

## **Data protection declaration - Privacy policy**

### **I. Information about the responsible for data collection**

The responsible body for data processing within the meaning of the EU General Data Protection Regulation (GDPR - Art. 4 Para. 7) and other national data protection laws of the member states as well as other data protection regulations is:

*expipoint GmbH*

*Schachtstr.8  
64293 Darmstadt*

*Inhaber*

*Mikhail Patrushev*

*Tel.: 06151 36 81 697*

*www.expipoint.com*

*info@expipoint.com*

### **II. Name and address of the data protection officer**

*Mikhail Patrushev*

*Schachtstr.8  
64293 Darmstadt*

*E-Mail: info@expipoint.com*

### **III. General information on data processing**

#### **1. Scope of processing of personal data**

In principle, we only process personal data of our users insofar as this is necessary for the provision of a functional website as well as our content and services. The processing of personal data of our users takes place regularly only with the consent of the user. An exception applies in cases where prior consent is not possible for actual reasons and the processing of the data is permitted by legal regulations.

#### **2. Legal basis for the processing of personal data**

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 Para. 1 lit. a GDPR is the legal basis.

If processing of personal data is necessary for the performance of a contract to which the data subject is a party, Art. Para. 1 lit. b GDPR is the legal basis. This also applies to processing operations necessary for the implementation of pre-contractual measures.

Insofar as processing of personal data is necessary to fulfil a legal obligation to which our company is subject, Art. 6 Para. 1 lit. c GDPR is the legal basis.

If vital interests of the data subject or another natural person require the processing of personal data, Art. 6 Para. 1 lit. d GDPR serves as the legal basis.

If the processing is necessary to safeguard a legitimate interest of our company or a third party and the interests, fundamental rights and fundamental freedoms of the data subject do not outweigh the first interest, shall serve Art. 6 Para. 1 lit. f GDPR as the legal basis for processing.

### **3. Data erasure and storage time**

The personal data of the data subject will be deleted or blocked as soon as the purpose of the storage is achieved. Storage may also take place if this has been provided for by the European or national legislator in EU regulations, laws, or other regulations to which the responsible body is subject. The data shall also be blocked or deleted if a storage period prescribed by the standards applies unless there is a need for further storage of the data for the conclusion of a contract or fulfilment of the contract.

## **IV. Provision of the website and creation of log files**

### **1. Description and scope of dataprocessing**

Every time we access our website, our system automatically collects data and information from the computer system of the calling computer.

We collect the following data:

- a. Information about the browser type and version used
- b. The user's operating system
- c. The user's Internet service provider
- d. The user's IP address
- e. Date and time of access
- f. Websites from which the user's system enters our website
- g. Websites accessed by the user's system via our website

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user.

### **2. Legal basis for data processing**

The legal basis for the temporary storage of data and log files is Art. 6 Para 1 lit. f GDPR.

### **3. Purpose of data processing**

The temporary storage of the IP address by the system is necessary in order to enable the delivery of the website to the user's computer. To do this, the user's IP address must be stored for the duration of the session.

The storage in log files is done to ensure the functionality of the website. In addition, the data is used to optimize the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

Here, too, there is a legitimate interest in data processing in accordance with Art. 6 Paragraph 1 lit. f GDPR.

### **4. Duration of storage**

The data will be deleted as soon as they are no longer necessary for the purpose of their collection. In the case of the collection of data for the provision of the website, this is the case when the respective session is terminated.

In the case of the storage of the data in log files, this is the case after seven days at the latest. Additional storage is possible. In this case, the IP addresses of the users are deleted or alienated, so that an assignment of the calling client is no longer possible.

### **5. Possibility of opposition and disposal**

The collection of data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility of objection on the part of the user.

## **V. Use of cookies**

### **1. Description and scope of data processing**

Our website uses cookies. Cookies are text files that are stored in the internet browser or the internet browser on the user's computer system. When a user accesses a website, a cookie can be stored on the user's operating system. This cookie contains a characteristic string that allows the browser to be uniquely identified when the website is re-accessed.

We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser can be identified even after a page change.

We use cookies to make our website more user-friendly. Some elements of our website require that the calling browser can be identified even after a page change.

The following data is stored and transmitted in the cookies:

- a. Language Setting
- b. Log-in information

We also use cookies on our website that enable an analysis of users' browsing behavior.

