

Google services

This website uses various services of Google Inc. (“Google”), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. These enable us to improve the user-friendliness of the website and to target our advertising activities to users.

By integrating Google services, Google may collect and process information (including personal data). It cannot be ruled out that Google may also transfer the data to a server in a third country.

If you are signed in to your Google account, Google may add the processed information to your Google Account and treat it as personal data, depending on your Google Account settings, see in particular <https://www.google.de/policies/privacy/partners/>.

You can prevent this data from being added directly by logging out of your Google account or by making the appropriate account settings in your Google account. Furthermore, you can prevent the use of cookies by selecting the appropriate settings in your browser; however, we would like to point out that in this case you may not be able to use all functionalities of this website to the full extent. You can also find more information in Google's privacy policy, which is available at the following link: <https://www.google.com/policies/privacy/>.

1. Tag Manager

For reasons of transparency, we would like to point out that we use Google Tag Manager. The Google Tag Manager itself does not collect any personal data. The Tag Manager makes it easier for us to integrate and manage our tags. Tags are small code elements that are used, among other things, to measure traffic and visitor behaviour, record the impact of online advertising and social channels, set up remarketing or retargeting and targeting, and test and optimise websites. For more information on Google Tag Manager, see <https://www.google.com/intl/de/tagmanager/use-policy.html>.

2. Google Analytics

BESTSECRETuses Google Analytics, a web analytics service provided by Google Inc.

If you have given your consent, Google Analytics is used on this website. The contact for users in the EU/EEA and Switzerland is Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland (“Google”).

Google Analytics uses cookies that enable us to analyse your use of our website. The information about your use of this website collected by cookies is generally transmitted to a Google server in the USA and retained there.

We use the User ID function. Using the User ID allows us to assign a unique, permanent ID to one or more sessions (and the activities within these sessions) and analyse user behaviour across devices.

We use Google Signals. This allows Google Analytics to collect additional information about users who have activated personalised ads (interests and demographic data) and ads can be delivered to these users in cross-device remarketing campaigns.

In Google Analytics 4, the anonymisation of IP addresses is activated by default. Due to IP anonymisation, your IP address will be shortened by Google within member states of the European Union or in other contracting states of the European Economic Area Agreement. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

When you are visiting the website, your user behaviour is recorded in the form of “events”. Events can be:

- Page views
- First visit to the website
- Start of the session
- Your “click path”, interaction with the website
- Scrolls
- Clicks on external links
- internal search queries
- Interaction with videos
- viewed / clicked ads

The following is also recorded:

- Your approximate location (region)
- Your IP address (in abbreviated form)
- technical information about your browser and the end devices you use (e.g. language setting, screen resolution)
- Your internet provider
- the referrer URL (via which website/advertising medium you came to this website)

On behalf of BestSecret, Google will use this information to analyse your use of the website and to compile reports on website activity. The reports provided by Google Analytics are used to analyse the performance of our website, our app and the success and management of our marketing campaigns, social media channels, online magazines and newsletters.

Recipients of the data are/may be:

Google Ireland Limited, Gordon House, Barrow Street 4, Dublin, Ireland (as data processor within the meaning of Art. 28 GDPR)

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

Alphabet Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA

It cannot be ruled out that US authorities will access the data retained by Google.

Insofar as data is processed outside the EU/EEA and there is no level of data protection corresponding to the European standard, we have concluded EU standard contractual clauses with the service provider to establish an appropriate level of data protection. The parent company of Google Ireland, Google LLC, is headquartered in California, USA. A transfer of data to the USA and access by US authorities to the data retained by Google cannot be ruled

out. The USA is currently considered a third country from a data protection perspective. You do not have the same rights there as within the EU/EEA. You may not be entitled to any legal remedies against access by the authorities. You can request a copy of the EU standard contractual clauses concluded with the provider from the BESTSECRETGroup's data protection officer.

The data sent by us and linked to cookies is automatically erased after 50 months. Data that has reached the end of its retention period is automatically erased once a month.

