

Privacy Policy
25.05.2018

BUSINESSPUNKS UG, Marlene-Dietrich-Straße 43, 80636 Munich, Germany (hereinafter “BUSINESSPUNKS” or “we”) provides the BUSINESSPUNKS website, including the online store integrated into it under the URL www.businesspunks.com.

In the following you receive information about the data controller processing your personal data and the data controller’s data protection officer (**Section A**) and about your rights with respect to the processing of your personal data (**Section B**).

You also receive information in the following about the processing of your personal data (**Section C**).

TABLE OF CONTENTS

A.	Information about the data controller	3
I.	Name and contact details of the data controller	3
II.	Contact details of the data controller’s Data Protection Officer	3
B.	Information about the rights of data subjects	4
I.	Right to access	4
II.	Right to rectification	5
III.	Right to erasure (“right to be forgotten”)	5
IV.	Right to the restriction of processing	6
V.	Right to data portability	6
VI.	Right to object	7
VII.	Right to withdraw consent	8
VIII.	Right to lodge a complaint with the supervisory authority	8
C.	Information about the processing of personal data	9
I.	Informational use of the website	9
II.	Measurement of the web audience and use of web analysis technologies	12
III.	Use of the online contact form	17
IV.	Use of the online store	21
V.	Use of the chat function	39
D.	Effective date and amendment of this Privacy Policy	43

A. Information about the data controller

I. Name and contact details of the data controller

BUSINESSPUNKS UG
Marlene-Dietrich-Str 43, 80636 Munich
E-mail: info@businesspunks.com

II. Contact details of the data controller's Data Protection Officer

BUSINESSPUNKS UG
Marlene-Dietrich-Str 43, 80636 Munich
E-mail: info@businesspunks.com

B. Information about the rights of data subjects

As a data subject you have the following rights with respect to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (“right to be forgotten”) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data portability (Article 20 of the General Data Protection Regulation)
- Right to object (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7 paragraph 3 of the General Data Protection Regulation)
- Right to lodge a complaint with the supervisory authority (point (f) of Article 57 paragraph 1 of the General Data Protection Regulation)

You may contact our Data Protection Officer (Section A.II.) for the purpose of exercising your rights.

Information about any special arrangements or mechanisms that make it easier for you to exercise your rights, in particular exercising your rights to data portability and to object can if applicable be found in the information on the processing of personal data in Section C of this Privacy Policy.

Below you will find detailed information about rights relating to the processing of your personal data:

I. Right to access

As a data subject you have a right to obtain access and information under the conditions in accordance with Article 15 of the General Data Protection Regulation.

This means in particular that you have the right to obtain confirmation from us as to whether we are processing your personal data. If so, you also have the right to obtain access to the personal data and the information listed in Article 15 paragraph 1 of the General Data Protection Regulation. This includes information regarding the purposes of the processing, the categories of personal data that are being processed and the recipients or categories of recipients to whom the personal data have been or will be disclosed (points (a), (b) and (c) of Article 15 paragraph 1 of the General Data Protection Regulation).

You can find the full extent of your right to access and information in Article 15 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

II. Right to rectification

As a data subject, you have the right to rectification under the conditions provided in Article 16 of the General Data Protection Regulation.

This means in particular that you have the right to receive from us without undue delay the rectification of inaccuracies in your personal data and completion of incomplete personal data.

You can find the full extent of your right to rectification in Article 16 of the GDPR, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

III. Right to erasure (“right to be forgotten”)

As a data subject, you have a right to erasure (“right to be forgotten”) under the conditions provided in Article 17 of the General Data Protection Regulation.

This means that you have the right to obtain from us the erasure of your personal data and we are obliged to erase your personal data without undue delay when one of the reasons listed in Article 17 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (point (a) of Article 17 paragraph 1 of the General Data Protection Regulation).

If we have made the personal data public and are obliged to erase it, we are also obliged, taking account of available technology and the cost of implementation, to take reasonable steps, including technical measures, to inform data controllers which are processing the personal data that you have requested the erasure by such data controllers of any links to, or copy or replication of those personal data (Article 17 paragraph 2 of the General Data Protection Regulation).

The right to erasure (“right to be forgotten”) does not apply if the processing is necessary for one of the reasons listed in Article 17 paragraph 3 of the General Data Protection Regulation. This can be the case, for example, if the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (points (a) and (e) of Article 17 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to erasure (“right to be forgotten”) in Article 17 of the GDPR, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

IV. Right to the restriction of processing

As a data subject, you have a right to restriction of processing under the conditions provided in Article 18 of the General Data Protection Regulation.

