Data Protection Notice

Alnavit GmbH (hereinafter also "Alnavit") develops organic products. In the following, we would like to inform you about the processing of personal data within the scope of our online offers. The careful handling of personal information is of great concern to us. When processing your personal data, we therefore naturally comply with the statutory provisions and take the protection of your data very seriously.

You can print or save this document by using the usual functionality of your browser (mostly File/Save As).

1. Contact person

The contact person and so-called Data Controller for the processing of your personal data when visiting this website within the meaning of the EU General Data Protection Regulation (GDPR) is the:

Alnavit GmbH Mahatma-Gandhi-Straße 7 64295 Darmstadt E-Mail: **datenschutz@alnavit.com** Phone: +49 6151 356 7100 Fax: +49 6151 356 8791

For all questions on the subject of data protection in connection with our products or the use of our website, you can also contact us at any time. This is possible at the above postal address as well as at the e-mail address given above.

2. Processing of personal data

When you use our online services or interact with our websites (e.g. fill out and submit the contact form), personal data is processed.

2.1 Personal data

Personal data is information that relates to an identified or identifiable person. This primarily includes information that allows conclusions to be drawn about your identity, for example your name, your telephone number, your address or e-mail address.

Statistical data that we collect, for example, when you visit our website and data that cannot be linked to your person do not fall under the concept of personal data.

2.2 Visiting our website/access data

Each time you use our website, we collect the access data that your browser automatically transmits to enable you to visit the website. The access data includes in particular:

- IP address (will be anonymized) of the requesting device
- Date and time of the request
- Time zone difference from Greenwich Mean Time (GMT)
- Content of the request (concrete page)
- Access status/HTTP status code
- Website from which the request comes
- Browser and its version and language
- Operating system and its version
- Details of manufacturer and model for mobile devices such as smartphone or tablet
- Screen resolution

- JavaScript activation
- Color level

The data processing of this access data is necessary to enable the visit of the website and to ensure the permanent functionality and security of our systems. The access data is also temporarily stored in internal log files for the purposes described above, in order to compile statistical information about the use of our website, to further develop our website with regard to the usage habits of our visitors (e.g. if the proportion of mobile devices used to access the pages increases) and for general administrative maintenance of our website.

The legal basis is Art. 6 para. 1 p. 1 lit. b) of the GDPR, if the page view occurs in the course of the initiation or execution of a contract, and otherwise Art. 6 para. 1 p. 1 lit. f) of the GDPR due to our legitimate interest in the permanent functionality and security of our systems.

The IP addresses of the users are deleted or anonymized after termination of use. In the case of anonymization, the IP addresses are changed in such a way that the individual information about personal or factual circumstances can no longer be assigned to a specific or identifiable natural person, or can only be assigned to such a person with a disproportionate amount of time, cost and effort. The log files are stored temporarily and then anonymized. The data in the so-called log files are evaluated by us in anonymized form in order to further improve the Alnavit online offers and make them more user-friendly, as well as to find and correct errors more quickly. In addition, they are used to control the server capacities in order to be able to provide corresponding data volumes if necessary.

2.3 Contact form and contact by e-mail

You have various options for contacting us. These include the contact form and contacting us by e-mail. To use these functions, you must provide additional personal data, which we use and store to provide the respective service. If you provide us with personal data via our contact form or by e-mail, we will only use it to answer your questions or communicate with you, as well as to process complaints, and in accordance with data protection principles. If you contact us using the contact form, your first and last name, your e-mail address and your preferred form of address will be stored in order to be able to process your inquiry comprehensively and appropriately.

If additional voluntary information is possible, it is marked accordingly and serves to better process your request. The legal basis for inquiries with product reference is Art. 6 para. 1 lit. b) of the GDPR, as far as your information is needed to answer your inquiry or to initiate or execute a contract. The legal basis for inquiries without product reference is Art. 6 para. 1 p. 1 lit f) of the GDPR due to our legitimate interest that you contact us and that we can answer your inquiry.

No data is passed on to third parties, with the exception of a transfer of personal data to Alnatura Produktions- und Handels GmbH, Mahatma-Gandhi-Str. 7, 64295 Darmstadt, for the purpose of processing contracts or responding to customer inquiries in connection with inquiries about "organic food". In this context, only the data required to answer this specific customer inquiry (e.g. a complaint) or to process these contracts will be passed on. Further information can be found in the <u>data protection regulations of Alnatura Produktions- und</u> <u>Handels GmbH</u>. The legal basis for the transfer is Art. 6 para. 1 lit. b) with regard to the processing of contracts and Art. 6 para. 1 lit. f) of the GDPR, based on our legitimate interest in answering customer inquiries.

We will use the data only for the underlying purpose and in accordance with data protection principles.

2.4 Customer/recipe ratings

You have the possibility to rate the products and recipes offered on alnavit.de.

To make this possible, we use the services (software services) of Bazaarvoice Inc, 10901 Stonelake Blvd Austin, Texas 78759, USA (<u>https://www.bazaarvoice.com/</u>).

The service provider also performs an assessment and fraud prevention check of the respective assessments. An agreement has been concluded with Bazaarvoice Inc. for the processing of personal data in accordance with the GDPR. There is a data transfer to the USA. A contract has been concluded with the service provider that includes the EU standard contractual clauses to ensure an appropriate level of data protection when transferring personal data to third countries. For more information, please see the privacy policy of Bazaarvoice here.

When submitting a product/recipe rating, the review you entered along with the rating (stars) as well as the nickname/name and e-mail address you provided will be stored until revoked. Likewise, your IP address is temporarily collected for fraud prevention (18 months, in case of suspected fraud initially indefinitely).

