Privacy Policy

1) Introduction and Contact Details of the Controller

- **1.1** We are pleased that you are visiting our website and thank you for your interest. Below, we inform you about the handling of your personal data when using our website. Personal data is any data with which you can be personally identified.
- **1.2** The controller for data processing on this website within the meaning of the General Data Protection Regulation (GDPR) is Helm Trophy GmbH, Im Gewerbegebiet 8, 36289 Friedewald, Germany, Tel.: +49 66 74 / 22 000-0, Fax: +49 66 74 / 22 000-99, E-Mail: service@helmtrophy.com. The controller for the processing of personal data is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data.

2) Data Collection When Visiting Our Website

- **2.1** When using our website for informational purposes only, i.e., if you do not register or otherwise provide us with information, we only collect data that your browser transmits to the server (so-called "server log files"). When you access our website, we collect the following data, which is technically necessary for us to display the website to you:
- Our visited website
- Date and time at the time of access
- Amount of data sent in bytes
- Source/reference from which you reached the page
- Used browser
- Used operating system
- Used IP address (if applicable: in anonymized form)

The processing is carried out in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in improving the stability and functionality of our website. The data will not be passed on or used in any other way. However, we reserve the right to check the server log files retrospectively if there are concrete indications of illegal use.

2.2 This website uses SSL or TLS encryption for security reasons and to protect the transmission of personal data and other confidential content (e.g., orders or inquiries to the controller). You can recognize an encrypted connection by the string "https://" and the lock symbol in your browser line.

3) Hosting & Content-Delivery-Network

3.1 For hosting our website and displaying the page content, we use a provider who provides its services exclusively on servers within the European Union, either itself or through selected subcontractors.

All data collected on our website is processed on these servers.

We have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

3.2 Bunny

We use a content delivery network from the following provider: BUNNYWAY d.o.o., Cesta komandanta Staneta 4A, 1215 Medvode, Slovenia

This service allows us to deliver large media files such as graphics, page content, or scripts faster through a network of regionally distributed servers. The processing is carried out to safeguard our legitimate interest

in improving the stability and functionality of our website in accordance with Art. 6 para. 1 lit. f GDPR.

We have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

4) Cookies

To make visiting our website attractive and to enable the use of certain functions, we use cookies, i.e., small text files that are stored on your device. Some of these cookies are automatically deleted after closing the browser (so-called "session cookies"), while others remain on your device longer and allow the storage of page settings (so-called "persistent cookies"). In the latter case, you can find the storage duration in the overview of the cookie settings of your web browser.

If personal data is also processed by individual cookies we use, the processing is carried out in accordance with Art. 6 para. 1 lit. b GDPR either for the execution of the contract, in accordance with Art. 6 para. 1 lit. a GDPR in the case of consent given, or in accordance with Art. 6 para. 1 lit. f GDPR to safeguard our legitimate interests in the best possible functionality of the website as well as a customer-friendly and effective design of the page visit.

You can set your browser to inform you about the setting of cookies and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or in general.

Please note that if you do not accept cookies, the functionality of our website may be limited.

5) Contact

5.1 Own Live Chat System

This website uses a live chat system to answer live inquiries.

The processing of personal data transmitted via the chat is carried out either in accordance with Art. 6 para. 1 lit b GDPR because it is necessary for the initiation or execution of a contract, or in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in effectively supporting our site visitors. Your data transmitted in this way will be deleted, subject to statutory retention periods, when the matter in question has been conclusively clarified.

In addition, further information may be collected and evaluated for the purpose of creating pseudonymized usage profiles using cookies, which, however, do not serve your personal identification and are not merged with other data sets. If this information has a personal reference, the processing is carried out in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in the statistical analysis of user behavior for optimization purposes.

The setting of cookies can be prevented by appropriate browser settings. However, the functionality of our website may be restricted in this case.

You can object to the collection and storage of data for the purpose of creating a pseudonymized usage profile at any time with effect for the future.

5.2 Contact for Review Reminder

To review our service and product quality, we reserve the right to use your email address, which we have received from you in connection with the sale of a good or service, for a review request, which we may send to you by email following an order you have placed in our online shop. You can object to the use of your email address for the aforementioned purpose at any time without incurring any costs other than the transmission costs according to the basic rates.

5.3 WhatsApp Business

We offer visitors to our website the opportunity to contact us via the WhatsApp messaging service of WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. For this purpose, we use the so-called "Business Version" of WhatsApp.

If you contact us via WhatsApp on the occasion of a specific transaction (e.g., a placed order), we store and use the mobile phone number you use on WhatsApp and, if provided, your first and last name in accordance with Art. 6 para. 1 lit. b. GDPR to process and respond to your request. On the same legal basis, we may ask you via WhatsApp to provide further data (order number, customer number, address, or email address) to be able to assign your request to a specific process.

If you use our WhatsApp contact for general inquiries (e.g., about the range of services, availability, or our website), we store and use the mobile phone number you use on WhatsApp and, if provided, your first and last name in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in efficiently and promptly providing the requested information.

Your data will always be used only to respond to your request via WhatsApp. There will be no disclosure to third parties.

Please note that WhatsApp Business has access to the address book of the mobile device we use for this purpose and automatically transfers phone numbers stored in the address book to a server of the parent company Meta Platforms Inc. in the USA. For the operation of our WhatsApp Business account, we use a mobile device in whose address book only the WhatsApp contact data of users who have also contacted us via WhatsApp are stored.

This ensures that every person whose WhatsApp contact data is stored in our address book has already consented to the transmission of their WhatsApp phone number from the address books of their chat contacts in accordance with Art. 6 para. 1 lit. a GDPR by accepting the WhatsApp terms of use when first using the app on their device. A transmission of data of users who do not use WhatsApp and/or have not contacted us via WhatsApp is thus excluded.