This means that you have the right to obtain from us the restriction of processing if one of the conditions provided in Article 18 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if you contest the accuracy of the personal data. In such a case, the restriction of processing lasts for a period that enables us to verify the accuracy of the personal data (point (a) of Article 18 paragraph 1 of the General Data Protection Regulation).

Restriction means that stored personal data are marked with the goal of restricting their future processing (Article 4 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to restriction of processing in Article 18 of the GDPR, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

V. Right to data portability

As a data subject, you have a right to data portability under the conditions provided in Article 20 of the General Data Protection Regulation.

This means that you generally have the right to receive your personal data with which you have provided us in a structured, commonly used and machine-readable format and to transmit those data to another data controller without hindrance from us if the processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation and the processing is carried out by automated means (Article 20 paragraph 1 of the General Data Protection Regulation).

You can find information as to whether an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

In exercising your right to data portability, you also generally have the right to have your personal data transmitted directly from us to another data controller if technically feasible (Article 20 paragraph 2 of the General Data Protection Regulation).

You can find the full extent of your right data portability in Article 20 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

VI. Right to object

As a data subject, you have a right to object under the conditions provided in Article 21 of the General Data Protection Regulation.

At the latest in our first communication with you, we expressly inform you of your right, as a data subject, to object.

More detailed information on this is given below:

1. Right to object on grounds relating to the particular situation of the data subject

As a data subject, you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on point (e) or (f) of Article 6 paragraph 1, including profiling based on those provisions.

You can find information as to whether an instance of processing is based on point (e) or (f) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

In the event of an objection relating to your particular situation, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You can find the full extent of your right to objection in Article 21 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

2. Right to object to direct marketing

Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You can find information as to whether and to what extent personal data are processed for direct marketing purposes in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

If you object to processing for direct marketing purposes, we no longer process your personal data for these purposes.

You can find the full extent of your right to objection in Article 21 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

VII. Right to withdraw consent

Where an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation, as a data subject, you have the right, pursuant to Article 7 paragraph 3 of the General Data Protection Regulation, to withdraw your consent at any time. The withdrawal of your consent does not affect the legitimacy of the processing that occurred based on your consent until the withdrawal. We inform you of this before you grant your consent.

You can find information as to whether an instance of processing is based on point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

VIII. Right to lodge a complaint with the supervisory authority

As a data subject, you have a right to lodge a complaint with the competent supervisory authority under the conditions provided in point (f) of Article 57 paragraph 1 of the General Data Protection Regulation.

C. Information about the processing of personal data

In connection with our online activities different personal data are processed for different purposes. For example, we process certain protocol data, which accrue for technical reasons when our website is accessed, to provide you with the website content you have requested.

You will find information below regarding the purposes and means of the processing of personal data, in particular on

- the personal data or categories of personal data that are processed,
- the purposes of the processing for which the personal data are intended,
- the legal basis for the processing and, where the processing is based on point (f) of Article 6 paragraph 1 of the General Data Protection Regulation, the legitimate interests pursued by us or by a third party,
- the recipients or categories of recipients of the personal data, if any,
- the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period,
- the existence of any automated decision-making including profiling in accordance with Article 22 paragraphs 1 and 4 of the General Data Protection Regulation and – at least in these cases – meaningful information on the logic involved and the significance of the envisaged consequences of such processing for you.

Where we obtain your personal data from you as the data subject, you also find below information on whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and of the possible consequences of failure to provide such data.

Where we do not obtain personal data from you as the data subject, you will also find below information on from which source the personal data originate, and if applicable, whether it came from publicly accessible sources.

I. Informational use of the website

When the use of the website is purely informational, certain information, for example your IP address, is for technical reasons sent to our server by the browser used on your end device. We process this information in order to provide the website content requested by you. To ensure the security of the IT infrastructure used to provide the website, this information is also stored temporarily in what is referred to as a “web server log file”.

In order to facilitate an informational use of the website by you, we use cookies on the website, by means of which personal data are processed.

You receive more detailed information on this below:

1. Details on the personal data that are processed

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Protocol data which accrue via the Hypertext Transfer Protocol (Secure) (HTTP(S) ("HTTP Data") for technical reasons when the website is visited.	IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site (referrer URL), date and time of the visit.	Website users.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data. Not providing these data means that we cannot provide the requested website content.	Data are stored in server log files in a form allowing the identification of data subject for a maximum period of 7 days, unless any security related event occurs (e.g. a DDoS attack). If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full.

