

# **Privacy Policy**

## 1. About this privacy policy

Protecting your privacy is very important to us. That's why we process your data at our data centers located in Germany in accordance with the strict German data protection law. If you have any questions regarding the collection of your data, you will find the corresponding contact details of our contact persons at the end of this declaration.

# 2. Scope

This privacy policy clarifies users about the scope and purpose of collecting and processing personal data by the responsible company ISPpro Internet KG (named as PROVIDER in the following), Otto-Schott-Str. 13, D-07745 Jena, Germany, Telephone: +49 (0)3641 5044 0, E-Mail: info@isppro.de on this website (hereinafter "Offer").

#### 3. General

The data collected by the Provider will only be processed and used for the submission of product information and offers, order processing and contract justification as well as for billing purposes and for establishing contact or for market research purposes, as far as this is required and the approval of the customer is available. This approvemnt may be revoked by the user at any time.

In order to ensure the best possible protection against unauthorized access and misuse of the data collected and processed by the Provider, extensive technical and organizational security preventions are taken. These are regularly reviewed and adapted to technological progress.

Collection of these personal data is voluntary, if that is possible. Also, we only pass on this data to third parties with your express approval. We ensure high security for particularly confidential data such as payment transactions or for your requests to us by using SSL encryption.

## 4. Handling of personal data

#### 4.1. What data is collected and processed?

#### **Contract data:**

We collect, process and store the data you provide when you create an account (register), order with us or use the contact form or the comment function. This information includes your name, address, country, birthday, e-mail address, telephone number and bank details. Furthermore, we store and process data about the order and payment history. Data stored on our servers: The provider also collects, processes, and saves the data which you yourself save when using our services. This includes the creation of backup copies in backup systems of the provider.

#### Log data:

The provider collects log data (connection data) about every access to the offer. A log file



is created as part of an automatic log of the processing computer system. This means that information from your used device is recorded as logfiles on a server. We as the website operator log the name of the website visited, date, time and frequency of access, the previously visited website, the amount of data sent, your operating system, the type and version of your browser, your IP address and the name of the requesting provider. These log data are used exclusively for statistical evaluations for the purpose of operation, security and optimization of the offer. The Provider reserves the right, however, to retrospectively review the log data if, on the basis of concrete evidence, the legitimate suspicion of unlawful use exists.

#### **Cookies:**

Our offer uses cookies. This are small text files that will be placed in your browsing history and are used to reconstruct settings you made during your next visit and any other changes you made. Cookies allow us to personalize our service and make it more user-friendly.

Most of the cookies used in the offer are so called session cookies. These types of cookies ensure, for example, that after a login only the user can access his or her data, for example his own customer area. Session cookies are automatically deleted after the end of each website visit. Persistent cookies remain on your device for a maximum of 60 days, but can be deleted at any time by means of corresponding settings in your Internet browser. You can make settings in the browser that inform you if cookies will be set or that will block the setting of cookies automatically. In this case, we must point out that certain features on the website could no longer or only partially be usable. Cookies do not harm your computer and do not contain viruses.

## **Social Bookmarks and Plugins:**

On our website we offer the possibility to share content on social networks or by email via external links. If you use these features, you will be redirected to the websites of the providers and corresponding user information will be passed on. If you are logged in to one of these social networks with your account while using our site and you want to share our content, then that information will be linked to your respective account. We have no influence on the data, which are conveyed by plug-ins to appropriate servers. As a rule, the IP address is transmitted.

**a) Facebook plugin:** Within the offer services of the social network Facebook are linked, which are operated by Facebook Inc. These Facebook plug-ins are identifiable in the offer of the Facebook logo or the "Like-Button" ("Like") When you visit our website, we connect directly to the Facebook server via the plug-in.

If you have a Facebook account and are logged into it when you visit the website, this tracking mechanism will link the visit to your account at Facebook. By the way we don't know what kind of content will be transmitted to Facebook and how Facebook uses it. Log out of your Facebook account before visiting the website to prevent this linking from taking place. You can configure additional ad-related settings on Facebook in your user profile or prevent the assignment of your visit by simply logging out of your Facebook account. Further information can be found in the privacy policy of Facebook.

**b) Twitter plugin:** Within the offer services of the microblogging service Twitter are linked, which are operated by the US company Twitter Inc. By clicking the Twitter Share button, the user is redirected to Twitter where data is collected through Twitter. The Provider has neither knowledge nor influence on the extent, the content and the use of the data sent to Twitter.



c) Google+: Within the offer services are linked of the social network Google+ operated by Google Inc. Use of the Google+ Share button redirects the user to Google+, where Google collects data. The provider has no influence on the amount of data Google collects. The purpose and scope of the data collection and the further processing and use of the data by Google, as well as other related rights and privacy settings can be found in the privacy policy of Google.

If the user is an active Google+ member and would like to prevent Google from gathering data about him and linking it to the member data stored there, he must log out of Google+ before clicking on the Google+ Share button.

**d) XING plugin:** Within the offer, services of the social network XING, which are operated by XING AG, may be linked. When the XING Share button is clicked, the user will be redirected to XING where data is collected by XING. We do not affect the amount of data XING collects.

