal data in this sense refers to all individual pieces of information regarding the personal or material circumstances of an identified or identifiable natural person, such as name, address, or email address as well as IP address. If you visit our websites or use the contact form, the collection, processing, and use of personal data will take place.

### **4. Legal bases for the data processing**

We only collect and process your personal data if this is permitted by law. In addition to your **explicit consent**, other legal bases may be considered for this purpose. If the processing is based on your consent, Art. 6 (1 a) EU General Data Protection Regulation (GDPR) serves as legal basis for the processing of your data.

The processing of personal data required to **fulfil the license contract** as legal basis pursuant to Art. 6 (1 b) GDPR.

If the processing of personal data is necessary to comply with a **legal obligation** to which our company is subject, Art. 6 (1 c) GDPR is the legal basis.

And if processing is necessary to **safeguard a legitimate interest of Travian Games** or a third party and if the interests, fundamental rights and freedoms of you as the person concerned do not outweigh the former interest, Art. 6 (1 f) GDPR shall apply as the legal basis for processing. If processing is based on a balance of interests, you have the right to object to such data processing (**see section 17.f. on the right to object**) provided that you have special reasons for this and we cannot prove any compelling reasons worthy of protection for the processing.

**You will find the relevant legal basis for individual data processing at the end of the respective descriptions of data processing.**

If we use contracted service providers for individual functions of our offer or would like to use your data for advertising purposes, we will inform you in detail about the respective processes below. There we will also specify the defined criteria for the storage period. If we cooperate with appropriate service providers, we have carefully selected them with regard to compliance with the legal requirements for data protection and data security and concluded processor agreements with them, which comply with the requirements of Art. 28 GDPR. If the service providers are based outside the EU, we ensure that there are appropriate safeguards as referred to in Art. 46 GDPR that a corresponding level of data protection is given by the contract processor. For example, certification under the EU-US Privacy Shield or so-called EU standard data protection clauses may be considered. We will refer to the appropriate safeguards if necessary.

#### **5. Erasure of data and storage period**

Your personal data will be erased as soon as the purpose of storage has been achieved or no longer applies. In exceptional cases, data may also be stored if this has been provided for by European or national legislators in EU regulations, laws or other provisions. The data will also be erased if a storage period determined by the aforementioned standards expires, unless a further storage of the data for the conclusion or performance of a contract is necessary.

#### **6. Data when visiting the website**

We do not collect any personal data during simple visits to our websites, with the exception of data transmitted by your browser in order to enable the visit to the websites. These include:

- IP address
- Date and time of the request
- Content of the request (specific page)
- Access status / HTTP status code
- Any data quantities transmitted
- Website from which the request originates
- Browser
- Operating system

We delete or anonymize the IP addresses of website visitors after the end of use. Anonymization means that the IP addresses are modified such that the individual details regarding personal or material circumstances can no longer be associated with an identified or identifiable natural person, or may only be associated to such a person with an unreasonable expenditure of time, costs and effort.



### **Legal basis and purpose of the processing**

The legal basis for the temporary storage of data is Art. 6 (1f) GDPR. The temporary storage of the IP address by the system is necessary to enable the App to be delivered to the user. For this purpose, the IP address of the user must remain stored for the duration of the session. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

### **7. Data entered by users - Registration**

To use the games a registration is required. When registering, you must enter an E-mail address and choose a username. Such data will be stored permanently as soon as you click on the activation link sent to the E-mail address provided during the registration process. If you do not access the link, this data will be deleted after two weeks. Please do not use your real name, the name of another person or that of a protected registered trademark as a username. Furthermore, we assign you to a country based on the transmitted IP address of your device. This information will be saved to enable us to offer you a suitable selection of payment methods.

We will offer a service for more and more games that allows you to activate only once for a game, but to move with this game account on several game worlds within this game. The data you provide when registering for a game are stored for this purpose by the respective game at a central location.