In the case of product/recipe ratings, the "Terms and Conditions for Product/Recipe Ratings" apply. Here you will find supplementary notes and regulations on the processing of the data and content provided by you, as well as other information on the terms and conditions for product/recipe ratings. Personal data is processed for the purpose of enabling the rating function and for checking the rating content with regard to compliance with the applicable conditions for product/recipe ratings.

The processing of personal data for the purpose of implementing the rating function and a review of the rating content for compliance with the applicable conditions for ratings is based on your previously given consent pursuant to Art. 6 para. 1 sentence 1 lit. a) of the GDPR. Access to and storage of information on the user device is based on the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (1) of the Telecommunications Telemedia Data Protection Act.

You also have the option of having the rating you submitted deleted. To do so, please contact <u>information@alnavit.com</u>.

2.5 Surveys and competitions

If you participate in one of our surveys, we use your data for market and opinion research. In principle, we evaluate the data anonymously for internal purposes. If, exceptionally, surveys are not evaluated anonymously, the data is collected exclusively with your consent. In the case of anonymous surveys, the GDPR is not applicable and in the case of exceptionally personal evaluations, the legal basis is the above-mentioned consent pursuant to Art. 6 para. 1 p. 1 lit. a) of the GDPR.

In the context of competitions, we use your data for the purpose of conducting the competition and notifying you of the prize. Detailed information can be found, if applicable, in the conditions of participation for the respective competition. The legal basis of the processing is the competition contract according to Art. 6 para. 1 p. 1 lit. b) of the GDPR.

As a rule, prizes will be sent to you by us. Due to the nature of a prize or also to save transport routes, your data may be passed on to transport partners for the purpose of processing the competition or shipping the prize. Insofar as these are not explicitly named in the terms and conditions of participation, we have concluded order processing agreements with the transport company in accordance with Art. 28 of the GDPR with regard to the processing of your name and address required for shipping.

3. Transfer of personal data

A transfer of the data collected by us occurs in principle only if:

- You have given your express consent to this in accordance with Art. 6 para. 1 p. 1 lit. a) of the GDPR,
- The transfer is necessary in accordance with Art. 6 para. 1 p. 1 lit. f) of the GDPR for the assertion, exercise or defense of legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not having your data transferred, or
- We are legally obligated to transfer data according to Art. 6 para. 1 p. 1 lit. c) of the GDPR or
- This is legally permissible and necessary according to Art. 6 para. 1 p. 1 lit. b) of the GDPR for the processing of contractual relationships with you or for the implementation of pre-contractual measures, which take place upon your request.

Part of the data processing may be carried out by our service providers. In addition to the service providers mentioned in this privacy policy, this may include in particular IT service providers who maintain our systems, as well as consulting companies. If we pass on data to our service providers, they may only use the data to perform their tasks. Personal data may also be transferred to Alnatura Produktions- und Handels GmbH.

The service providers have been carefully selected and commissioned by us. They are contractually bound to our instructions, have suitable technical and organizational measures to protect the rights of the Data Subjects and are regularly monitored by us.

In addition, a transfer may occur in connection with official inquiries, court orders and legal proceedings if it is necessary for legal prosecution or enforcement.

4. Retention and deletion of personal data

In principle, we store personal data only as long as necessary to fulfill contractual or legal obligations for which we collected the data. Thereafter, we delete the data immediately, unless we still need the data until the expiry of the statutory limitation period for evidence purposes for civil law claims or due to statutory retention obligations.

For evidence purposes, we must retain contractual data for three years from the end of the year in which the business relationship with you ends. Any claims shall become statute-barred at the earliest at this point in time in accordance with the standard statutory limitation period.

Even after this, we still have to store some of your data for accounting reasons. We are obliged to do so due to legal documentation obligations, which may arise in particular from the German Commercial Code and the German Fiscal Code. The periods specified there for the retention of documents are up to ten years.

5. Cookies and similar technologies

This website uses cookies and similar technologies that are offered either by ourselves or by third parties.

Cookies are small text files used by websites and stored by the browser on your device to make the user experience more efficient. Cookies cannot run programs or transmit viruses to your computer. We use cookies to personalize content and ads, provide social media features, and analyze traffic to our website. This storage helps us to design our website and makes it easier for you to use, for example, by storing certain entries you make so that you do not have to keep repeating them. In addition, some of this information is needed to ensure that the website functions as expected.

We also share information about your use of our website with our social media, advertising and analytics partners where we have consent. Our partners may combine this information with other data that you have provided to them or that they have collected in the course of your use of the Services.

This site uses different types of cookies. Some cookies are placed by third parties that appear on our pages.

Generally, a distinction is made between two different types of cookies, so-called session cookies, which are deleted as soon as you close your browser (=end of session) and persistent cookies, which are stored on your data carrier for a longer period of time or indefinitely. Most of the cookies we use are session cookies and are automatically deleted from your hard drive at the end of the browser session. In addition, we also use persistent cookies that remain on your hard drive. During a further visit, it is thus automatically recognized that you have already been with us and which inputs and settings you prefer.

The cookies are stored on your hard drive and delete themselves after the time specified in the listing.

Because we respect your right to privacy, you have the ability to decide for yourself which cookies, except for the necessary cookies, as they condition the functionality of the website, you want to allow or not. The control over the cookie setting is up to you, the user. Most browsers are set by default to accept cookies and similar technologies. However, you can usually adjust your browser settings to reject cookies or similar technologies or to store them only with your prior consent. If you reject cookies or comparable technologies, not all of our offers may function properly for you.

We understand that when you access our website, you may not be interested in all of the features, which is why when you first access our website, we give you the opportunity to choose whether or not to use certain services. When selecting your personal cookie setting, you have the choice between:

- Functional
- Statistics
- Marketing

More detailed information about cookies can be found in your individual settings under Details.

You can change or revoke your consent at any time from the cookie statement on our website. You therefore have the option to adjust your preferences at any time via the cookie settings.

