

# Privacy Statement for MyPossehl by Possehl Online Solutions GmbH

This privacy statement informs you about the scope of processing of your personal data (hereinafter "Data").

## 1. Responsibility for data processing

The data processing officer as defined by the provisions of the General Data Protection Regulation (GDPR) is:

Possehl Online Solutions GmbH  
Alois-Senefelder-Allee  
86153 Augsburg, Germany  
info@possehl-online.com

## 2. Contact details of our data protection officer

Pascal Landherr  
Alois-Senefelder-Allee 1  
86153 Augsburg, Germany  
+49 1516 5067603  
privacy@possehl-online.com

## 3. General information on data processing

In the course of our business and website operations, we process data.

This also includes disclosure by transmission to third parties and, where applicable, to third countries outside the European Union ("EU") and the European Economic Area ("EEA"). Where we transfer data outside the EU or the EEA, we have indicated this accordingly below.

## 4. Data processing

The individual data concerned, processing purposes, legal bases, recipients and, if applicable, transfers to third countries are listed below:

### (1) Log file when you visit our website

We record your visit to our website. In doing so we process:

- the name(s) of our website(s) accessed,
- the date and time you accessed the site(s),
- the amount of data transferred,
- the browser type and version,
- the operating system you used,
- the referrer URL (previously visited website),
- your IP address,
- the requesting provider.

The legal basis for data processing in accordance with **Article 6 (1) (f) GDPR** is

our overriding legitimate interest in the ongoing provision and security of our website.

The log file is deleted after seven days, unless it is needed to prove or clarify specific legal violations that have become known within the retention period.

### (2) Hosting

To provide our online presence, we use the services of web hosting providers who process the above-mentioned data and all data processed in connection with the operation of this website (log file when visiting the website) on our behalf.

The legal basis for data processing in accordance with Article 6(1)(f) GDPR is our overriding legitimate interest in providing our website.

For hosting we use the servers of Amazon Web Services EMEA SARRL, 38 avenue John F. Kennedy, L-1855, Luxembourg ("AWS"). The data is processed on servers in Frankfurt, Germany. However, since AWS Luxembourg is a subsidiary of Amazon Web Services Inc., 410 Terry Avenue North, Seattle, WA 98109-5210, USA we cannot completely rule out a data transfer to the USA.

The EU Commission has not issued an adequacy decision for data transfers to the USA. AWS ensures an adequate level of data protection via the EU standard contractual clauses. You can access a copy of the contractual clauses here:

[https://d1.awsstatic.com/legal/aws-gdp/r/AWS\\_GDPR\\_DPA.pdf](https://d1.awsstatic.com/legal/aws-gdp/r/AWS_GDPR_DPA.pdf)

### (3) Contacting us

If you contact us, we process the following data from you for the purpose of processing and handling your enquiry: Name, contact details—if provided by you—and your message.

The legal basis for data processing is our obligation to fulfil the contract and/or to fulfil our pre-contractual obligations in accordance with **Article 6 (1) (b) GDPR** and/or our overriding legitimate interest in processing your enquiry in accordance with **Article 6 (1) (f) GDPR**.

We use Google Forms to process registration enquiries. The data collected using Google Forms is stored in the "Google Drive" cloud storage supplied to us by Google. The data verwendet um einen Benutzeraccount zu erstellen und die Nutzung von

collected on the form is used to create a user account and enable the use of MyPossehl. Possehl Online Solutions GmbH uses the professional version of Google Workspace Enterprise which complies with data protection. The Provider is Google Cloud EMEA Ltd, 70 Sir John Rogerson's Quay, Dublin 2, Ireland. You can find more information on data processing in connection with Google Forms and Google Drive in Google's privacy policy

<https://policies.google.com/privacy?hl=en-GB>

Data is processed on the basis of **Article 6 (1) (b) GDPR**. Personal data in connection with registration enquiries are only stored as long as is necessary for the processing purpose and making contact. Should there be no more collaboration, these shall be deleted or anonymised after 12 months at the latest.

