

IWAY AG – DATA PROTECTION DECLARATION (GENERAL)

Version 1.1 from 30.06.2018 Valid from 1 July 2018

We are very pleased that you are interested in our company. Data protection is a major priority for the executive board of iWay AG. It is possible to use the iWay AG website without disclosing any personal data. However, if a data subject wishes to use special services of our company via our website, processing of personal data may become necessary. If the processing of personal data is necessary and there is no legal basis for such processing, we generally request the consent of the person concerned.

The processing of personal data, such as the name, address, email address or telephone number of a data subject, is always carried out in accordance with the General Data Protection Regulation and in compliance with the country-specific data protection regulations applicable to iWay AG. By means of this data protection declaration, our company wishes to inform the public about the type, scope and purpose of the personal data collected, used and processed by us. Furthermore, this data protection declaration informs data subjects about their rights.

In its capacity as the data controller, iWay AG has implemented numerous technical and organisational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions generally can have security gaps, making absolute protection difficult to be guaranteed. For this reason, every person concerned is free to transmit personal data to us by alternative means, for example by telephone or a secure email (www.privasphere.com).

1. Definitions

The data protection declaration of iWay AG is based on the terms used by the European legislator for Directives and Regulations when the General Data Protection Regulation (DS-GVO) was issued. Our data protection declaration should be easy to read and understand for the public as well as for our customers and business partners. For this reason, we would like to explain the terms used in advance.

We use the following terms, among others, in this data protection declaration:

a) Personal data

Personal data means any information that is related to an identified or identifiable physical person (hereinafter "data subject"). An identifiable physical person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identification, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that physical person.

b) Data subject

Data subject means any identified or identifiable physical person whose personal data are processed by the controller.

c) Processing

Processing is any operation or series of operations carried out with or without the help of automated processes in connection with personal data such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of restricting their future processing.

e) Profiling

Profiling is any automated processing of personal data consisting of the use of such personal data to evaluate certain personal aspects related to a data subject, in particular to analyse or predict aspects relating to the job performance, economic situation, health, personal preferences, interests, reliability, conduct, location or change of location of that data subject.

f) Pseudonymisation

Pseudonymisation is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that this additional information is kept separately and is subject to technical and organisational measures which ensure that the personal data are not attributed to an identified or identifiable data subject.

g) Controller or data controller

The controller or data controller is the physical or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are laid down by law, the controller or the specific criteria for its designation may be provided for in accordance with the law.

h) Processor

The processor is a physical or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

i) Recipient

The recipient is any physical or legal person, public authority, agency or other body to whom personal data are disclosed, regardless of whether or not it is a third party. However, authorities that receive personal data in accordance with legal requirements in the context of a specific investigation mandate are not considered recipients.

j) Third party

A third party is a physical or legal person, public authority, agency or body other than the data subject, the controller, the processor and the persons who, under the direct

authority of the controller or the processor, are authorized to process the personal data.

k) Consent

Consent is any expression of free will given by the data subject in an informed and unequivocal manner for a specific purpose, in the form of a statement or any other unequivocal affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

2. Name and address of the controller

The person responsible within the scope of the Swiss Data Protection Act and the General Data Protection Regulation is:

iWay AG Badenerstr. 569
8048 Zurich
Switzerland

Phone: +41 43 5001111
Email: info@iway.ch
Website: www.iway.ch

3. Cookies

The web pages of iWay AG use cookies. Cookies are text files that are stored on a computer system via an Internet browser.

Many websites and servers use cookies. Many cookies contain what is called a cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a string of characters that can be used to assign Internet pages and servers to the specific Internet browser in which the cookie was stored. This enables the Internet pages and servers visited to distinguish the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified by means of the unique cookie ID.

By using cookies, iWay AG can provide users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimised in the interest of the user. As already mentioned, cookies enable us to recognize the users of our website. The purpose of this recognition is to make it easier for users to use our website. For example, the user of a website that uses cookies does not have to enter his or her access data each time he or she visits the website, because this is done by the website and the cookie stored on the user's computer system. Another example is the cookie of a shopping cart in the online shop. The online shop memorizes the articles that a customer has placed in the virtual shopping cart using a cookie.

The data subject can prevent the setting of cookies by our website at any time by means of a corresponding setting on the Internet browser used and thus permanently reject the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programs. This is possible in all common Internet browsers. If the data subject deactivates the cookie setting in the Internet browser used, under certain circumstances not all functions of our website may be fully usable.

4. Collection of general data and information

The iWay AG website collects a number of general data and information each time a person or an automated system accesses the website. These general data and information are stored in the log files of the server. The following can be recorded: (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system accesses our website (what is called a referrer), (4) the sub-websites that are accessed via an accessing system on our website, (5) the date and time of an access to the website, (6) an internet protocol address (IP address), (7) the internet service provider of the accessing system, and (8) other similar data and information which serve to avert danger in the event of attacks on our information technology systems.

When using this general data and information, iWay AG does not draw any conclusions about the data subject. Rather, this information is required to (1) deliver the contents of our website correctly, (2) optimize the contents of our website and the advertising for it, (3) ensure the permanent functionality of our information technology systems and the technology of our website, and (4) to provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. These anonymously collected data and information are therefore statistically evaluated by iWay AG on the one hand and also with the aim of increasing data protection and data security in our company, in order to ultimately ensure an optimal level of protection for the personal data processed by us on the other hand. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

5. Registration on our website

The data subject has the possibility to register on the website of the controller by providing personal data. The personal data transmitted to the controller will be determined by the input mask used for registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the data controller and for the data subject's own purposes. The controller may arrange for the personal data to be transferred to one or more processors, such as a parcel service provider, which will also use the personal data exclusively for an internal use attributable to the controller.