The purpose and scope of data collection and the further processing and use of data by WhatsApp, as well as your rights in this regard and settings options for protecting your privacy, can be found in WhatsApp's privacy policy: https://www.whatsapp.com/legal/?eea=1#privacy-policy

We have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

In the context of the above-mentioned processing, data may be transferred to servers of Meta Platforms Inc. in the USA.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

5.4 In the context of contacting us (e.g., via contact form or email), personal data is processed exclusively for the purpose of processing and responding to your request and only to the extent necessary for this purpose.

The legal basis for processing this data is our legitimate interest in responding to your request in accordance with Art. 6 para. 1 lit. f GDPR. If your contact aims at a contract, the additional legal basis for processing is Art. 6 para. 1 lit. b GDPR. Your data will be deleted if it can be inferred from the circumstances that the matter in question has been conclusively clarified and provided that there are no statutory retention obligations to the contrary.

6) Comment Function

In the context of the comment function on this website, in addition to your comment, information on the time of the comment's creation and the commentator name you have chosen will be stored and published on this website. Furthermore, your IP address will be logged and stored. This storage of the IP address is for security reasons and in the event that the person concerned violates the rights of third parties or posts illegal content through a submitted comment. We need your email address to contact you if a third party objects to your published content as illegal.

The legal bases for storing your data are Art. 6 para. 1 lit. b and f GDPR. We reserve the right to delete comments if they are objected to as illegal by third parties.

7) Data Processing When Opening a Customer Account

In accordance with Art. 6 para. 1 lit. b GDPR, personal data will continue to be collected and processed to the extent necessary if you provide it to us when opening a customer account. The data required for opening an account can be found in the input mask of the corresponding form on our website.

You can delete your customer account at any time and can do so by sending a message to the abovementioned address of the controller. After deleting your customer account, your data will be deleted, provided that all contracts concluded through it have been fully processed, there are no statutory retention obligations to the contrary, and there is no legitimate interest on our part in further storage.

8) Use of Customer Data for Direct Advertising

8.1 Registration for our Email Newsletter

If you register for our email newsletter, we will regularly send you information about our offers. The only mandatory information for sending the newsletter is your email address. The provision of further data is voluntary and is used to address you personally. For sending the newsletter, we use the so-called double opt-in procedure, which ensures that you only receive newsletters if you have expressly confirmed your consent to receive the newsletter by activating a verification link sent to the specified email address.

By activating the confirmation link, you give us your consent to use your personal data in accordance with Art. 6 para. 1 lit. a GDPR. We store your IP address entered by the Internet Service Provider (ISP) as well as the date and time of registration to be able to trace a possible misuse of your email address at a later date. The data collected by us when registering for the newsletter will be used strictly for the intended purpose.

You can unsubscribe from the newsletter at any time via the link provided in the newsletter or by sending a corresponding message to the controller mentioned at the beginning. After unsubscribing, your email address will be immediately deleted from our newsletter distribution list, unless you have expressly consented to further use of your data or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this declaration.

8.2 Sending the Email Newsletter to Existing Customers

If you have provided us with your email address when purchasing goods or services, we reserve the right to regularly send you offers for similar goods or services from our range by email. For this, we do not need to obtain separate consent from you in accordance with § 7 para. 3 UWG. The data processing is carried out solely based on our legitimate interest in personalized direct advertising in accordance with Art. 6 para. 1 lit. f GDPR. If you have initially objected to the use of your email address for this purpose, no mail will be sent by us.

You are entitled to object to the use of your email address for the aforementioned advertising purpose at any time with effect for the future by notifying the controller mentioned at the beginning. For this, you will only incur transmission costs according to the basic rates. After receiving your objection, the use of your email address for advertising purposes will be immediately discontinued.

8.3 Advertising by Mail

Based on our legitimate interest in personalized direct advertising, we reserve the right to store your first and last name, your postal address, and - if we have received this additional information from you in the context of the contractual relationship - your title, academic degree, year of birth, and your professional, industry, or business designation in accordance with Art. 6 para. 1 lit. f GDPR and to use it for sending interesting offers and information about our products by mail.

You can object to the storage and use of your data for this purpose at any time.

9) Data Processing for Order Processing

9.1 Transmission of Image Files for Order Processing by Email

On our website, we offer customers the opportunity to commission the personalization of products by submitting image files via email. The submitted image motif is used as a template for the personalization of the selected product.

Via the email address provided on the website, the customer can transmit one or more image files from the storage of the used device to us. We collect, store, and use the files transmitted in this way exclusively for the production of the personalized product in accordance with the respective service description on our website. If the transmitted image files are passed on to specific service providers for the production and processing of the order, you will be explicitly informed about this in the following paragraphs. No further disclosure will take place. If the transmitted files or the digital motifs contain personal data (in particular images of identifiable persons), all the aforementioned processing operations are carried out exclusively for the purpose of processing your online order in accordance with Art. 6 para. 1 lit. b GDPR.

After the order has been fully processed, the transmitted image files will be automatically and completely deleted.

9.2 Transmission of Image Files for Order Processing via Messaging Function

If the customer has the opportunity to commission the personalization of products by submitting image files via the messaging function, the submitted image motif is used as a template for the personalization of the selected product.

Via the Instagram messaging function, the customer can transmit one or more image files from the storage of the used device to us. We collect, store, and use the files transmitted in this way exclusively for the production of the personalized product in accordance with the respective description of our services. If the transmitted image files are passed on to specific service providers for the production and processing of the order, you will be explicitly informed about this in the following paragraphs. No further disclosure will take place. If the transmitted files or the digital motifs contain personal data (in particular images of identifiable persons), all the aforementioned processing operations are carried out exclusively for the purpose of processing your online order in accordance with Art. 6 para. 1 lit. b GDPR. After the order has been fully processed, the transmitted image files will be automatically and completely deleted.