2. Details on the processing of personal data

Purpose of processing the personal data	Categories of personal data that are processed	Automated decision-making	Legal basis, and, if applicable, legitimate interests	Recipient
HTTP Data are temporarily processed on our server to provide the website content requested by the user.	HTTP Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate	Hosting provider.

			interest is providing the website content requested by the user.	
HTTP data are processed temporarily in web server log files to ensure the security of the IT infrastructure used to provide the website, in particular to identify, eliminate and preserve evidence of disruptions (e.g. DDoS attacks).	HTTP Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is ensuring the security of the IT infrastructure used to provide the website, in particular to identify, eliminate and preserve evidence of disruptions (e.g. DDoS attacks).	Hosting provider.

3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Hosting provider	Processor	EU	-

II. Use of the BusinessPunks Newsletter

We offer you the possibility on the website to register to our Newsletter. We process the information provided by you in the registration form to process your request.

You receive more detailed information on this below:

1. Details on the personal data that is processed

Categories of personal data that are processed	Types of personal data within the category	Source of the personal data (and, if applicable, whether the source is publicly accessible)
Data that we collect when you register for the Newsletter (“ Registration Data ”)	E-mail address (mandatory), title, first name, surname (voluntary). When registering on the website, we also record the country-specific version of BusonessPunks Website via which you subscribe to the Newsletter. When registering in an Outlet, we also record the Outlet and the country in which you subscribe to the Newsletter.	Newsletter subscribers
Protocol data that are generated technically when subscribing or unsubscribing to the Newsletter (“ Subscription and Unsubscription Data ”)	Date and time of subscription confirmation in double opt-in process, as well as the IP address of the terminal device used for confirmation, data and time of any unsubscription from the Newsletter.	Newsletter subscribers

<p>Protocol data that are generated technically via the Hypertext Transfer Protocol (HTTP) using the web beacons** contained in the Newsletter when our Newsletter is accessed (“Newsletter HTTP Data”)</p>	<p>IP address, date and time of access</p>	<p>Newsletter subscribers</p>
<p>Data that are stored in cookies* in the Newsletter subscriber’s browser when our Newsletter is accessed („Newsletter Cookie Data“).</p>	<p>Unique ID to (re)identify Newsletter subscribers</p>	<p>Newsletter subscribers</p>
<p>Data in usage profiles that we create by analysing usage behaviour in the Newsletter using pseudonyms (“Newsletter Usage Profile Data”).</p>	<p>Data on usage of the Newsletter, in particular visits, visit frequency and click behaviour in accessed Newsletters</p>	<p>Generated autonomously</p>

<p>Protocol data that are generated technically via the Hypertext Transfer Protocol (HTTP) when the BUSINESSPUNKS Website is visited (“Website HTTP Data”).</p>	<p>IP address, type and version of your Internet browser, operating system used, page visited, page visited beforehand (referral URL), date and time of visit.</p>	<p>Newsletter subscribers</p>
<p>Data that are stored in cookies* in the Newsletter subscriber’s browser when the BUSINESSPUNKS Website is accessed (“Website Cookie Data”).</p>	<p>Unique ID to (re)identify Newsletter subscribers and aggregated Segment Data with objective of improving campaign content.</p>	<p>Newsletter subscribers</p>
<p>Data in usage profiles that we create by analysing the usage behaviour of Newsletter subscribers on the website by using pseudonyms (“Website Usage Profile Data”).</p>	<p>Data about the use of the Website, in particular visits, visits frequency and visit duration on the pages visited.</p>	<p>Generated autonomously</p>

** Cookies are small text files with information stored on the user's terminal device via its browser when a website is visited. When the website is visited again using the same terminal device, the cookie and the information stored in it can be accessed. Depending on storage duration a differentiation is made between transient and persistent cookies. Transient cookies, already called session cookies, are deleted automatically when you close your browser. Persistent cookies are stored on your terminal device for a defined period even after you close your browser.*

*** Web beacons (also called tracking pixels) are small images that enable a log file to be recorded and analysed when e-mails or websites are accessed.*

2. Purpose and legal basis of processing personal data

We process the (categories of) personal data specified in II.1. above for the following purposes and on the legal bases.