Furthermore, by registering on the website of the data controller, the IP address assigned to the data subject by the Internet Service Provider (ISP), the date and time of registration are stored. The storage of this data is carried out on the basis that this is the only way to prevent the misuse of our services and, if necessary, to enable the clarification of criminal offences committed. In this respect, the storage of this data is necessary to protect the data controller. As a matter of principle, this data will not be passed on to third parties unless there is a legal obligation to do so or the passing on of the data serves criminal prosecution.

The registration of the data subject with voluntary provision of personal data permits the data controller to offer the data subject content or services which, by their very nature, can only be offered to registered users. Registered users are free to modify the personal data provided during registration at any time or to have them completely deleted from the data stock of the data controller.

The controller shall at any time upon request provide any data subject with information regarding the personal data relating to the data subject. Furthermore, the controller shall correct or delete personal data at the request or notice of the data

subject, unless this is contrary to any legal obligation to preserve records. The entire staff of the data controller is available to the data subject as contact persons in this context.

6. Subscription to our newsletter

On the iWay AG website, users are given the opportunity to subscribe to our company newsletter. The personal data transmitted to the data controller when subscribing to the newsletter is determined by the input mask used for this purpose. iWay AG informs its customers and business partners at regular intervals by means of a newsletter about offers from the company. The newsletter of our company can only be received by the data subject if (1) the data subject has a valid email address and (2) the data subject subscribes to the newsletter. For legal reasons, a confirmation email will be sent to the email address entered by a data subject for the newsletter for the first time using the double opt-in procedure. This confirmation email is used to check whether the owner of the email address, as the data subject, has authorized the receipt of the newsletter.

When registering for the newsletter, we also store the IP address assigned by the Internet service provider (ISP) of the computer system used by the data subject at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of a data subject's email address at a later date and therefore serves to provide legal protection for the data controller.

The personal data collected during the newsletter subscription process are used exclusively for the purpose of sending our newsletter. In addition, subscribers to the newsletter could be informed by email if this is necessary for the operation of the newsletter service or for registration, as could be the case if there are changes to the newsletter offer or if technical conditions change. The personal data collected within the scope of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be cancelled by the data subject at any time. The consent to the storage of personal data, which the data subject has given us for the newsletter service, can be revoked at any time. A link to this effect is included in every newsletter for the purpose of revoking this consent. It is also possible to unsubscribe from the newsletter at any time directly on the website of the data controller or to inform the data controller in another way.

7. Newsletter Tracking

The iWay AG newsletters contain what are known as tracking pixels. A tracking pixel is a miniature graphic embedded in emails that are sent in HTML format to allow log file recording and log file analysis. This enables a statistical evaluation of the success or failure of online marketing campaigns. By means of the embedded tracking pixel, iWay AG can identify whether and when an email was opened by a data subject and which links in the email were accessed by the data subject.

Such personal data collected via the tracking pixels contained in the newsletters are stored and evaluated by the data controller in order to optimise the delivery of newsletters and to adapt the content of future newsletters even better to the interests of the data subject. These personal data are not passed on to third parties. Data subjects are entitled at any time to revoke the separate declaration of consent given in this regard via the double opt-in procedure. After revocation, these personal

data will be deleted by the data controller. Unsubscription from receiving the newsletter is automatically interpreted by iWay AG as a revocation.

8. How to contact us via the website

Due to legal regulations, the iWay AG website contains information that enables rapid electronic contact with our company and direct communication with us, which also includes a general address for the so-called electronic mail (email address). If a data subject contacts the data controller via email or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted by a data subject to the controller on a voluntary basis are stored for the purposes of processing or for contacting the data subject. These personal data shall not be disclosed to third parties.

9. Routine deletion and blocking of personal data

The controller shall process and store personal data relating to the data subject only for the period of time necessary to achieve the purpose for which the data are stored or if provided for by the legislator pursuant to laws or regulations to which the controller is subject.

If the intended storage purpose ceases to apply or if a storage period prescribed by law expires, the personal data are routinely blocked or deleted in accordance with the statutory provisions.

10. Rights of the data subject

a) Right to confirmation

Every data subject has the right granted by law to obtain confirmation from the controller as to whether personal data relating to him or her are being processed. If a data subject wishes to exercise this right of confirmation, he or she may at any time contact an employee of the controller.

b) Right to information

Any data subject concerned by the processing of personal data shall have the right to obtain, at any time and free of charge, from the controller, information on personal data relating to him or her and a copy thereof. Furthermore, the legislator has granted the data subject access to the following information:

- the processing purposes
- the categories of personal data processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular to recipients in third countries or international organisations
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of a right of rectification or erasure of personal data relating to him or her or of a restriction on processing by the controller or a right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data are not collected from the data subject: All available information on the origin of the data

- the existence of automated decision making, including profiling and meaningful information on the logic involved and the scope and intended impact of such processing on the data subject
The data subject shall also have the right to obtain information as to whether personal data have been transferred to a third country or to an international organisation. If this is the case, the data subject shall also have the right to obtain information on the appropriate security measures relating to the transfer.
If a data subject wishes to exercise this right of access, he or she may at any time contact an employee of the controller.

c) Right to rectification

Every person concerned by the processing of personal data has the right, granted by the legislator, to request the rectification of inaccurate personal data concerning them. The data subject shall also have the right to obtain the completion of incomplete personal data, including by means of a supplementary declaration, having regard to the purposes of the processing.

