## **Privacy policy**

## **Preamble**

With the following privacy policy, we would like to inform you about the types of your personal data (hereinafter also referred to as "data") that we process, for what purposes and to what extent. The privacy policy applies to all processing of personal data carried out by us, both in the context of the provision of our services and, in particular, on our websites, in mobile applications as well as within external online presences, such as our social media profiles (hereinafter collectively referred to as "online offering").

The terms used are not gender-specific.

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## Person in charge

Maxim Neumüller, Gassenäcker 13, 72669 Unterensingen, GERMANY - Deutschland

E-mail-addresse: max@lifedetox.info Impressum: https://lifedetox.info/

## Overview of processing operations

The following table summarises the types of data processed and the purposes for which they are processed, and refers to the data subjects.

#### Types of data processed

- 1. File dating.
- 2. Payment.
- 3. Contact details.
- 4. Contract.
- 5. Usage.
- 6. Meta, communication and procedural data.

#### Categories of data subjects

- 1. Customers.
- 2. User.

#### **Purposes of processing**

- 1. Provision of contractual services and fulfilment of contractual obligations.
- 2. Security Measures.
- 3. Marketing.
- 4. Provision of our online offer and user-friendliness.
- 5. Information technology infrastructure.

## Relevant legal bases

**Relevant legal bases under the GDPR:** Below you will find an overview of the legal bases of the GDPR on the basis of which we process personal data. Please note that, in addition to the provisions of the GDPR, national data protection requirements may apply in your or our country of residence or domicile. Furthermore, if more specific legal bases are relevant in individual cases, we will inform you of these in the privacy policy.

- 1. **Performance of a contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR)** Processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures taken at the request of the data subject.
- 2. **Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR)** the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, provided that such interests are not overridden by the interests, fundamental rights and freedoms of the data subject requiring the protection of personal data.

National data protection regulations in Germany: In addition to the data protection regulations of the GDPR, national regulations on data protection apply in Germany. This includes, in particular, the Act on the Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act – BDSG). In particular, the BDSG contains special provisions on the right to information, the right to erasure, the right to object, the processing of special categories of personal data, processing for other purposes and the transmission and automated decision-making in individual cases, including profiling. In addition, the data protection laws of the individual federal states may apply.

Notice of the applicability of the GDPR and the Swiss FADP: This data protection notice serves to provide information in accordance with both the Swiss Federal Act on Data Protection (Swiss FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the wider spatial application and comprehensibility, the terms of the GDPR are used. In particular, instead of the terms "processing" of "personal data", "overriding interest" and "particularly sensitive personal data" used in the Swiss FADP, the terms "processing" of "personal data" and "personal data" used in the GDPR are used. "berechtigtes Interesse" und "besondere Kategorien von Daten" verwendet. Die gesetzliche Bedeutung der Begriffe wird jedoch im Rahmen der Geltung des Schweizer DSG weiterhin nach dem Schweizer DSG bestimmt.

## **Security Measures**

In accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, we take appropriate technical and organizational measures to ensure a level of protection appropriate to the risk.

The measures shall include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical and electronic access to the data, as well as access, input, disclosure, availability and segregation of data. Furthermore, we have put in place procedures to ensure the exercise of data subject rights, the deletion of data and reactions to the risk of data being compromised. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and processes in accordance with the principle of data protection, through technical design and through privacy-friendly default settings.

Securing online connections using TLS/SSL encryption technology (HTTPS): In order to protect users' data transmitted via our online services from unauthorized access, we rely on TLS/SSL encryption technology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are the cornerstones of secure data transmission on the Internet. These technologies encrypt the information transmitted between the website or app and the user's browser (or between two servers), protecting the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions meet the highest security standards. If a website is secured by an SSL/TLS certificate, this is signaled by the display of HTTPS in the URL. This serves as an indicator for users that their data is being transmitted securely and encrypted.

## **International Data Transfers**

Data processing in third countries: If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or if the processing takes place in the context of the use of third-party services or the disclosure or transfer of data to other persons, bodies or companies, this will only be done in accordance with the legal requirements. If the level of data protection in the third country has been recognised by means of an adequacy decision (Art. 45 GDPR), this serves as the basis for the data transfer. Otherwise, data transfers will only take place if the level of data protection is otherwise ensured, in particular by means of standard contractual clauses (Art. 46 (2) (c) GDPR), explicit consent or in the case of contractual or legally required transfer (Art. 49 (1) GDPR). In addition, we will inform you of the basis of the third-country transfer with the individual providers from the third country, whereby the adequacy decisions take precedence as the basis. Information on third-country transfers and existing adequacy decisions can be found in the information provided by the EU Commission: <a href="https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection en?prefLang=de">https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection en?prefLang=de</a>.

EU-US Trans-Atlantic Data Privacy Framework: As part of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the level of data protection as secure for certain companies from the USA within the framework of the adequacy decision of 10.07.2023. The list of certified companies, as well as more information about the DPF, can be found on the website of the U.S. Department of Commerce at

<u>https://www.dataprivacyframework.gov/</u>. As part of the data protection notice, we inform you which service providers we use are certified under the Data Privacy Framework.