9.3 Transmission of Image Files for Order Processing via Upload Function

On our website, we offer customers the opportunity to commission the personalization of products by submitting image files via an upload function. The submitted image motif is used as a template for the personalization of the selected product.

Via the upload form on the website, the customer can transmit one or more image files from the storage of the used device directly via automated, encrypted data transmission to us. We collect, store, and use the transmitted files exclusively for the production of the personalized product in accordance with the respective service description on our website. If the transmitted image files are passed on to specific service providers for the production and processing of the order, you will be explicitly informed about this in the following paragraphs. No further disclosure will take place. If the transmitted files or the digital motifs contain personal data (in particular images of identifiable persons), all the aforementioned processing operations are carried out exclusively for the purpose of processing your online order in accordance with Art. 6 para. 1 lit. b GDPR.

After the order has been fully processed, the transmitted image files will be automatically and completely deleted.

9.4 To the extent necessary for the contract processing for delivery and payment purposes, the personal data collected by us will be passed on to the commissioned transport company and the commissioned credit institution in accordance with Art. 6 para. 1 lit. b GDPR.

If we owe you updates for goods with digital elements or for digital products based on a corresponding contract, we process the contact data you provided when ordering (name, address, email address) to inform

you personally about upcoming updates within the legally prescribed period in accordance with Art. 6 para. 1 lit. c GDPR via a suitable communication channel (e.g., by mail or email). Your contact data will be used strictly for the purpose of notifications about updates owed by us and will only be processed by us to the extent necessary for the respective information.

To process your order, we also work with the following service provider(s), who support us in whole or in part in the execution of concluded contracts. Certain personal data will be transmitted to these service providers in accordance with the following information.

9.5 Use of Payment Service Providers (Payment Services)

- Adyen

One or more online payment methods from the following provider are available on this website: Adyen, Simon Carmiggeltstraat 6 - 50, 1011 DJ Amsterdam, Netherlands

If you select a payment method from the provider where you make an advance payment (e.g., credit card payment), your payment data provided during the order process (including name, address, bank and card information, currency, and transaction number) as well as information about the content of your order will be passed on to this provider in accordance with Art. 6 para. 1 lit. b GDPR. The transfer of your data is carried out solely for the purpose of payment processing with the provider and only to the extent necessary for this purpose.

- Amazon Pay

One or more online payment methods from the following provider are available on this website: Amazon Payments Europe s.c.a., 38 avenue J.F. Kennedy, L-1855 Luxembourg

If you select a payment method from the provider where you make an advance payment (e.g., credit card payment), your payment data provided during the order process (including name, address, bank and card information, currency, and transaction number) as well as information about the content of your order will be passed on to this provider in accordance with Art. 6 para. 1 lit. b GDPR. The transfer of your data is carried out solely for the purpose of payment processing with the provider and only to the extent necessary for this purpose.

- Apple Pay

If you choose the payment method "Apple Pay" from Apple Distribution International (Apple), Hollyhill Industrial Estate, Hollyhill, Cork, Ireland, the payment processing is carried out via the "Apple Pay" function of your device operated with iOS, watchOS, or macOS by charging a payment card stored in "Apple Pay". Apple Pay uses security features integrated into the hardware and software of your device to protect your transactions. To authorize a payment, you must enter a code previously set by you and verify it using the "Face ID" or "Touch ID" function of your device.

For the purpose of payment processing, the information you provide during the order process, along with information about your order, is transmitted to Apple in encrypted form. Apple then encrypts this data again with a developer-specific key before the data is transmitted to the payment service provider of the payment card stored in Apple Pay to carry out the payment. The encryption ensures that only the website through which the purchase was made can access the payment data. After the payment is made, Apple sends your device account number and a transaction-specific, dynamic security code to the originating website to confirm the success of the payment.

If personal data is processed during the described transmissions, the processing is carried out solely for the purpose of payment processing in accordance with Art. 6 para. 1 lit. b GDPR.

Apple stores anonymized transaction data, including the approximate purchase amount, the approximate date and time, and the indication of whether the transaction was successfully completed. The anonymization completely excludes a personal reference. Apple uses the anonymized data to improve "Apple Pay" and other Apple products and services.

If you use Apple Pay on the iPhone or Apple Watch to complete a purchase made via Safari on the Mac, the Mac and the authorization device communicate via an encrypted channel on Apple's servers. Apple does

not process or store any of this information in a format that can identify you. You can disable the ability to use Apple Pay on your Mac in the settings of your iPhone. Go to "Wallet & Apple Pay" and disable "Allow Payments on Mac".

Further information on data protection at Apple Pay can be found at the following internet address: https://support.apple.com/de-de/HT203027 - Google Pay

If you choose the payment method "Google Pay" from Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"), the payment processing is carried out via the "Google Pay" application of your mobile device operated with at least Android 4.4 ("KitKat") and equipped with an NFC function by charging a payment card stored in Google Pay or a verified payment system there (e.g., PayPal). To authorize a payment via Google Pay of more than 25,- €, you must first unlock your mobile device using the verification measure set up (e.g., facial recognition, password, fingerprint, or pattern).

For the purpose of payment processing, the information you provide during the order process, along with information about your order, is transmitted to Google. Google then transmits your payment information stored in Google Pay in the form of a one-time transaction number to the originating website, which verifies a successful payment. This transaction number does not contain any information about the real payment data of your payment methods stored in Google Pay but is created and transmitted as a one-time valid numeric token. In all transactions via Google Pay, Google acts solely as an intermediary to process the payment. The transaction is carried out exclusively in the relationship between the user and the originating website by charging the payment method stored in Google Pay.

If personal data is processed during the described transmissions, the processing is carried out solely for the purpose of payment processing in accordance with Art. 6 para. 1 lit. b GDPR.