We use personal data to make a secure, effective and user-related use of our Apps possible, among others for

- the anonymous statistical evaluation for studies to improve and make the Apps more user-friendly,
- the recommendation by you to friends and acquaintances (e-mail address) by means of the Invite function,
- share the use of "social features", e.g. messages and/or articles on social networks or by e-mail, and marks with the "Like button".

### **8. Social Sign in**

In addition to manual registration, we offer you the possibility of registering directly with us using your existing profile with a social network of selected providers. We use the platforms "Facebook Sign In" and "Google+ Sign In". If you wish to use one of these functions, you will be redirected to the page of the respective provider and navigated through the registration.

With the data transmitted by the social network provider we create your user account. We do this, of course, without saving lists of friends and contacts. There is no permanent link between your account



and your Facebook and Google account. More details can be found in the Privacy Policies of the respective services.

### **Legal basis and purpose of the processing**

The legal basis for the processing of data is Art. 6 (1 a) GDPR if the user has given his or her consent. As a user you have the possibility to cancel the registration at any time. You can change the data stored about you at any time.

### **9. Support- Helpcenter/ Contact possibilities**

You can use the contact form in the Help Center to get in touch with us and submit questions and suggestions. To use it, you must provide additional personal information such as e-mail address and Avatar. In addition, we need information about the game world, the topic of your request and your message to us in order to process support requests. You can also include attachments such as screenshots to clarify your request.

### **10. Data collection in connection with registering for newsletters**

We use the "double opt-in" procedure for the provision of our newsletters; this means we will only send you a newsletter by email if you confirm that you wish to receive our newsletter by clicking on a link contained in our notification email. If you confirm your desire to subscribe to the newsletter, we will store your email address until you cancel your newsletter subscription. The data is stored only in order to be able to send you the newsletter.

Naturally, you may cancel your subscription to our newsletter at any time; a relevant link can be found in each newsletter. Alternatively, you may use the above-mentioned contact details.

### **11. Communication in the games**

The games operated by us offer you various ways to communicate with us or other players. We use automatic filter systems that prevent communication in violation of § 9 of the General Terms and Conditions of Travian Games GmbH. In particular, we use automatic filter systems that prevent the mass sending of messages or insulting, violence-glorifying, obscene racist or otherwise offensive statements or messages with an advertising character. Furthermore, we log the use of the provided communication channels for a short time to analyze and correct technical errors, to guarantee system security and integrity, to combat abusive and/or unauthorized use and to compile usage statistics on a non-personal basis. The reports that are generated contain the date and time of the message, the sender and recipient, the message text and the volume of data sent.

None of our employees will read messages without your consent. However, in case of a suspected misuse and/or unauthorized use of the communication channels provided (e.g. when the recipient



reports a message), we reserve the right to investigate the affected game account and the messages sent from this game account and to take further measures if necessary.

#### **Legal basis and purpose of the processing**

The legal basis for the temporary storage of data is Art. 6 (1a) GDPR and Art. 6 (1f) GDPR. The data input for communication purposes is voluntary and therefore based on the consent of the user. The use of filter systems serves to check compliance with the rules of proper communication and to protect the rights of third parties. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

### **12. Investigating manipulations of game operations**

We collect and store logs that reflect the use of the games we operate, such as activities in the games and user communications in the games or in services related to the games. This includes the monitoring of playing patterns and checks for possible manipulations of game operations which can then serve to detect any abusive or improper activities of users. We use special programs to detect, for example, the use of forbidden scripts and store the IP address, the login data of the last fourteen days and other data transmitted by the device. For this purpose, we employ specially trained persons. These persons can be our employees or freelancers. At the same time, we will select suitable people from among our players who like to work as volunteers. Employees, freelancers and volunteers ("specially trained staff") have access to the same data as the special programs we use to perform their tasks. The specially trained employees will also be assigned to identify, detect and penalize any infringements against the current General Terms and Conditions and game rules, such as the illegal use of several game accounts or insults to other players. These employees act solely in accordance with our instructions and have been specifically obliged to maintain confidentiality in the handling of personal data and to comply with data protection regulations. We are and will remain responsible for data processing. If we find that you are in breach of your contractual obligations, for example by using unauthorized scripts, we expressly reserve the right to merge your IP address with other data that we hold about you in order to be able to notify you about your breach.