5.1 Legal basis and revocation

5.1.1 Legal basis

We use tools necessary for website operation on the basis of our legitimate interest pursuant to Art. 6 para. 1 p. 1 lit. f) of the GDPR to enable you to use our website more conveniently and individually and to make use as time-saving as possible. In certain cases, these tools may also be necessary for the performance of a contract or for the implementation of precontractual measures, in which case the processing is carried out in accordance with Art. 6 para. 1 p. 1 lit. b) of the GDPR. The access to and storage of information on the user device is absolutely necessary in these cases and is carried out on the basis of the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (2) no. 2 of the Telecommunications Telemedia Data Protection Act.

We use all other tools, in particular those for marketing purposes, on the basis of your consent

pursuant to Art. 6 para 1 p. 1 lit. a) of the GDPR and pursuant to Section 15 para. 3 p. 1 of the German Telemedia Act (TMG), insofar as usage profiles are created for the purposes of advertising or market research. Data processing using these tools only takes place if we have received your consent in advance. The access to and storage of information on the user device is absolutely necessary in these cases and is carried out on the basis of the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (2) no. 2 of the Telecommunications Telemedia Data Protection Act.

If personal data is transferred to third countries, we refer you to section 6 ("Data transfer to third countries"), also with regard to the possible associated risks. We will inform you if we have concluded standard contractual clauses or other guarantees with the providers of certain tools. If you have given your consent to use certain tools, we (also) transfer the data processed when using the tools to third countries on the basis of this consent.

5.1.2 Obtaining your consent

To obtain and manage your consent, we use the Cookiebot tool from Cybot A/S, Havnegade 39, 1058 Copenhagen, Denmark ("Cookiebot"). This generates a banner informing you about data processing on our website and giving you the option to consent to all, some or no data processing through optional tools. This banner appears the first time you visit our website and when you revisit the selection of your preferences to change them or withdraw consent. The banner will also appear on subsequent visits to our website if you have disabled the storage of cookies or the cookie has been deleted by Cookiebot or has expired.

Your consent or revocation (consent status as proof of consent), your shortened IP address (the last 3 digits are set to zero), information about your browser, your terminal device and at the time of your visit as well as the URL from which the consent was sent are transmitted to Cookiebot as part of your website visit.

In addition, Cookiebot sets a necessary cookie to store your given consents and revocations. Provided you delete your cookies, we will ask you for your consent again when you visit the site later. Otherwise, we store your consent status for one year.

The data processing by Cookiebot is necessary to provide you with the legally required consent management and to comply with our documentation obligations. The legal basis for the use of Cookiebot is Art. 6 para. 1 p. 1 lit. f) of the GDPR, justified by our interest in fulfilling the legal requirements for cookie consent management. The access to and storage of information on the user device is absolutely necessary in these cases and is carried out on the basis of the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (2) no. 2 of the Telecommunications Telemedia Data Protection Act. If you delete your cookies, we will ask for your consent again when you visit the site later.

5.1.3 Revocation of your consent or change of your selection

You can withdraw your consent for certain tools at any time. Click <u>here</u> and then on "Change your consent" or "Revoke your consent". There you can also change the selection of tools you wish to consent to use, as well as obtain supplementary information on cookies and the respective storage period. Alternatively, you can assert your revocation for certain tools directly with the provider.

5.2 Necessary and functional tools

We use certain tools to enable the basic functions of our website ("necessary tools"). Without these tools, we could not provide our service. We also use tools to improve the user experience on our website and to provide you with more features ("functional tools"). Unless we obtain consent for these tools, necessary and functional tools are used without consent based on our legitimate interests pursuant to Art. 6 para. 1 p. 1 lit. f) of the GDPR or for the

performance of a contract or for the execution of pre-contractual measures pursuant to Art. 6 para. 1 p. 1 lit. b) of the GDPR. The access to and storage of information on the user device is absolutely necessary in these cases and is carried out on the basis of the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (2) no. 2 of the Telecommunications Telemedia Data Protection Act.

5.2.1 Own cookies

We use our own necessary cookies, in particular

• To save your language settings,

• To indicate that information placed on our website has been displayed to you - so that it will not be displayed again the next time you visit the website.

5.2.2 Google Tag Manager

Our website uses Google Tag Manager, a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland for users from the European Economic Area, Switzerland and Liechtenstein and by Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043, USA (together "Google") for all other users. The Tag Manager is used to manage tracking tools and other services, so-called website tags. A tag is an element that is stored in the source code of our website, for example, to record specified usage data. The Google Tag Manager ensures that the usage data required by our partners (cf. the data processing operations described above) is forwarded to them.

The legal basis is Art. 6 para. 1 p. 1 lit. a) of the GDPR, based on the consent you have given via the cookie banner.

An order processing agreement has been concluded with Google. In part, data is processed on a Google server in the USA. In the event that personal data is transferred to the USA or other third countries, standard contractual clauses have been concluded with Google pursuant to Art. 46 para. 2 lit. c) of the GDPR. For further information, please refer to section 6 ("Data transfer to third countries").

For more information, see <u>Google's tag manager information</u>.

5.3 Analysis and advertising measures

To improve our website, we use various technologies to analyze usage behavior and evaluate the associated data. The data collected may include, in particular, the IP address of the end device, the date and time of access, the identification number of a cookie, the device identifier of mobile end devices, and technical information about the browser and operating system. However, the collected data is stored exclusively pseudonymously, so that no direct conclusions can be drawn about individuals. This data is also processed for marketing purposes and so that individualized advertising messages can be displayed to you. The legal basis for both analysis measures and advertising measures and the associated data processing is Art. 6 para. 1 p. 1 lit. a) of the GDPR, based on the consent given by you separately for both purposes, if applicable via the cookie banner. You can revoke or change the individual consent at any time with effect for the future (see above).