In this way, the following data can be transmitted:

- c. IP address
- d. Location
- e. Access times
- f. visited pages

When accessing our website, the user is informed about the use of cookies for analysis purposes and his consent is obtained to the processing of the personal data used in this context. In this context, a reference is also made to this privacy policy.

### **2. Legal basis for data processing**

The legal basis for the processing of personal data using technically necessary cookies is Art. 6 Para. 1 lit. f GDPR.

The legal basis for the processing of personal data using cookies for analysis purposes is Art. 6 Para. 1 lit. a GDPR.

### **3. Purpose of data processing**

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognized even after a page change.

We require cookies for the following applications:

- a. Transfer of language settings
- b. Remembering search terms

The user data collected by technically necessary cookies will not be used to create user profiles.

The use of the analysis cookies is done for the purpose of improving the quality of our website and its contents. Through the analysis cookies, we learn how the website is used and can thus continuously optimize our offer.

### **4. Duration of storage, possibility of appeal and disposal**

Cookies are stored on the user's computer and transmitted by the user to our site. Therefore, as a user, you also have full control over the use of cookies. By changing the settings in your internet browser, you can disable or restrict the transmission of cookies. Cookies that have

already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, all functions of the website may no longer be fully utilized.

## **VI. Analysis Tools - Trace Tools**

### **1. Legal basis for the processing of personal data**

The tracking measures listed below and used by us are carried out based on Article 6 (1) p. 1 lit. f GDPR.

### **2. Purpose of data processing**

With the tracking measures to be used, we want to ensure a needs-based design and the continuous optimization of our website. On the other hand, we use the tracking measures to statistically record the use of our website and to evaluate it for you for the purpose of optimising our offer. Those interests must be regarded as justified within the meaning of the abovementioned provision.

The respective data processing purposes and data categories can be found in the corresponding tracking tools. You can prevent the recording of your user behavior by denying your consent on our website (read V. 1., last paragraph).

### **3. Google Analytics**

For the purpose of tailor-made and continuous optimization of our pages, we use Google Analytics, a web analysis service of Google Inc. (<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter "Google"). In this context, pseudonymized user profiles are created and cookies are used (read point 4). The information generated by the cookie about your use of this website such as

- Browser-Typ/-Version,
- operating system used,
- ReferrerURL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request,

transferred by Google to the USA and stored there. The information is used to evaluate the use of the website, to compile reports on website activity and to provide other services related to website and internet usage for the purposes of market research and the design of these websites according to their needs. This information may also be transferred to third parties if required to do so by law or if third parties process this data on behalf of the company. Under no circumstances will your IP address be merged with other data from Google. The IP addresses are anonymized so that an assignment is not possible (IP-masking).

You can prevent the installation of cookies by setting the browser software; accordingly. However, we would like to point out that in this case not all functions of this website can be used to the full extent.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent the collection by Google Analytics by clicking on this link. An opt-out cookie is set, which prevents the future collection of your data when you visit this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you will need to set the opt-out cookie again.

For more information about data protection related to Google Analytics, see The Google Analytics Help (<https://support.google.com/analytics/answer/6004245?hl=de>).

## **VII. Contact form and e-mail contact**

### **1. Description and scope of data processing**

A contact form is available on our website, which can be used for electronic contact. If a user takes advantage of this possibility, the data entered in the input mask will be transmitted to us and stored. These data are:

- a. Address
- b. Name, First Name

When the message is sent, the following data is also stored:

- c. The user's IP address
- d. Date and time of registration

For the processing of the data, your consent will be obtained during the sending process and reference will be made to this data protection declaration.

Alternatively, it is possible to contact us via the e-mail address provided. In this case, the personal data of the user transmitted by the e-mail will be stored.

In this context, the data will not be passed on to third parties. The data is used exclusively for the processing of the conversation.

### **2. Legal basis for data processing**

The legal basis for the processing of the data is Art. 6 Para. 1 lit. a GDPR upon the consent of the user.

The legal basis for the processing of data transmitted while sending an e-mail is Art. 6 sec. 1 lit. f GDPR. If the e-mail contact is aimed at concluding a contract, the additional legal basis for the processing is Art. 6 sec. 1 lit. b GDPR.

### **3. Purpose of data processing**

The processing of personal data from the input mask is used solely for the processing of contact. In the case of contact by e-mail, this also has the necessary legitimate interest in the processing of the data.