The legal basis for this data processing is your consent in accordance with Art. 6 para. 1, sentence 1, lit. a GDPR and Section 25 para. 1 sentence 1 German Teleservices Data Protection Act (TDDDG). You can withdraw your consent given via the cookie banner at any time with effect for the future by changing your selection in the tracking settings (see above, under Tracking technologies). Alternatively, you can erase your cookies (all or only from this website). The banner with the selection options is then displayed again.

Alternatively, you can prevent the implementation of cookies from the outset by setting your browser software accordingly. However, if you configure your browser to reject all cookies, this may limit the functionality of this and other websites. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by

- not giving your consent to the implementation of the cookie or
- by downloading and installing the browser add-on to deactivate Google Analytics [HERE](#).

You can find more information on the terms of use of Google Analytics and data protection at Google at <https://marketingplatform.google.com/about/analytics/terms/de/> and at <https://policies.google.com/?hl=de>.

| Data | Processing purpose | Legal basis | Retention period |
|---|--|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, screen resolution, device model (smartphones, tablets or other end devices), device manufacturer, date and time of access, user agent. | Evaluation of customer behaviour | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 50 months at the latest |
| Behavioural data such as: Registration date, products visited, products ordered, name of the page accessed | Evaluation of customer behaviour | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 50 months at the latest |
| User key, device key | Evaluation of user behaviour on different devices/browsers | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 50 months at the latest |

| | | | |
|--|---------------------------------------|---------------------------------------|--|
| Personal data such as email address, Google Click ID, Google Client ID, IP address, mobile advertising ID, order ID, user ID, voucher code | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 50 months at the latest |
|--|---------------------------------------|---------------------------------------|--|

3. Google Ads, Audiences and Conversion Tracking

In order to draw attention to our services, we place Google Ads ads and use Google Conversion Tracking and Google Tag Manager for the purpose of personalised, interest-based and location-based online advertising.

The ads are displayed on Google's own websites, services and apps. The ads are also displayed on websites in the Google advertising network. Detailed information about the Google advertising network can be found at <https://support.google.com/google-ads/answer/1752334?hl=de>. We can combine our ads with specific search terms. With the help of cookies, we can display ads based on a user's previous visits to our website.

If you click on an advert, Google sets a cookie in the your browser. Further information on the cookie technology used can also be found in Google's notes on website statistics at <https://services.google.com/sitestats/de.html> and in the privacy policy at <https://www.google.de/policies/privacy/>.

By means of this technology, Google and we as a client receive information that a user has clicked on an advert and has been redirected to our websites. The information obtained in this way is used exclusively for statistical evaluation to optimise advertisements. We do not receive any information with which users can be personally identified. The statistics provided to us by Google include the total number of users who have clicked on one of our ads and, if applicable, whether they were redirected to a page on our website with a conversion tag. Based on these statistics, we can track which search terms were clicked on our advert how often and which ads lead to the user contacting us via the contact form.

We also use the “Custom Match function” of Google Ads. With the help of this function, we can form target groups in order to present certain advertising content only to certain users. For this purpose, we provide Google with a customer list that contains your e-mail address, which is retained in your Account. Of course, this only happens if you have given your consent.

Further information and the cancellation option can be found at <https://support.google.com/google-ads/answer/6379332> or <https://adssettings.google.com/>.

| Data | Processing purpose | Legal basis | Retention period |
|--|---------------------------------------|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, screen resolution, device manufacturer, device model (smartphones, tablets or other end devices), date and time of access, user agent | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 26 months at the latest |

| | | | |
|--|---------------------------------------|---------------------------------------|--|
| Behaviour-related data such as registration date, products viewed, products ordered, name of the page accessed | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 26 months at the latest |
| Personal data such as email address, Google Click ID, Google Client ID, IP address, mobile advertising ID, order ID, user ID | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 26 months at the latest |

4. Google Marketing Platform

We also use the Google Marketing Platform, a service provided by Google Inc. The Google Marketing Platform uses cookies to place user-based ads. The cookies recognise which ad has already been placed in your browser and whether you have accessed a website via a placed ad. The cookies collect the types of personal data listed below.

When using this service, personal data may be transferred to the USA and thus to a third country.

