

# PRIVACY POLICY:

This privacy policy clarifies the nature, scope and purpose of the processing of personal data (hereinafter referred to as "data") within our online offer and the associated websites, functions and content as well as external online presences, such as our social media profile. (hereinafter collectively referred to as "online offering"). With regard to the terms used, such as "processing" or "controller", we refer to the definitions in Art. 4 of the General Data Protection Regulation (GDPR).

## Person responsible

ALPHA-Numerics GmbH  
Tobias Best  
Römerstrasse 32  
56355 Nastätten  
[tobias.best@alpha-numerics.de](mailto:tobias.best@alpha-numerics.de)

[Link to the imprint](#)

## Types of data processed:

- Inventory data (e.g., names, addresses).
- Contact data (e.g., e-mail, telephone numbers).
- Content data (e.g., text entries, photographs, videos).
- Usage data (e.g., websites visited, interest in content, access times).
- Meta/communication data (e.g., device information, IP addresses).

## Categories of affected persons

Visitors and users of the online offer (hereinafter we also refer to the data subjects collectively as "users").

## Purpose of the processing

- Provision of the online offering (support pages), its functions and content.
- Answering contact enquiries and communicating with users.
- Security measures.
- Reach measurement/marketing

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SORT CODE 51050015  
IBAN DE73 5105 0015 0830 0071 00

*This translation is intended to help you understand the German general terms and conditions in English. This is not a legally binding translation.*

## Terminology used

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject"); an identifiable natural 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, an online identifier (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Processing" means any operation or set of operations which is performed on personal data, whether or not by automated means. The term is broad and covers practically any handling of data.

The "controller" is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

## Relevant legal bases

In accordance with Art. 13 GDPR, we inform you of the legal basis of our data processing. If the legal basis is not stated in the privacy policy, the following applies: The legal basis for obtaining consent is Art. 6 para. 1 lit. a and Art. 7 GDPR, the legal basis for processing to fulfil our services and implement contractual measures and respond to enquiries is Art. 6 para. 1 lit. b GDPR, the legal basis for processing to fulfil our legal obligations is Art. 6 para. 1 lit. c GDPR, and the legal basis for processing to protect our legitimate interests is Art. 6 para. 1 lit. f GDPR. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d GDPR serves as the legal basis.

## **Cooperation with processors and third parties**

If we disclose data to other persons and companies (processors or third parties) as part of our processing, transfer it to them or otherwise grant them access to the data, this will only be done on the basis of legal permission (e.g. if the transfer of data to third parties, such as payment service providers or software licence suppliers, is necessary for contract fulfilment pursuant to Art. 6 para. 1 lit. b GDPR), if you have given your consent, if a legal obligation provides for this or on the basis of our legitimate interests.

If we commission third parties with the processing of data on the basis of a so-called "order processing contract", this is done on the basis of Art. 28 GDPR.

## **Transfers to third countries**

If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this occurs in the context of the use of third-party services or disclosure or transfer of data to third parties, this will only take place if it is done to fulfil our (pre)contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual authorisations, we only process or have the data processed in a third country if the special requirements of Art. 44 et seq. GDPR are met. This means, for example, that the processing takes place on the basis of special guarantees, such as the officially recognised determination of a level of data protection corresponding to the EU (e.g. for the USA through the "Privacy Shield") or compliance with officially recognised special contractual obligations (so-called "standard contractual clauses").

## **Rights of the data subjects**

You have the right to request confirmation as to whether the data in question is being processed and to request information about this data as well as further information and a copy of the data in accordance with Art. 15 GDPR.

In accordance with Art. 16 GDPR, you have the right to request the completion of data concerning you or the correction of incorrect data concerning you.

In accordance with Art. 17 GDPR, you have the right to demand that the data in question be deleted immediately or, alternatively, to demand that the processing of the data be restricted in accordance with Art. 18 GDPR.

You have the right to request to receive the data concerning you that you have provided to us in accordance with Art. 20 GDPR and to request that it be transferred to other data controllers.

In accordance with Art. 77 GDPR, you also have the right to lodge a complaint with the competent supervisory authority.

### **Right of cancellation**

You have the right to withdraw your consent in accordance with Art. 7 (3) GDPR with effect for the future.

### **Right of objection**

You can object to the future processing of data concerning you at any time in accordance with Art. 21 GDPR. In particular, you may object to processing for direct marketing purposes.

### **Deletion of data**

The data processed by us will be deleted or its processing restricted in accordance with Art. 17 and 18 GDPR. Unless expressly stated in this privacy policy, the data stored by us will be deleted as soon as it is no longer required for its intended purpose and the deletion does not conflict with any statutory retention obligations. If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

According to legal requirements in Germany, the retention period is 6 years in accordance with Section 257 (1) HGB (commercial books, inventories, opening balance sheets, annual financial statements, commercial letters, accounting documents, etc.) and 10 years in accordance with Section 147 (1) AO (books, records, management reports, accounting documents, commercial and business letters, documents relevant for taxation, etc.).