Google reserves the right to collect, store, and evaluate certain transaction-specific information for each transaction made via Google Pay. This includes the date, time, and amount of the transaction, the merchant location and description, a description of the goods or services purchased provided by the merchant, photos you have attached to the transaction, the name and email address of the seller and buyer or sender and recipient, the payment method used, your description of the reason for the transaction, and any offer associated with the transaction.

According to Google, this processing is carried out solely in accordance with Art. 6 para.1 lit. f GDPR based on the legitimate interest in proper accounting, verification of transaction data, and optimization and maintenance of the Google Pay service.

Google also reserves the right to combine the processed transaction data with other information collected and stored by Google when using other Google services.

The terms of use for Google Pay can be found here:

https://payments.google.com/payments/apis-secure/u/0/get_legal_document?ldo=0&ldt=googlepaytos &ldl=de

Further information on data protection at Google Pay can be found at the following internet address: https://payments.google.com/payments/apis-secure/get_legal_document?ldo=0&ldt=privacynotice&ldl=de - iDeal

One or more online payment methods from the following provider are available on this website: Currence Holding BV, Beethovenstraat 300 Amsterdam, Netherlands

If you select a payment method from the provider where you make an advance payment (e.g., credit card payment), your payment data provided during the order process (including name, address, bank and card information, currency, and transaction number) as well as information about the content of your order will be passed on to this provider in accordance with Art. 6 para. 1 lit. b GDPR. The transfer of your data is carried out solely for the purpose of payment processing with the provider and only to the extent necessary for this purpose.

- Klarna

One or more online payment methods from the following provider are available on this website: Klarna Bank AB, Sveavägen 46, 111 34 Stockholm, Sweden

If you select a payment method from the provider where you make an advance payment (e.g., credit card payment), your payment data provided during the order process (including name, address, bank and card information, currency, and transaction number) as well as information about the content of your order will be passed on to this provider in accordance with Art. 6 para. 1 lit. b GDPR. The transfer of your data is carried out solely for the purpose of payment processing with the provider and only to the extent necessary for this purpose.

If you select a payment method where the provider makes an advance payment (e.g., invoice or installment purchase or direct debit), you will also be asked to provide certain personal data (first and last name, street, house number, postal code, city, date of birth, email address, telephone number, if applicable, data on an alternative payment method) during the order process.

To safeguard our legitimate interest in determining the solvency of our customers, this data is forwarded to the provider for the purpose of a credit check in accordance with Art. 6 para. 1 lit. f GDPR. The provider checks, based on the personal data you provide and other data (such as shopping cart, invoice amount, order history, payment experiences), whether the payment option you have selected can be granted with regard to payment and/or default risks.

For the decision within the scope of the application check, identity and credit information from the following credit agencies may be included in addition to provider-internal criteria in accordance with Art. 6 para. 1 lit. f GDPR:

https://cdn.klarna.com/1.0/shared/content/legal/terms/0/de_de/credit_rating_agencies

The credit report may contain probability values (so-called score values). If score values are included in the result of the credit report, they are based on a scientifically recognized mathematical-statistical procedure. Address data, among other things, but not exclusively, is included in the calculation of the score values.

You can object to this processing of your data at any time by sending a message to us or the provider. However, the provider may still be entitled to process your personal data if this is necessary for the contractual payment processing.

- Paypal

One or more online payment methods from the following provider are available on this website: PayPal (Europe) S.a.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

If you select a payment method from the provider where you make an advance payment, your payment data provided during the order process (including name, address, bank and card information, currency, and transaction number) as well as information about the content of your order will be passed on to this provider in accordance with Art. 6 para. 1 lit. b GDPR. The transfer of your data is carried out solely for the purpose of payment processing with the provider and only to the extent necessary for this purpose.

If you select a payment method where we make an advance payment, you will also be asked to provide certain personal data (first and last name, street, house number, postal code, city, date of birth, email address, telephone number, if applicable, data on an alternative payment method) during the order process.

To safeguard our legitimate interest in determining your solvency in such cases, this data is forwarded to the provider for the purpose of a credit check in accordance with Art. 6 para. 1 lit. f GDPR. The provider checks, based on the personal data you provide and other data (such as shopping cart, invoice amount, order history, payment experiences), whether the payment option you have selected can be granted with regard to payment and/or default risks.

The credit report may contain probability values (so-called score values). If score values are included in the result of the credit report, they are based on a scientifically recognized mathematical-statistical procedure. Address data, among other things, but not exclusively, is included in the calculation of the score values.

You can object to this processing of your data at any time by sending a message to us or the provider. However, the provider may still be entitled to process your personal data if this is necessary for the contractual payment processing.

- SOFORT

One or more online payment methods from the following provider are available on this website: SOFORT GmbH, Theresienhöhe 12, 80339 Munich, Germany

If you select a payment method from the provider where you make an advance payment (e.g., credit card payment), your payment data provided during the order process (including name, address, bank and card information, currency, and transaction number) as well as information about the content of your order will be passed on to this provider in accordance with Art. 6 para. 1 lit. b GDPR. The transfer of your data is carried out solely for the purpose of payment processing with the provider and only to the extent necessary for this purpose.

9.6 Credit Check

If we make an advance payment (e.g., delivery on account), we reserve the right to carry out a credit check based on mathematical-statistical procedures to safeguard our legitimate interest in determining the solvency of our customers. The personal data necessary for a credit check is transmitted to the following service provider in accordance with Art. 6 para. 1 lit. f GDPR:

Creditreform Boniversum GmbH, Hammfelddamm 13, 41460 Neuss, Tel.: +49 (0)2131-109501, Fax: -557

The credit report may contain probability values (so-called score values). If score values are included in the result of the credit report, they are based on a scientifically recognized mathematical-statistical procedure. Address data, among other things, but not exclusively, is included in the calculation of the score values. The result of the credit check regarding the statistical probability of default is used by us for the purpose of deciding on the establishment, execution, or termination of a contractual relationship. You can object to this processing of your data at any time by sending a message to the controller responsible for data processing or to the aforementioned credit agency. However, we may still be entitled to process your personal data if this is necessary for the contractual payment processing.