If a data subject wishes to exercise this right of rectification, he or she may at any time contact an employee of the controller.

d) Right to erasure (right to be forgotten)

Any person concerned by the processing of personal data shall have the right granted by law to obtain from the controller the immediate erasure of personal data relating to him or her, provided that one of the following reasons applies and insofar as the processing is not necessary:

- The personal data have been collected or otherwise processed for purposes for which they are no longer necessary.
- The data subject withdraws the consent on which the processing was based in accordance with applicable legal provisions and there is no other legal basis for the processing.
- The data subject lodges an objection to the processing in accordance with the applicable legal provisions, and there are no legitimate reasons for the processing.
- The personal data have been processed unlawfully.
- The erasure of the personal data is necessary to fulfil a legal obligation to which the controller is subject.

If one of the above reasons applies and a data subject wishes to have personal data stored by iWay AG deleted, he or she can contact an employee of the data controller at any time. The employee of iWay AG will arrange for the deletion request to be honoured.

If the personal data have been made public by iWay AG and our company, as the responsible party, is obliged to delete the personal data in accordance with applicable laws, iWay AG will take reasonable measures, including technical measures, taking into account the available technology and implementation costs, to inform other data controllers who process the published personal data that the data subject has requested that these other data controllers delete all links to this personal data or copies or replications of this personal data, unless the processing is necessary. The employee of iWay AG will arrange the necessary steps in individual cases.

e) Right to restriction of processing

Any person concerned by the processing of personal data has the right, granted by the legislator, to obtain from the controller the restriction of the processing if one of the following conditions is met:

- The accuracy of the personal data is contested by the data subject, for a period of time that allows the controller to verify the accuracy of the personal data.
- The processing is unlawful, the data subject refuses to have the personal data deleted and instead requests that the use of the personal data be restricted.
- The controller no longer needs the personal data for the purposes of the processing, but the data subject needs them in order to assert, exercise or defend legal claims.
- The data subject has lodged an objection to the processing and it is not yet clear whether the controller's legitimate reasons outweigh those of the data subject.

If one of the above-mentioned conditions is met and a data subject wishes to request the restriction of personal data stored by iWay AG, he or she may contact an employee of the data controller at any time. The employee of iWay AG will arrange for the restriction of the processing.

f) Right to data transferability

Any person affected by the processing of personal data has the right, granted by the legislator, to receive the personal data concerning him or her provided by the data subject to a controller in a structured, common and machine-readable format. He or she shall also have the right to transfer such data to another controller without interference by the controller to whom the personal data have been disclosed, provided that the processing is based on the consent of the applicable laws and that the processing is carried out by automated processes, except where such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising their right to data transfer in accordance with the applicable legislation, the data subject has the right to request that the personal data be transferred directly from one controller to another controller, as far as this is technically feasible and provided that it does not affect the rights and freedoms of other parties.

In order to assert the right to data transferability, the data subject can contact an employee of iWay AG at any time.

g) Right to appeal

Every data subject has the right, granted by the legislator, to object at any time, for reasons arising from his or her particular situation, to the processing of personal data concerning him or her, carried out pursuant to data protection legislation. This also applies to profiling based on these provisions.

In the event of an objection, iWay AG will no longer process the personal data unless we can prove compelling reasons for processing worthy of protection that outweigh the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

If iWay AG processes personal data for the purpose of direct advertising, the data

subject has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling, insofar as it is related to such direct mail. If the data subject objects to iWay AG processing for the purposes of direct marketing, iWay AG will no longer process the personal data for these purposes.

In addition, the data subject shall have the right to object, on legitimate grounds relating to his or her particular situation, to the processing of personal data concerning him or her carried out at iWay AG for purposes of scientific or historical research or for statistical purposes, except where such processing is necessary for the performance of a task carried out in the public interest.

In order to exercise the right to appeal, the data subject may directly contact any employee of iWay AG.

h) Automated decisions in individual cases including profiling

Every data subject shall have the right granted by the legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her in a similar way, provided that the decision (1) is not necessary for the establishment or execution of a contract between the data subject and the controller, or (2) is authorised by legal provisions to which the controller is subject and those legal provisions contain appropriate measures to protect the rights and freedoms as well as the legitimate interests of the data subject, or (3) is made with the explicit consent of the data subject.

If the decision (1) is necessary for the establishment or execution of a contract between the data subject and the controller or (2) is made with the express consent of the data subject, iWay AG will take reasonable measures to protect the rights and freedoms as well as the legitimate interests of the data subject, including at least the right to obtain the intervention of a third party from the controller, to present its own position and to challenge the decision.

If the data subject wishes to exercise rights relating to automated decisions, he or she may at any time consult an employee of the controller.

i) Right to revoke consent under data protection law

Every data subject affected by the processing of personal data has the right to withdraw his or her consent to the processing of personal data at any time, as granted by the European Directive and Regulation Authorities.

If the data subject wishes to exercise his or her right to withdraw consent, he or she may at any time contact an employee of the controller.

11. Data protection for applications and the application process

The controller collects and processes the personal data of applicants for the purpose of handling the application process. The processing may also be done electronically. This is particularly the case if an applicant submits relevant application documents to the controller electronically, for example by email or via a web form on the website. If the data controller signs an employment contract with an applicant, the transmitted data is stored for the purpose of processing the employment relationship in accordance with the statutory provisions. If the data controller does not sign an employment contract with the applicant, the application documents are automatically

deleted two months after notification of the rejection decision, provided that no other legitimate interests of the data controller conflict with deletion.