The other personal data processed during the sending process are used to prevent misuse of the contact form and to ensure the security of our information technology systems.

### **4. Duration of storage**

The data will be deleted as soon as they are no longer necessary for the purpose of their collection. For the personal data from the input form of the contact form and those sent by e-mail, this is the case when the respective conversation with the user is finished. The conversation ends when it can be inferred from the circumstances that the facts in question have been finally clarified.

The additional personal data collected during the sending process will be deleted at the latest after a period of seven days.

### **5. Possibility of opposition and disposal**

The user has the possibility to revoke his/her consent to the processing of personal data at any time. If the user contacts us by e-mail, he can object to the storage of his personal data at any time. In such a case, the conversation cannot be continued.

If you wish to exercise your right of withdrawal or objection, please send an e-mail to [info@expipoint.com](mailto:info@expipoint.com).

All personal data stored while contacting us will be deleted in this case.

## **VIII. Dealing with comments and contributions**

### **1. Description and scope of data processing**

On our website, you have the option of leaving a post or comment in a chronologically descending list of entries (blog). If a user makes use of this option, the data entered in the input mask will be transmitted to us and saved. These data are:

- a) Name
- b) email address

*If necessary, add the list of data to the input mask*

At the time the message is sent, the following data is also stored:

A list of the relevant data follows. Examples can be:

- (1) The user's IP address
- (2) Date and time of registration

For the processing of the data, your consent is obtained as part of the sending process and reference is made to this data protection declaration.

In this context, the data will not be passed on to third parties. The data will only be used to process the conversation.

### **2. Legal basis for data processing**

If the user has given his / her consent, the legal basis for processing the data is Article 6 (1) (a) GDPR.

The legal basis for the processing of the data that is transmitted in the course of comments and contributions on our website is Art. 6 Para. 1 lit.f GDPR.

### **3. Purpose of data processing**

The processing of the personal data from the input mask serves us only to identify the user and the security of us as the website operator as well as the correction of any illegal content. This is also where the necessary legitimate interest in the processing of the data lies.

The other personal data processed during the sending process serve to prevent misuse of the blog function and to ensure the security of our information technology systems.

### **4. Duration of storage**

The data will be deleted as soon as they are no longer required to achieve the purpose for which they were collected. For the personal data from the input mask for the comment function, this is the case when the respective contribution or comment is removed.

The additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

## **5. Opposition and removal option**

The user has the option of revoking his consent to the processing of personal data at any time. If the user contacts us by email, he can object to the storage of his personal data at any time. In such a case, the conversation cannot be continued.

If you would like to exercise your right of revocation or objection, an email to [info@expipoint.com](mailto:info@expipoint.com) is sufficient.

In this case, all personal data that was stored in the course of the comment and contribution function will be deleted.

## **IX. Newsletter**

### **1. Description and scope of data processing**

On our website it is possible to subscribe to a free newsletter. When you register for the newsletter, the data from the input form will be transmitted to us.

- a. E-mail address

In addition, the following data will be collected at the time of registration:

- b. IP address of the calling computer
- c. Date and time of registration

For the processing of the data, your consent will be obtained during the registration process and reference will be made to this data protection declaration.

### **2. Legal basis for data processing**

The legal basis for the processing of the data after the user has registered for the newsletter is Art. 6 sec. 1 lit. a GDPR in the presence of the user's consent.

### **3. Purpose of data processing**

The purpose of collecting the user's e-mail address is to deliver the newsletter.

### **4. Duration of storage**

The data will be deleted as soon as they are no longer necessary for the purpose of their collection. The user's e-mail address is therefore stored if the subscription to the newsletter is active.

### **5. Possibility of opposition and disposal**

The subscription to the newsletter can be cancelled by the affected user at any time. For this purpose, there is a corresponding link in each newsletter.

This also allows a revocation of the consent to the storage of the personal data collected during the registration process.

## **X. Registration/User Accounts**

### **1. Description and scope of data processing**

On our website, we offer users the opportunity to register with personal data and to create a user account. The data is entered into an input mask and transmitted to us and stored. The data will not be passed on to third parties. The following data will be collected during the registration process:

- a. E-mail address

- b. Name, First Name
- c. Address
- d. Date of birth (voluntary)
- e. Payment data
- f. Password

At the time of registration, the following data is also stored:  
At this point, the data must be listed accordingly. Examples can be:

- g. The user's IP address
- h. Date and time of registration

To place orders, each customer must set up a password-protected customer account. This includes an overview of orders placed and active order transactions. If you leave the online shop as a customer, you will be automatically logged out.

