

Privacy Policy

Data protection and the protection of your personal rights are of great importance to us. On this page we would like to inform you about what data we process and for what purposes. If you have any questions or suggestions about the Privacy Policy, please feel free to contact us.

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1. Foreword and selected terms

On the one hand, this privacy policy informs visitors and users of our website about the online data processing operations in which personal data is processed. On the other hand, you will receive information about our processing operations, which do not primarily take place online.

- **GDPR** is an abbreviation for the European General Data Protection Regulation.
- **BDSG** is an abbreviation for the Federal Data Protection Act in its current version.
- **Personal data** is all individual information that allows conclusions to be drawn about a natural person (for definition, see Art. 4 para. 1 GDPR). This includes, for example, names, e-mail addresses, telephone numbers, but also data such as IP addresses or customer numbers.
- The **processing of personal data** includes all operations, such as the collection, storage, transmission, archiving or deletion of personal data (definition Art. 4 para. 2 GDPR).
- The **data subject** within the meaning of data protection law is any natural person from whom personal data is processed.
- Further **definitions of terms can be found in the General Data Protection Regulation**, which can be found in Art. 4 of the GDPR (definitions).

2. Responsible body and data protection officer

Responsible body

Heinrich Hofsäß GmbH & Co. KG

Schloßstraße 77

75223 Niefern

Phone: +49 (0) 7233 9618 – 0

E-Mail: info@hhn.de

External Data Protection Officer

DPO External Data Protection Officer Stuttgart

Fabian Henkel

info@externer-datenschutzbeauftragter-stuttgart.de

<https://www.externer-datenschutzbeauftragter-stuttgart.de>

3. Compact overview

The following content gives you a brief overview of the processing of personal data, more detailed information can be found in the passages presented in each case.

Security on our website

Our website is provided with a TLS certificate, which is used to encrypt data transmission processes. This happens, for example, if you send us a message via a form. However, as a precautionary measure, we would like to point out that one hundred percent security in electronic data processing is not possible and that there is always a residual risk.

Information you provide to us

On this page, we process the data that you enter yourself, for example in a form. In this case, the purpose of the processing results from the nature of the form and, on the other hand, from this privacy policy. For example, if you send us a message by e-mail or contact us in any other way, we will process your data in accordance with the purpose for which you contacted us.

Automatic Server Log Files

On the other hand, our server automatically records all accesses and thus also IP addresses (log files), which serves to defend against attacks, analyze access numbers and ensure smooth operation.

Use of cookies

Cookies are small text files that are stored in your browser and may be necessary in the provision of various services. Details on the cookies used can be found in our privacy policy.

Other data recipients

Use of processors

In accordance with the requirements of Art. 28 GDPR, we use processors, for example in the area of IT services, such as web hosting or e-mail hosting. They process personal data for us in accordance with instructions.

Use of non-specialist services

If it is necessary (for example, for the execution of the contract), we pass on your data to banks, shipping service providers or our tax advisor, for example.

Legitimate interests

In order to protect our legitimate interests, we reserve the right to pass on personal data to our lawyer in the event of disputes.

Legal obligations

In certain cases, we are required to share personal data due to legal obligations. For example, tax law imposes obligations to submit receipts to the tax office.

Crime Investigation

If it is necessary for the investigation of a crime, we pass on data to the law enforcement authorities.

General information on deletion periods for personal data

We process the data for as long as it is necessary for the respective purpose. If necessary, we process your personal data for the duration of our business relationship, which also includes the initiation and execution of a contract, and we are also obliged to comply with statutory retention obligations. If the data processing is based on your consent, we will delete your data after your revocation.

Transfer of personal data to a third country

We strive to have all service providers and services provided by providers within the European Union as far as possible. A transfer of personal data to a third country is possible if you have given us your consent and/or we have concluded a data processing agreement in accordance with Art. 28 GDPR, taking into account suitable safeguards in accordance with Art. 44 to Art. 49 GDPR. In individual cases, we may use plugins or tools hosted in third countries, but use them on the basis of our legitimate interests. In these cases, we will point this out in an appropriate place.

