# **Privacy Statement Website ePost**

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# 1. What is this Privacy Statement for?

ePost which belongs to KLARA Business AG, a digitization specialist of Swiss Post (hereinafter "Klara", "we", "us") procures and processes personal data relating to you or other persons (so-called "third parties"). We use the term "data" here as synonymous with "personal data".

In this Privacy Statement we describe what we do with your data when you use our apps, obtain our services or products, otherwise have a connection with us under a contract, communicate with us or deal with us in other ways. If necessary, we will inform you by means of a timely written notification about additional processing activities not mentioned in this Privacy Statement. In addition, we can inform you separately about the processing of your data, e.g. in contract conditions, in supplementary terms and conditions for specific products or other information.

This Privacy Statement is based on the requirements of the EU General Data Protection Regulation ("GDPR") and the Swiss Federal Act on Data Protection ("FADP"). However, whether and to what extent these laws are applicable depends on the individual case.

## 2. Who is responsible for processing your data?

**KLARA Business AG, Schlössli Schönegg, Wilhelmshöhe 1, 6003 Lucerne, Switzerland** ("**Klara**"), is legally responsible for the data processing described in this Privacy Statement, unless otherwise communicated in individual cases.

You can contact us with regard to your data protection concerns and exercising your rights in accordance with section 11 as follows:



KLARA Business AG
Data Protection Officer
Schlössli Schönegg
Wilhelmshöhe 1
CH-6003 Lucerne
dataprotection@klara.ch

## 3. Which data do we process?

We process different categories of data about you. The most important categories are as follows:

- Technical data: if you use our website or other electronic services, we collect the IP address of your device and other technical data to ensure the functionality and security of these services. These data also include logs recording the use of our systems. We usually keep technical data for 1 month, and in connection with banking applications for 1 year. In order to ensure the functionality of these services, we may also assign an individual code to you or your device (e.g. in the form of a cookie, see section 12). In principle, the technical data do not allow any conclusions to be drawn about your identity. However, in the context of user accounts, registrations, access controls or the processing of contracts, they may be linked to other data categories (and therefore possibly to you personally).
- Registration data: our services can only be used with a user account. You must provide us with certain data that we require to process our contractual and other business relationships or for marketing and advertising purposes. Depending on the service you use, this includes username, password, name, company, information about your role and function, powers of attorney, access authorisations and declarations of consent, address, e-mail, bank details and information about your relationship with us (customers, suppliers and partners). In addition, we collect data about the customer history and the use of the range or services. We process your registration data if you are a customer or other business contact or you work for one (e.g. as a contact person for the business customer), or because we want to contact you for our own reasons or for the purposes of a contractual partner (e.g. in the context of marketing and advertising). We generally retain registration data for 3 months after the termination of the user account.
- Content data: when using our services, you provide a large amount of data, import them, or the data are generated during use. This may involve data about your own activities, your employees or your customers. Depending on the service you use, this may be financial data, personal data, information about the relationship with your customers, about your projects, or about your electronic and physical mail. The content data are stored in encrypted form and are essentially neither accessible nor readable by us, unless it is absolutely necessary for the provision of the service, or if you agree in individual cases, e.g. if you make use of our support. We store your content data securely on your behalf and enable you to use them in our services. To do this, you conclude a separate Data Processing Agreement with us.

If you provide us with data about other people, such as your customers, employees or family members, etc., we assume that you are authorised to do so and that these data are correct. By submitting data about third parties, you confirm this. Please also ensure that these third parties have been informed of this Privacy Statement.



The content data are retained during the contract period. After termination of all contracts with us and after termination of the user account, all content data will be deleted within 3 months.