You can find more information on how Google uses cookies in the Google [Privacy Policy](#).

| Data | Processing purpose | Legal basis | Retention period |
|--|---------------------------------------|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, screen resolution, device manufacturer, device model (smartphones, tablets or other end devices), date and time of access, user agent, app events, advertising ID | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 26 months at the latest |
| Behaviour-related data such as registration date, products viewed, products ordered, name of the page accessed | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 26 months at the latest |
| Personal data such as email address, Google Click ID, Google Marketing Platform Click ID, Google Marketing Platform Client ID, IP address, mobile advertising ID, order ID | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after 26 months at the latest |

5. Google Firebase

We use Google Firebase technology with various functionalities in our apps. Firebase uses “instance IDs” to save individual settings made in the mobile app. As each instance ID is unique to a mobile app and the mobile device you are using, Firebase can analyse and react to specific processes within the mobile app. The information generated by the Instance ID about your use of this mobile app on your mobile device is usually transmitted to a Google server in

the USA and retained there. If the IP address is transmitted, Google guarantees that the IP address will be anonymised immediately. The information processed by Firebase may be merged with other Google services, e.g. Google Analytics.

Further information can be found in the [Terms and Conditions of Use](#) and [Privacy policy](#) of Firebase.

In detail, the following functionalities are used:

5.1 Firebase Remote Config

Firebase Remote Config enables the configuration of app settings. This allows us to change the behaviour and appearance of your app on the user's end device without having to completely reinstall it from the respective app store. You can find information about how Remote Config works [here](#).

| Data | Processing purpose | Legal basis | Retention period |
|---|---------------------------|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets, other end devices), date and time of access, ... | Optimisation of the app | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after fulfilment of purpose, at the latest 180 days after request |
| Instance ID | Optimisation of the app | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after fulfilment of purpose, at the latest 180 days after request |

5.2 Firebase Performance Monitoring

Firebase Performance Monitoring enables us to record the performance of the app and react to certain incidents within the app. Further information can be found [here](#).

| Data | Processing purpose | Legal basis | Retention period |
|--|---------------------------|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Optimisation of the app | Art. 6 para. 1 sentence 1 lit. a GDPR | DeletionDeletion after fulfilment of purpose, at the latest 180 days after request |
| Instance ID | Optimisation of the app | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after fulfilment of purpose, at the latest 180 days after request |

5.3 Firebase Dynamic Links

We use the Firebase Dynamic Links service if you use a mobile device with an iOS or Android operating system. Firebase Dynamic Links are links that work on multiple platforms, regardless of whether you have already installed our app or not. When you open a Dynamic Link on iOS or Android, you will be forwarded directly to the linked content in your app. If you have not yet installed our app, you will be directed to the App Store or Play Store via the link to install the app. Your app then starts and can access the link. On the other hand, if you open the same dynamic link in a desktop browser, you will be redirected to the corresponding content on the website. In this way, we are always able to forward you directly to the right address. For the functionalities, personal data such as the IP address and device specifications are used, which are temporarily retained in order to provide the services.

Further information on Firebase Dynamic Links can be found [here](#) and on data protection and IT security at <https://firebase.google.com/support/privacy>.

| Data | Processing purpose | Legal basis | Retention period |
|---|--|---------------------------------------|--|
| IP address and device specifications (language and version of the browser software, operating system used and its interface, referrer URL, date and time of the server request, time zone difference to Greenwich Mean Time (GMT), content of the request (specific page), amount of data transferred, access status/ HTTP status code. | Optimisation of the user experience when using links | Art. 6 para. 1 sentence 1 lit. f GDPR | Deletion after fulfilment of purpose, at the latest 180 days after request |

5.4 Firebase Crashlytics

We have integrated Firebase Crashlytics (<https://firebase.google.com/products/crashlytics>) to detect and notify app crashes. This information is used to improve the performance and stability of the applications. For this purpose, technical data such as device ID, device type, model, operating system and the approximate location of the mobile device are transferred in order to obtain a more reliable analysis, for example to determine whether the problem is specific to one or more device types.