12. Data protection regulations for the use of Facebook

The data controller has integrated components of the company Facebook on this website. Facebook is a social network.

A social network is a social meeting place operated on the Internet, an online community that generally allows users to communicate with each other and interact virtually. A social network can serve as a platform for the exchange of opinions and experiences or it can enable the Internet community to provide personal or company-related information. Facebook enables users of the social network to create private profiles, upload photos and network via friend requests, among other things.

The operating company of Facebook is Facebook, Inc. 1 Hacker Way, Menlo Park, CA 94025, USA. The person responsible for processing personal data if a data subject lives outside the USA or Canada is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Each time one of the individual pages of this website, which is operated by the data controller and on which a Facebook component (Facebook plug-in) has been integrated, is accessed, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Facebook component to download a representation of the corresponding Facebook component from Facebook. A complete overview of all Facebook plug-ins is available at https://developers.facebook.com/docs/plugins/?locale=en_US. As part of this technical process, Facebook receives information about which specific subpage of our website is being visited by the data subject.

If the data subject is logged in on Facebook at the same time, Facebook recognises which specific subpage of our website the data subject is visiting each time the data subject accesses our website and for the entire duration of their stay on our website. This information is collected by the Facebook component and assigned by Facebook to the respective Facebook account of the data subject. If the data subject presses one of the Facebook buttons integrated on our website, for example the "Like" button, or if the data subject makes a comment, Facebook assigns this information to the personal Facebook user account of the data subject and stores these personal data.

Facebook will always receive information via the Facebook component that the data subject has visited our website if the data subject is logged in on Facebook at the same time when he or she accesses our website; this occurs regardless of whether the data subject clicks on the Facebook component or not. If the data subject does not want this information to be transmitted to Facebook, he or she can prevent the transmission by logging out of his or her Facebook account before accessing our website.

The data policy published by Facebook, which is available at <https://de-de.facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. It also explains which settings Facebook offers to protect the privacy of the data subject. In addition, various applications are available that make it possible to suppress data transmission to Facebook. Such applications can be used by the data subject to suppress data transfer to Facebook.

13. Privacy policy on the use of images from Getty Images

The data controller has integrated components of Getty Images on this website. Getty Images is an American image agency. An image agency is a company that offers images and other visual material on the market. Picture agencies usually market photographs, illustrations and film material. Through a picture agency, various customers, especially website operators, editorial offices of print and TV media and advertising agencies, license the images they use.

The operating company of the Getty Images components is Getty Images International, 1st Floor, The Herbert Building, The Park, Carrickmines, Dublin 18, Ireland.

Getty Images allows the embedding of stock images (free of charge if applicable). Embedding is the inclusion or integration of certain third-party content, such as text, video or image data, that is provided by a third-party website and then appears on your own website. An embed code is used for embedding. An embed code is an HTML code that is integrated into a website by a website operator. If an embed code has been integrated by a website operator, the external content of the other website is displayed immediately as soon as a website is visited. To display the external content, the external content is loaded directly from the other website. Getty Images provides further information about embedding content under the link <https://www.gettyimages.co.uk/resources/embed>.

Through the technical implementation of the embedding code, which enables the display of images from Getty Images, the IP address of the Internet connection through which the data subject accesses our website is transmitted to Getty Images. Getty Images also collects information about our website, the type of browser used, the browser language, the time and length of access. In addition, Getty Images may collect navigational information, which is information about which of our subpages the data subject has visited and which links have been clicked on, and other interactions that the data subject has engaged in while visiting our website. This information may be stored and analysed by Getty Images.

Additional information and the applicable Getty Images privacy policy can be found at <https://www.gettyimages.co.uk/company/privacy-policy>.

14. Privacy policy on the deployment and use of Google AdSense

The person responsible for processing has integrated Google AdSense on this website. Google AdSense is an online service that enables the placement of advertising on third party sites. Google AdSense is based on an algorithm which selects the advertisements displayed on third party sites according to the content of the respective third-party site. Google AdSense allows an interest-related targeting of the internet user, which is implemented by generating individual user profiles.

The operating company of the Google AdSense component is Alphabet Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of the Google AdSense component is the integration of advertisements on our website. Google AdSense sets a cookie on the information technology system of the data subject. Cookies were already explained earlier. By setting the cookie, Alphabet Inc. is able to analyse the use of our website. Each time one of the individual pages of this website is accessed, which is operated by the data controller and on which a Google AdSense component has been integrated, the Internet browser on the data subject's information technology system is automatically prompted by the respective Google AdSense component to transmit data to Alphabet Inc. for the

purposes of online advertising and the billing of commissions. As part of this technical process, Alphabet Inc. obtains knowledge of personal data, such as the IP address of the data subject, which is used by Alphabet Inc. among other things to trace the origin of visitors and clicks and subsequently to enable commission settlements.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting in the Internet browser used and thus permanently object to the setting of cookies. Such a setting in the Internet browser used would also prevent Alphabet Inc. from setting a cookie on the data subject's information technology system. In addition, a cookie already set by Alphabet Inc. can be deleted at any time via the Internet browser or other software programs.

Google AdSense also uses the so-called tracking pixels. A tracking pixel is a thumbnail graphic that is embedded in web pages to enable log file recording and log file analysis, which allows statistical evaluation. Alphabet Inc. can use the embedded tracking pixels to identify whether and when a website was accessed by a data subject and which links were clicked on by the data subject. Tracking pixels are used, among other things, to evaluate the flow of visitors to a website.

Through Google AdSense, personal data and information, which also includes the IP address and is necessary for the collection and billing of the ads displayed, are transferred to Alphabet Inc. in the United States of America. These personal data are stored and processed in the United States of America. Alphabet Inc. may pass on the personal data collected via the technical process to third parties.