According to legal requirements in Austria, the retention period is 7 years in accordance with § 132 para. 1 BAO (accounting documents, receipts/invoices, accounts, receipts, business papers, statement of income and expenses, etc.), 22 years in connection with real estate and 10 years for documents in connection with electronically provided services, telecommunications, radio and television services that are provided to non-entrepreneurs in EU member states and for which the Mini-One-Stop-Shop (MOSS) is used.

### **Registration function**

Users have the option of creating a user account for the online support area. As part of the registration process, users will be provided with the required mandatory information. The data entered during registration is used for the purposes of using the service. Users can be informed by e-mail about information relevant to the offer or registration, such as changes to the scope of the offer or technical circumstances. If users have cancelled their user account, their data will be deleted with regard to the user account, subject to their retention is necessary for commercial or tax law reasons in accordance with Art. 6 para. 1 lit. c GDPR. It is the responsibility of users to back up their data before the end of the contract in the event of cancellation. We are authorised to irretrievably delete all user data stored during the term of the contract.

As part of the use of our registration and login functions as well as the use of the user account, we store the IP address and the time of the respective user action. This data is stored on the basis of our legitimate interests as well as those of the user in protection against misuse and other unauthorised use. This data is not passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so in accordance with Art. 6 para. 1 lit. c GDPR. The IP addresses are anonymised or deleted after 7 days at the latest.

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## Contact us

When contacting us (e.g. by contact form, e-mail, telephone or via social media), the user's details are processed to process the contact enquiry and its handling in accordance with Art. 6 para. 1 lit. b) GDPR. The user's details may be stored in a customer relationship management system ("CRM system") or comparable enquiry organisation.

We delete the enquiries if they are no longer required. We review the necessity every two years; the statutory archiving obligations also apply.

## Comments and contributions

If users leave comments or other contributions, their IP addresses are stored on the basis of our legitimate interests within the meaning of Art. 6 para. 1 lit. f. GDPR for 7 days. This is done for our security in case someone leaves illegal content in comments and posts (insults, prohibited political propaganda, etc.). In this case, we ourselves may be prosecuted for the comment or post and are therefore interested in the identity of the author.

## Newsletter

With the following information we inform you about the contents of our newsletter as well as the registration, dispatch and statistical evaluation procedure and your rights of objection. By subscribing to our newsletter, you agree to receive it and to the procedures described.

Content of the newsletter: We only send newsletters, emails and other electronic notifications with advertising information (hereinafter "newsletter") with the consent of the recipient or with legal authorisation. If the content of the newsletter is specifically described when registering for the newsletter, it is decisive for the user's consent. Otherwise, our newsletters contain information about our services and us.

Double opt-in and logging: Registration for our newsletter takes place in a so-called double opt-in procedure. This means that after registering you will receive an e-mail asking you to confirm your registration. This confirmation is necessary to ensure that no-one can register using other people's e-mail addresses. Subscriptions to the newsletter are logged in order to be able to prove the registration process in accordance with legal requirements. This includes storing the time of registration and confirmation as well as the IP address. Changes to your data stored with the mailing service provider are also logged.

Registration data: In order to register for the newsletter, we need your full contact details so that we can identify you as a serious business partner.

Germany: The newsletter and the associated performance measurement are sent on the basis of the consent of the recipients in accordance with Art. 6 para. 1 lit. a, Art. 7 GDPR in conjunction with Section 7 para. 2 no. 3 UWG or on the basis of the legal authorisation in accordance with Section 7 para. 3 UWG.

The registration process is logged on the basis of our legitimate interests in accordance with Art. 6 para. 1 lit. f GDPR. We are interested in using a user-friendly and secure newsletter system that serves both our business interests and the expectations of users and also allows us to provide proof of consent.

Cancellation/revocation - You can cancel the receipt of our newsletter at any time, i.e. revoke your consent. You will find a link to cancel the newsletter at the end of each newsletter. We may store the unsubscribed email addresses for up to three years on the basis of our legitimate interests before deleting them for the purpose of sending the newsletter in order to be able to prove that consent was previously given. The processing of this data is limited to the purpose of a possible defence against claims. An individual request for deletion is possible at any time, provided that the former existence of consent is confirmed at the same time.

## **Integration of third-party services and content**

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR), we use content or service offers from third-party providers within our online offer. GDPR), we use content or service offers from third-party providers to integrate their content and services, such as videos or fonts (hereinafter uniformly referred to as "content").

This always presupposes that the third-party providers of this content recognise the IP address of the user, as they would not be able to send the content to their browser without the IP address. The IP address is therefore required to display this content. We endeavour to only use content whose respective providers only use the IP address to deliver the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. Pixel tags can be used to analyse information such as visitor traffic on the pages of this website. The pseudonymised information may also be stored in cookies on the user's device and may contain technical information about the browser and operating system, referring websites, time of visit and other information about the use of our online offering, as well as being linked to such information from other sources.

### **Youtube**

We integrate the videos of the platform "YouTube" of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/authenticated>.

### **Google Fonts**

We integrate the fonts ("Google Fonts") of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/authenticated>.

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