We also use tools for advertising purposes ("marketing tools"). Some of the access data collected when using our website is used for interest-based advertising. By analyzing and evaluating this access data, it is possible for us to present you with personalized advertising, i.e. advertising that corresponds to your actual interests and needs, on our website and on the websites of other providers.

The legal basis for the marketing tools is your consent according to Art. 6 para. 1 p. 1 lit. a) of the GDPR. For revocation of your consent, see 4.1.3: "Revoking your consent or changing your selection". Access to and storage of information on the user device is based on the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (1) of the Telecommunications Telemedia Data Protection Act.

In the event that personal data is transferred to the USA or other third countries, your consent expressly extends to the data transfer (Art. 49 para. 1 p. 1 lit. a) of the GDPR). Please refer to section 6 ("Data transfer to third countries") for the associated risks.

In the following section, we would like to explain these technologies and the providers used for this purpose in more detail. The data collected may include in particular:

- The IP address of the device;
- The identification number of a cookie;
- The device identifier of mobile devices (Device ID);
- Referrer URL (previously visited page);
- Pages viewed (date, time, URL, title, time spent);
- Downloaded files;
- Clicked links to other websites;
- If applicable, achievement of specific goals (conversions);
- Technical Information: Operating system; browser type, version, and language; device type, brand, model, and resolution;
- Approximate location (country and city, if applicable).

However, the data collected is only stored pseudonymously, so that no direct conclusions can be drawn about individuals.

Below you will find an additional option to object to our analysis and advertising measures. You can exercise your objection by making the appropriate settings on <u>http://preferences-mgr.truste.com/</u>, a site that provides bundled objection options from advertisers. The website of TRUSTe, Inc, 835 Market Street, San Francisco, CA 94103-1905, USA ("TRUSTe") allows you to deactivate all ads at once by means of opt-out cookies or, alternatively, to make the settings for each provider individually. Please note that after deleting all cookies in your browser or using a different browser and/or profile later, an opt-out cookie must be set again.

In the following section, we would like to explain these technologies and the providers used for them in more detail.

5.3.1 Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). According to Google, the contact for all data protection issues is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics uses cookies to analyze websites with regard to your user behavior. The information generated by cookies about the use of these websites is transferred to a Google server in the USA and stored there.

However, your IP address is shortened before the usage statistics are analyzed so that no conclusions can be drawn about your identity. For this purpose, Google Analytics has been extended on our online offers by the code "anonymizelP" to ensure anonymized collection of IP addresses.

We also use Google Analytics to analyze new content and functions on our website. For this purpose, we use the optimization service "Google Optimize", which is also offered by Google. Google Optimize makes it possible to display newly designed areas of our website to some of our users for test purposes and to evaluate usage to improve our website.

On the basis of Google Analytics, we use the Google service "Google Data Studio" to analyze the traffic development on our website over a certain period of time and, if necessary, evaluate the success of our website using other specific measuring points. This includes the tracking of internal advertising media for the presentation of brand campaigns, of product overlays as well as share buttons and newsletter sign-ups.

Google will use the information obtained from the cookies to evaluate your use of the website, to compile reports on website activity for website operators and to provide other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

We have set the following privacy settings for Google Analytics:

- IP anonymization (shortening of the IP address before evaluation so that no conclusions can be drawn about your identity)
- Limitation of the storage period
- Disabled advertising feature (including audience remarketing through GA Audience)
- Disabled personalized ads
- Disabled cross-page tracking (Google signals)
- Disabled data sharing to other Google products and services

The following data is processed by Google Analytics:

- Anonymized IP address;
- Referrer URL (previously visited page);
- Pages viewed (date, time, URL, title, time spent);
- Downloaded files;
- Clicked links to other websites;
- If applicable, achievement of specific goals (conversions);
- Technical Information: Operating system; browser type, version, and language; device type, brand, model, and resolution;
- Approximate location (country and city, if applicable, based on anonymized IP address).

Google Analytics sets the following cookies for the specified purpose with the respective storage period:

- "_ga" for 2 years and "_gid" for 24 hours (both used to recognize and distinguish website visitors by a user ID);
- "_gat" for 1 minute (to reduce requests to Google servers).

An order processing agreement has been concluded with Google for the use of Google Analytics, as well as EU standard contractual clauses in the event that personal data is transferred to the USA or other third countries.

As shown above, you can configure your browser to reject cookies, or you can prevent the collection of data generated by the cookie and related to your use of this website (including your IP address) to Google and the processing of this data by Google by loading and installing the <u>browser plugin</u>.

As an alternative to the cookie banner and browser add-on or within browsers on mobile devices, you can set an opt-out cookie to prevent the collection of data by Google Analytics within this website in the future (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.

For more information, please see Analytics' <u>security and privacy policies</u> and Google's <u>privacy policy</u>.

5.3.2 Google Marketing Platform and Ad Manager (formerly DoubleClick)

Our website uses the Google Marketing Platform and Google Ad Manager, services which are provided for users from the European Economic Area and Switzerland by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland and for all other users by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (together "Google").

These services use cookies and similar technologies to present you with advertisements that are relevant to you. Use of the Services enables Google and its partner websites to serve ads based on prior visits to our website or other websites on the Internet.

The data generated in this context may be transferred by Google to a server in the USA for evaluation and stored there. In the event that personal data is transferred to the USA, the standard contractual clauses provided by Google shall apply.

If you have not consented to the use of Google Marketing Platform and Ad Manager, Google will only display general advertising that has not been selected based on the information collected about you on this website. In addition to withdrawing your consent, you also have the option to disable personalized advertising in Google's <u>advertising settings</u>. The following cookies are set by Google:

• "IDE" for 12 months.

You can find more information on this in Google's privacy policy.