If processing is based on Article 6 (1) (f) GDPR, we also specify the legitimate interests pursued by us or any third party.

Purpose of processing (and, if applicable, the legitimate interests pursued with the processing)	(Categories of) personal data (see point C. above for details on the individual categories)	Legal basis for processing in accordance with GDPR (as of 25.05.2018)	(Categories of) recipients (see E. below for details)
Web applications made available on the Website in which you can provide data to us regarding your subscription or unsubscription of our Newsletter.	Website HTTP Data, Registration Data, Subscription and Unsubscription Data	Point (f) of Article 6(1) GDPR	Hosting service providers Newsletter service providers
(Digital) subscription forms made available in the Outlets, in which you can provide data to us regarding the subscription of our Newsletter.	Registration Data, Subscription and Unsubscription Data	Point (f) of Article 6(1) GDPR	Newsletter service providers
“Double opt-in” procedure to confirm subscription. For this purpose we send you an e-mail message requesting you to confirm the e-mail address specified when subscribing to the Newsletter A subscription does not take effect until the e-mail address has been confirmed by clicking on the confirmation link in the e-mail.	Registration Data, Subscription and Unsubscription Data	Point (f) of Article 6(1) GDPR	Newsletter service providers
Sending the Newsletter to Newsletter subscribers. We use the title and name you specified when subscribing to the Newsletter to personalise your Newsletter. To determine the language and the country-specific content of the Newsletter we use the country-specific version of the BusinessPunks Website used when registering for the Newsletter on the Website. When registration takes place in an Outlet, we use the language of the Outlet in which the registration took place for this. When registration takes place in an outlet we also use the recorded information on the individual outlet in which you registered for the Newsletter to determine the country-specific and outlet-specific content of the Newsletter.	Registration Data, Newsletter HTTP Data, Newsletter Cookie Data, Segment Data	Point (a) of Article 6(1) GDPR	Newsletter service providers
Analysis of usage behaviour of Newsletter subscribers in our Newsletter and on our Website and creation of usage profiles using pseudonyms and Subscriber Segments based on these for the purposes of personalising and designing the Newsletter in accordance with user preferences.	Registration Data, Newsletter HTTP Data, Newsletter Cookie Data, Newsletter Usage Profile Data, Website HTTP Data, Website Cookie Data, Website Usage Profile Data, Segment Data	Point (a) of Article 6(1) GDPR	Newsletter service providers
Creation of anonymised reports analysing and determining Newsletter strategy.	Registration Data, Segment Data	Point (f) of Article 6(1) GDPR	

3. Recipients who receive personal data

For the purposes set forth in D. we use a contract data processor that supports us in the handling of our business processes. The following service providers and/or categories of service providers to whom we disclose personal data belong to these:

- Hosting service providers
- Newsletter service providers

4. Duration for which personal data are stored

The duration for which the personal data are stored is set forth below and determined based on the following criteria:

(Categories of) personal data (see C. above for details on individual categories)	Duration for which personal data are stored / criteria for determining this duration
Registration Data, Subscription and Unsubscription Data	We store this data for as long as you subscribe to our Newsletter. In addition, we store this data as an exception beyond this if and as long as we are subject to statutory retention or documentation obligations for such data or to the extent this is necessary for evidence purposes.
Newsletter HTTP Data, Newsletter Cookie Data, Newsletter Usage Profile Data, Website HTTP Data, Website Cookie Data, Website Usage Profile Data, Segment Data	We only store this data as long as you subscribe to our Newsletter. We delete such data as soon as you have unsubscribed our Newsletter.

5. Necessity or obligation to provide personal data and possible consequences of not providing such data

The provision of the following personal data is required/mandatory by law/contract or in order to conclude a contract:

(Categories of) personal data (see C. above for details on individual categories)	Necessity/Obligation	Possible consequences of not providing such data
Registration Data	You must provide your e-mail address when registering in order to receive the Newsletter.	Not providing your e-mail address means that we cannot send you the Newsletter.

6. Rights of the data subject

I. Access, correct, deletion, restriction, data portability

You have the following rights with respect to the processing of your personal data:

- To request us to grant you access to your personal data in accordance with Article 15 DSGVO.

- To request us to correct your personal data in accordance with Article 16 GDPR.
- To request us to delete your personal information in accordance with Article 17 GDPR.
- To request us to restrict the processing of your personal information in accordance with Article 18 GDPR.
- The right to data portability in accordance with Article 20 GDPR.

