

## **Privacy Statement**

#### **Data Protection: a Summary**

The following data protection information is designed to provide you with an overview of how your data is collected and processed when you visit our websites.

You will find the detailed data protection information below.

#### Which data do we collect?

Technical details: We collect the IP address from which you access our website; the browser version you use to do so, the date and time of access, the website from which you visited our website (Referrer).

We use cookies, small textfiles, for example for our online shops or log-ins to protected areas of our website. The cookies are stored on your computer for a temporary period of time.

We record usage profiles under a pseudonym with the assistance of tracking services and cookies, so-called third party supplier cookies. This type of usage profile contains information about visitors to a website. Such information will not enable us to work out who you are. You may raise an objection to your usage profile being produced at any time.

You may adjust your browser setting so that it does not store cookies or so that they are deleted at the end of your internet session.

#### How do we collect your data?

The data created by a visit to our websites is collected automatically. Additional data is collected from your inputs in our website and from cookies.

#### What do we use your data for?

To prepare, fine-tune and manage SEAMCOM websites.

To create anonymous user profiles, provided that you do not object to this.

In addition to this, we use your data to identify misuse and for fault rectification and, if necessary, for passing out information to state authorities.

SEAMCOM sometimes calls upon other companies to process order data. SEAMCOM will retain the responsibility for processing data.

#### Your rights:

- Information
- Correction of mistakes
- Objection
- Deletion
- Restriction
- Data transferability
- Revocation of consent



Should you have any concerns about data protection you may contact our staff in the customer care department as well as contact our data protection officer directly at <a href="mailto:privacy@also.com">privacy@also.com</a>.

This information is designed to provide you with an overview of data protection at SEAMCOM/ALSO. You will find the detailed data protection information below.

## **Detailed Data Protection Information**

#### General

As the party responsible for processing your data, SEAMCOM GmbH & Co. KG has implemented a large number of technical and organisational measures with the aim of ensuring that your personal data processed via these websites is provided with all round security, if possible. Nevertheless, internet-based data transfers may, as a matter of principle, give rise to security gaps, so that total security cannot be guaranteed. For this reason every person concerned shall be at liberty to send us personal data by other means as well, over the telephone, for example.

#### Which data do we record and how do we use it?

We record the IP address from which you access our website, the browser version used, date and time of access, the website from which you accessed our website (Referrer).

The data recorded by this method will be used for data security purposes and to protect you against hacking attacks on our website infrastructure and for statistical analysis.

This data will not be used to create individual user profiles and it will not be forwarded to third parties.

Other data will also be recorded when you log in with SEAMCOM: notably, your name, contact details, payment details, address and order details.

**Cookies:** We use cookies for specific offers. Cookies are small data files saved on your computer. This enables us to identify if you have already visited our website previously from the same computer.

**Session Cookies** are cookies which are only saved on your computer for the duration of an internet session and which are needed for transactions. These session cookies serve only to control the connection and navigation and make surfing on our websites user-friendly for you (e.g. for handling a purchase while you are logged in on our shop systems). Session cookies will be deleted again when you terminate your browser session.

For certain offers we use **persistent cookies**, which serve to identify visitors who have already visited the website previously and are saved on your computer for future sessions.



These cookies will be valid for between 6 and 24 months (e.g. if a persistent cookie is required so that your surfing patterns are not recorded by tracking tools).

You have the option of adjusting your browser setting so that these cookies are not even saved in the first place or that cookies will be deleted at the end of your internet session. Please note however, that in this case it is possible that you will not be able to use all the functions on our website.

No other personal details will be recorded, unless you have disclosed such information voluntarily.

#### Where will my data be processed?

Your data will be processed within the EU. Data processing will also take place outside Europe within legal limits.

#### **Data security**

We have implemented extensive technical and organisational measures as required by the Basic European Data Protection Regulations (EU-DSGVO) to protect your data.

#### Forwarding data

We shall forward data required to state authorities requesting it in fulfilment of our statutory obligations. Other than this we shall not forward any personal data, unless you have granted your consent thereto.

## Analysis of user usage patterns

#### Webtrekk:

SEAMCOM uses Webtrekk on your webpages. It is a web analysis service provided by the company Webtrekk GmbH. Some data recorded when you visit our website will be processed for statistical analysis. This statistical analysis helps us to optimise our product as necessary. Webtrekk GmbH is certified for data protection in web controlling. Your IP address will be transferred on the occasion of each server enquiry. Your IP address will only be stored in anonymous format when doing so. As a matter of principle it will not be possible to work out who you are. Your data is collected by setting up a pixel which is incorporated on your website. Webtrekk uses so-called session cookies, as well as last-click cookies, which are deleted when you terminate your browser session. In addition to this, Webtrekk sets so-called ever-cookies, which last no longer than 6 months and are deleted after a set number of uses at the latest. Webtrekk does not merge this user data together with other data from the



anonymised person. This data is deleted as soon as it is no longer needed to produce usage analysis or if the user requests deletion.

#### Google Analytics:

This website uses Google Analytics, a web analysis service from Google Inc, (1600 Amphitheatre Parkway Mountain View, CA 94043, USA). Google will use this information as instructed by the operator of this website to analyse how you use this website and to render services associated with the use of the website and internet usage for the website operator. We would draw your attention to the fact that Google Analytics was extended on this website by the code "anonymizelp" in order to ensure that IP addresses are logged in anonymous format (so-called IP-Masking). Your IP address will be abbreviated beforehand by Google within the member states of the European Union or in other signatory states to the European Economic Area agreement. Only in exceptional cases will the full IP address be sent by Google to a server in the USA and abbreviated there. The IP addresses passed over by your browser as part of Google Analytics will not be merged together with other Google data.