Obligation to provide personal data

You are free to choose whether you provide personal data on our website for specific purposes. For the initiation and execution of legal transactions, the provision of personal data is contractually required.

4. Legal bases for the processing of personal data

The legal bases for the processing of personal data are exceptions that allow the processing of personal data. The main legal bases are set out in particular in Art. 6 GDPR. The legal bases on which we process personal data are described in the individual processing operations in this Privacy Policy.

Consent given (Art. 6 para. 1 lit. a GDPR)

Consent is one of these legal bases and requires that the consenting person gives it in an informed manner and on a voluntary basis. Consent on the basis of Art. 6 (1) (a) GDPR can be revoked at any time without giving reasons.

[Contract-related data processing \(Art. 6 para. 1 lit. b GDPR\)](#)

The processing of personal data for the initiation or execution of contracts is also a legal basis and is defined in Art. 6 (1) (b) GDPR.

[Legal obligation \(Art. 6 para. 1 lit. c GDPR\)](#)

The exception for data processing due to a legal obligation can be found in Art. 6 (1) (c) GDPR, for example, we are obliged to comply with certain retention periods under commercial law and tax law.

[Legitimate interests \(Art. 6 para. 1 lit. f GDPR\)](#)

The processing of personal data on the basis of a balancing of interests in accordance with Art. 6 (1) (f) GDPR permits processing after careful weighing of financial or legal interests against the interests of the data subject worthy of protection.

5. Your rights under the General Data Protection Regulation

Every natural person has certain rights, these are defined in particular in Articles 15 to 21 and 77 of the GDPR. In principle, you have the following rights, which you can claim against us.

[Right to revoke consent in accordance with Art. 7 GDPR](#)

You can revoke your consent to us at any time without giving reasons with effect for the future.

[Right to information according to Art. 15 GDPR \(restrictions according to § 34 BDSG possible\)](#)

You have the right to request information about the data you are processing and the purposes of the processing at any time.

[Right to rectification according to Art. 16 GDPR](#)

If you become aware that we are processing incorrect or incomplete data about you, you have the right to rectification.

[Right to erasure according to Art. 17 GDPR \(restrictions according to § 35 BDSG possible\)](#)

You have the right to request the erasure of your personal data that we process about you at any time. If complete deletion is not possible, for example because we have to comply with statutory retention obligations or we can assert legitimate interests for other reasons, we will restrict your data until these reasons cease to apply.

[Right to restriction of processing pursuant to Art. 18 GDPR](#)

You have the right to request the restriction of the processing of your personal data. You can contact us at any time at the address given in the imprint. The right to restriction of processing exists in the following cases:

- If you contest the accuracy of your personal data held by us, we will usually need time to verify this. For the duration of the audit, you have the right to request the restriction of the processing of your personal data.
- If the processing of your personal data was / is unlawful, you can request the restriction of data processing instead of deletion.
- If we no longer need your personal data, but you need it to exercise, defend or assert legal claims, you have the right to request the restriction of the processing of your personal data instead of erasure.
- If you have filed an objection in accordance with Art. 21 (1) GDPR, a balancing of your interests and ours must be carried out. As long as it has not yet been determined whose interests prevail, you have the right to request the restriction of the processing of your personal data.
- If you have restricted the processing of your personal data, this data may only be processed with your consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or of a Member State.

[Right to data portability according to Art. 20 GDPR](#)

You have the right to have data that we process automatically on the basis of your consent or in fulfilment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only be done to the extent that it is technically feasible.

[Right to object to certain processing operations and direct marketing in accordance with Art. 21 GDPR](#)

If the data processing is carried out on the basis of Art. 6 (1) (e) or (f) GDPR, you have the right to object to the processing of your personal data at any time on grounds relating to your particular

situation; this also applies to profiling based on these provisions. The respective legal basis on which processing is based can be found in this privacy policy. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims (objection pursuant to Art. 21 (1) GDPR).

If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling, insofar as it is related to such direct advertising. If you object, your personal data will no longer be used for the purpose of direct marketing (objection pursuant to Art. 21 para. 2 GDPR).