7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR (see D. above).

If personal data are processed for the purposes of direct marketing (see D. above), you have the right to object at any time to the processing of personal data concerning you for the purposes of such marketing.

8. Right to withdraw consent

If processing is based on point (a) of Article 6(1) or point (a) of Article 9(2) GDPR (see D. above), you have the right to withdraw your consent at any time without the legality of processing based on your consent which has taken place up to withdrawal being affected.

9. Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with a supervisory authority in accordance with point (f) of Article 57(1) GDPR.

III. Measurement of the web audience and use of web analysis technologies

To measure the web audience, visits to our website are recorded by “tracking pixels” and analysed in an anonymised form. Tracking pixels are small graphics on the websites that record a log file and allow a log file analysis of visits to the website.

If you have given your consent to this, we also use web analysis technologies in order, by means of cookies, to record and analyse the usage behaviour on our website to improve the website and better achieve the objectives of the website (e.g. frequency of visits, increase in number of page visits).

You receive more detailed information on this below:

1. Details on the personal data that are processed

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Tracking pixels				
<p>Protocol data that accrue via the Hypertext Transfer Protocol (Secure) (HTTP(S)) when the tracking pixels contained in our website are accessed (“Tracking Pixel HTTP Data”).</p> <p>Tracking pixels are small graphics on websites that allow recording of a log file and a log file analysis of visits to the websites.</p>	<p>IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site (referrer URL), data and time of the visit.</p>	<p>Website users.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot measure the web audience.</p>	<p>An “IP anonymisation” is activated on this website for the use of tracking pixels. This means that the IP address transmitted via the browser for technical reasons is anonymised before being stored by shortening the IP address (by deleting the last octet of the IP address).</p> <p>This means that the other protocol data are not stored in a form allowing the data subject to be identified either.</p>
Google Analytics				

Protocol data that accrue via the Hypertext Transfer Protocol (Secure) (HTTP(S)) for technical reasons during use of the web analysis tool Google Analytics used on the website ("Google Analytics" HTTP Data").	IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site (referrer URL), data and time of the visit.	Website users.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data. Not providing these data means that we cannot conduct a web analysis.	On this website, IP anonymisation is activated for the use of the web analysis tool Google Analytics. This means that the IP address technically transmitted by the browser is anonymised before being stored by shortening the IP address (by deleting the last octet of the IP address). We store the data until you revoke your consent.
Data that are stored on the user's end device for the web analysis tool Google Analytics ("Google Analytics Cookie Data").	Unique visitor ID to recognise returning visitors, number of each visitor's visits, date and time of first visit, previous visits and the current visit, beginning and predicted end of the current visit, visitor's category, source or campaign that explains how the user came to the website.	Website users.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data. Not providing these data means that we cannot conduct any web analysis.	We do not store these data on our systems.
Data collected by the web analysis tool Google Analytics and stored in pseudonym user profiles ("Google Analytics Profile Data").	Data about the use of the website, in particular page visits, visit frequency and time spent on the pages visited.	Generated autonomously.	-	We store the data until you revoke your consent.
analysis tool Webtrekk and stored in pseudonym user profiles ("Webtrekk Profile Data").	particularly page visit and page visit frequency and time spent on the pages visited.			

2. Details on the processing of the personal data

Purpose of processing the personal data	Categories of personal data that are processed	Automated decision-making	Legal basis, and, if applicable, legitimate interests	Recipient
To measure the web audience, the visits to our website are	Tracking Pixel HTTP Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate	Hosting provider.

<p>recorded by tracking pixels and analysed in anonymised form.</p>			<p>interest is measuring the web audience.</p>	
<p>To improve the website and better achieve the objectives of the website (e.g. frequency of visits, increase in number of page visits), the behaviour of users on our website is recorded and analysed in pseudonymised form. Users of the website are marked in pseudonymised form so that they can be recognised again on the website. Pseudonymised usage profiles are created from this information. The pseudonymised usage profiles are not combined with data regarding the bearer of the pseudonym. The objective of this process is to examine where users come from, which areas of the website they visit and how often and how long which subpages and categories are looked at. Using the web analysis tool Optimizely, we also study how website variations are used in certain regions.</p> <p>For these purposes, cookies for the web analysis tools Google Analytics, Optimizely and Webtrekk are used.</p>	<p>Google Analytics HTTP Data, Google Analytics Cookie Data, Google Analytics Profile Data, Optimizely HTTP Data, Optimizely Cookie Data, Optimizely Profile Data, Webtrekk HTTP Data, Webtrekk Cookie Data, Webtrekk Profile Data.</p>	<p>No automated decision-making.</p>	<p>Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation)</p>	<p>Google</p>

3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA ("Google")	Processor	USA	EU-U.S. Privacy Shield Certification

IV. Use of the online contact form

We offer you the possibility on the website to contact us using contact forms. We process the information provided by you in the contact forms to process your request.