#### **Legal basis and purpose of the processing**

The legal basis for the temporary storage of data is Art. 6 (1a) GDPR and Art. 6 (1f) GDPR. The data input for communication purposes is voluntary and therefore based on the consent of the user. The storage of the logs serves to check compliance with the rules of proper communication and to protect the rights of third parties, as well as to protect the games from manipulation. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

### **13. Payment processing**

If you initiate a payment process, you must enter additional data. What data you have to enter depends on the type of payment method you have chosen. We allow you to use anonymous payment methods.



We transmit the data required for payment processing to service providers who are commissioned to collect the fee. For this purpose, we have carefully selected the service provider Adyen GmbH, PayPal (Europe) S.à.r.l. et Cie, S.C.A as well as Boku Inc. and concluded an order processing contract with it in accordance with the requirements of the EU Data Protection Basic Regulation. This ensures secure data processing in compliance with data protection regulations.

Cooperation with third parties also involves payment processing via external service providers (PayPal, credit card companies, mobile network operators, etc.). These third parties are legally bound to manage your personal data in a confidential and secure manner in accordance with statutory legislation and may only use your personal data to fulfill their contractual obligations. You can choose the respective service provider and to decide voluntarily for or against a payment method.

When you initiate a payment during the game, a cookie will be set that contains a randomly generated ID number. This cookie will be required to return you to the game once the payment process has been completed.

We employ employees who ensure the proper processing of the payment processes that have been initiated and who have access to the necessary data for this purpose. These employees act solely in accordance with our instructions and are specifically obliged to comply with data protection regulations. Such employees use anonymous payment data to detect and prevent any misuse of the payment processes. In the event of a violation, the payment process will be canceled.

We are entitled to make data available to third parties to whom we have assigned claims against the user or who are commissioned to collect the fee, insofar as this is necessary for the fulfilment of the claim or the collection of the fee.

#### **Legal basis and purpose of the processing**

The legal basis for the temporary storage of data is Art. 6 (1b) GDPR because the data processing serves for the fulfilment of contractual obligations.

#### **14. Cookies**

Our website sometimes uses so-called cookies. Cookies serve to make our website more user-friendly, effective and secure. Cookies are small files that are stored on your device and contain certain settings and data for interaction with our system via your browser.

A distinction is generally made between two different types of cookies: Session cookies are deleted as soon as you close your browser (= end of session) and temporary/permanent cookies are stored on your data storage medium for either an extended period of time or without limitation. This storage helps us to design our website effectively and facilitates your use, for instance, by storing certain details about you so that you do not need to repeatedly enter them.



You can delete the cookies at any time via the security settings for your browser and configure your browser settings as you see fit (such as the acceptance of third-party cookies or rejection of all cookies). Generally, you will be shown how you can reject new cookies and delete existing cookies using the help function in the menu bar of your web browser. However, we wish to point out that you may then no longer be able to use all the features of our website.

## 15. Tracking/ Analysis

### a. **Google Analytics**

We use Google Analytics, a web analytics service provided by Google Inc., Google, 1600 Amphitheatre Parkway, Mountain View, CA 94043 ("Google"). Google Analytics uses cookies to analyze our website with regard to your user behavior. The information generated by the cookies about your use of the website will be transmitted to and stored by Google on servers in the United States. However, your IP address is shortened before the usage statistics are evaluated, so that no conclusions can be drawn about your identity. For this purpose, Google Analytics has been extended on our website by the code "anonymizelp" in order to guarantee anonymous collection of IP addresses.

Google will use the information obtained by the cookies to evaluate your use of the website, to compile reports on the website activities for the website operators and to provide further services associated with the use of the website and the Internet. Google may also transfer this information to third parties if this is required by law or if third parties process this data on behalf of Google.