### (4) Fulfilment of contract and data management in the course of providing services

We process various data in the course of providing our services as well as initiating and executing the existing contractual relationship between you and us.

If you have commissioned us to provide you with a service, we process your data (if provided: name, contact details, address) and all information necessary in the course of fulfilling the contract, exclusively for the purpose of processing and executing the contractual relationship.

If you place an order with a Dealer via the platform we send the contract and order details to the respective Dealer for further contract processing. The respective Dealer is then responsible for further processing in accordance with their privacy statement in the Dealer profile.

Data is processed on the basis of **Article 6 (1) (b) GDPR**.

### (5) Customer account

When you open and use a customer account, we process your master data (company name, company address, billing address, delivery address, name, email address, language, telephone number) as well as your user data (user name, password). This enables you to manage your orders and contracts, and we can identify you as a customer. The legal basis for this data processing is your consent according to **Article 6 (1) (a) GDPR**.

(6) Use of functional cookies

We use cookies on our website. Cookies are small text files that are stored on your respective end device (PC, smart-phone, tablet, etc.) and saved by your browser.

We only use strictly necessary session cookies on our website. .

(7) External content

We use dynamic content from external sources to optimise the presentation of our website and what it offers. When you visit the website, a request is automatically sent via an interface to the server of the relevant content provider, and specific log data (such as the user's IP address) is transferred. The dynamic content is then transmitted to our website and displayed there.

We use external content in connection with the following functionalities:

a. Integration of YouTube videos

We incorporate videos of the YouTube portal of YouTube LLC, 901 Cherry Ave. San Bruno, CA 94066, USA ("YouTube") on our website. The data controller at YouTube is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter "Google"). When playing the videos, log data is transferred to the YouTube servers in the USA.

The legal basis for processing data is our overriding legitimate interest in optimising the marketing of our online offer in accordance with **Article 6 (1) (f) GDPR**.

The EU Commission has not issued an adequacy decision for data transfers to the USA. Google ensures an adequate level of data protection via the EU standard contractual clauses. You can access a copy of the contractual clauses here:

<https://policies.google.com/privacy/frameworks?hl=en-GB>

You can find further information here:

<https://policies.google.com/privacy?hl=en-GB>

**5. Duration of data storage**

We only store personal data for as long as we need it for the purposes for which it is processed or until you withdraw your consent. Insofar as statutory retention obligations must be observed, the storage period for certain data can be up to ten years, irrespective of the processing purposes.

**6. Your rights as a data subject**

(1) Information

You may request information free of charge at any time on all of the personal data that we have stored about you.

(2) Rectification, erasure, restriction of processing (blocking), objection

If you no longer agree to the storage of your personal data or if this data is no longer correct, we will on the basis of a corresponding instruction arrange for the deletion or blocking of your data or make the necessary corrections (insofar as this is possible under the applicable law). The same applies if we are only to process data in a restrictive manner in the future. You have a right of objection in particular in cases in which your data is necessary for the performance of a task carried out in the public interest or on the basis of our legitimate interest, as well as profiling based on this. You also have such a right of objection in the case of data processing for the purpose of direct advertising.

(3) Right to withdraw consent with effect for the future

You may withdraw your consent at any time with effect for the future. Your withdrawal will not affect the lawfulness of the processing up until the time of withdrawal.

(4) Data portability

If data is processed based on a contract, pre-contractual negotiations, consent or by means of automated procedures, you have the right to data portability. Upon request, we will provide you with your data in a common, structured and machine-readable format so that you can transfer the data to another controller if you wish.

(5) Restriction of processing

The above rights do not apply for data where we are not able to identify the data subject, e.g. if it has been anonymised for analysis purposes. Information, deletion, blocking, correction or transfer to another company may be possible in relation to this data if you provide us with additional information that allows us to identify you.

(6) Exercising your rights as a data subject and right of appeal

If you have any questions about the processing of your personal data, if you would like information or to rectify, block, object to the use of, or erase data, or request for data to be transferred to another company, please contact: [privacy@possehl-online.com](mailto:privacy@possehl-online.com)

You also have the option to complain to a supervisory authority about your rights as a data subject.