You receive more detailed information on this below:

1. Details on the personal data that is processed

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Protocol data that accrue via the Hypertext Transfer Protocol (Secure) (HTTP(S)) for technical reasons ("HTTP Data").	IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site (referrer URL), data and time of the visit.	Website users.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data. Not providing these data means that we cannot provide the requested Website content.	Data are stored in server log files in a form allowing the identification of data subject for a maximum period of 7 days, unless any security related event occurs (e.g. a DDoS attack). If there is a security related event, server log files are

				stored until the security relevant event has been eliminated and clarified in full.
Data that you provide us with in the contact forms on the website (“Contact Form Data”).	Title, first name, last name, street, house number, postal code, city, country, e-mail address, your request, your message (mandatory), title, telephone number, order number (voluntary).	Website users.	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>Not providing the data means that we cannot process your request.</p>	<p>Data are stored until your request has been handled.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.</p> <p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i>, section 257 German Commercial Code <i>Handelsgesetzbuch (HGB)</i>).</p>

2. Details on the processing of the personal data

Purpose of processing the personal data	Categories of personal data that are processed	Automated decision-making	Legal basis, and, if applicable, legitimate interests	Recipient
HTTP Data are processed temporarily on our web server to provide the contact forms on the website.	HTTP Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is providing the website content requested by the user.	Hosting provider.
Processing your request.	Contact Form Data.	No automated decision-making.	If your request relates to a contract to which you are a party or the implementation of pre-contractual measures: point (f) of Article 6 paragraph 1 of the General Data Protection Regulation. Otherwise: balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). In this case, our legitimate interest is processing your request.	-
Storage and processing for evidence purposes for the establishment, exercise or defence of any legal claims.	Contact Form Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of any legal claims.	-
Storage of data in order to meet statutory document retention	Contact Form Data.	No automated decision-making.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1	-

<p>requirements, in particular commercial and tax law document retention requirements.</p> <p>Depending on the document type, commercial and tax law document retention requirements of six or ten years can exist (Sec. 147 German Fiscal Code (<i>Abgabenordnung – AO</i>), Sec. 257 German Commercial Code – <i>Handelsgesetzbuch – HGB</i>)).</p>			<p>of the General Data Protection Regulation).</p>	
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	----------------------------------------------------	--

3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Hosting provider	Processor	EU	-

V. Use of the online store

You have the possibility on our website to use the online store. Various different possibilities are available to you for placing orders in our online store. You can place your order as a guest customer, by using your My BUSINESSPUNKS customer account, via PayPal or with the support of an online chat agent (“co-browsing”). We process various personal data, for example personal data that you provide us with in the order form, in particular to provide various functions in our online store, for the conclusion and performance of purchase agreements, for the management and collection of our purchase price receivables and in order to carry out a risk and fraud assessment. You receive more detailed information on this below.

1. Details on the personal data that is processed

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Protocol data that accrue via the Hypertext Transfer Protocol (Secure) (HTTP(S)) for technical reasons during use of our online store (“HTTP Data”).	IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site (referrer URL), data and time of the visit.	Online store users.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data. Not providing these data means that we cannot provide the requested Website content.	Data are stored in server log files in a form allowing the identification of data subject for a maximum period of 7 days, unless any security related event occurs (e.g. a DDoS attack). If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full.
Data that provide us with to process your order (“Order Form Data”).	Title, first name, last name, address and e-mail address.	Online store users.	Provision is necessary in order to enter into a purchase agreement. Not providing these data means that you cannot order anything from our online store.	We store your data until your order has been completely processed, i.e. until the goods have been sent. We store these data for evidence purposes for the