You can configure your browser to reject cookies as shown above, or you can prevent the collection of data generated by the cookie and relating to your use of this website (including your IP address) and the processing of this data by Google by downloading and installing the [browser plug-in](#).

As an alternative to the browser add-on or within browsers on mobile devices, you can set [an opt-out cookie](#) to prevent future collection by Google Analytics within this website (the opt-out only works in the browser and only for this domain). If you delete your cookies in this browser, you must click this link again.

You can find more information about Google and data protection in the [overview of data protection](#) and the [Privacy Policy](#).

### **Legal basis and purpose of the processing**

The legal basis for the collection and temporary storage of data is Art. 6 (1f) GDPR. The data is used for the purpose of analyzing user behavior on our pages and improving our service. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR. We have also





concluded an order processing agreement with Google in compliance with the requirements of Art. 28 GDPR. As Google is based in the USA and thus in a so-called third country, further guarantees are required to ensure an adequate level of data protection. Google has been certified under the EU-US Privacy Shield, thus ensuring the necessary level of data protection.

#### **b. Simplax**

We use Simplax, an externally developed tool for our games. Code fragments are used in the source code of the games or mobile Apps, which are activated when you perform a specific action defined by us (e.g. registration, activation, login, purchase of credits, etc.). During the activation process, the following data is transmitted to Simplax servers located in the EU: Name of the game or website, country and language version of the game, a randomly generated and anonymized identification number of your account, an identification number and name defined for the specified action, time stamp, IP address, details of browser, device and operating system, E-mail address, information on the status of the game and the purchase of credits or other in-game items. These data are evaluated by Simplax within the scope of its obligation for us to analyze the use of online advertising for us and to present you with special advertising relevant to our online and mobile offer. In addition, Simplax uses the transmitted data to be able to make general statements about user behavior. Apart from this use, Simplax uses the data transmitted by us only within the scope of its obligation and in accordance with our instructions. You can object to this data collection and storage at any time with effect for the future. Please follow the instructions below for your objection. No other costs shall be incurred for a revocation apart from the costs of transmitting such revocation.

If you do not want Simplax to target your interests, please deactivate "Ad-Tracking" in the settings for your iOS device or "Interest-based ads" in the settings for your Android device as described above.

#### **Legal Basis**

The legal basis for the collection and temporary storage of data is Art. 6 (1f) GDPR. The data is used for the purpose of analyzing user behavior on our pages and improving our service. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

#### **c. Facebook Custom Audiences**

This website using the remarketing feature "Custom Audiences" of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). When you visit our website, a connection is established between your browser and the Facebook server. Facebook thus receives information that our website has been visited from your IP address. If you are a member of Facebook, Facebook may link this information with



your Facebook profile – provided you have not objected to this in the data protection settings of your Facebook profile – and use it for targeted advertisements placed by Facebook Ads.

Detailed information on the collection and use of your data by Facebook and regarding your rights and options in this respect can be found in the [data protection information](#) of Facebook. If you do not wish Facebook to link the information obtained with your Facebook profile, you can deactivate this at any time via the [Facebook settings](#).

### **Legal basis and purpose of the processing**

The legal basis for the collection and temporary storage of data is Art. 6 (1f) GDPR. The data is used for the purpose of analyzing user behavior on our pages and improving our service. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

### **16. Social plug-ins**

In our games we use social plug-ins such as the “Like” button or “Facebook Connect” from Facebook and the “Google+1” button from Google.

We currently use the following social media plug-ins: Facebook, Google+. You can identify the provider of the plug-in by the marking on the box above its initial letter or the logo. We offer you the possibility to communicate directly with the provider of the plug-in via the button. Only if you click on the marked field and thereby activate it, the plug-in provider receives the information that you have accessed the corresponding website of our online offer. In addition, the data specified in § 3 of this declaration will be transmitted. In the case of Facebook and Xing, the IP address is anonymized immediately after collection, according to the respective provider in Germany. By activating the plug-in, personal data is transferred from you to the respective plug-in provider and stored there (for US providers in the USA). Since the plug-in provider collects data mainly via cookies, we recommend that you delete all cookies before clicking on the grayed-out box using your browser’s security settings.