The legal basis underpinning the use of Google Analytics is Section 15 Para 3 of the German Telemedia Act [TMG] and Article 6 Para 1 f DSGVO. Meetings and campaigns will be terminated after a specific period of time has lapsed. Normally meetings will be terminated after 30 minutes without activity and campaigns after six months. The time limit set for campaigns may be for up to a maximum of two years. You can consult more detailed information about the terms and conditions of use and data protection here athttps://www.google.com/analytics/terms/de.html or at https://www.google.de/intl/de/policies/. Google Analytics uses so-called cookies, which are textfiles stored on your computer and enable an analysis to be conducted on the use of the website by you. The information generated by the cookie about your usage pattern for this website will as a rule be sent by Google to a server in the USA and saved there. You may prevent the cookies from being stored by setting your browser software accordingly; we would, however, point out that in this case it is possible that you will not be able to have full use of all the functions on this website. In addition to this, you may prevent the data generated by the cookie relating to how you use the website (including your IPaddress) being sent to Google as well as prevent this data being used by Google by downloading and installing the browser plugin <a href="https://tools.google.com/dlpage/gaoptout?hl=de">https://tools.google.com/dlpage/gaoptout?hl=de</a> .

#### AppDynamics:



You may object to your visitor data being stored in anonymised format, so that you are no longer logged in future. A persistent cookie will be set to preclude web controlling. This objection will apply until you delete the cookie.

- Tracking Yes
- Tracking No

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### Newsletter

#### **Subscription to our Newsletter**

Users will be granted an opportunity on the SEAMCOM GmbH & Co. KG website to subscribe to our Company's newsletter. SEAMCOM is availing itself of the services of Supermailer at Mirko Böer Softwareentwicklungen to send out the newsletter.

SEAMCOM GmbH & Co. KG keeps its customers and business partners informed at regular intervals by means of a newsletter of information about products, sales campaigns, lotteries and new developments at ALSO. If possible, this information will be tailored to meet individual interests. In addition to this, occasionally we use the service to conduct surveys with the aim of increasing levels of customer satisfaction. Our Company's Newsletter can, as a matter of principle, only be received by the person concerned if, (1) the person concerned has a valid e-mail address, and (2) the person concerned has registered to have a Newsletter sent out to them. For legal reasons a confirmation e-mail will be sent out as part of the double opt-in procedure to the person concerned on a single occasion prior to the Newsletter being sent out. This confirmation e-mail serves to check whether the holder of the e-mail address has been authorised to receive the Newsletter.

When subscribing for our Newsletter, we also save the IP address of the computer system used by the person concerned at the point in time of application provided by the Internet-Service-Provider (ISP) plus the time and date of the application. This information is needed to understand and track (possible) misuse of thee-mail address of the person concerned at a subsequent point in time and therefore serves to furnish the controller with legal protection.

The personal data collected in the course of registering for the Newsletter is only used for sending out our Newsletter. Moreover, this allows us to keep subscribers to the Newsletter up to date by e-mail, insofar as this is necessary for running the Newsletter service or for registration thereto, as could be the case with amendments to the Newsletter or changes in technical factors. The personal data collected in the course of Newsletter service will not be



forwarded to third parties. Subscription to the Newsletter may be terminated at any time by the person concerned. The consent granted to us for storing personal data by the person concerned enabling us to dispatch the Newsletter may be revoked at any time. There is a corresponding link to the cancellation form in every Newsletter enabling the person concerned to cancel the subscription. Moreover, there will at all times be the option to cancel the subscription to the Newsletter directly on the website of SEAMCOM GmbH & Co. KG or to inform the person responsible for handling the Newsletter by other means.

#### **Newsletter-Tracking**

The SEAMCOM GmbH & Co. KG Newsletter contains so-called tracking pixel. A tracking pixel is a miniature graphic embedded in those e-mails sent in HTML format, in order to facilitate a logfile record and a logfile analysis. As a result of this it is possible to conduct a statistical analysis on the success or failure of online marketing campaigns. The embedded tracking pixel enables SEAMCOM GmbH & Co. KG to identify whether and when an e-mail was opened by a subscriber. In addition to this, by adjusting links it is possible to record which of the links in the e-mail were called up by the subscriber.

That personal data collected by means of the tracking pixels and links contained in the Newsletter will be stored and analysed by the person responsible for processing, with the aim of updating the News letters sent out and to align the content of future Newsletters with the interests of the subscriber. This personal data will not be handed out to third parties. The subscribers shall at all times be entitled to cancel the declaration of consent thereto they have handed in. This will be the equivalent of cancelling one's name from the Newsletter distribution list.



# The EU-DSGVO provides you with the following rights:

- Right of information
- Right to have the information held about you corrected
- Right to restrict processing (Blocking)
- Right of cancellation
- Right of deletion
- Right to have your data transferred to another party
- Right not to be subjected to an automated decision made in response to a given set of circumstances
- Right to revoke your consent

Furthermore, you will have the right to complain to the data protection supervisory authority.

#### When will your personal data be deleted?

SEAMCOM will delete your personal data as soon as the purpose for which it is collected no longer exists. In order to fulfil statutory requirements your personal data will initially have to be just blocked for subsequent processing.

#### Data protection officer:

You may also contact our customer support team, employees as well as our data protection officer at <a href="mailto:privacy@also.com">privacy@also.com</a> should you have any data protection-related concerns.