- Communications data: if you get in touch with us via the contact form, by e-mail, telephone or chat, by letter or other means of communication, we record the data exchanged between you and us, including your contact details and the marginal data from the communication. If we record or listen in to telephone conversations or video conferences, e.g. for training and quality assurance purposes, we will expressly make you aware of this. Such recordings may only be made and used in accordance with our internal guidelines. You will be informed if and when such recordings are made, e.g. by notification during the video conference in question. If you do not wish to be recorded, please let us know or end your participation. If it is your image that you do not want recorded, please switch off your camera. If we want or need to establish your identity, e.g. if you submit a request for information, media access, etc., we collect data to identify you (e.g. a copy of an ID card). We generally keep communication data for 3 months after termination of the user account. This period may be longer if this is required for reasons of proof, to comply with legal or contractual requirements or for technical reasons.
- Contract data: these are data that arise in connection with the conclusion of a contract or the execution of a contract, e.g. information about the contracts and services to be provided or which have been provided, payments, reminders, collection information and data from the run-up to the conclusion of a contract, or the information required or used for processing and details of responses. We usually collect these data from you, from contractual partners and from third parties involved in the execution of the contract, but also from third-party sources (e.g. credit score provider data) and from publicly accessible sources. We may check your creditworthiness before we offer you purchase on account options. We generally retain these data for 10 years from the last contract activity, but at least from the end of the contract. This period may be longer if this is necessary for reasons of proof, to comply with legal or contractual requirements or for technical reasons.
- Behaviour and preference data: depending on the relationship we have with you, we try to get to know you and tailor our products, services and offers accordingly. In order to do this, we collect and use data about your behaviour and preferences. We do this by evaluating information about your behaviour in connection with us, and we may also supplement these details with information from third parties, including sources that are publicly available. Based on this, we can, for example, work out the likelihood that you will use specific services or behave in a certain way. Some of the data processed for this purpose are already known to us (e.g. if you use our services), or we obtain these data by recording your behaviour (for example, how you navigate on our website). We anonymise or delete these data when they are no longer meaningful for the purposes in question, which may be up to [24] months depending on the nature of the data. This period may be longer if this is required for reasons of proof, to comply with legal or contractual requirements or for technical reasons. In section 12, we describe how tracking works on our website.

# 4. What are the purposes for which we process your data?

We process your data for the purposes explained below. These purposes, or the objectives on which they are based, represent our legitimate interests and, if applicable, those of third parties. You will find further information on the legal basis of our processing in Section 5.

We process your data for purposes related to **communicating with you**, in particular to answer inquiries and to assert your rights (section 11) and to contact you if you have any questions. We use communications data and registration data for this in particular. We retain these data to document our communications with you, for training purposes, for quality assurance and for inquiries.

We process data for the recording, management, fulfilment and processing of the **contractual relationship** with you. This includes in particular the operation of the services to which you have subscribed with us.

We process data for marketing purposes and to maintain relationships, e.g. to send our customers and other contractual partners personalised advertising about products and services from us and from third parties. This may be carried out, for example, in the form of newsletters and other regular contacts (electronically, by post or by telephone), via other channels for which we have contact details for you, and also as part of individual marketing campaigns (e.g. events, competitions, etc.) as well as free services (e.g. invitations, vouchers, etc.). You may reject such contact at any time (see the end of this section 4) or refuse or revoke your consent to being contacted for advertising purposes. With your consent, we are able to tailor our online advertising on the Internet more specifically to you (see our Privacy Statement on website use).

We can provide you with customised offers, including from third parties. No data will be passed on to third parties. If you are interested in such an offer, you can initiate data transmission to the third-party provider yourself.

We continue to process your data for market research, to improve our services and our operations, for product development and as part of our internal processes and administration.

We may also process your data for **security purposes** and to **control access** to our services.

We process personal data to comply with laws, directives and recommendations from authorities and internal regulations ("compliance").

We also process data for the purposes of our **risk management** and as part of judicious **corporate management**, including business organisation and corporate development.

#### 5. On what basis do we process your data?

If we ask you for your consent for certain processing (e.g. for marketing mailings or for holding competitions), we will inform you separately about the corresponding purposes of the processing. You may revoke your consent at any time by sending us a written message or an e-mail to take effect for the future. Our contact details can be found in section 2. Once we have received the notice of withdrawal of your consent, we will no longer process your data for the purposes to which you initially consented, unless we have another legal basis for doing so. The revoking of your consent does not affect the legality of the processing carried out on the basis of the consent up to the revocation.