5.3.3 Advertising with Facebook via Facebook Pixel

Within the scope of our online communication, we use the "Facebook Pixel" service for usage-based user targeting and, within the scope of this, the retargeting function "Custom Audiences via your website" of the social network Facebook, a service offered for users outside the USA and Canada by Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook") and for all other users by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA ("Facebook"). We use Facebook Pixel to display individualized advertising messages to you based on your interest in our products ("Retargeting"). This also involves target group marketing through Custom Audiences. For this purpose, Facebook processes data that the service collects via cookies, web beacons and comparable storage technologies on our websites. For this purpose, the so-called "Facebook Pixel" has been integrated on our website. This tracking Pixel establishes a direct connection between your browser and the Facebook server. The so-called tracking takes place with the help of a cookie, which is placed on your computer and collects the following information, such as HTTP header information (including IP address, information about the web browser, page location, document, URL of the website and user agent of the web browser, as well as day and time of use), as well as Pixel-specific data (this includes the Pixel ID and Facebook cookie data, including your Facebook ID (these are used to link events to a specific Facebook advertising account and assign them to a Facebook user).

In this way, Facebook receives information from your browser that our page has been accessed by your end device, including across devices, regardless of whether you have a user account with Facebook or not. If you do not have a user account with Facebook, ad placements will only be displayed from a "Custom Audience" size of 20 different users, but this does not allow any conclusions to be drawn about the characteristics of the individual users in this group.

Furthermore, Facebook receives information about what actions you have performed on our site (e.g., searched and viewed content at the product level, and can track which of our

pages or sub-pages you are on or have been on. Facebook uses this information to provide us with statistical and anonymous data about the general use of our website and the effectiveness of our Facebook Ads. This procedure is used to evaluate the effectiveness of Facebook Ads for statistical and market research purposes and can help to optimize future advertising measures. The assignment to a so-called "Custom Audience" achieved in this way takes place for a maximum of 180 days. The data collected in this way is anonymous for us, but the data is stored and processed by Facebook.

The data generated in this context may be transferred by Facebook to a server in the USA for evaluation and stored there. In the event that personal data is transferred to the USA, the standard contractual clauses provided by Facebook shall apply.

If you are a member of Facebook and have allowed Facebook to do so via the privacy settings of your account, Facebook will also link the information collected about your visit to us with your member account and use it for the targeted placement of Facebook ads. You can view and change the <u>privacy settings</u> of your Facebook account at any time. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data as well as its use by Facebook. We can only select which segments of Facebook users should be shown our ads.

The legal basis for the use of the Facebook Pixel is your consent given at the beginning of the visit to our website according to Art. 6 para. 1 p. 1 lit. a) of the GDPR.

If you have not consented to the use of Facebook Pixel, Facebook will only display generic Facebook Ads that are not selected based on the information collected about you on this website.

If you do not agree with the data processing by Facebook in connection with this procedure, you can prevent the transfer of your data to Facebook via "Facebook Pixel" using the selection option on the cookie banner or the deactivation link from Alnavit below here. By clicking on the "Opt-Out-Link", an "Opt-Out-Cookie" will be set via Javascript, so that when you visit our website again, you will be asked whether an "Opt-Out-Cookie" has been set. If the response is positive, the Facebook Pixel will no longer be used for future visits. However, this opt-out function is device- or browser-related, i.e. it only applies to the respective end device or browser from which it was set. If you access our pages from different end devices or browsers, you must perform the opt-out on each individual end device and in each additional browser used.

For more information, see Facebook's Data Policy.

5.3.4 Web analytics Bazaarvoice

Alnavit uses the services of Bazaarovice Inc, 10901 Stonelake Blvd Austin, Texas 78759, USA (<u>www.bazaarvoice.com</u>) to enable product reviews on the alnavit.de website and to collect data on how visitors to the website use reviews submitted, which Alnavit services are used after contact with any of the aforementioned content and which subpages on alnavit.de are accessed. For this purpose, both cookies and Pixels, i.e. small image elements, are used, which are integrated on alnavit.de.

An order processing agreement has been concluded with Bazaarvoice, which includes the EU standard contractual clauses to ensure an adequate level of data protection in the event of a possible transfer of personal data to third countries such as the USA. The privacy policy of Bazaarvoice can be found <u>here</u>.

The legal basis for the use of Bazaarvoice is your consent given at the beginning of the visit to our website according to Art. 6 para. 1 p. 1 lit. a) of the GDPR.

You can object to the collection and storage of data for the aforementioned purposes at any time with effect for the future by selecting the appropriate option in the cookie banner. In addition, you can revoke your consent at any time with effect for the future.

5.3.5 Sitecore Analytics

We also use the web analytics service of Sitecore USA, Inc, 101 California Street, Suite 1600, San Francisco, CA 94111, USA ("Sitecore"), to help us improve the customer experience on our website. Sitecore uses cookies and similar technologies to analyze our website with regard to your user behavior. Information about your operating system, browser, incoming and outgoing references (links), geographical origin, and resolution and type of device may be analyzed for statistical purposes. Sitecore uses the data thus generated on our behalf to evaluate the use of the website and to create reports on the use of the website. You can, as shown above, configure your browser to reject cookies.

As Sitecore is a service provider based in the US, in the event that data is transferred to the US or other third countries, a contract has been concluded with Sitecore that includes the EU standard contractual clauses to ensure an adequate level of data protection when transferring personal data to third countries.

The legal basis for the use of Sitecore is your consent given at the beginning of the visit to our website according to Art. 6 para. 1 p. 1 lit. a) of the GDPR.

You can object to data processing for the aforementioned purposes at any time with effect for the future by selecting the corresponding option in the cookie banner. In addition, you can revoke the consent you have given at any time with effect for the future.