Further information can be found in the [Terms and Conditions of use](#) and [Privacy policy](#) of Firebase.

| Data category concerned | The purpose of the processing | Legal basis of the data processing | Retention period |
|--|---------------------------------------|---------------------------------------|---------------------------------------|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Detection and notification of crashes | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 180 days at the latest |

| | | | |
|--|---------------------------------------|---------------------------------------|---------------------------------------|
| Behaviour-related data such as registration date, products viewed, products ordered, name of the page accessed | Detection and notification of crashes | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 180 days at the latest |
| User key, device key | Detection and notification of crashes | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 180 days at the latest |

6. Google Maps

This site uses Google Maps for location searches. If you select the “Pick-Up and Drop-Off Point” delivery option when completing your order, the application will open to allow you to select a pick-up point close to the address you have entered. The information you provide will be erased after completion of the respective order.

The data collected by Google Maps concern:

- Your current location
- Date and time of the information provided,
- The URL of the BESTSECRET web shop,
- Your IP address.

It is used to improve your shopping experience in the web shop. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

You can find further information on data protection at Google at:

<https://www.google.se/intl/sv/policies/privacy/>.

Business intelligence application / internal tools

We use various business intelligence technologies within our organisation to continuously improve the Onlineshop and associated services and to provide you with a successful shopping experience.

This involves, for example, internal business analytics with long-term optimisation of our service, for example in the form of new applications (tools/apps). We process a small amount of already existing/collected personal data, such as the user ID or order information, in pseudonymised form and, if necessary, link it. If anonymisation of your personal data is technically possible, we will anonymise it in order to prevent you from being identified. The tools used communicate on the basis of existing interfaces in order to maintain the purpose of long-term optimisation.

In order to offer you the most personalised shopping experience possible, we offer you the “Topseller for you” category. The display of products in this category is always based on your manual selection of your favourite brands. If you do not have any favourite brands saved, we use a “backup” list of 10 designers that sell well in the Onlineshop. We do not use an algorithm in this regard.

When you order something in the Onlineshop or add items to your wish list, we process the size information you provide and other product-specific features. These are processed for the purpose of suggesting suitable items for future purchases.

Data is collected and retained on the basis of our legitimate interest in accordance with Art. 6 para. 1 sentence 1 lit. f GDPR. Our legitimate interest is to continuously improve the Onlineshop and the associated shopping experience.

Your personal data will be erased immediately after fulfilment of the purpose. If historical data is affected, it will be erased after 2 years. If a contact is deleted in the Salesforce Marketing Cloud, their data is also erased from the business intelligence tools within 90 days.

Hotjar

Hotjar (3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta) is integrated on our website (<https://www.hotjar.com>). We can use Hotjar to record and evaluate user behaviour (e.g. mouse movements, clicks, scroll height) on our website. For this purpose, Hotjar sets cookies on users' end devices and can store user data, e.g. browser information, operating system, time spent on the site, in anonymised form. You can find out more about data processing by Hotjar at the following link: <https://www.hotjar.com/privacy>.

| Data | Processing purpose | Legal basis | Retention period |
|--|--|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Analysis of customer behaviour for the purpose of optimising the website | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 12 months at the latest |
| Behavioural data such as: products viewed, behaviour on the website, pages visited | Analysis of customer behaviour for the purpose of optimising the website | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 12 months at the latest |

Criteo

Our pages use Criteo technology (Criteo GmbH, Lehel Carré, Gewürzmühlstraße 11, 80538 Munich, Germany) to collect information about the surfing behaviour of website visitors for marketing purposes in encrypted form and to set cookies and web pixels for this purpose. Criteo can thus analyse surfing behaviour and then display targeted product recommendations as appropriate advertising banners when other websites are visited. For this purpose, cookies from our partner websites are also placed via Pixel. Under no circumstances can the data be used to personally identify the visitor to the website. The data collected by Criteo is only used to improve the advertising offer. Further information on Criteo's data protection can be found at <https://www.criteo.com/de/privacy/>.

| Data | Processing purpose | Legal basis | Retention period |
|---|---|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 13 months at the latest |
| Behaviour-related data such as registration date, products viewed, products ordered, name of the page accessed | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 13 months at the latest |
| Personal data such as email address, Criteo client ID, IP address, mobile advertising ID, order ID | Evaluation of user behaviour on different devices and browsers for the placement of advertisements on different end devices | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 13 months at the latest |

Salesforce

We use the customer relationship management modules “Salesforce Marketing Cloud” and “Salesforce Service Cloud” of Salesforce.com Inc, The Landmark @ One Market Street, Suite 300, San Francisco, California, CA 94105, USA. The data is processed in the USA, which means that data is transferred to a third country. Further information on the Salesforce Marketing Cloud and Service and the data processed can be found at <https://www.salesforce.com/de/company/privacy/>.