Where we do not ask for your consent to processing, we base the processing of your personal data on the fact that the processing is required for the **initiation**, **fulfilment or execution of a contract** with you (or the office or place you represent) or that we or a third party have a **legitimate interest** in doing so, in particular for the purposes described above under section 4, to pursue related goals and to be able to implement appropriate measures. Our legitimate interests also include compliance with **legal provisions**, insofar as this is not already recognised as a legal basis by the applicable data protection law (e.g. the law in the EEA and Switzerland in the case of the GDPR). However, this also includes the marketing of our products and services, the interest in understanding our markets better and in managing and developing our company, including operations, securely and efficiently.

We can also process your data for other legal reasons, for example, in the case of disputes due to the necessity of processing for any lawsuit or the enforcement or defence of **legal claims**. In individual cases, other legal grounds may apply, which we will communicate to you separately if necessary.

## 6. What applies to profiling and automated individual decisions?

"Profiling" means the automated processing of personal data in order to analyse or predict certain personal aspects or behaviour. This means that customers can be looked after and advised more individually, for example, or offers can be better tailored to specific customer requirements.

"Automated individual decisions" are those that are made fully automatically, i.e. without relevant human influence, and which have negative legal effects on the customer or other similar negative effects.

We do not generally carry out any profiling nor make any automated individual decisions.

# 7. To whom do we disclose your data?

In connection with our contracts, the website, our services and products, our legal obligations or to otherwise protect our legitimate interests and the other purposes listed in section 4, we also transmit your personal data to third parties, in particular to the following categories of recipients:

- **Service providers:** we work with service providers domestically and abroad who process data about you on our behalf. (e.g. IT providers, postal and shipping companies, printing and scanning services or advertising service providers). We also obtain services from providers to be able to deliver our services efficiently (e.g. collection agencies, credit agencies or address verifiers who update address lists when moving house). We conclude contracts with these service providers that make provision for the protection of data, insofar as this does not result from the law. You can find a list of the most important service providers here [Link to overview of contractors].
- Partner companies: our partner companies, such as authorities, insurance companies, banks, Swiss Post or other enterprises, offer certain services in conjunction with us. If you want to take advantage of such an offer, we share data about you or the necessary content data with these companies. You will always be informed in advance of any such data sharing and this will only be carried out with your consent.



- Authorities: we can pass on personal data to offices, courts and other authorities at home
  and abroad if we are legally obliged or entitled to do so or if this appears necessary to protect our interests (e.g. criminal investigations, police measures, regulatory requirements
  and investigations, court hearings, reporting obligations and pre-litigation and post-litigation proceedings as well as statutory information and obligations to cooperate).
- Other persons: this refers to other cases where the involvement of third parties results from the purposes according to section 4, e.g. delivery addressees or external payment recipients specified by you that differ from yours, other third parties also in the context of representation relationships (e.g. if we send your data to your lawyer or your bank) or persons involved in administrative or legal proceedings. In the course of business development, we may sell or acquire, or enter into partnerships with any business, division, asset or company, which may involve the disclosure of information (including by you, e.g. as a customer or supplier or as a supplier representative) that may have consequences for persons involved in these transactions. The content data are never affected by potential passing on in this sense.

All these categories of recipients may in turn involve third parties, so that your data may also be accessible to them. We can restrict the processing by certain third parties (e.g. IT providers), but not that by other third parties (e.g. authorities, banks, etc.).

## 8. Where do we process your data?

As explained in section 7, we also disclose data to other bodies. These are not based exclusively in Switzerland. Your **content data** are stored and processed in Switzerland. **Communications data** are processed in Europe and **registration data** may also be processed in the USA. To ensure security of information, **network traffic** can be checked using analysis tools that can be operated worldwide. A list of our most important service providers and the location where the data is processed can be found here [Link to overview of contractors].