However, we would like to point out that in this case not all functions of this website may be fully available. Information on data processing by Sitecore and the corresponding data protection provisions can be found at: www.sitecore.net/legal/privacy-policy.aspx

For more information on the categorization and storage of the cookies used, please refer to the tabular list in section 5 of the privacy policy under the subheading "Cookies".

As part of the use of Sitecore, error and usage analysis is also performed on our website by their **sub-service provider New Relic**.

Within the scope of Sitecore's services, our website also uses a service provided by New Relic, Inc, 188 Spear Street, Suite 1200, San Francisco, CA 94105, USA ("New Relic") for monitoring and analysis purposes, in particular to measure and analyze the performance (response time, throughput, error rate, transactions) of the website, to evaluate the impact of performance on the customer from the frontend to the server, to count and measure each individual request (transactions or transaction fields, event data), to filter and analyze events according to individual users or customer groups, and to detect errors and correct problems in real time (error analysis).

The cookie set by New Relic is a so-called Pixel tracker or a so-called session cookie, which is automatically deleted when the browser is closed.

The legal basis for the use of New Relic is your consent given at the beginning of the visit to our website according to Art. 6 para. 1 p. 1 lit. a) of the GDPR.

An order processing agreement has been concluded with Sitecore for the use of New Relic, as well as standard contractual clauses in the event that personal data is transferred to the USA or other third countries.

For more information, please see New Relic's Privacy Policy.

Our website is hosted by **Rackspace International GmbH**, Pfingstweidstrasse 60, 8005 Zurich, Switzerland ("Rackspace"), a **sub-service provider of Sitecore**. This means that Rackspace's servers are used to connect your device to the content on our website. For technical reasons, the servers that Rackspace uses are located both within the European Union and in countries that have a level of protection that is not equivalent to that of the European Union. Switzerland has been recognized by the European Commission as having an adequate level of data protection through an adequacy decision. We will be happy to provide you with further information on the appropriate guarantees for compliance with an adequate level of data protection upon request.

The legal basis for the use of Rackspace is Art. 6 para. 1 p. 1 lit. f) of the GDPR, based on our legitimate interest in presenting content on our website quickly, securely and reliably.

5.4 Social Plugins

We also use social network tools that are used to log in to the website with existing user accounts or to share posts and content via these networks ("social media plugins"), as well as other external media, such as embedded videos or maps.

The legal basis for this is - unless otherwise stated - your consent pursuant to Art. 6 para. 1 p. 1 lit. a) of the GDPR, which you give via the cookie banner or with the respective tool itself by individually allowing its use via a banner (overlay) placed over it. Access to and storage of information on the user device is based on the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (1) of the Telecommunications Telemedia Data Protection Act. You can revoke your consent or change your selection at any time. In the event that personal data is transferred to the USA or other third countries, your consent expressly extends to the data transfer (Art. 49 para. 1 p. 1 lit. a) of the GDPR). Please refer to section 6 ("Data transfer to third countries") for the associated risks.

5.4.1 Facebook

Facebook is a social network offered by Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland for users outside the USA and Canada and by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA (collectively "Facebook") for all other users. Facebook functions are marked with the Facebook logo. Depending on the type of function, additional information may be added (e.g. "Share", "Recommend"). The legal basis for this data processing is Art. 6 para. 1 p. 1 lit. a) of the GDPR, based on your consent.

For data protection reasons, no personal data is initially passed on to the social network when you visit our website. Only after the activation of the Facebook functions through your consent is a direct contact of your browser to the social network possible. This prevents us from transferring data to the network without your knowledge and storing it there.

Only when you visit an Alnavit page that contains a Facebook button and click on the Facebook button will your browser establish a direct connection with the Facebook servers and load the button for the respective function from there. In the process, the information is transmitted to Facebook that the corresponding Alnavit website has been accessed.

Except if you visit a page on which we use a Facebook plugin, with the help of which the current Facebook activities of Alnavit are displayed on our online offers. In this case, your browser or application establishes a direct connection with the Facebook servers.

If you have consented and the Facebook plugin has been activated, your data will be processed as follows:

Facebook receives the information that you have accessed the corresponding subpage of our online offer. This occurs regardless of whether you have an account with Facebook and are logged in there. If you are logged in to Facebook, this data is directly assigned to your account. If you activate the plug-in and, for example, link to the page, Facebook also stores this information, including date and time, in your user account and shares this publicly with your contacts. If you do not wish to be associated with your Facebook profile, you must log out before activating the plug-in.

Facebook stores this data as usage profiles and uses it for purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation is carried out in particular (also for non-logged-in users) for the display of needs-based advertising and to inform other users of the social network about your activities on our website.

At no time does Alnavit learn which Facebook buttons you have used and when, but only receives from Facebook summarized, non-personal statistics on the use of Alnavit's fan pages on Facebook and summarized statistics on the use of Facebook buttons. The data generated in this context may be transmitted by Facebook to a server in the USA and stored there. In the event that personal data is transferred to the USA or other third countries, the standard contractual clauses provided by Facebook apply.

The legal basis is your consent according to Art. 6 para. 1 a) of the GDPR. In addition to revoking your consent, as a Facebook member you also have the option to deactivate advertising based on social actions in the <u>advertising preferences</u>.

For more information, please see Facebook's Privacy Policy.

5.4.2 Twitter

Twitter is a microblogging service provided by Twitter, Inc, 1355 Market Street #900, San Francisco, California 94103, USA ("Twitter").

For data protection reasons, no personal data is initially passed on to the social network when you visit our website. Only after your consent will the Twitter functions be activated and is a direct contact of your browser to the social network possible. This prevents us from transferring data to the network without your knowledge and storing it there. Only when you visit an Alnavit page that contains a Twitter button and click on the Twitter button, your browser establishes a direct connection with the servers of Twitter and the button is loaded from there. In doing so, the information is transmitted to Twitter that the corresponding Alnavit page has been accessed. Even if you are not logged in, Twitter may collect and store usage data. The exception is when you visit a page on which we use a Twitter plugin, with the help of which the current Twitter activities of Alnavit are displayed on our online offers. In this case, your browser or application establishes a direct connection with the Twitter servers without you having to click the Twitter button separately.