				<p>establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.</p> <p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i>, section 257 German Commercial Code <i>Handelsgesetzbuch (HGB)</i>).</p> <p>If you have given your consent, we also store and use your purchase data for the fraud check and creditworthiness verification (details below under Section 2.IV.2.b)).</p> <p>If you participate in our customer loyalty programme and</p>
--	--	--	--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

				use your customer account for orders, we also store your address data for the functions of your customer account and use them for the purposes described under CII of the data protection notifications for participating in the loyalty programme.
Your contact data with which PayPal provides us when the payment method "PayPal Express" is used, if you consent to this ("PayPal Contact Data").	Title, first name, last name, address and e-mail address.	PayPal S.à.r.l, et Cie, S.C:A. (22-24 Boulevard Royal, L-2449 Luxembourg, Luxembourg).	-	<p>We store your data until your order has been completely processed, i.e. until the goods have been sent.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.</p> <p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to</p>

				commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i> , section 257 German Commercial Code <i>Handelsgesetzbuch (HGB)</i>).
Data with which you provide us for the payment of the items you have ordered ("PaymentData").	The details that are required for the payment method you choose (EC card, credit card, instant transfer/iDeal, PayPal, PayPal Express or invoice).	Online store users.	Provision is necessary to enter into a purchase agreement. Not providing these data means that you cannot order anything from our online store.	<p>We store your data until your order has been completely processed, i.e. until the goods have been sent.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.</p> <p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i>, section 257 German</p>

				Commercial Code <i>Handelsgesetzbuch (HGB).</i>
Information about your purchase that we need to fill your order ("Purchase Data").	Information about the articles purchased (article description, article number, number of articles, size, colour, price, currency, order number), store version used, date and time of each purchase, payment method chosen and shipping option, status of your order.	Generated autonomously.	-	<p>We store your data until your order has been completely processed, i.e. until the goods have been sent.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.</p> <p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code Abgabenordnung (AO), section 257 German Commercial Code Handelsgesetzbuch (HGB)).</p>

				<p>If you have given your consent, we also store and use your purchase data for the fraud check and creditworthiness verification (details below under Section 2.IV.2.b)).</p> <p>If you participate in our customer loyalty programme use your customer account for orders, we also store your purchase data for the functions of your customer account and use them for the purposes described under CII of the data protection notifications for participating in the loyalty programme.</p>
Information in transaction e-mails, that we send to process (or reverse) your order (e.g. order receipt confirmation) ("Transaction E-Mail Data").	Order Form Data, Purchase Data, Receivables Data, other content and the time of the transaction e-mails.	Generated autonomously.	-	<p>We store your data until your order has been completely processed, i.e. until the goods have been sent.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes</p>

				<p>until such have been concluded.</p> <p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i>, section 257 German Commercial Code <i>Handelsgesetzbuch (HGB)</i>).</p>
Data that we process to manage our purchase price receivables from customers in our internal receivables management system ("Receivables Data").	Especially information on currently unpaid items, payments received, payment reminders issued, on-going collection processes, returns.	Payment services provider, collection agencies, generated autonomously.	-	<p>We store your data until your order has been completely processed, i.e. until the goods have been sent.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.</p>

				<p>We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i>, section 257 German Commercial Code <i>Handelsgesetzbuch (HGB)</i>).</p> <p>If you have given your consent, we also store and use your purchase data for the fraud check and creditworthiness verification (details below under Section 2.IV.2.b))</p>
<p>Technical data on the device used for the order (“Device Data”).</p>	<p>Plug-ins (including. versions installed on the device, reading of the information stored in the tracking cookie, reading of the information contained in the HTML5 Canvas picture element, fonts installed on the device, screen parameters (width, height, resolution, colours), information from the canvas WebGL context(if available, renderer name, vendor name), Web Audio API, operating</p>	<p>Online store users, generated autonomously.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot conduct a fraud check or creditworthiness verification based on these data.</p>	<p>We store the data until you revoke your consent.</p>

	system identifier, browser type and version, time information (time zone, current time), language setting, URLs of websites accessed and referenced, supported MIME Types, IP address including anonymisation, hash ID created from these data.			
Internal data that we process to check and detect a payment default risk ("Internal Risk Data").	Knowledge that we have obtained from past-completed fraud and creditworthiness checks and the decision parameters and limits set on this basis.	Generated autonomously.	-	We store the data until you revoke your consent.