If a recipient is located in a country without adequate statutory data protection, we contractually oblige the recipient to comply with the applicable data protection regulations, unless they are already subject to a legally recognised set of data protection regulations and we cannot rely on an exemption clause.

# 9. For what period of time do we process your data?

We process your data for as long as is required for our processing purposes, the legal retention periods and our legitimate interests in processing for documentation and evidence purposes, or when storage is necessary for technical reasons. Further information on the relevant storage and processing period can be found in the individual data categories in section 3. If there are no legal or contractual obligations to the contrary, we will delete or anonymise your data after the storage or processing period has expired as part of our usual processes.

#### 10. How do we protect your data?

We take appropriate security measures to protect the confidentiality, integrity and availability of your personal data, to protect them against unauthorised or unlawful processing and to counteract the risks of loss, unintentional modification, unwanted disclosure or unauthorised access.



The content data in particular are subject to high information security requirements. For the operation of our services, we have ISO 27001 certification, which ensures a high standard of information security.

## 11. What rights do you have?

The applicable data protection law grants you the right to object to the processing of your data, in particular when they are used for direct marketing purposes and other legitimate processing interests under specific circumstances.

In order to make it easier for you to control the processing of your personal data, you also have the following rights in connection with our data processing, depending on the applicable data protection law:

- the right to request information from us as to whether and which data we process from you;
  - the right to have data corrected if it is inaccurate;
- the right to request the deletion of data;
- the right to request that we provide certain personal data in a commonly used electronic format or transmit it to another party involved;
- the right to withdraw consent where our processing is based on your consent;
- the right, upon request, to obtain further information required for the exercising of these rights.

If you wish to exercise the above rights with us, please contact us by email. Our contact details can be found in section 2. To enable us to rule out misuse, we have to identify you (e.g. via a copy of your ID, unless this is possible by other means).

Please note that these rights are subject to requirements, exemptions or restrictions under applicable data protection law (e.g. to protect third parties or trade secrets).

We will inform you accordingly if necessary. In particular, we may have to process and store your personal data in order to fulfil a contract with you, to protect our own legitimate interests, such as the assertion, exercising or defence of legal claims, or to comply with legal obligations.

If you do not agree with our handling of your rights or data protection, please let us know (section 2). In particular, if you are located in the EEA, UK or Switzerland, you also have the right to complain to your country's data protection supervisory authority.

#### 12. Do we use online tracking techniques?

We use various techniques in our services with which we and third parties we engage can recognise you when you use them and, under certain circumstances, also track you over several visits. We give you information about it in this section.



It is essentially to enable us to be able to differentiate access by you (via your system) from access by other users, so that we can ensure the functionality of the website and carry out evaluations and personalisation. It is not our intention to infer your identity, even if we can, insofar as we or third parties engaged by us can identify you through a combination of registration data. However, even without registration data, the technologies used are designed in such a way that you are recognised as an individual visitor each time the page is accessed, for example by our server (or the servers of third parties) assigning you or your browser a specific identification number (so-called "cookie").

Other techniques can also be used with which you are more or less likely to be recognised (i.e. distinguished from other users), e.g. "fingerprinting". Fingerprinting combines your IP address, the browser used, the screen resolution, the language selected, and other information your system communicates to each server, resulting in a fingerprint that is more or less unique. Cookies can therefore be dispensed with.

Whenever you access a **server** (e.g. when using a website or an app or because an e-mail contains a visible or invisible image), your visits can be tracked. If we integrate offers from an advertising partner or provider of an analysis tool on our website, they can track you in the same way, even if you cannot be identified as an individual.

We use techniques such as these on our website and allow certain third parties to do the same. You can set your browser to block or trick certain cookies or alternative technologies, or delete existing cookies. You can also enhance your browser with software that blocks tracking by certain third parties. You will find more information about this on the help pages of your browser (usually under the keyword "Privacy Statement") or on the websites of third parties, which we list below.