[Right to lodge a complaint with a supervisory authority in accordance with Art. 77 DSGVO in conjunction with § 19 BDSG](#)

In the event of violations of the GDPR, the data subjects have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, their place of work or the place of the alleged infringement. The right of appeal exists without prejudice to other administrative or judicial remedies.

6. External Hosting

This website is hosted externally. The personal data collected on this website is stored on the servers of the hoster/hosters. This can include, but is not limited to, IP addresses, contact requests, meta and communication data, contract data, contact data, names, website accesses and other data generated via a website.

External hosting is carried out for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 para. 1 lit. b GDPR) and in the interest of a secure, fast and efficient provision of our online offering by a professional provider (Art. 6 para. 1 lit. f GDPR). Our host will only process your data to the extent necessary to fulfil its performance obligations and follow our instructions with regard to this data.

We use the following hosts:

oHKN GmbH, Hochstadenstrasse. 5, 47829 Krefeld

oHetzner Online GmbH, Industriestraße 25, 91710 Gunzenhausen

Order processing

We have concluded a contract processing agreement (DPA) for the use of the above-mentioned service. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

7. Automatic Server Log Files

Our web server automatically logs all accesses and thus also IP addresses of the visitors. This serves to defend against attacks, analyze access numbers, and ensure smooth operation. We have a legitimate interest in this (Art. 6 lit. f GDPR).

In addition to the IP address, the server log usually also records other metadata about the session, which can be found below.

- Date and time of retrieval
- Information about the browser type and version used
- Information about the operating system used
- Device (Client)
- Referrer URL (via which page you landed with us)
- Accessed hyperlinks

We only process this data for the purposes mentioned above. We delete server log files after three months at the latest.

8. Use of cookies

[Our website currently does not use cookies!](#)

What are cookies?

Cookies are small text files that are automatically stored in your browser or device. Cookies can have different functions and contain a characteristic string of characters that allows the browser to be uniquely identified when you return to the website.

Cookies are stored on your device and transmitted from it to our site. As a user, you basically have full control over the use of cookies. You can determine whether and which cookies you allow in principle in your browser settings. We recommend that you set your browser so that you are informed when a website wants to set cookies on you. This gives you control over which cookies you want to allow. However, if you do not allow cookies, the functionality of websites may be limited.

Cookies are fundamentally divided into non-persistent and persistent cookies. A distinction is also made between first-party cookies (which come directly from our web server) and third-party cookies (which are set by third-party providers).

[Cookie types by duration](#)

Session Cookies

Session cookies are deleted at the latest when you leave our website and close your browser.

Persistent cookies

These cookies remain stored even after you leave our website and close your browser. Persistent cookies can have different durations, from one day to several years. These cookies can perform various functions, such as remembering your login details so that you are automatically logged in when you return to our website. Other persistent cookies are used for analytics, tracking, and marketing purposes.

[Types of cookies by origin](#)

Cookies can be both first-party cookies and third-party cookies. First-party cookies are cookies that come directly from us. Third-party cookies are cookies that are placed through a third party. We use various third-party cookies for analytics, tracking, and marketing purposes.

[Types of cookies by function](#)

Technically necessary or necessary cookies

These cookies enable the operation of our website, without technically necessary cookies our site would not be usable or only to a very limited extent. For example, such cookies are used when you log in to our site or add a product to your shopping cart. In some cases, required cookies also serve security.

Analytical/statistical cookies

Analysis Cookies collect information about the behaviour of site visitors, provide information about the length of stay and what information was accessed. Furthermore, information is collected about which website site visitors come from, how many visitors the websites have and how long the user spends on the websites. The aim of these cookies is to optimize our website based on the information collected.

Tracking and marketing cookies

Tracking or marketing cookies (also remarketing and retargeting cookies) enable an analysis of browser behaviour, they store which content has been visited or which products the user has searched for (tracking in this sense means tracking). On the basis of these cookies, a user can also be identified across sites with the aim of placing advertisements tailored to his interests.