9.7 We reserve the right to pass on your data to the collection service provider SEPA Collect GmbH, Mehlbeerenstraße 2, 82024 Taufkirchen, +49 (0)89-904030010, if our payment claim has not been settled despite a previous reminder. In this case, the claim will be collected directly by the collection service provider.

The transfer of your data serves the fulfillment of the contract in accordance with Art. 6 para. 1 sentence 1 lit. b GDPR as well as the safeguarding of our overriding legitimate interests in the effective assertion or enforcement of our payment claim in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR.

10) Web Analysis Services

10.1 Google Analytics 4

This website uses Google Analytics 4, a web analysis service of Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"), which enables an analysis of your use of our website.

By default, cookies are set by Google Analytics 4 when visiting the website, which are stored as small text blocks on your device and collect certain information. This information also includes your IP address, which is, however, shortened by Google by the last digits to exclude direct personal reference.

The information is transmitted to Google's servers and further processed there. Transfers to Google LLC with headquarters in the USA are also possible.

Google uses the collected information on our behalf to evaluate your use of the website, compile reports on website activities for us, and provide other services related to website and internet usage. The IP address transmitted by your browser as part of Google Analytics and shortened is not merged with other data from

Google. The data collected as part of the use of Google Analytics 4 is stored for a period of two months and then deleted.

All the processing described above, in particular the setting of cookies on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. Without your consent, the use of Google Analytics 4 will not take place during your visit to the site. You can revoke your consent at any time with effect for the future. To exercise your right of revocation, please deactivate this service via the "Cookie-Consent-Tool" provided on the website.

We have concluded a data processing agreement with Google, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

Further legal information on Google Analytics 4 can be found at https://business.safety.google/intl/de /privacy/, https://policies.google.com/privacy?hl=de&gl=de and at https://policies.google.com/technologies /partner-sites

Demographic Features

Google Analytics 4 uses the special function "demographic features" and can create statistics that provide information about the age, gender, and interests of site visitors. This is done by analyzing advertising and information from third parties. This allows target groups for marketing activities to be identified. However, the collected data cannot be assigned to a specific person and is deleted after a storage period of two months.

Google Signals

As an extension to Google Analytics 4, Google Signals can be used on this website to create cross-device reports. If you have enabled personalized ads and linked your devices to your Google account, Google can analyze your usage behavior across devices and create database models, including cross-device conversions, subject to your consent to the use of Google Analytics in accordance with Art. 6 para. 1 lit. a GDPR. We do not receive any personal data from Google, only statistics. If you want to stop the cross-device analysis, you can disable the "Personalized Advertising" function in the settings of your Google account. Follow the instructions on this page: https://support.google.com/ads/answer/2662922?hl=de Further information on Google Signals can be found at the following link: https://support.google.com/analytics/answer/7532985?hl=de

UserIDs

As an extension to Google Analytics 4, the "UserIDs" function can be used on this website. If you have consented to the use of Google Analytics 4 in accordance with Art. 6 para. 1 lit. a GDPR, have set up an account on this website, and log in to this account on different devices, your activities, including conversions, can be analyzed across devices.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

10.2 Matomo

This website uses a web analysis service from the following provider: InnoCraft Ltd., 150 Willis St, 6011 Wellington, New Zealand, ("Matomo")

To protect site visitors, Matomo uses a so-called "config_id" to enable various analyses of site usage within a short time window of up to 24 hours. The "config_id" of the site is a randomly set, time-limited hash of a limited set of visitor settings and attributes. The config_id or config hash is a string calculated for a visitor based on their operating system, browser, browser plugins, IP address, and browser language. Matomo does not use device fingerprinting and uses an anonymized IP address of the site visitor to create the "config_id".

If the information processed in this way includes personal user data, the processing is carried out in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in the statistical analysis of user

behavior for optimization and marketing purposes. To object to the data processing of your visitor data for the future, we provide you with a separate objection option on our website.

If data collected with the Matomo technology (including your pseudonymized IP address) is transferred to Matomo servers in New Zealand and processed for usage analysis purposes, we inform you that the European Commission has issued an adequacy decision for New Zealand, which certifies compliance with European data protection standards for international data transfers.

If data is also transferred to the provider's servers and the web analysis service is not installed locally on our server, we have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

You may choose to prevent this website from aggregating and analyzing the actions you take here. Doing so will protect your privacy, but will also prevent the owner from learning from your actions and creating a better experience for you and other users.

✓You are not opted out. Uncheck this box to opt-out.

11) Retargeting/Remarketing and Conversion Tracking

11.1 Meta Pixel with Extended Data Matching

Within our online offering, we use the "Meta Pixel" service in the mode of extended data matching from the following provider: Meta Platforms Ireland Limited, 4 Grand Canal Quare, Dublin 2, Ireland ("Meta")

If a user clicks on an ad we have placed on Facebook or Instagram, the URL of our linked page is extended with a parameter using "Meta Pixel". This URL parameter is then entered into the user's browser via a cookie set by our linked page after redirection. In addition, this cookie captures specific customer data such as the email address that we collect on our website linked to the Facebook or Instagram ad during transactions such as purchases, account registrations, or sign-ups (extended data matching). The cookie is then read and allows the transmission of the data, including the specific customer data, to Meta.

We use "Meta Pixel" with extended data matching to make our ads (so-called "Ads") on Facebook and/or Instagram more effective and to ensure that they correspond to the interests of users or have certain characteristics (e.g., interests in certain topics or products determined based on the visited websites) that we transmit to Meta (so-called "Custom Audiences").