A distinction is made between the cookies below (i.e. techniques with comparable functionalities such as fingerprinting are also meant here):

Essential cookies: some cookies are necessary for the functioning of the website as such or certain features. For example, they ensure that you can switch between pages without losing information entered in a form. They also ensure that you stay logged in. These cookies are only temporary ("session cookies"). If you block them, the website may not work. Other cookies are necessary so that the server can save decisions or entries made by you during a session (i.e. a visit to the website) if you use this feature (e.g. selected language, consent given, the feature for automatic login, etc.).

These cookies have an expiry date of up to [24] months.

Performance cookies: in order to optimise our website and corresponding offers and to better
tailor them to the requirements of users, we use cookies to record and analyse the usage of
our website, possibly beyond the session. We do this by using third-party analysis services.
These are listed below. Performance cookies also have an expiration date of up to [24] months.
 See the third-party websites for details.

#### 13. Can this Privacy Statement be changed?

This Privacy Statement does not form part of any contract with you. We can adapt this Privacy Statement at any time. The version published on this website is the current version.



# 14. Additional details Additional details on tools used and data processed

## a. Visiting our website

When you visit our website, user-specific data (e.g. IP address, web browser and operating system) as well as technical data (e.g. URLs of the pages accessed and conducting search requests) are collected and analysed anonymously.

We use cookies for this purpose (see cookie policy). By using our website, you agree to the collection and use of the information in accordance with this privacy policy.

The processing of these data is based on our legitimate interest in enabling the use of the website and ensuring its security. In addition, the data are used to optimise and personalise the website.

#### b. Server log data

When you use our website, information that your browser transmits to us is automatically collected and stored. This information includes:

- Browser type and browser version
- Operating system
- IP address
- Referrer URL
- Host name of the computer
- Date of the request

We do not draw any conclusions about you from these data. The data collected are required, for example, to correctly deliver the contents of our website, to ensure the functionality of our website or to provide law enforcement authorities with the appropriate information in the event of a cyber attack.

#### c. Google Analytics

In the context of the use of Google Analytics, data about your use of the website are automatically collected and anonymously transmitted to a Google server and stored there. The IP address is always masked and all data are therefore passed on anonymously to Google. Only in exceptional cases will the full IP address be transmitted to a Google server and it is only abbreviated there. For further information, see the Google Analytics privacy policy.

On behalf of KLARA, Google will evaluate your use of the website anonymously in order to compile reports on website activities, and to provide the website operator with further services related to use of the website and Internet. We also use Google Analytics to evaluate data from Google Ads for statistical purposes.

If you do not want your data to be collected by Google Analytics, you can disable this via the ad preferences manager. We use Google Analytics, including GA4 features, to analyse the activities on



our website across devices. However, there are no restrictions on data protection measures, such as IP masking or the browser add-on.

## d. Google Maps

Google Maps is a service that embeds maps on the website. This service uses cookies, which transfer data to Google. For further information, see the Google privacy policy.

#### e. Google Invisible reCAPTCHA

This website uses a service – Google reCAPTCHA – to protect against bots and spam on forms used on the website. This service deploys cookies, which transfer data to Google. For further information, see the Google privacy policy.

#### f. Google Fonts

This website uses so-called web fonts, which are provided by Google, to display fonts. When you access a page, your browser loads the required web fonts into the browser cache to display texts and fonts correctly. For this purpose, the browser you use must establish a connection to Google's servers. In this way, Google learns that your IP address has been used to access our website. Google Web Fonts is used in the interests of creating an appealing presentation of our website. If your browser does not support web fonts, a default font from your computer will be used. For further information, see the Google privacy policy.

## g. Google Tag Manager

This website uses Google Tag Manager. Google Tag Manager is a solution that enables website tags to be managed through an interface. The Tag Manager tool (which implements the tags) is a cookie-free domain and does not collect personal information. The tool ensures the forwarding of data and the triggering of other tags that can collect data. Google Tag Manager does not have access to these data. If disabled at the domain or cookie level, it will remain in place for all tracking tags implemented with Google Tag Manager. For further information, see the Google privacy policy.