The purpose and scope of the data collection and the further processing and use of the data by XING as well as the related rights and setting options for protecting the privacy of the user can be found in XING's privacy policy.

If the user is an active XING member and would like to prevent XING from collecting data and linking it with the stored member data, he must log out of XING before clicking on the XING Share button.

### Web analytics services:

Our offer uses Piwik, an open source statistical analysis software. This service enables us to understand the use of our website by creating reports and thus to adapt our offer to the demands of the users. According to the data protection declaration, we are obliged to inform you about the operation of this service. Piwik uses cookies, which allow an analysis of the use of the website by the users. The information generated by the cookie about the use of this offer is stored on a server in the Providers data center in Jena/Thuringia. The IP address is anonymized immediately after processing and prior to its storage. Users can prevent the installation of cookies by setting their browser software accordingly; However, the provider notifies the users that in this case they may not be able to use all functions of this website to their full extent.

## **Marketing Tracking:**

We use Google AdWords on our website to use an online advertising program provided by Google Inc. This also includes conversion tracking. With this tool, Google AdWords sets a cookie on your PC when you visit our website through a Google ad. The cookie is no longer valid after 30 days. It does not serve any personal traceability. If you visit our website as a user and the cookie is still working, we and Google will recognize that you clicked on the ad and were redirected to our site. Each Google AdWords customer is assigned a different cookie. Cookies are thus not traceable via the websites of the advertisers. Conversion cookie data is used to generate conversion statistics for advertisers. We, as a customer, experience the total number of users who responded to our ad and were then redirected to a web page that was tagged with a conversion tracking tag. We do not receive any information in this process that could personally identify you as a user. If you decline the tracking process, the cookie of the Google conversion tracking can be deactivated via your Internet browser. If necessary, use the help function of the browser for further information.

## Newsletter and mailing list subscriptions:

With the newsletter, the provider regularly informs about current offers and services. The receipt of the newsletter is reserved for registered customers and can be activated directly



in the registration process or via the customer panel.

The approval to get the newsletter can be revoked by the user at any time in customer panel.

### Blog:

If a user leaves comments or other posts on the provider's blog, his / her IP address will be saved to trace the identity of the author in the case of misappropriated content (e.g., insults, prohibited political propaganda, etc.).

### 4.2. How data collected and processed?

We assure that the collection and processing of personal data is solely used for fulfillment of contracts, to provide our services, for statistical evaluation and improvement of our offer, as well as the provision of updates and upgrades. It also allows us to send you notifications related to the Service. According to current regulations, these data are collected only for the time in which you use our service.

## 4.3. How will personal data be transferred to third parties?

Personal data may be transfered to third parties in accordance with the provisions of the Federal Data Protection Act (BDSG) and according to the order-related requirements. We transmit your data to our business units, domain registries (e.g., DENIC, COREnic, NIC.it, etc.), participating service providers (e.g., banks), and requesting authorities. These agencies use your information for accounting and payment, domain registration or law enforcement purposes.

For domain registrations, we must forward certain personal data to registries. These data are stored in registries' databases and are online available to a varying extent via WHOIS queries from the registries. For the .DE domain registration, DENIC eG in Frankfurt, for example needs Name and address of the domain owner, the administrative and technical contact person as well as the zone administrator and, in addition, the telephone and fax numbers as well as the e-mail address of the technical contact person and the zone administrator. These data are transfered and stored there. Name and address can be found at www.denic.de in the "whois" inquiry on the Internet for the customer as well as for third parties at any time. For .COM, .NET, .ORG domains, we are also obliged to forward the telephone and fax numbers as well as the e-mail address of the administrative contact. This information is publicly available in the respective Whois databases.

The Provider only provides data information to authorities and third parties in compliance with the applicable statutory provisions or in the case of a judicial title (for example for the purpose of prosecution) and only if this is explicitly necessary by a statutory provision. (eg copyright infringement).

We assure that the data given in this way comply with the legal requirements.

## 5. Your legal rights

Of course you have rights regarding the collection of your data. Under current law, we are required to educate you about them. The use and implementation of these rights is free of charge for you.

Right of recission: You have the right to revoke your consent to the collection of data at



any time. This right applies with effect for the future; the data collected up to the legal force of the revocation remain unaffected.

**Right of Data Transferability:** You have the right to request a transfer of your data from us to another provider.

**Right of correction, deletion or blocking:** You have the right to have your data corrected, deleted or blocked. You can change and delete data that you save in our services yourself.

After contract termination, we delete the data stored in the services.

Contract data will be blocked after the contract has ended and will be deleted after expiry of the legal retention period.

**Right to complain:** You have the right to complain to a supervisory authority or a responsible agency. Therefore please contact the contact persons listed at the end of this Privacy Policy.

## 6. Responsible for data collection

For questions, requests for information, applications, complaints or criticism regarding our data protection, please contact the companies corporate data privacy officer.

Dirk Seidel Otto-Schott-Str. 13 07745 Jena Germany

#### 7. Change of data privacy policy

We reserve the right to change the privacy policy at any time with regard to applicable data protection regulations. Current version is from May 2018.