In addition, we analyze the effectiveness of our ads by tracking whether users were redirected to our website after clicking on an ad (conversion). Compared to the standard version of "Meta Pixel", the extended data matching function helps us better measure the effectiveness of our advertising campaigns by capturing more assigned conversions.

All transmitted data is stored and processed by Meta, making it possible to assign it to the respective user profile, and Meta can use the data for its own advertising purposes in accordance with Meta's data usage policy (https://www.facebook.com/about/privacy/). The data may allow Meta and its partners to place ads on and outside of Facebook.

All the processing described above, in particular the setting of cookies for reading information on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service in the "Cookie-Consent-Tool" provided on the website.

We have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

The information generated by Meta is usually transmitted to a server of Meta and stored there; in this context, a transfer to servers of Meta Platforms Inc. in the USA may also occur.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

11.2 Google Ads Remarketing

This website uses retargeting technology from the following provider: Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland

For this purpose, Google sets a cookie in your device's browser, which automatically enables interest-based advertising using a pseudonymous cookie ID and based on the pages you visit. Further data processing only takes place if you have agreed with Google that your internet and app browsing history will be linked to your Google account and information from your Google account will be used to personalize ads you view on the web. If you are logged in to Google during your visit to our website in this case, Google uses your data together with Google Analytics data to create and define target group lists for cross-device remarketing. For this purpose, your personal data is temporarily linked by Google with Google Analytics data to form target groups. In the context of using Google Ads Remarketing, personal data may also be transferred to the servers of Google LLC. in the USA.

All the processing described above, in particular the setting of cookies for reading information on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. Without this consent, the use of retargeting technology will not take place during your visit to the site.

You can revoke your consent at any time with effect for the future. To exercise your revocation, please deactivate this service in the "Cookie-Consent-Tool" provided on the website.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

Details on the processing initiated by Google and Google's handling of data from websites can be found here: https://policies.google.com/technologies/partner-sites

Further information on Google's privacy policy can be found here: https://business.safety.google/intl/de/privacy/ and https://www.google.de/policies/privacy/

11.3 Microsoft Advertising

This website uses retargeting technology from the following provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA

This allows us to target visitors to our websites with personalized, interest-based advertising who have already shown interest in our shop and our products. The display of advertising materials is based on a cookie-based analysis of previous and current usage behavior, but no personal data is stored. In cases of retargeting technology, a cookie is stored on your computer or mobile device to collect pseudonymized data about your interests and thus adapt the advertising individually to the stored information. These cookies are small text files stored on your computer or mobile device. You will be shown advertising that is likely to match your product and information interests.

All the processing described above, in particular the setting of cookies for reading information on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. Without this consent, the use of retargeting technology will not take place during your visit to the site.

You can revoke your consent at any time with effect for the future. To exercise your revocation, please deactivate this service in the "Cookie-Consent-Tool" provided on the website.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

11.4 billiger.de Sales Tracking

This website uses the conversion tracking technology of the following provider: solute.de GmbH, Zeppelinstraße 15, D-76185 Karlsruhe, Germany

If you have reached our website from an advertisement on the provider's domain, the success of the advertisement can be tracked using cookies and/or similar technologies (tracking pixels, web beacons, pings, or HTTP requests).

For this purpose, certain device and browser information, including your IP address, may be read out via the tracking technology to capture and evaluate predefined user actions (e.g., completed transactions, leads, searches on the website, product page views). This allows the creation of statistics on usage behavior on our website after redirection from an advertisement, which serves to optimize our offer.

All the processing described above, in particular the setting of cookies for reading information on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service in the "Cookie-Consent-Tool" provided on the website.

We have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

11.5 Google Ads Conversion Tracking

This website uses the online advertising program "Google Ads" and, within the framework of Google Ads, the conversion tracking of Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google").

We use the offer of Google Ads to draw attention to our attractive offers on external websites with the help of advertising materials (so-called Google Adwords). We can determine how successful the individual advertising measures are in relation to the data of the advertising campaigns. We pursue the goal of showing you advertising that is of interest to you, making our website more interesting for you, and achieving a fair calculation of the advertising costs incurred.

The cookie for conversion tracking is set when a user clicks on an ad placed by Google. Cookies are small text files stored on your device. These cookies usually lose their validity after 30 days and do not serve personal identification. If the user visits certain pages of this website and the cookie has not yet expired, Google and we can recognize that the user clicked on the ad and was redirected to this page. Each Google Ads customer receives a different cookie. Cookies can therefore not be tracked across the websites of Google Ads customers. The information obtained using the conversion cookie is used to create conversion statistics for Google Ads customers who have opted for conversion tracking. The customers learn the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information that personally identifies users.

In the context of using Google Ads, personal data may also be transferred to the servers of Google LLC. in the USA.

Details on the processing initiated by Google Ads Conversion Tracking and Google's handling of data from websites can be found here: https://policies.google.com/technologies/partner-sites

All the processing described above, in particular the setting of cookies for reading information on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke your consent at any time with effect for the future by deactivating this service in the "Cookie-Consent-Tool" provided on the website.

You can also permanently object to the setting of cookies by Google Ads Conversion Tracking by downloading and installing the browser plug-in available at the following link:

https://www.google.com/settings/ads/plugin?hl=de

To address users whose data we have received in the context of business or business-like relationships even more interest-based, we use a customer matching function within Google Ads. For this purpose, we transmit one or more files with aggregated customer data (mainly email addresses and phone numbers) electronically to Google. Google does not gain access to clear data but encrypts the information in the customer files automatically using a special algorithm during the transmission process. The encrypted information can then only be used by Google to assign it to existing Google accounts that the data subjects have set up. This allows personalized advertising to be displayed across all Google services linked to the respective Google account.