We have no influence on the data collected and data processing processes, nor are we aware of the full extent of data collection, the purposes of processing, the storage periods. We also have no information on the deletion of the data collected by the plug-in provider.

The plug-in provider stores the data collected about you as user profiles and uses these for the purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation takes place in particular (also for not logged in users) for the representation of advertisement tailored to meet the market need and in order to inform other users of the social network about your activities on our website. You have a right of objection to the creation of these user profiles, whereby you must contact the respective plug-in provider to exercise this right. Through the plug-ins we offer you the possibility to interact with social networks and other users, so that we can improve our offer and make it more interesting for you as a user. The legal basis for the temporary storage of data is Art. 6 (1f) GDPR.



The data is transferred regardless of whether you have an account with the plug-in provider and are logged in there. If you are logged in with the plug-in provider, your data collected with us will be directly assigned to your existing account with the plug-in provider. If you click the activated button and, for example, link the page, the plug-in provider also stores this information in your user account and shares it publicly with your contacts. We recommend that you log out regularly after using a social network, especially before activating the button, as this way you can avoid being assigned to your profile with the plug-in provider.

For more information on the purpose and scope of data collection and its processing by the plug-in provider, please refer to the data protection declarations of these providers as notified below. They will also provide you with further information about your rights in this regard and setting options to protect your privacy.

Addresses of the respective plug-in providers and URL with their data protection information:

- a. [Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA; <http://www.facebook.com/policy.php>; further information regarding data collection can be found here: <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> and <http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook is subject to the EU-US-Privacy-Shield <https://www.privacyshield.gov/EU-US-Framework>.
- b. Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA; <https://www.google.com/policies/privacy/partners/?hl=de>. Google is subject to the EU-US-Privacy-Shield <https://www.privacyshield.gov/EU-US-Framework>.

### **Legal basis and purpose of the processing**

The legal basis for the temporary storage of data is Art. 6 (1f) GDPR.

These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

### **YouTube**

We use YouTube for the integration of videos. YouTube is operated by YouTube LLC, headquartered at 901 Cherry Avenue, San Bruno, CA 94066, USA. YouTube is represented by Google Inc. based at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

If you call up the websites of our Internet presence provided with such a plugin, a connection to the YouTube servers is established and the plugin is displayed. This transmits to the YouTube server which of our Internet pages you have visited. If you are logged in as a YouTube member, YouTube assigns this information to your personal user account. When using the plugin, e.g. clicking the start button of a video, this information is also assigned to your user account. You can prevent this assignment by logging out of your YouTube account and other user accounts of YouTube LLC and Google Inc. and deleting the corresponding cookies of the companies before using our website.

Further information on data processing and privacy protection by YouTube <https://policies.google.com/privacy>.

### **Legal basis and purpose of the processing**

The legal basis for the temporary storage of data is Art. 6 (1f) GDPR.

These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1 f) GDPR.

## **17. Rights of the data subjects**

As data subject as referred to in the GDPR you have the following rights:

### **a. Right to information**

You may ask us to inform you whether personal data relating to you as a data subject will be processed by us. In case of such a processing, we will provide you with all of the following information:

- the purposes of the processing for which the personal data are intended;
- the categories of personal data, which are being processed;
- the recipients or categories of recipients of the personal data to whom the personal data relating to you as a data subject have been or are still being disclosed;
- the period for which the personal data relating to you as a data subject will be stored, or if the relevant details cannot be provided, the criteria used to determine that period;
- the existence of a right to rectification or erasure of personal data relating to you as a data subject, a right to restriction of processing by the controller or a right to object to such processing;
- the existence of a right to lodge a complaint to a supervisory authority;
- to obtain all available information on the origin of the data if the personal data are not collected from the data subject;

Additionally, you have the right to request information from us as to whether the personal data relating to you as a data subject is transferred to a third country or to an international organization. In this context, you may request us to obtain information in regard to appropriate safeguards pursuant to Art. 46 GDPR in connection with the data transfer.