[Legal basis for the use of cookies](#)

If we use technically necessary cookies, this is done in the interest of a functional and stable website (Art. 6 para. 1 lit. f GDPR in conjunction with §25 para. 2 TDDDG), we only use other cookies with your consent (Art. 6 para. 1 lit. a GDPR in conjunction with §25 para. 1 TDDDG).

9. Data processing in the context of communication and contact

[Message via contact form](#)

You have the option of sending us messages via the contact form. In doing so, we process the data that you have entered into the data collection mask. Mandatory fields are marked and must be specified. The purpose of the data processing is to process your request and, if necessary, to contact you afterwards. If you send us enquiries via the contact form, your details from the enquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the enquiry and in the event of follow-up questions.

The processing of this data is carried out on the basis of Art. 6 (1) (b) GDPR if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the enquiries addressed to us within the meaning of Art. 6 (1) (f) GDPR.

We store the transmitted data until the purpose of the data storage has been achieved or you revoke your consent. Please note that the process may be subject to statutory retention periods under certain circumstances. In this case, we will restrict your data for further processing until it expires.

Communication by E-Mail

If you send us an e-mail, we will process your data in accordance with the content and purpose of the message. As a rule, the processing is carried out on the basis of pre-contractual measures or within the framework of the implementation of a contractual relationship on the basis of Art. 6 (1) (b) GDPR and Art. 6 (1) (f) GDPR. It is a legitimate interest to process your request quickly and efficiently.

If it is a product- or service-related message, we usually process your data on the basis of our legitimate interests in accordance with Art. 6 (1) (b) GDPR.

Please note that we store all incoming e-mails in accordance with the principles of proper accounting for a period of eight years, starting on the first day of the following year in which the message was received. If you ask us to delete the data, we will henceforth restrict your data for processing and only store it for the purpose of complying with retention periods in our legitimate interest.

Communication by phone or fax

Even if you contact us by phone or fax, we process your data either for the initiation and execution of contractual relationships (if the content is product- or service-related) and/or in our legitimate interest, analogous to contacting us by e-mail. We do not record the content of conversations, but we may take notes to process your request. This will be stored until the purpose of the data processing has been achieved.

10. Information for Applicants

Privacy Policy Application Process

If you apply to us, whether for an advertised position or on your own initiative, we will process your data to carry out the selection process. It is irrelevant to us whether you apply by post, by e-mail or, if available for the respective position, by online form.

Scope and legal basis of processing

In principle, only the data that you have submitted to us yourself will be processed in the context of an application process. The use of other sources may only be considered after information and consultation with you. For example, whether we can turn to a former employer. The legal basis for the implementation of an application procedure is §26 BDSG in conjunction with Art. 6 para. 1 lit. b GDPR (initiation of employment contract). If you give us your consent to the longer-term storage of your data, this will be done on the legal basis of Art. 6 (1) (a) GDPR.

Deletion deadlines for applicant data

We delete applicant data a maximum of 4 months after completion of the application process. The purpose of the data processing is generally no longer given at the end of the selection process, but we have a legitimate interest (Art. 6 para. 1 lit. f GDPR) in being able to defend ourselves against any claims of rejected applicants. If you have the impression that your interests in immediate deletion outweigh your interests, you have the option of asking us to do so. We will then review your request and give you feedback.

After the expiry of the above-mentioned period, your data will be deleted, unless we have to defend ourselves, for example, in ongoing proceedings, for example due to a lawsuit under the General Equal Treatment Act. In this case, we will delete your data after completion of the procedure, unless there are any statutory retention periods.

If we are allowed to store your data for a longer period of time on the basis of your consent, we will delete your data if you ask us to do so and withdraw your consent. We may also delete your data before you withdraw your consent if it is foreseeable that no position will be available.

11. Audio and Video Conferences

We use Microsoft Teams to communicate with our business partners and applicants. The provider is Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.

The company is certified according to the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that is intended to ensure compliance with European data protection standards for data processing in the USA. Every company certified according to the DPF is committed to complying with these data protection standards. Further information on this can be obtained from the provider under the following link:

<https://www.dataprivacyframework.gov/participant/6474>.