If you give your express consent, these technologies will also be used to evaluate information about user behaviour on websites, mobile apps, emails, push messages, in-app messages and other communications for marketing purposes. Cookies and web pixels are used for this purpose, as well as the tracking service iGoDigital, which belongs to Salesforce. The information collected is assigned to your e-mail address and is linked to a unique ID in order to clearly assign clicks in the communications to you. The user profile is used to customise the offer and our services to your interests and to improve our advertising offer and communications for you.

| Data | Processing purpose | Legal basis | Retention period |
|--|---|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Profile creation as part of the Salesforce CRM system | Art. 6 para. 1 sentence 1 lit. a GDPR | Data for profiling is deleted after 365 days. Otherwise, the data will be deleted no later than 90 days after termination of membership. |

| | | | |
|--|--|---------------------------------------|--|
| Behavioural data such as: products viewed, products ordered, categories visited, use of FAQ/help, name of the page viewed, products on the wish list | <ul style="list-style-type: none"> Finding suitable product recommendations or other communication content for newsletters and special mailings as well as other messages such as push notifications or in-app messages Improvement of the website and other communication | Art. 6 para. 1 sentence 1 lit. a GDPR | Data for profiling is deleted after 365 days. Otherwise, the data will be deleted no later than 90 days after termination of membership. |
| User key, device key | <ul style="list-style-type: none"> Finding suitable product recommendations or other communication content for newsletters and special mailings as well as other messages such as push notifications or in-app messages Improvement of the website and other communication | Art. 6 para. 1 sentence 1 lit. a GDPR | Data for profiling is deleted after 365 days. Otherwise, the data will be deleted no later than 90 days after termination of membership. |

Meta Ads and Custom Audiences & Smartly

We use the Custom Audiences service of Meta Platforms Inc. for usage-based online advertising (1601 S. California Avenue, Palo Alto, CA 94304, USA). Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (as a company in the EU) also acts as a data processor for us.

As part of usage-based online advertising via Custom Audiences, we define target groups of users who are shown ads within the meta network in the meta ads manager based on certain characteristics. Users are selected by Meta on the basis of the profile information provided by them and other data provided through the use of Meta. If a user clicks on an advert and then reaches our website, Meta receives the information that the user has clicked on the advertising banner via the meta pixel integrated on our website and via the Meta Conversion API. In principle, a non-reversible and non-personalised assessment sum (hash value) is generated from your usage data, which is transmitted to Meta for analysis and marketing purposes. Meta-cookies are set in the process. These collect information about your activities on our website (e.g. surfing behaviour, subpages visited, etc.). Your IP address is also retained and used for the geographical targeting of advertising.

Alternatively, we can provide Meta with a customer list containing your e-mail address and advertising ID that you provided upon registration.

The legal basis for our processing is Art. 6 para. 1 sentence 1 lit. a GDPR.

You can withdraw your consent at any time for the future by changing your selection in the cookie settings. Alternatively, you can erase your cookies (all or only from this website). The banner with the selection options is then displayed again.

If you consent to the data processing described above, Meta will also have access to your data. In particular, it is possible that Meta Platforms Inc, 1601 Willow Road, Menlo Park, California 94025, USA, in addition to Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, may have access to your data. Meta Platforms Inc. is located in a third country.

Since 27/09/2021, Meta has provided an online [“Facebook European Data Transfer Addendum”](#) which is intended to incorporate the standard contractual clauses in cases where Meta Platforms Ireland Limited processes data from the EU/EEA as a processor and transfers it to Meta Platforms Inc. as a sub-processor.

You can find more information about Meta's Custom Audiences service at <https://de-de.facebook.com/business/help/744354708981227?id=2469097953376494>.

The deactivation of the “Meta Custom Audiences” function is available for logged-in users at <https://www.facebook.com/settings/?tab=ads#>.