When you click the Twitter buttons and "tweet" information via the Twitter window that opens, you submit the tweeted information to Twitter. This information is then published in your Twitter user profile. For more information, please see Twitter's <u>Privacy Policy</u>.

5.4.3 Pinterest

Pinterest is an online pinboard for graphics and photographs provided for users within the European Economic Area by Pinterest Europe Ltd, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland and for all other users by Pinterest Inc, 651 Brannan Street, San Francisco, California 94107, USA (collectively "Pinterest"). Pinterest features are marked with the pin-it logo.

For data protection reasons, no personal data is initially passed on to Pinterest when you visit our website. Only after your consent, the Pinterest functions are activated and a direct

contact of your browser to the image service is possible. This prevents us from transferring data to the network without your knowledge and storing it there. Only when you visit an Alnavit page that contains a Pinterest button and click on the button, your browser establishes a direct connection with the Pinterest servers and the button for the respective function is loaded from there. In doing so, the information is transmitted to Pinterest that the corresponding Alnavit website has been accessed. The exception is when you visit a page on which we use a Pinterest plugin, with the help of which the current Pinterest activities of Alnavit are displayed on our online offers. In this case, your browser or application establishes a direct connection with the Pinterest servers.

When you click the Pinterest buttons and "pin" graphics or photographs via the window that opens, you submit this information to Pinterest. The information is then published in your Pinterest user profile. Pinterest also uses the information to present ads tailored to you.

The legal basis is your consent according to Art. 6 para. 1 lit. a) of the GDPR. In addition to revoking your consent, as a Pinterest member you also have the option to deactivate personalized ads by accessing the <u>account settings</u> and activating the checkbox next to "Use info from our partners to better tailor recommendations and ads on Pinterest".

For more information, please see Pinterest's Privacy Policy.

5.5 YouTube

The video platform "YouTube" on which users can post videos and make them publicly available is operated by YouTube LLC, 901 Cherry Ave, San Bruno, CA 94066, USA ("YouTube"), a group company of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

We have integrated YouTube videos into our online offers, which are stored on the YouTube portal and can be played directly from our online offers.

We have activated YouTube's extended data protection mode. This means that Google does not receive any usage information and does not set any cookies until the user actively clicks on the play button. After this click, the video is played and Google sets its own cookies to improve its services and to play individualized advertising in the Google advertising network.

By playing a video, YouTube and Google receive the information that you have accessed the corresponding subpage on our website. In addition, further information on the purpose and scope of the data collection and its processing by the plug-in provider is collected. YouTube and Google use this data for the purposes of advertising, market research and demand-oriented design of their websites. In addition, if you access YouTube on our website while logged into your YouTube or Google profile, YouTube and Google may link this event to the respective profiles. If you do not want the association, it is necessary that you log out of Google before visiting our website.

The legal basis is your consent according to Art. 6 para. 1 lit. a) of the GDPR. Access to and storage of information on the user device is based on the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (1) of the Telecommunications Telemedia Data Protection Act. In addition to revoking your consent, you can configure your browser as described above to reject cookies, or you can prevent the collection of data generated by cookies and related to your use of this website, as well as the processing of this data by Google, by deactivating the "Personalized advertising on the web" button in Google's advertising settings. In this case, Google will only display non-individualized advertising.

For more information on the processing of your data by YouTube, please see Google's <u>Privacy Policy</u>.

5.6 Google Maps

Our website uses the map service Google Maps which is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland for users from the European Economic Area, Switzerland and Liechtenstein and by Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043, USA (together "Google") for all other users.

This service is integrated by us in particular to provide the "Retailer Search" and Producer Map functions. In order for the Google map material used by us to be integrated and displayed in your web browser, your web browser must establish a connection to a Google server, which may also be located in the USA, when you visit the contact page. In the event that personal data is transferred to the USA or other third countries, standard contractual clauses have been concluded with Google.

By integrating the map material, Google receives the information that a page of our website was accessed from the IP address of your device. If you access the Google map service on our website while logged into your Google profile, Google can also link this event to your Google profile. If you do not want the association with your Google profile, it is necessary that you log out of Google before visiting our contact page. Google stores your data and uses it for purposes of advertising, market research and personalized display of Google Maps.

The legal basis is Art. 6 para. 1 p. 1 lit. a) of the GDPR, based on the consent you may have given via the cookie banner. Access to and storage of information on the user device is based on the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (1) of the Telecommunications Telemedia Data Protection Act.

For more information, please see Google's <u>Privacy Policy</u> and the <u>Additional Terms of Use for</u> <u>Google Maps</u>.

6. Online presence in social networks

We maintain online presences in social networks in order to communicate there with customers and interested parties, among others, and to provide information about our products and services.

The users' data is usually processed by the social networks concerned for market research and advertising purposes. Thus, usage profiles can be created based on the interests of the users. For this purpose, cookies and other identifiers are stored on the users' computers. Based on these usage profiles, advertisements, for example, are then placed within the social networks but also on third-party websites.

As part of the operation of our online presences, it is possible that we may access information such as statistics on the use of our online presences provided by the social networks. These statistics are aggregated and may include, in particular, demographic information and data on interaction with our online presences and the posts and content distributed via them. For details and links to the data of the social networks that we as operators of the online presences can access, please refer to the list below.