The transmission of customer data to Google only takes place if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke this consent at any time with effect for the future. Further information on Google's data protection measures regarding the customer matching function can be found here: https://support.google.com/google-ads/answer/6334160?hl=de&ref_topic=10550182 Google's privacy policy can be viewed here: https://business.safety.google/intl/de/privacy / and https://www.google.de/policies/privacy/

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

11.6 Microsoft Advertising Universal Event Tracking

This website uses conversion tracking technology from the following provider: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA

For the use of Universal Event Tracking, a tag is placed on each page of our website that interacts with the conversion cookie set by Microsoft. This interaction makes user behavior on our website traceable and sends the information collected in this way to Microsoft. This serves the purpose of statistically recording and evaluating certain predefined goals such as purchases or leads to make the alignment and content of our offers more interest-based. The tags are never used to personally identify users.

All the processing described above, in particular the setting of cookies for reading information on the used device, is carried out only if you have given us your express consent in accordance with Art. 6 para. 1 lit. a GDPR. Without this consent, the use of retargeting technology will not take place during your visit to the site.

You can revoke your consent at any time with effect for the future. To exercise your revocation, please deactivate this service in the "Cookie-Consent-Tool" provided on the website.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

12) Page Functionalities

12.1 Google Maps

This website uses an online map service from the following provider: Google Maps (API) from Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google").

Google Maps is a web service for displaying interactive (land) maps to visually display geographical information. By using this service, our location is displayed to you and any approach is facilitated.

When you access the subpages in which the map from Google Maps is integrated, information about your use of our website (e.g., your IP address) is transmitted to Google's servers and stored there, and a transfer to the servers of Google LLC. in the USA may also occur. This happens regardless of whether Google provides a user account through which you are logged in or whether a user account exists. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the assignment with

your profile at Google, you must log out before activating the button. Google stores your data (even for users not logged in) as usage profiles and evaluates them.

The collection, storage, and evaluation are carried out in accordance with Art. 6 para. 1 lit. f GDPR based on Google's legitimate interest in displaying personalized advertising, market research, and/or the needs-based design of Google websites. You have a right to object to the creation of these user profiles, whereby you must contact Google to exercise this right. If you do not agree with the future transmission of your data to Google in the context of using Google Maps, there is also the option to completely deactivate the web service of Google Maps by turning off the JavaScript application in your browser. Google Maps and thus also the map display on this website cannot be used.

Where legally required, we have obtained your consent in accordance with Art. 6 para. 1 lit. a GDPR for the above-described processing of your data. You can revoke your consent at any time with effect for the future. To exercise your revocation, please follow the above-described option to make an objection.

For data transfers to the USA, the provider has joined the EU-US Data Privacy Framework, which ensures compliance with the European data protection level based on an adequacy decision of the European Commission.

Further information on Google's privacy policy can be found here: https://business.safety.google/intl/de/privacy/

12.2 Applications for Job Advertisements by Email

On our website, we advertise currently vacant positions in a separate section, for which interested parties can apply by email to the provided contact address.

Applicants must provide all personal data necessary for a well-founded assessment, including general information such as name, address, and contact options, as well as performance-related evidence and, if applicable, health-related information. Details of the application can be found in the job advertisement.

Upon receipt of the application by email, the data is stored and evaluated exclusively for the purpose of processing the application. In case of queries, we use either the applicant's email address or phone number. The processing is carried out based on Art. 6 para. 1 lit. b GDPR (or § 26 para. 1 BDSG), in the sense of which the application process is considered an employment contract initiation.

If special categories of personal data within the meaning of Art. 9 para. 1 GDPR (e.g., health data such as information on severe disability) are requested from applicants in the context of the application process, the processing is carried out in accordance with Art. 9 para. 2 lit. b. GDPR so that we can exercise the rights arising from labor law and social security and social protection law and fulfill our obligations in this regard.

Cumulatively or alternatively, the processing of special data categories may also be based on Art. 9 para. 1 lit. h GDPR if it is carried out for purposes of health care or occupational medicine, for the assessment of the applicant's work capacity, for medical diagnostics, the provision or treatment in the health or social sector, or for the management of systems and services in the health or social sector.

If no selection of the applicant is made or an applicant withdraws their application prematurely, the transmitted data and all electronic correspondence, including the application email, will be deleted after a corresponding notification at the latest after 6 months. This period is based on our legitimate interest in answering any follow-up questions about the application and, if necessary, fulfilling our proof obligations under the regulations on equal treatment of applicants.

In the case of a successful application, the data provided will be processed based on Art. 6 para. 1 lit. b GDPR (in the case of processing in Germany in conjunction with § 26 para. 1 BDSG) for the purpose of carrying out the employment relationship.

12.3 Online Applications via a Form

On our website, we advertise currently vacant positions in a separate section, for which interested parties can apply via a corresponding form.

Applicants must provide all personal data necessary for a well-founded assessment, including general information such as name, address, and contact options, as well as performance-related evidence and, if applicable, health-related information. Details of the application can be found in the job advertisement.

When submitting the form, the applicant data is transmitted to us encrypted according to the state of the art, stored by us, and evaluated exclusively for the purpose of processing the application. The processing is carried out based on Art. 6 para. 1 lit. b GDPR (or § 26 para. 1 BDSG), in the sense of which the application process is considered an employment contract initiation.

If special categories of personal data within the meaning of Art. 9 para. 1 GDPR (e.g., health data such as information on severe disability) are requested from applicants in the context of the application process, the processing is carried out in accordance with Art. 9 para. 2 lit. b. GDPR so that we can exercise the rights arising from labor law and social security and social protection law and fulfill our obligations in this regard.

Cumulatively or alternatively, the processing of special data categories may also be based on Art. 9 para. 1 lit. h GDPR if it is carried out for purposes of health care or occupational medicine, for the assessment of the applicant's work capacity, for medical diagnostics, the provision or treatment in the health or social sector, or for the management of systems and services in the health or social sector.