## h. Google Optimize

For the purpose of designing and continuously optimizing our websites in line with demand, we use the Google Optimize analysis service, a web analysis service from Google. Google deploys a cookie to enable the analysis of your page views and page activity. The information generated by the cookie about your use of our websites, such as

- your user behaviour on our websites,
- browser type/version,
- operating system used,
- referrer URL (the page previously visited),



- host name of the accessing computer (IP address) and
- time of the server request,

is transferred to a Google server and stored there. You can prevent the installation of the cookie in advance by setting your browser software accordingly, or object to this processing by deleting cookies via your browser settings. For further information, see the Google privacy policy.

#### Google Ads conversion tracking

To control and improve our campaigns, we use the "Google Ads" online advertising program and the conversion tracking analysis tool, a service from Google. When you click on an ad placed by Google, a cookie for conversion tracking is stored on your computer. The information generated by the cookie, such as

- ads clicked,
- browser type/version,
- operating system used,
- location,
- referrer URL (the page previously visited),
- host name of the accessing computer (IP address) and
- time of the server request,

is transferred to a Google server and stored there. The cookie has a pre-configured storage period of 90 days, does not contain any personal data, and therefore does not involve personal identification.

If you visit certain Internet pages of our website and the cookie has not expired, Google and we may recognise that you have clicked on the ad and have been redirected to this page. Every Google Ads customer receives a different cookie. The information collected via the cookie is used to generate conversion statistics for us. In this way, we find out the total number of users who clicked on our ad and were redirected to a page tagged with a conversion tracking tag. However, we do not receive any information that personally identifies users.

You can prevent this processing in advance by generally preventing the installation of cookies via a corresponding browser setting of your browser (deactivation option) or by setting it in such a way that cookies from the googleadservices.com domain are rejected. You can revoke your consent to this data processing at any time with effect for the future by setting the slider in Google settings to "off".

#### i. Google remarketing

We use Google's remarketing or "similar audiences" tool. This feature serves the purpose of analysing visitor behaviour and interests. Google uses cookies to perform an analysis of website usage, which forms the basis for creating interest-related advertisements. Cookies are used to collect visits to the website as well as anonymised data about the use of the website. Personal data of visitors to



the website are not stored. If you subsequently visit another website in the Google advertising network, you may be shown advertisements that are highly likely to take previously accessed product and information areas into account and may resemble them.

You can revoke your consent to this data processing at any time with effect for the future by permanently disabling the use of third-party cookies on the network advertising initiative deactivation page. For detailed information on Google remarketing and its privacy policy, please visit: https://policies.google.com/technologies/ads?hl=en-GB

## k. Campaign Manager / Floodlight tags

This website uses Google's Campaign Manager online marketing tool. Campaign Manager uses cookies to place ads that are relevant to users, improve advertising campaign performance, or to prevent a user from seeing the same ads more than once.

By means of a cookie ID, Google records which ads are placed in which browser and can thus prevent ads from being displayed multiple times. In addition, Campaign Manager can use cookie IDs to capture so-called conversions related to ad requests. This is the case, for example, when a user sees a Campaign Manager ad and later uses the same browser to visit the advertiser's website and buy something there.

Your browser automatically establishes a direct connection to Google's server due to the marketing tools used. Through the integration of Campaign Manager, Google receives information that you have accessed the corresponding part of our website or clicked on an ad from us.

The Campaign Manager (Floodlight tag) cookies used enable us to understand whether you are carrying out certain actions on our website after you have accessed or clicked on one of our ads on Google or on another platform via Campaign Manager (conversion tracking). This enables us to send you targeted advertising.

#### I. Matomo

We use Matomo for web analysis. For your additional protection, we have configured Matomo to record your IP address in abbreviated form only. We therefore process your personal usage data anonymously. For further information on Matomo's terms of use and data protection regulations, please visit: https://matomo.org/privacy/.