Google AdSense is explained in more detail on this link
<https://www.google.co.uk/intl/en/adsense/start/>.

15. Privacy policy for the use and application of Google Analytics (with anonymization function)

The data controller has integrated the Google Analytics component (with the anonymisation function) on this website. Google Analytics is a web analysis service. Web analysis is the collection, compilation and evaluation of data on the behaviour of visitors on websites. Among other things, a web analysis service collects data about the website from which a data subject accessed a website (so-called referrer), which subpages of the website were accessed or how often and for how long a subpage was viewed. A web analysis is mainly used as part of website optimization and cost-benefit analysis of internet advertising.

The operating company of the Google Analytics component is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The data controller uses the addition "_gat._anonymizeIp" for web analysis via Google Analytics. By means of this addition, the IP address of the data subject's Internet connection is shortened by Google and made anonymous if our Internet pages are accessed from a member state of the European Union or from another state that is a party to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the flow of visitors on our website. Among other things, Google uses the data and information obtained to evaluate the use of our website in order to compile online reports for us which show the activities on our website and to provide further services related to the use of our website.

Google Analytics places a cookie on the information technology system of the data subject. Cookies have already been explained earlier. By setting the cookie, Google is

able to analyse the use of our website. Each time one of the individual pages of this website, which is operated by the data controller and on which a Google Analytics component has been integrated, is accessed, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. Within the scope of this technical procedure, Google receives knowledge of personal data, such as the IP address of the person concerned, which Google uses, among other things, to trace the origin of visitors and clicks and subsequently to enable commission settlements.

Cookies are used to store personal data, such as the time of access, the location from which access originated and the frequency of visits to our website by the data subject. Each time our website is visited, these personal data, including the IP address of the Internet connection used by the data subject, are transmitted to Google in the United States of America. The personal data are stored by Google in the United States of America. Google may share the personal data collected through the technical process with third parties.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting in the Internet browser used and thus permanently reject the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Furthermore, the data subject has the opportunity to object to and prevent the collection of data generated by Google Analytics relating to the use of this website and the processing of these data by Google. To do this, the data subject must download and install a browser add-on from the link

<https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data and information about visits to websites may be transmitted to Google Analytics. Google considers the installation of the browser add-on to be an objection. If the data subject's information technology system is deleted, formatted or reinstalled at a later date, the data subject must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated by the data subject or another person within his or her sphere of control, the browser add-on may be reinstalled or reactivated. Further information and Google's applicable privacy policy can be found at

<https://www.google.co.uk/intl/en/policies/privacy/> and

<http://www.google.com/analytics/terms/de.html>. Google Analytics is explained in more detail at https://www.google.com/intl/de_de/analytics/.

16. Privacy policy on the use and application of Google Remarketing

The data controller has integrated Google Remarketing services on this website. Google Remarketing is a function of Google AdWords that enables a company to display advertising to Internet users who have previously visited the company's website. The integration of Google Remarketing thus allows a company to create user-related advertising and consequently to display interest-relevant advertisements to the Internet user.

The operating company of the Google Remarketing services is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google Remarketing is to show interest-relevant advertising. Google Remarketing enables us to display advertisements via the Google advertising network or to have them displayed on other Internet sites, which are tailored to the individual needs and interests of Internet users.

Google Remarketing places a cookie on the information technology system of the data subject. Cookies have already been explained earlier. By setting the cookie, Google is able to recognise the visitor to our website if he or she subsequently accesses websites that are also members of the Google advertising network. Each time a website on which the Google Remarketing service has been integrated is accessed, the Internet browser of the data subject automatically identifies itself to Google. In the course of this technical process, Google obtains knowledge of personal data, such as the IP address or the browsing behaviour of the user, which Google uses, among other things, to display interest-relevant advertising.

By means of cookies, personal information, such as the websites visited by the data subject, is stored. Whenever our website is visited, personal data, including the IP address of the Internet connection used by the data subject, are transmitted to Google in the United States of America. The personal data are stored by Google in the United States of America. Google may share this personal data collected through the technical process with third parties.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting in the Internet browser used and thus permanently reject the setting of cookies. Such a setting on the Internet browser used would also prevent Google from placing a cookie on the data subject's information technology system. In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Furthermore, the data subject has the opportunity to reject the interest-based advertising by Google. To do so, the data subject must access the link www.google.co.uk/settings/ads from any of the Internet browsers he or she uses and adjust the desired settings there.

Further information and Google's applicable privacy policy can be found at <https://www.google.de/intl/de/policies/privacy/>.

17. Privacy policy on the deployment and use of Google AdWords

The data controller has integrated Google AdWords on this website. Google AdWords is an internet advertising service that allows advertisers to display ads in Google's search engine results as well as in the Google advertising network. Google AdWords allows an advertiser to specify pre-defined keywords that will cause an ad to appear in Google's search engine results only when the user uses the search engine to retrieve a keyword relevant search result. In the Google advertising network, the ads are distributed to topic-relevant websites by means of an automatic algorithm and in compliance with the previously defined keywords.

The operating company of the Google AdWords services is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google AdWords is to advertise our website by displaying interest-relevant advertising on the websites of third-party companies and in the search engine results of the Google search engine, and to display third-party advertising on our website.