The operator assumes no liability for password misuse unless this was caused by the operator himself.

As part of the registration process, the user's consent to the processing of this data is obtained.

## **2. Legal basis for data processing**

The legal basis for the processing of the data is Art. 6 Para. 1 lit. a GDPR.

If the registration serves the performance of a contract to which the user is a party or the implementation of pre-contractual measures, the additional legal basis for the processing of the data is Art. 6 Para. 1 lit. b GDPR.

## **3. Purpose of data processing**

A registration of the user is necessary for the fulfilment of a contract with the user or for the implementation of pre-contractual measures.

## **4. Duration of storage**

The data will be deleted as soon as they are no longer necessary for the purpose of their collection.

This is the case during the registration process for the performance of a contract or for the implementation of pre-contractual measures, if the data are no longer necessary for the execution of the contract or without conclusion of the contract, if the registration on our website is cancelled or changed. Even after the conclusion of the contract, there may be a need to store personal data of the contractual partner to comply with contractual or legal obligations.

## **5. Possibility of opposition and disposal**

As users, they have the option to resolve the registration at any time. You can have the data stored about you changed at any time.

If you wish to exercise your right of withdrawal or objection, please send an e-mail to [info@expipoint.com](mailto:info@expipoint.com).

If the data are necessary for the performance of a contract or for the implementation of pre-contractual measures, early deletion of the data is only possible unless contractual or legal obligations preclude deletion.

## **XI. Rights of the data subject**

If your personal data is processed and you are the person concerned within the meaning of the GDPR, you have the following rights to the person responsible:

### **1. Right**



You may request confirmation from us as to whether personal data concerning you is processed by us.

If such processing is available, you may request the following information from the responsible body:

- a. the purposes for which the personal data are processed;
- b. the categories of personal data that are processed;
- c. the recipients or categories of recipients to whom the personal data concerning you has been or is still being disclosed;
- d. the planned duration of the storage of the personal data concerning you or, if specific information is not possible, criteria for determining the storage period;
- e. the existence of a right to rectification or erasure of personal data concerning you, a right to restrict processing by the responsible body or a right to object to such processing;
- f. the existence of a right of appeal to a supervisory authority;
- g. all available information on the origin of the data if the personal data are not collected from the data subject;
- h. the existence of automated decision-making, including profiling in accordance with Art. 22 Para. 1 and 4 GDPR and, at least in such cases, meaningful information on the logic involved and the scope and intended effects of such processing for the data subject.

You have the right to request information as to whether the personal data concerning you will be transferred to a third country or to an international organisation. In this context, you may request the appropriate guarantees in accordance with Art. 46 GDPR in connection with the transmission.

## **2. Right to correction**

You have the right to rectification and/or completion to us if the personal data processed concerning you is inaccurate or incomplete. We must make the correction without delay.

## **3. Right to restrict processing**

You may request the restriction of the processing of personal data concerning you under the following conditions:

- a. if you dispute the accuracy of the personal data concerning you for a period that allows the responsible body to verify the accuracy of the personal data;
- b. the processing is unlawful, and you refuse to delete the personal data and instead request the restriction of the use of the personal data;
- c. we no longer need the personal data for the purposes of the processing, but you need it to assert, exercise or defend legal claims, or
- d. if you object to the processing in accordance with Art. 21 Para. 1 GDPR and it is not yet clear whether the legitimate reasons of the responsible body outweigh your reasons.

Where the processing of personal data concerning you has been restricted, such data may be processed, except for its storage, only with your consent or for the assertion, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of an important public interest of the Union or a Member State.

If the restriction of processing has been restricted according to the above conditions, you will be informed by the responsible body before the restriction is lifted.