#### m. Meta pixels and cookies

To use our Meta campaigns as required, to further optimise them and to measure their conversion, we use an individual so-called visitor action pixel and cookies from Meta. On the one hand, we can ensure that the Meta ads initiated by us are only displayed to those Meta users who have also shown an interest in our offer. This ensures that our Meta ads correspond to the potential interest of respective users and are not an irritation to them. On the other hand, this enables us to track the actions of Meta users after they have seen or clicked on one of our Meta ads. This helps us measure



the conversion of each campaign for statistical and market research as well as billing purposes. The following information is processed during use:

- Time stamp,
- URL,
- Campaign-related information (impression specification, form field and activated button, in particular).

The data collected in this way are anonymous to us and do not provide us with any conclusions about the identity of the respective user.

If you log in to your Meta account after placing the pixel or cookies, or visit our website while logged in, it is possible that these data will be stored and processed by Facebook, and we want you to be aware of this. Meta may link this information to your Meta account and may also use it for its own advertising purposes in accordance with Meta's data use policy. You can revoke your consent to this data processing at any time with effect for the future by objecting to the use of cookies that serve to measure reach and which are used for advertising purposes. You can do this via the deactivation page of the network advertising initiative or on the European website. For further information, please refer to Meta's privacy policy.

#### n. LinkedIn

This website uses a LinkedIn cookie when you visit our website. The tag tells LinkedIn what actions you have taken on our website and potential identifying data.

The data may be used by LinkedIn to detect that you have visited our website, what you have clicked on and whether you have clicked on LinkedIn on a link that connects you to our website. This allows LinkedIn to show you interest-related content. LinkedIn may link these data to your user account and use it for its own purposes. For further information, please refer to LinkedIn's privacy policy.

We do not receive any personal information, but only statistics that show us how users have utilised our offers and ads, aggregated for all users over a certain period of time. This helps us analyse which of our ads have been successful and which have not.

### o. YouTube integrations

This website provides information about the world of small businesses. In addition to texts and photos, we also provide informative videos, e.g. in our blog posts. For this purpose, we use YouTube integrations. A cookie is set when these videos are watched. The information generated by the cookie about your use of our website, such as

- browser type/version,
- operating system used,
- referrer URL (the page previously visited),
- host name of the accessing computer (IP address),



- time of the server request and
- website or subpage visited,

is transferred to a YouTube server and stored there. Processing to improve our websites by enriching and complementing the content with informative videos is to be regarded as our legitimate interest. You can prevent the installation of the cookie in advance by setting the browser software accordingly, or object to this processing with effect for the future by deleting cookies via your browser settings, or changing the corresponding settings in the data protection centre. For further information, see the Google privacy policy.

#### p. Microsoft Advertising

This website uses Microsoft Advertising. Microsoft Advertising is an online advertising program.

The so-called UET tag is used as part of Microsoft Advertising. When you click on a Microsoft Advertising ad, a cookie is set for UET tracking. These cookies expire after 7 days and do not serve to personally identify visitors to our website. If you visit certain pages of this site and the cookie has not expired, Microsoft and we may recognise that you have clicked on the ad and have been redirected to that page.

Each Microsoft Advertising customer receives a different cookie. Cookies cannot be tracked through the websites of Microsoft Advertising customers. The information collected via the Microsoft Advertising cookie (UET tags) is used to generate UET statistics for Microsoft customers who have opted for UET tracking. Microsoft Advertising customers will see the total number of users who clicked on their ad and were redirected to a UET tracking tagged page. However, they do not receive any information that can be used to personally identify visitors. If you wish to disable tracking, you can object to this use by disabling the cookie of the Microsoft UET tracking via your Internet browser under user settings. For further information on Microsoft Advertising and UET tracking, please refer to the Microsoft privacy policy.