2. Details on the processing of the personal data

a) Processing of personal data on the basis of statutory legislation

Purpose of processing the personal data	Categories of personal data that are processed	Automated decision-making	Legal basis, and, if applicable, legitimate interests	Recipient
-----------------------------------------	------------------------------------------------	---------------------------	-------------------------------------------------------	-----------

<p>HTTP Data are temporarily processed on our web server in order to make our online store functions available on the website.</p>	<p>HTTP Data.</p>	<p>No automated decision-making.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is providing the website content that requested by the user.</p>	<p>Hosting provider.</p>
<p>Providing the ordering method "PayPal Express", that enables you to order even more quickly. If you wish to pay for your order using PayPal and click on "directly to PayPal", you arrive at the website of PayPal S.à.r.l, et Cie, S.C:A. (22-24 Boulevard Royal, L-2449 Luxembourg, Luxembourg), where you will be asked to provide and/or confirm your login and contact data stored by PayPal. PayPal then transfers the data necessary to process the order to us so that we can carry out the order.</p>	<p>PayPal Contact Data.</p>	<p>No automated decision-making.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is making the user-friendly function "PayPal Express" available.</p>	<p>Payment services provider, hosting provider.</p>
<p>Conclusion and performance of purchase agreements that are entered into via our online store.</p> <p>This includes in particular preparing the shipping of the goods you have ordered by the shipping services provider you have chosen and the sending of transaction e-mails, to inform you</p>	<p>Order Form Data, Payment Data, Purchase Data, Transaction E-Mail Data.</p>	<p>No automated decision-making.</p>	<p>Performance of a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).</p>	<p>Hosting provider, e-mail provider, payment services provider, shipping services provider.</p>

<p>of the status of each of your orders.</p>				
<p>Providing the “co-browsing” function, with which you can choose to have our live-chat agents actively assist you in ordering from our online store.</p> <p>If, during an online chat on our website, you consent to give the chat agent remote control of your browser, this agent can take individual steps in the ordering process for you (see also no. 3 of the general terms and conditions for the online store). To provide this type of support for you in the ordering process, we process only the data necessary for this, i.e. the data already processed during the ordering procedure as well as a screen shot of the BUSINESSPUNKS online store opened in your browser.</p> <p>We have ensured by technical means that the chat agents are only able to view the content absolutely necessary for this support on our own pages of our online store and that no other personal data whatsoever from your computer or other browser windows are processed.</p>	<p>All data listed under Section C.IV.1 and an image of your browser.</p>	<p>No automated decision-making.</p>	<p>Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is user-friendly technical assistance in the ordering process.</p>	<p>Chat agents</p>

Management of our receivables from customers in our internal receivables management system.	Receivables Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is proper management of our customer receivables.	Hosting provider.
Collection of our customer receivables.	Receivables Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is collecting our customer receivables.	Collection agencies.
Storage and processing for evidence purposes for the establishment, exercise or defence of any legal claims.	Order Form Data, Payment Data, Purchase Data, Transaction E-Mail Data, Receivables Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of any legal claims.	Hosting provider
<p>Reversing purchase agreements in the event of a cancellation or another reason for reversal.</p> <p>To refund the purchase price, we use the same payment method that you used to pay the purchase price.</p> <p>If you use our "Order from store" service, pay directly at the point of sale and decide to cancel your order, we collect and use your bank account information to refund the purchase price</p>	Order Form Data, Payment Data, Purchase Data, Transaction E-Mail Data, Receivables Data.	No automated decision-making.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is in reversing purchase agreements.	Hosting provider, e-mail provider.

because we do not store the details of your payment in the payment systems of our brick-and-mortar stores. In order to do this, we contact you via e-mail and inform you of the next steps.				
<p>Storage of data to comply with statutory document retention requirements, particularly under commercial and tax law.</p> <p>Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (section 147 German Tax Code <i>Abgabenordnung (AO)</i>, section 257 German Commercial Code <i>Handelsgesetzbuch (HGB)</i>).</p>	Order Form Data, Payment Data, Purchase Data, Transaction E-Mail Data, ReceivablesData.	No automated decision-making.	Compliance with a legal obligation (point (c) of Article 6 paragraph 1 of the General Data Protection Regulation).	Hosting provider

3. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Hosting provider	Processor	EU	-
E-mail service provider	Processor	EU	-

Payment services provider	Controller	EU	-
Shipping services provider	Controller	EU	-
Collection agencies	Processor	EU	-

D. Effective date and amendment of this Privacy Policy

The effective date of this Privacy Policy is 25 May 2018.

It may be necessary to amend this Privacy Policy due to technical developments and/or changes to statutory or regulatory requirements,

The currently valid version of this Privacy Policy can be accessed at any time at www.businesspunks.com