## **Deletion of data**

The data processed by us will be deleted in accordance with the legal requirements as soon as their consents to processing are revoked or other permissions cease to apply (e.g. if the purpose of processing this data has ceased to exist or if it is not necessary for the purpose). Unless the data is erased because it is necessary for other purposes permitted by law, its processing will be limited to these purposes. This means that the data will be blocked and will not be processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons, or the storage of which is necessary for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person. Our privacy policy may also contain further information on the retention and deletion of data that takes precedence over the respective processing.

## Rights of data subjects

Rights of data subjects under the GDPR: As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Art. 15 to 21 GDPR:

- 1. **Right to object:** You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data based on Art. 6 (1) (e) or (f) GDPR; this also applies to profiling based on these provisions. If your personal data is processed for the purpose of direct marketing, you have the right to object at any time to the processing of your personal data for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing.
- 2. **Right to withdraw consent:** You have the right to withdraw your consent at any time.
- 3. **Right of access:** You have the right to request confirmation as to whether the data in question is being processed and to request access to this data, as well as further information and a copy of the data in accordance with the legal requirements.
- 4. **Right to rectification:** In accordance with the law, you have the right to request the completion of the data concerning you or the correction of the inaccurate data concerning you.
- 5. **Right to erasure and restriction of processing:** In accordance with the legal requirements, you have the right to demand that data concerning you be erased without undue delay or, alternatively, to demand that the processing of the data be restricted in accordance with the legal requirements.
- 6. **Right to data portability:** You have the right to receive data concerning you that you have provided to us in a structured, commonly used and machine-readable format in accordance with the legal requirements, or to request that it be transmitted to another controller.
- 7. **Complaint to a supervisory authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you believe that the processing of your personal data infringes the requirements of the GDPR.

# Use of online platforms for quotation and distribution purposes

We offer our services on online platforms operated by other service providers. In this context, in addition to our data protection notices, the data protection notices of the respective platforms apply. This applies in particular with regard to the execution of the payment transaction and the reach measurement and interest-based marketing procedures used on the platforms.

- 1. **Types of data processed:** inventory data (e.g. names, addresses); payment data (e.g. bank details, invoices, payment history); contact details (e.g. email, phone numbers); Contract data (e.g. subject matter of the contract, duration, customer category); Usage data (e.g. websites visited, interest in content, access times). Meta, communication and procedural data (e.g. IP addresses, times, identification numbers, consent status).
- 2. **Data Subjects:** Customers.
- 3. **Purposes of processing:** Provision of contractual services and fulfilment of contractual obligations. Marketing.
- 4. **Legal basis:** Performance of a contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Provision of the online offer and web hosting

We process users' data in order to be able to provide them with our online services. For this purpose, we process the user's IP address, which is necessary to transmit the content and functions of our online services to the user's browser or device.

- 1. **Types of data processed:** Usage data (e.g. websites visited, interest in content, access times). Meta, communication and procedural data (e.g. IP addresses, times, identification numbers, consent status).
- 2. **Data subjects:** Users (e.g. website visitors, users of online services).
- 3. **Purposes of processing: Provision of** our online offer and user-friendliness; Information technology infrastructure (operation and provision of information systems and technical equipment (computers, servers, etc.). Security Measures.
- 4. **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### Further information on processing processes, procedures and services:

1. Collection of access data and log files: Access to our online services is logged in the form of so-called "server log files". The server log files may include the address and name of the websites and files accessed, date and time of access, data volumes transferred, notification of successful retrieval, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. On the one hand, the server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the case of abusive attacks, so-called DDoS attacks) and, on the other hand, to ensure the utilization of the servers and their stability; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Deletion of data: Log file information is stored for a maximum of 30 days and then deleted or anonymized. Data whose further retention is necessary for evidentiary purposes are excluded from deletion until the respective incident has been finally clarified.

2. STRATO: services in the field of the provision of information technology infrastructure and related services (e.g. storage space and/or computing capacities); Service provider: STRATO AG, Pascalstraße 10, 10587 Berlin, Germany; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <a href="https://www.strato.de">https://www.strato.de</a>; Privacy Policy: <a href="https://www.strato.de/datenschutz/">https://www.strato.de/datenschutz/</a>. Data Processing Agreement: Provided by the Service Provider.

#### **Definitions**

This section provides an overview of the terminology used in this Privacy Policy. Insofar as the terms are defined by law, their legal definitions apply. The following explanations, on the other hand, are primarily intended to serve the purpose of understanding.

- 1. **Personal data:** "Personal data" means any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject"); an identifiable natural person is defined as one who identifies directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. a cookie) or to one or more factors specific which are an expression of the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 2. **Controller:** "Controller" means 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.
- 3. **Processing:** "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 encompasses practically any handling of data, be it collection, evaluation, storage, transmission or deletion.

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