Microsoft Teams collects all data that you provide/use to use the tools (email address and/or your phone number). In addition, the conference tools process the duration of the conference, the start and end (time) of participation in the conference, the number of participants and other "contextual information" related to the communication process (metadata).

Furthermore, the provider of the tool processes all technical data required to handle online communication. This includes, but is not limited to, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or speakers, and the type of connection.

If content is exchanged, uploaded or otherwise made available within Microsoft Teams, it is also stored on the servers of the tool providers. Such content includes, but is not limited to, cloud recordings, chat/instant messages, voicemails, photos and videos uploaded to voicemails, files, whiteboards, and other information shared while using the Service.

Please note that we do not have full influence on the data processing processes in Microsoft Teams. Our opportunities are largely based on Microsoft's corporate policy. Further information on data processing by Microsoft can be found in the Microsoft Teams privacy policy: <https://privacy.microsoft.com/de-de/privacystatement>.

Purpose and legal basis

We use Microsoft Teams to communicate with prospective or existing business partners or applicants or to offer certain services to our business partners (Art. 6 para. 1 lit. b GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). If consent has been requested, the use of the tools in question is based on this consent; consent can be revoked at any time with effect for the future.

Storage period

The data collected directly by us via the video and conference tools will be deleted from our systems as soon as you ask us to delete it, revoke your consent to its storage or the purpose for which it was stored no longer applies. Stored cookies remain on your device until you delete them. Mandatory statutory retention periods remain unaffected.

We have no influence on the storage period of your data, which is stored by the operators of the conference tools for their own purposes. For details, please contact the operators of the conference tools directly.

Order processing

We have concluded a contract processing agreement (DPA) for the use of the above-mentioned service. This is a contract required by data protection law that ensures that it processes the personal data of our website visitors only in accordance with our instructions and in compliance with the GDPR.

12. Supplementary data protection information for our business partners

Data categories and purposes of processing

We process personal data of our service providers and partners, which we receive directly in the course of our business relationship. If we have received data from you, we will only process it for the purposes for which we received or collected it.

As a rule, we process the following categories of data from you

- Last name, first name
- Address and/or company address
- Telecommunications data
- E-mail address
- Company
- Professional function and/or position
- Bank details / other payment details
- Data on the history of the business relationship

In the course of the business initiation phase and during the business relationship, in particular through personal, telephone or written contacts, initiated by you or by one of our employees, further personal data is generated, e.g. information about contact channel, date, occasion and result; (electronic) Copies of correspondence and information on participation in direct marketing activities.

On the other hand, we process personal data that we have permissibly obtained from publicly accessible sources (e.g. commercial and association registers, press, media, Internet) and are permitted to process.

Data processing for other purposes can only be considered if the legal requirements required in this respect pursuant to Art. 6 (4) GDPR are met. In this case, we will of course comply with any information obligations pursuant to Art. 13 (3) GDPR and Art. 14 (4) GDPR.

[Legal bases on which we process your data](#)

On the basis of your consent (Art. 6 para. 1 lit. a) GDPR)

We process personal data for one or more specific purposes if you have given us consent to do so. If personal data is processed on the basis of your consent, you have the right to revoke your consent at any time with effect for the future.

Data processing for the performance of contracts (Art. 6 para. 1 lit. b) GDPR)

We process personal data for the performance of contracts. The fulfilment of contracts includes, for example, the conclusion, processing and rescission of a contract. In addition, we process personal data that is necessary for the implementation of pre-contractual measures, such as the initiation of a contract, and which is provided at your request

Data processing on the basis of a legal obligation (Art. 6 para. 1 lit. c) GDPR)

Like any company, we have to comply with retention obligations and other documentation obligations, this can also affect documents containing personal information. Insofar as we process data for these purposes, the processing is carried out on the basis of a legal obligation.

Data processing on the basis of a balancing of interests (Art. 6 para. 1 lit. f) GDPR)

If we process data on the basis of a balancing of interests, you as a data subject have the right to object to the processing of personal data, taking into account the requirements of Art. 21 GDPR. As far as the specific purpose allows, we process your data in a pseudonymized or anonymized manner.