If a data subject reaches our website via a Google ad, a conversion cookie is stored on

the data subject's information technology system by Google. Cookies have already been explained earlier. A conversion cookie loses its validity after thirty days and does not serve to identify the data subject. If the cookie has not expired, the conversion cookie is used to determine whether certain subpages, such as the shopping cart from an online shop system, have been accessed on our website. The conversion cookie enables us and Google to track whether a person who has reached our website via an AdWords ad has generated revenue, i.e. whether he or she has completed or abandoned a purchase.

The data and information collected through the use of the conversion cookie is used by Google to create visit statistics for our website. These visit statistics are in turn used by us to determine the total number of users who were referred to us via AdWords ads, i.e. to determine the success or failure of the respective AdWords ad and to optimize our AdWords ads for the future. Neither our company nor other Google AdWords advertisers receive any information from Google that could be used to identify the data subject.

The conversion cookie is used to store personal information, such as the Internet pages visited by the data subject. Each time our website is visited, personal data, including the IP address of the Internet connection used by the data subject, are transmitted to Google in the United States of America. The personal data are stored by Google in the United States of America. Google may share the personal data collected through the technical process with third parties.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting in the Internet browser used and thus permanently reject the setting of cookies. This setting of the Internet browser used would also prevent Google from placing a conversion cookie on the data subject's information technology system. In addition, a cookie already set by Google AdWords can be deleted at any time via the Internet browser or other software programs.

Furthermore, the data subject has the opportunity to reject the interest-based advertising by Google. To do so, the person concerned must access the link www.google.de/settings/ads from any of the Internet browsers he or she uses and make the desired adjustments there.

Further information and Google's applicable privacy policy can be found on <https://www.google.de/intl/de/policies/privacy/>.

18. Privacy policy for the use and application of LinkedIn

The data controller has integrated components of LinkedIn Corporation on this website. LinkedIn is an Internet-based social network that allows users to connect with existing business contacts and to make new business contacts. Over 400 million registered users use LinkedIn in more than 200 countries. This makes LinkedIn currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. Outside the USA, LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible for data protection matters.

Each time an individual accesses our website, which is equipped with a LinkedIn component (LinkedIn plug-in), this component causes the browser used by the data subject to download a corresponding representation of the LinkedIn component.

Further information about LinkedIn plug-ins can be found at <https://developer.linkedin.com/plugins>. This technical process allows LinkedIn to know which specific page of our website is being visited by the data subject. If the data subject is logged on to LinkedIn at the same time, LinkedIn will recognize which specific page of our website the data subject is visiting each time the data subject accesses our website and at all times during each visit. This information is collected by the LinkedIn component and is allocated by LinkedIn to the relevant LinkedIn account of the data subject. If the data subject clicks on a LinkedIn button integrated on our website, LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data. LinkedIn will receive information through the LinkedIn component about the data subject's visit to our website whenever the data subject is logged on to LinkedIn at the same time as he or she visits our website, regardless of whether the data subject clicks on the LinkedIn component or not. If the data subject does not want this information to be sent to LinkedIn, he or she may opt-out of receiving it by logging out of his or her LinkedIn account before accessing our Website. At <https://www.linkedin.com/psettings/guest-controls> LinkedIn offers the option to unsubscribe from email messages, SMS messages and targeted ads as well as to manage ad settings. LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame who may set cookies. Such cookies can be rejected at <https://www.linkedin.com/legal/cookie-policy>. LinkedIn's current privacy policy is available on <https://www.linkedin.com/legal/privacy-policy>. LinkedIn's cookie policy is available on <https://www.linkedin.com/legal/cookie-policy>.

19. Privacy policy for the use and application of Matomo

The data controller has integrated the Matomo component into this website. Matomo is an open source software tool for web analysis. Web analysis is the collection, compilation and evaluation of data concerning the behaviour of visitors to websites. A web analysis tool collects, among other things, data about the website from which a data subject accessed a website (so-called referrer), which subpages of the website were accessed or how often and for how long a subpage was viewed. A web analysis is mainly used to optimize a website and for cost-benefit analysis of internet advertising.

The software is operated on the server of the person responsible for the processing, the log files which are sensitive in terms of data protection law are stored exclusively on this server.

The purpose of the Matomo component is the analysis of visitor flows on our website. The data and information obtained is used by the data controller, among other things, to evaluate the use of this website in order to compile online reports that show the activities on our website.

Matomo places a cookie on the information technology system of the data subject. Cookies have already been explained earlier. With the setting of the cookies, we are able to analyse the use of our website. Every time one of the individual pages of this website is accessed, the internet browser on the information technology system of the data subject is automatically prompted by the Matomo component to transmit data to our server for the purpose of online analysis. Within the scope of this technical procedure, we receive information about personal data such as the IP address of the data subject, which serves us among other things to trace the origin of

visitors and clicks.

The cookie is used to store personal information such as the time of access, the location from which access was made and the frequency of visits to our website. Whenever you visit our website, the personal data, including the IP address of the Internet connection used by the data subject, are transferred to our server. The personal data are stored by us. We do not disclose the personal data to third parties. The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting in the Internet browser used and thus permanently reject the setting of cookies. Such a setting of the Internet browser used would also prevent Matomo from setting a cookie on the information technology system of the data subject. Furthermore, a cookie already set by Matomo can be deleted at any time via an internet browser or other software programs.

Furthermore, the data subject has the possibility to reject and prevent the collection of data generated by the Matomo and related to the use of this website. For this purpose the data subject must set "Do Not Track" in his or her browser. However, once the opt-out cookie has been set, it is possible that the data subject may no longer be able to fully access the Internet pages of the controller. Further information and Matomo's applicable privacy policy can be found at <https://matomo.org/privacy/>.