#### q. Hotjar

We use the Hotjar service on our website to improve user-friendliness. This service can be used to record mouse clicks and mouse and scrolling movements. In addition, keystrokes made on this website are recorded. No personal information is collected. Hotjar uses a tracking code to collect and transfer your data. As soon as you visit our website, the Hotjar tracking code automatically collects the data based on your activity and stores them on the Hotjar servers (Ireland location). In addition, the cookies placed on your computer or device by the website also collect data. For further information, see the Hotjar privacy policy.

If you would like to object to data collection by Hotjar (opt-out), please click here: https://www.hotjar.com/policies/do-not-track/.



#### r. Cloudflare

This website uses a so-called "content delivery network" (CDN). A CDN is a service that delivers content from our online presence, in particular large media files such as graphics or scripts, more quickly with the help of regionally distributed servers connected via the Internet. The data of the users (IP address) are processed exclusively for the purposes mentioned above and to maintain the security and functionality of the CDN. The use is based on our legitimate interests, i.e. our interest in the safe and efficient provision, analysis and optimisation of our online offer. For further information, see Cloudflare's privacy policy.

#### s. Analysing the use of our social media presence

Our social media partners, such as Facebook, LinkedIn and others, provide us with statistics and analyses that give us information about the use of our social media offerings. These statistics do not include names or other personal information of individual users. These services enable us to analyse and improve our social media activities.

#### t. Meta

When data are collected on our Facebook and Instagram pages, we act as "joint controllers" in accordance with Art. 26 GDPR together with Meta Platforms Ireland. We have created a separate agreement for this (see <a href="https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data">https://www.facebook.com/legal/terms/information\_about\_page\_insights\_data</a>). Meta Platforms Ireland is solely responsible for the further processing of data on Facebook and Instagram. If you wish to exercise your right of access, deletion or other rights, Meta Platforms Ireland is responsible for the implementation of your rights under its shared responsibility.

#### u. LinkedIn

In order to collect data on our pages, we act as "joint controller" with LinkedIn in accordance with Art. 26 GDPR. We have entered into a separate agreement with LinkedIn for this purpose (see <a href="https://legal.linkedin.com/pages-joint-controller-addendum">https://legal.linkedin.com/pages-joint-controller-addendum</a>). LinkedIn is solely responsible for the further processing of the data. If you wish to exercise your right of access, deletion, etc., LinkedIn is responsible for the implementation of your rights under its joint responsibility.

#### v. Newsletter

You have the opportunity to subscribe to our newsletter. By creating an account and submitting or uploading your information, you agree to the use of that information. The data collected enable us to send you a newsletter, which will draw your attention to suitable offers and further information. By registering for the newsletter, the KLARA user agrees to the recording, storage and evaluation of



all user access and movements. You give us your consent to the sending of the newsletter, which can revoke at any time and thereby unsubscribe. you

We use HubSpot software for the registration form and sending the newsletter.

w. Webinar registrations

It is possible to register for webinars via the Hubspot tool to obtain a better understanding of our products and services, or to obtain useful information in the field of SMEs (small businesses). We

will store the data you provide in order to be able to contact you if necessary, for example if an

event has to be cancelled.

x. Gated content downloads

Gated content is an exchange of information where the user obtains valuable knowledge, while in return we receive the user's contact details, which are of value to us. In the case of KLARA, these

may be, for example, white papers or eBooks on topics such as accounting, company start-ups or

Google's online presence.

y. Competitions

You have the opportunity to participate in our competitions. The information you provide enables

us to contact the winners of the competition. By using the competition form, you agree that KLARA may record, store and analyse all user access and movements. The winners of the competition may

be published on the website (including name and place of residence). By participating and providing

your data, you give your consent to this.

z. Marketing purposes

The data that you provide to us when using our services (contact details, login data, access, etc.)

may be used for marketing purposes based on legitimate interest. For example, we may use this information to communicate with you about certain products, marketing campaigns or services, to recommend products or services that may be of interest to you, and to serve and address you in a

customer-friendly manner.

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