[Other recipients of your data](#)

Affiliates

If necessary, we will pass on your data to affiliated companies within the group of companies within the framework of joint responsibility (Art. 26 GDPR).

Disclosure to processors within the scope of Art. 28 GDPR

Processors that we use within the framework of the requirements of Art. 28 GDPR, in particular in the area of IT services and, for example, printing services, process your data for us in accordance with instructions. Even if we use service providers to perform our tasks, we always comply with the data protection regulations; in particular, data will only be passed on after contracts for order processing have been concluded. We would be happy to inform you about which processors we use.

For the performance of a contractual relationship

Insofar as it is necessary for the execution of the contract with you, we pass on your data, for example, to our house bank for payment processing or to shipping service providers.

Disclosure due to a legal obligation

If there is a legal or official obligation, we will pass on your data to public bodies and institutions (authorities, such as the tax office or if this is necessary in the context of criminal prosecution).

Other entities, if you have given us your consent

If you have given your explicit consent, we will also pass on your data to other bodies. However, this will be done within the limits if you have verifiable consent.

[Information on deletion periods of personal data](#)

Principle of earmarking and observance of statutory retention periods

We process the data for as long as it is necessary for the respective purpose. If necessary, we process your personal data for the duration of our business relationship, which also includes the initiation and execution of a contract.

In addition, like any company, we are obliged to comply with the statutory retention periods, for example the deadlines from commercial and tax law. If there are statutory retention obligations, the personal data in question will be stored for the duration of the retention obligation. The storage period is also based on the statutory limitation periods, which, for example, according to §§ 195 et seq. of the German Civil Code (BGB), can usually be three years, but in certain cases up to thirty years. After expiry of the retention obligation, it will be checked whether there is a further necessity for processing. If a necessity no longer exists, the data will be deleted.

As a rule, such retention periods in the context of legal transactions (according to §147 AO and §257 HGB) are eight years, starting with the year following the legal transaction.

Concrete example

If you provide us with your contact details, for example by **e-mail, telephone, or by handing over your business card**, we store this data on the basis of Art. 6 para. 1 lit. b GDPR on the basis of pre-contractual

measures and in the legitimate interest (Art. 6 para. 1 lit. f GDPR) of smooth and targeted communication. If no legal transaction is concluded, we will delete your data if you ask us to do so or if no further contact takes place within a period of three years. If you enter into a **legal transaction** with us (Art. 6 para. 1 lit. b GDPR), we will store your data for eight years until the expiry of the commercial and tax law requirements. After this period, we check whether we can delete the data and, if necessary, submit it for deletion.

E-mails and business letters

We archive all of our **email traffic** for eight years. If you send us an e-mail, your data and the entire e-mail content will be stored accordingly for eight years. Most e-mails count as business letters, and e-mails can also contain tax-relevant information. In our opinion, the effort to check each individual e-mail in this regard is disproportionate to the benefit and the interests of the sender that are worthy of protection. Of course, you can ask us to delete it at any time and we will carry out a case-by-case examination, we will inform you of the result. This may lead to the deletion or restriction of processing, depending on the content of the correspondence.

Withdrawal of your consent

If we process your data on the basis of your **consent** (Art. 6 para. 1 lit. a GDPR), we will delete it after your **revocation**. Unless there are legitimate interests against complete deletion. For example, we generally keep declarations of consent for up to three years after receipt of your revocation in the legitimate interest (Art. 6 para. 1 lit. f GDPR). We will only retain consent with restriction of processing in order to be able to defend ourselves in the event of a dispute.

Legal or contractual obligation to provide personal data

The provision of personal data is regularly necessary for the initiation, conclusion, processing and rescission of a contract. In the event that you do not provide the required personal data, we will not be able to conclude and perform a contract with you.

Transfer to a third country

Your personal data will generally be processed by us in data centers in the Federal Republic of Germany or the European Union. A transfer to a third country is only possible if you have given us your consent or if we have concluded a contract for order processing in accordance with Art. 28 GDPR, taking into account suitable safeguards or other suitable safeguards.