20. Privacy policy on the use and application of Shariff

The data controller has integrated the Shariff component on this website. The Shariff component provides social media buttons that comply with data protection regulations. Shariff was developed for the German computer magazine c't and is published by GitHub, Inc.

The developer of the component is GitHub, Inc. 88 Colin P. Kelly Junior Street, San Francisco, CA 94107, USA.

Button solutions provided by social networks usually transfer personal data to the respective social network as soon as a user visits a website in which a social media button has been integrated. By using the Shariff component, personal data are only transmitted to social networks when the visitor of a website actively presses one of the social media buttons. Further information on the Shariff component is available from the computer magazine c't at

<http://www.heise.de/newsticker/meldung/Datenschutz-und-Social-Media-Der-c-tShariff-ist-im-Einsatz-2470103.html>. The purpose of using the Shariff component is to protect the personal data of visitors on our website and at the same time to enable us to integrate a social media button solution on this website.

Additional information and GitHub's current privacy policy can be found at <https://help.github.com/articles/github-privacy-policy/>.

21. Privacy policy on the use and application of Twitter

The data controller has integrated Twitter components on this website. Twitter is a multilingual, publicly accessible microblogging service where users can post and disseminate what are known as tweets, short messages limited to 280 characters. These short messages can be accessed by anyone, including people who are not registered on Twitter. The tweets are also displayed to what are known as followers of the respective user. Followers are other Twitter users who follow the tweets of a user. Furthermore, Twitter enables a wide audience to be addressed via hashtags,

links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.

Each time the data subject accesses one of the individual pages of this website operated by the data controller and on which a Twitter component (Twitter button) has been integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Twitter component to download a display of the corresponding Twitter component from Twitter. Further information on the Twitter buttons is available on

<https://about.twitter.com/de/resources/buttons>. As part of this technical process, Twitter is notified regarding which specific page of our website is visited by the data subject. The purpose of integrating the Twitter component is to enable our users to disseminate the content of this website, to make this website known in the digital world and to increase our visitor numbers.

If the data subject is logged in on Twitter at the same time, Twitter recognizes which specific subpage of our website the data subject is visiting each time the data subject accesses our website and at all times during his or her stay on our website. This information is collected by the Twitter component and assigned to the respective Twitter account of the data subject by Twitter. If the data subject clicks on one of the Twitter buttons integrated on our website, the data and information transmitted are assigned to the personal Twitter user account of the data subject and stored and processed by Twitter.

Twitter will receive information via the Twitter component that the data subject has visited our website if the data subject is logged in on Twitter at the same time when he or she accesses our website, regardless of whether the data subject clicks on the Twitter component or not. If the data subject does not want this information to be sent to Twitter, he or she can prevent it from being sent by logging out of his or her Twitter account before accessing our website.

The applicable privacy policy of Twitter is available at <https://twitter.com/privacy?lang=de>.

22. Privacy policy for the use and application of Xing

The data controller has integrated Xing components into this website. Xing is an Internet-based social network that enables users to connect with existing business contacts and to make new business contacts. Individual users can create a personal profile of themselves on Xing. For example, companies can create company profiles or post job offers on Xing.

Xing is operated by XING SE, Dammtorstrasse 30, 20354 Hamburg, Germany.

Each time one of the individual pages of this website, which is operated by the data controller and on which a Xing component (Xing plug-in) has been integrated, is accessed, the corresponding Xing component automatically causes the Internet browser on the information technology system of the data subject to download a representation of the corresponding Xing component from Xing. Further information on the Xing plug-ins can be found at <https://dev.xing.com/plugins>. As part of this technical process, Xing is notified of which specific subpage of our website is visited by the data subject.

If the data subject is logged in on Xing at the same time, Xing recognizes which specific subpage of our website the data subject is visiting each time the data subject accesses our website and at all times during his or her stay on our website. This

information is collected by the Xing component and assigned by Xing to the respective Xing account of the data subject. If the data subject clicks on one of the Xing buttons integrated on our website, for example the "Share" button, Xing assigns this information to the personal Xing user account of the data subject and stores the personal data.

Xing receives information via the Xing component that the data subject has visited our website if the data subject is logged in on Xing at the same time when he or she accesses our website; this occurs regardless of whether the data subject clicks on the Xing component or not. If the data subject does not want this information to be transmitted to Xing, he or she can prevent the transmission by logging out of his or her Xing account before accessing our website.

The data protection regulations published by Xing, which can be accessed at <https://www.xing.com/privacy>, provide information about the collection, processing and use of personal data by Xing. Xing has also published data protection information for the XING ShareButton on https://www.xing.com/app/share?op=data_protection.

23. Privacy policy on the use and application of YouTube

The data controller has integrated YouTube components into this website. YouTube is an Internet video portal that allows video publishers to post video clips for free and other users to view, rate and comment on them, also free of charge. YouTube allows the publication of all types of videos, which is why complete film and television programmes, but also music videos, trailers or videos created by users themselves can be accessed via the Internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 940431351, USA.

Each time one of the individual pages of this website, which is operated by the data controller and on which a YouTube component (YouTube video) has been integrated, is accessed, the Internet browser on the information technology system of the data subject is automatically prompted by the respective YouTube component to download a representation of the corresponding YouTube component from YouTube. Further information on YouTube can be found at <https://www.youtube.com/yt/about/de/>. As part of this technical process, YouTube and Google are informed of which specific subpage of our website is visited by the data subject.

If the data subject is logged in on YouTube at the same time, YouTube recognizes which specific subpage of our website the data subject is visiting by displaying a subpage containing a YouTube video. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject.