If no selection of the applicant is made or an applicant withdraws their application prematurely, the form-transmitted data and all electronic correspondence, including the application email, will be deleted after a corresponding notification at the latest after 6 months. This period is based on our legitimate interest in answering any follow-up questions about the application and, if necessary, fulfilling our proof obligations under the regulations on equal treatment of applicants.

In the case of a successful application, the data provided will be processed based on Art. 6 para. 1 lit. b GDPR (in the case of processing in Germany in conjunction with § 26 para. 1 BDSG) for the purpose of carrying out the employment relationship.

13) Tools and Miscellaneous

13.1 - DATEV

For bookkeeping, we use the service of the cloud-based accounting software from the following provider: DATEV eG, Paumgartnerstr. 6-14, 90429 Nuremberg, Germany

The provider processes incoming and outgoing invoices and, if applicable, the bank transactions of our company to automatically capture invoices, match them to transactions, and create financial accounting in a partially automated process.

If personal data is processed in this context, the processing is carried out in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in efficient organization and documentation of our business transactions.

13.2 Cookie-Consent-Tool

This website uses a so-called "Cookie-Consent-Tool" to obtain effective user consent for cookies and cookie-based applications that require consent. The "Cookie-Consent-Tool" is displayed to users in the form of an interactive user interface when they access the page, where consent for certain cookies and/or cookie-based applications can be given by ticking a box. By using the tool, all cookies/services that require consent are only loaded if the respective user gives the corresponding consent by ticking a box. This ensures that such cookies are only set on the respective user's device if consent has been given.

The tool sets technically necessary cookies to store your cookie preferences. Personal user data is generally not processed in this context.

If, in individual cases, personal data (such as the IP address) is processed for the purpose of storing, assigning, or logging cookie settings, this is carried out in accordance with Art. 6 para. 1 lit. f GDPR based on our legitimate interest in a legally compliant, user-specific, and user-friendly consent management for cookies and thus in a legally compliant design of our website.

Another legal basis for processing is Art. 6 para. 1 lit. c GDPR. As the controller, we are subject to the legal obligation to make the use of technically unnecessary cookies dependent on the respective user consent.

If necessary, we have concluded a data processing agreement with the provider, which ensures the protection of our site visitors' data and prohibits unauthorized disclosure to third parties.

Further information about the operator and the setting options of the Cookie-Consent-Tool can be found directly in the corresponding user interface on our website.

14) Rights of the Data Subject

14.1 The applicable data protection law grants you the following data subject rights (rights of access and intervention) vis-à-vis the controller regarding the processing of your personal data, whereby reference is made to the legal basis for the respective exercise conditions:

- Right of access according to Art. 15 GDPR;
- Right to rectification according to Art. 16 GDPR;
- Right to erasure according to Art. 17 GDPR;
- Right to restriction of processing according to Art. 18 GDPR;
- Right to notification according to Art. 19 GDPR;
- Right to data portability according to Art. 20 GDPR;
- Right to withdraw consent given according to Art. 7 para. 3 GDPR;
- Right to lodge a complaint according to Art. 77 GDPR.

14.2 RIGHT TO OBJECT

IF WE PROCESS YOUR PERSONAL DATA BASED ON OUR OVERRIDING LEGITIMATE INTEREST IN THE CONTEXT OF A BALANCING OF INTERESTS, YOU HAVE THE RIGHT TO OBJECT TO THIS PROCESSING AT ANY TIME FOR REASONS ARISING FROM YOUR PARTICULAR SITUATION, WITH EFFECT FOR THE FUTURE.

IF YOU EXERCISE YOUR RIGHT TO OBJECT, WE WILL STOP PROCESSING THE DATA CONCERNED. HOWEVER, FURTHER PROCESSING REMAINS RESERVED IF WE CAN DEMONSTRATE COMPELLING LEGITIMATE GROUNDS FOR THE PROCESSING THAT OVERRIDE YOUR INTERESTS, FUNDAMENTAL RIGHTS, AND FREEDOMS, OR IF THE PROCESSING SERVES THE ASSERTION, EXERCISE, OR DEFENSE OF LEGAL CLAIMS.

IF YOUR PERSONAL DATA IS PROCESSED BY US FOR DIRECT MARKETING PURPOSES, YOU HAVE THE RIGHT TO OBJECT AT ANY TIME TO THE PROCESSING OF YOUR PERSONAL DATA FOR SUCH MARKETING PURPOSES. YOU CAN EXERCISE THE RIGHT TO OBJECT AS DESCRIBED ABOVE.

IF YOU EXERCISE YOUR RIGHT TO OBJECT, WE WILL STOP PROCESSING THE DATA CONCERNED FOR DIRECT MARKETING PURPOSES.

15) Duration of Storage of Personal Data

The duration of the storage of personal data is determined based on the respective legal basis, the processing purpose, and - if applicable - additionally based on the respective statutory retention period (e.g., commercial and tax retention periods).

When processing personal data based on explicit consent in accordance with Art. 6 para. 1 lit. a GDPR, the data concerned will be stored until you withdraw your consent.

If there are statutory retention periods for data processed in the context of legal or quasi-legal obligations based on Art. 6 para. 1 lit. b GDPR, this data will be routinely deleted after the retention periods have expired, provided that it is no longer required for contract fulfillment or contract initiation and/or there is no legitimate interest on our part in further storage.

When processing personal data based on Art. 6 para. 1 lit. f GDPR, this data will be stored until you exercise your right to object in accordance with Art. 21 para. 1 GDPR, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves the assertion, exercise, or defense of legal claims.

When processing personal data for direct marketing purposes based on Art. 6 para. 1 lit. f GDPR, this data will be stored until you exercise your right to object in accordance with Art. 21 para. 2 GDPR.

If nothing else results from the other information in this declaration about specific processing situations, stored personal data will otherwise be deleted when they are no longer necessary for the purposes for which they were collected or otherwise processed.