### **b. Right to Rectification**

You have a right to rectification and/or completion if the personal data processed relating to you are incorrect or incomplete.

### **c. Right to Restriction of Processing**

Under the following conditions, you may request that the processing of personal data relating to you will be restricted:

- If you dispute the accuracy of the personal data relating to you for a period that enables the data controller to verify the accuracy of the personal data;
- the processing is unlawful and you object to the erasure of the personal data and instead request the restriction of use of the personal data;
- the Controller no longer needs the personal data for the purposes of the processing, but you do need them to assert, exercise or defend legal claims, or
- if you have objected to the processing pursuant to Art. 21 (1) GDPR and it has not yet been determined whether the legitimate reasons of the Controller are more important than your reasons.

If the processing of personal data relating to you as a data subject has been restricted, such data may only be processed with your consent or for the purpose of asserting, exercising or defending rights or protecting the rights of another natural or legal person or on grounds of an important public interest of the Union or a Member State.

#### d. **Right to Erasure**

You may request us to delete the personal data relating to you without delay and we are obliged to erase such data immediately if one of the following reasons applies:

- The personal data relating to you are no longer necessary for the purposes for which they were collected or otherwise processed.
- You withdraw your consent, on which the processing was based pursuant to Art. 6 (1 a) or Art. 9 (2 a) GDPR, and there is no other legal basis for the processing.
- You object to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate reasons for the processing, or you object to the processing pursuant to Art. 21 (2) GDPR.
- The personal data concerning you have been processed unlawfully.
- The erasure of personal data relating to you is necessary to comply with a legal obligation under Union law or the law of the Member States to which the Controller is subject.
- The personal data concerning you were collected in relation to information society services offered pursuant to Art. 8 (1) GDPR.

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

The right to erasure does not exist insofar as the processing is necessary

- to exercise freedom of expression and information;
- for the performance of a legal obligation required for processing under the law of the Union or of the Member States to which the Controller is subject or for the performance of a task in the public interest or in the exercise of official authority conferred on the Controller;
- for reasons of public interest in the field of public health in accordance with Art. 9 (2 h) and (i) and Art. 9 (3) GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Art. 89 (1) GDPR, in so far as such rights as mentioned under section a) are likely to render impossible or seriously impair the achievement of the specific purposes, or
- to assert, exercise or defend legal claims.

e. **Right to information**

If you have asserted your right to rectification, erasure or restriction of the processing against us, we are obliged to inform all recipients to whom the personal data concerning you have been disclosed about this rectification or erasure of the data or restriction of the processing, unless this is not possible or involves a disproportionate effort.

f. **Right to object**

You have the right to object at any time, **for reasons arising from your particular situation**, to the processing of personal data relating to pursuant to Art. 6(1)(e) or (f) of the GDPR; this also applies to profiling based on these provisions. Appropriate reasons must be submitted.

We will no longer process the personal data concerning you, unless we can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data relating to you as a data subject for the purpose of such advertising; this also applies to profiling, insofar as it is associated with such direct marketing. If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.

g. **Right to Data Portability**

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format. In addition, you have the right to transmit



those data to another controller without hindrance from us to which the personal data have been provided, where:

- the processing is based on consent pursuant to point (a) of Art. 6(1) GDPR or point (a) of Art. 9(2) GDPR or on a contract pursuant to point (b) of Art. 6(1); and
- the processing is carried out by automated means.

In exercising this right, you shall also have the right to have the personal data transmitted directly from us to another controller, where technically feasible. This shall not adversely affect the rights and freedoms of others.

The right to data portability shall not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority conferred on the Controller.

#### **h. Right to object to a given consent**

You have the right to revoke your consent to this Privacy Policy at any time. The revocation of consent shall not affect the legality of the processing carried out on the basis of the consent until the revocation was issued.

#### **i. Right to lodge a complaint with a supervisory authority**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

**Version of this Privacy Policy March 2018**