## **4. Right to erasure**

- a) Obligation to delete

You may require the responsible body to immediately delete the personal data concerning you, and the responsible body is obliged to delete such data immediately, provided that one of the following reasons applies:

- (1) The personal data concerning you is no longer necessary for the purposes for which it was collected or otherwise processed.
- (2) You revoke your consent, to which the processing in accordance with Art. Para. 1 lit. a, or Art. 9 Para. 2 lit. a GDPR and there is no other legal basis for processing.
- (3) You contradict the processing according to Art. 21 Para. 1 GDPR and there are no primary legitimate reasons for the processing, or you submit objection to the processing in accordance with the Art. 21 Para. 2 GDPR.
- (4) The personal data concerning you has been processed unlawfully.
- (5) The erasure of personal data concerning you is necessary to fulfil a legal obligation under Union law or the law of the Member States to which the controller is subject.
- (6) The personal data concerning you has been obtained in relation to information society services offered in accordance with Art. 8 Para. 1 GDPR.

b) Information to third parties

If the responsible body made personal data concerning you public and is obliged to delete it, in accordance with Art. 17 Paragraph 1 GDPR, the responsible body must take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to delete the personal data of that you, the data subject, have requested to be deleted, including copies or replications of this personal data.

c) Exceptions

The right to erasure does not exist if the processing is necessary

- (1) to exercise the right to freedom of expression and information;
- (2) to fulfil a legal obligation requiring processing under the law of the Union or the Member States to which the controller is subject, or to carry out a task which is in the public interest or in the exercise of official authority delegated to the controller;
- (3) for reasons of public interest in the field of public health in accordance with Art. 9 paragraph 2 lit. (h) and i and Article 9(3) GDPR;
- (4) for archival purposes in the public interest, for scientific or historical research purposes or for statistical purposes in accordance with Art. 89 (1) GDPR, in so far as the law referred to in (a) is likely to make the achievement of the objectives of such processing impossible or seriously impairs the achievement of the objectives of such processing, or
- (5) for the assertion, exercise, or defense of legal claims.

## 5. Right to information

If you have asserted the right to rectification, erasure or restriction of the processing against the controller, the controller is obliged to notify all recipients to whom the personal data concerning you have been disclosed, this rectification or deletion of the data or restriction of the processing, unless this proves impossible or involves a disproportionate effort.

You have the right to be informed of these recipients in respect of the controller.

## 6. Right to data portability

You have the right to receive the personal data concerning you that you have provided to the controller in a structured, common and machine-readable format. You also have the right to transfer this data to another controller without hindrance by the controller to whom the personal data was provided, provided that:

- a. processing in accordance with a consent in accordance with the Art. 6 Para. 1 lit. a GDPR or Art. 9 Para. 2 lit. a GDPR or on a contract in accordance with the Art. 6 paragraph 1 lit. b GDPR is based and
- b. processing is carried out using automated procedures.

In exercising this right, you also have the right to obtain that the personal data concerning you be transferred directly from one controller to another controller, insofar as this is technically feasible. The freedoms and rights of other persons must not be affected by this.

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

## **7. Right to object**

You have the right, for reasons arising from your particular situation, at any time against the processing of personal data concerning you, which, on the basis of Article 6 (1) lit. e or f GDPR is used to object; this also applies to profiling based on these provisions.

The responsible body no longer processes the personal data concerning you, unless he can prove compelling legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

If the personal data concerning you is processed for direct marketing purposes, 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 in so far as it is related to such direct marketing.

If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.

You can exercise your right to object in connection with the use of information society services, notwithstanding Directive 2002/58/EC, by means of automated procedures using technical specifications.

## **8. Right to revoke the declaration of consent under data protection law**

You have the right to revoke your consent under data protection law at any time. The revocation of consent does not affect the legality of the processing that was carried out on the basis of the consent until the revocation.

## **9. Automated decision in the case including profiling**

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a significant effect on you or, in a similar manner, significantly affects you. This does not apply if the decision

- a. necessary for the conclusion or performance of a contract between you and the controller,
- b. is permitted by Union or Member State legislation to which the controller is subject, and that legislation contains appropriate measures to safeguard your rights and freedoms and legitimate interests, or
- c. with your express consent.

However, those decisions may not be based on specific categories of personal data by Art. 9 Paragraph 1 GDPR unless Art. 9 paragraph 2 lit. a or g GDPR and appropriate measures have been taken to protect your rights and freedoms and legitimate interests.

With regard to the cases referred to in (1) and (3), the responsible body shall take appropriate measures to safeguard the rights and freedoms and your legitimate interests, including at least the right to obtain intervention by a person on the part of the person concerned, to express their own point of view and heard on contesting the decision.

## **10. Right to complain to a supervisory authority**

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

The supervisory authority to which the complaint was lodged shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy by Art. 78 GDPR.