The legal basis for data processing is Art. 6 para. 1 p. 1 lit. f) of the GDPR, based on our legitimate interest in effectively informing users and communicating with users, or Art. 6 para. 1 p. 1 lit. b) of the GDPR, in order to stay in contact with and inform our customers and to carry out pre-contractual measures with future customers and interested parties.

For the legal basis of the data processing carried out by the social networks under their own responsibility, please refer to the data protection notices of the respective social network.

The following links also provide you with further information on the respective data processing and the options to object.

We would like to point out that data protection requests can be asserted most efficiently with the respective provider of the social network, as only these providers have access to the data and can take appropriate measures directly.

Below is a list of information about the social networks on which we operate online presences:

- Facebook (USA and Kanada: Facebook Inc., 1601 Willow Road, Menlo Park, California 94025, USA; all other countries: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)
 - Operation of the Facebook fan page in joint responsibility on the basis of an agreement on joint processing of personal data provided unilaterally by Facebook (so-called Page Insights Supplement regarding the Controller).
 - Information about the processed page insights data and the contact option in case of data protection inquiries: <u>https://www.facebook.com/legal/terms/information_about_page_insights_data</u> ta
 - Privacy Policy: <u>https://www.facebook.com/about/privacy/</u>
 - Opt-Out: <u>https://www.facebook.com/settings?tab=ads</u> and <u>http://www.youronlinechoices.com</u>.
- Instagram (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland)
 - Privacy Policy: <u>https://help.instagram.com/519522125107875</u>
- Pinterest (Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Irland)
 - Privacy Policy: <u>https://policy.pinterest.com/de/privacy-policy</u>
 - Opt-Out: <u>https://policy.pinterest.com/de/privacy-policy#section-your-options</u>

7. Wao.io

We also use wao.io, a service provided by Avenga Germany GmbH, Bahnhofsvorplatz 1, 50667 Cologne, Germany ("wao.io").

Wao.io shortens the response time of a website request, for example by optimising image files, and protects our website against attacks. Wao.io does not place any cookies. For technical reasons and to transmit the content to the browser, wao.io obtains insight into your IP address, which is, however, anonymised and stored in log files in anonymised form for 7 days.

Further information can be found in the wao.io privacy policy.

The legal basis for the use of Wao.io is our legitimate interests in the analysis, optimisation and economic operation of our online offering in accordance with Art. 6 Para. 1 S. 1 lit. a of the GDPR. Access to and storage of information on the user device is based on the implementation laws of the ePrivacy Directive of the EU member states, and in Germany in accordance with Section 25 (1) of the Telecommunications Telemedia Data Protection Act.

An order processing agreement has been concluded with the provider of Wao.io.

8. Data transfer to third countries

As explained in this privacy policy, we use services whose providers are partly located in socalled third countries (outside the European Union or the European Economic Area) or process personal data there, i.e. countries whose level of data protection does not correspond to that of the European Union. Insofar as this is the case and the European Commission has not issued an adequacy decision (Article 45 of the GDPR) for these countries, we have taken appropriate precautions to ensure an adequate level of data protection for any data transfers. These include, among others, the standard contractual clauses of the European Union or binding internal data protection regulations.

Where this is not possible, we base the data transfer on exceptions of Art. 49 of the GDPR, in particular your explicit consent or the necessity of the transfer for the performance of the contract or for the implementation of pre-contractual measures.

If a third country transfer is provided for and no adequacy decision or appropriate safeguards are in place, it is possible and there is a risk that authorities in the respective third country (e.g., intelligence services) may gain access to the transferred data in order to collect and analyze it, and that enforceability of your Data Subject rights cannot be guaranteed. When obtaining your consent via the cookie banner, you will also be informed of this.

9. Your rights

You have the right to request information about the processing of your personal data by us at any time. When providing information, we will explain the data processing to you and provide you with an overview of the data stored about your person. If any data stored by us is incorrect or no longer up to date, you have the right to have this data corrected. You can also request the deletion of your data. If deletion is exceptionally not possible due to other legal regulations, the data will be blocked so that it is only available for this legal purpose. You can also have the processing of your data restricted, for example, if you believe that the data we have stored is incorrect. You also have the right to data portability, which means that we will provide you with a digital copy of the personal data you have provided upon request.

To exercise your rights as described here, you may contact us at any time using the contact details above. This also applies if you wish to receive copies of guarantees demonstrating an adequate level of data protection. Provided that the respective legal requirements are met, we will comply with your data protection request.

Your requests for the assertion of data protection rights and our responses to them will be stored for documentation purposes for a period of up to three years and in individual cases for the assertion, exercise or defense of legal claims even longer. The legal basis is Art. 6 para. 1 p. 1 lit. f) of the GDPR, based on our interest in defending against any civil claims under Art. 82 of the GDPR, avoiding fines under Art. 83 of the GDPR and fulfilling our accountability obligations under Art. 5 para. of the GDPR.

You have the right to revoke your consent at any time. This has the consequence that we no longer continue the data processing based on this consent for the future. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

Insofar as we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time on grounds relating to your particular situation. If it concerns an objection to data processing for direct marketing purposes, you have a general right of objection, which we will also implement without giving reasons.

If you wish to exercise your right of revocation or objection, it is sufficient to send an informal message to the above contact details.

Finally, you have the right to complain to the data protection supervisory authority responsible for us. You can exercise this right at a supervisory authority in the member state of your residence, your workplace or the location of the alleged violation. In Hesse, where Alnavit is headquartered, the competent supervisory authority is: Der Hessische Datenschutzbeauftragte, Postfach 3163, 65021 Wiesbaden

10. Data security

We maintain current technical measures to ensure data security, in particular to protect your personal data from risks during data transmissions and from third parties gaining knowledge. These are adapted to the current State of the Art in each case.

11. Changes to the privacy policy

Occasionally, we update this privacy policy, for example, if we adapt our website or if the legal requirements change.

Updated: July 2022