YouTube and Google receive information through the YouTube component that the data subject has visited our website whenever the data subject is logged in on YouTube at the same time as he or she visits our website, regardless of whether or not the data subject clicks on a YouTube video. If the data subject does not want this information to be transmitted to YouTube and Google, he or she can prevent the transmission by logging out of his or her YouTube account before accessing our website.

The privacy policy published by YouTube, which is available on <https://www.google.de/intl/de/policies/privacy/>, provides information about the collection, processing and use of personal data by YouTube and Google.

24. Privacy policy on the deployment and use of DoubleClick

The data controller has integrated components of DoubleClick by Google on this website. DoubleClick is a brand of Google under which mainly special online marketing solutions are marketed to advertising agencies and publishers. The operating company of DoubleClick by Google is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

DoubleClick by Google transfers data to the DoubleClick server with every impression, click or other activity. Each of these data transfers triggers a cookie request to the data subject's browser. If the browser accepts this request, DoubleClick places a cookie on the data subject's information technology system. What cookies are has already been explained above. The purpose of the cookie is to optimize and display advertising. The cookie is used, among other things, to serve and display advertisements relevant to the user and to report on or improve advertising campaigns. The cookie is also used to avoid multiple displays of the same advertisement.

DoubleClick uses a cookie ID, which is required to complete the technical process. For example, the cookie ID is needed to display an advertisement in a browser.

DoubleClick can also use the cookie ID to track which ads have already been displayed in a browser to avoid duplicate ads. The cookie ID also enables DoubleClick to track conversions. For example, conversions are recorded if a user has previously seen a DoubleClick ad and subsequently makes a purchase on the advertiser's website using the same Internet browser.

A DoubleClick cookie does not contain any personal information. However, a DoubleClick cookie may contain additional campaign identifiers. A campaign identifier is used to identify the campaigns with which the user has already been in contact. Each time one of the individual pages of this website, which is operated by the data controller and on which a DoubleClick component has been integrated, is accessed, the Internet browser on the information technology system of the data subject is automatically prompted by the relevant DoubleClick component to transmit data to Google for the purposes of online advertising and the billing of commissions. In the course of this technical process, Google receives information about data which it also uses to create commission statements. Among other things, Google can detect that the person concerned has clicked on certain links on our website.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting in the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, cookies already set by Google can be deleted at any time via an internet browser or other software programs.

Further information and DoubleClick by Google's applicable privacy policy can be found at <https://www.google.com/intl/de/policies/>

25. Payment method: Privacy policy for PayPal as payment method

The data controller has integrated components of PayPal on this website. PayPal is an online payment service provider. Payments are processed through what are called PayPal accounts, which are virtual private or business accounts. In addition, PayPal offers the possibility to process virtual payments via credit cards if a user does not have a PayPal account. A PayPal account is managed via an email address, so there is

no classic account number. PayPal makes it possible to initiate online payments to third parties or to receive payments. PayPal also acts as a trustee and provides buyer protection services.

The European operating company of PayPal is PayPal (Europe) S.à.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg.

If the data subject selects "PayPal" as a payment option during the ordering process in our online shop, the data of the data subject are automatically transmitted to PayPal. By selecting this payment option, the data subject agrees to the transfer of personal data required for the payment process.

The personal information submitted to PayPal is usually the first name, last name, address, email address, IP address, phone number, mobile phone number, or other information necessary to process the payment. For the processing of the purchase contract, personal data related to the respective order are also necessary.

The purpose of the transmission of data is to process payments and prevent fraud.

The data controller will transmit personal data to PayPal in particular if there is a legitimate interest in the transmission. The personal data exchanged between PayPal and the data controller may be transferred by PayPal to credit reference agencies. The purpose of this transmission is to check identity and creditworthiness.

PayPal may share personal information with affiliates and service providers or subcontractors insofar as this is necessary to fulfil contractual obligations or to process the data in the order.

The person concerned has the possibility to revoke his or her consent to the handling of personal data from PayPal at any time. A revocation does not affect personal data that must be processed, used or transmitted for the (contractual) handling of payments.

PayPal's applicable privacy policy can be found on

<https://www.paypal.com/de/webapps/mpp/ua/privacy-full>.

26. Legal basis for the processing operation

Article 13 of the Swiss Federal Law on Data Protection (DSG) and Article 6 of the European DS-GVO are the legal framework for our company's processing operations.

27. Duration of storage of personal data

The criterion for the duration of storage of personal data is the respective legal retention period. After expiry of the period, the corresponding data are routinely deleted if they are no longer required for contract fulfilment or contract initiation.

28. Legal or contractual provisions providing the personal data; necessity for the conclusion of the contract; obligation of the data subject to provide the personal data; possible consequences of not providing the data

We would like to inform you that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual regulations (e.g. details of the contractual partner). Sometimes it may be necessary to conclude a contract that a data subject provides us with personal data, which we must then process. For example, the data subject is obliged to provide us with personal data if our company signs a contract with him or her. Failure to provide the personal data would result in the contract with the data subject not being able to be signed. Before the data subject makes personal data available, the data subject must contact one of our employees. Our employee will inform the data subject on a case-by-case basis as to whether the

provision of the personal data is required by law or contract or is necessary for the establishment of the contract, whether there is an obligation to provide the personal data and what the consequences would be if the personal data were not provided. The basis of this data protection declaration was created by the privacy policy generator of the DGD Deutsche Gesellschaft für Datenschutz GmbH, which acts as the External Data Protection Officer in Freising, in cooperation with the lawyer for data protection law Christian Solmecke. Certain sections have been specifically adapted to iWay AG and Swiss legislation.