In this context, please note that Meta may also use the data provided by us about your usage behaviour and your e-mail address for its own purposes. On the page linked here you have the possibility to [object to targeting on Facebook](#).

Further information about the purpose and scope of data collection and the further processing and use of the data by Meta, as well as your setting options for protecting your privacy, can be found in the [Facebook Privacy Policy](#).

We also use the Smartly.io tool. The tool is a service provided by Solutions Inc, Elielinaukio 2 G, 00100 Helsinki, Finland. The platform offers a web-based interface for creating and managing Facebook, Messenger, Instagram and WhatsApp campaigns. We use Smartly for the creation and implementation of advertising campaigns from BESTSECRET via Meta. The campaigns are created in Smartly and played out via the interface to Meta. The statistics created by Meta to analyse the web campaigns are also displayed in Smartly. In the course of using the tool, we have concluded a data processing agreement with Smartly in accordance with Article 28 GDPR and thus ensure that the data protection regulations are complied with.

Further information on data protection when using Smartly.io is available at <https://cdn2.hubspot.net/hubfs/1570479/Privacy%20Policy/Smartly.io%20Privacy%20Policy.pdf?t=1541578381755>.

| Data | Processing purpose | Legal basis | Retention period |
|--|---------------------------------------|---------------------------------------|------------------|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | 6 months |

| | | | |
|--|---------------------------------------|---------------------------------------|----------|
| Behavioural data such as: Registration date, products viewed, products ordered, name of the page accessed | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | 6 months |
| Personal data such as e-mail address, IP address, meta client ID, meta click ID, mobile advertising ID, order ID, user ID, Registration ID | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | 6 months |

Snapchat

We use the online services of the provider Snapchat Inc. (Market Street, Venice Ca 90291 USA) for the purpose of analysing and optimising our website and services. Using the snap pixel, it is possible to determine visitors to our website in the form of a target group and to place ads in the form of Snapchat ads. Accordingly, we use Snapchat pixels to address specific target groups that are interested in advertising or have certain interests in topics or products. We are also able to track the effectiveness of the Snapchat ads in the form of statistics.

Snapchat uses EU standard contractual clauses (Art. 46 paras. 2 and 3 GDPR) as the basis for data processing for recipients based in third countries (outside the EU) or for data transfer to third countries. You can request a copy of the EU standard contractual clauses concluded with the provider from the BESTSECRET Group's data protection officer.

Further information on how Snapchat processes your personal data can be found at the following link: <https://snap.com/de-DE/privacy/privacy-policy>.

The legal basis for this data processing is your consent pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR.

TikTok

On our website we use TikTok Pixel, a conversion tracking tool from the service provider TikTok, based in London, United Kingdom (6th Floor, One London Wall, London, EC2Y 5EB). This is a subsidiary of the TikTok parent company headquartered in China.

We would like to expressly point out that TikTok stores the data (e.g. IP address, preferences and personal interests or behaviour) of users and uses it for its business purposes. We have no influence on the processing and further use of this data, as TikTok alone determines the processing of your personal data on its own behalf. It is currently not clear to us to what extent, where and for how long the data is retained, to what extent the data is linked and analysed and to whom the data may be transferred.

TikTok processes data within Europe, China and the USA. We would like to point out that, in the opinion of the European Court of Justice, there is currently no adequate level of protection for data transfers to some countries outside the European Union, including the USA and China. We have concluded so-called EU standard contractual clauses with TikTok as the basis for data transfer to recipients based in a third country (outside the EU) (Art. 46 paras. 2 and 3 GDPR). As a result, TikTok undertakes to maintain and comply with the European level of

data protection when processing your personal data, even if your personal data is processed in a third country. You can request a copy of the EU standard contractual clauses concluded with the provider from the BESTSECRET Group's data protection officer.

Further information on how TikTok processes your personal data can be found at the following link: <https://www.tiktok.com/legal/privacy-policy-eea?lang=de>.

The legal basis for this data processing is your consent pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR.

RTB House

Our website uses RTB House technology (RTB House SA Złota 61/101, 00-819, Warsaw, Poland) to collect information about the behaviour of website users for marketing purposes in pseudonymised form by setting cookies and web pixels. RTB House can thus analyse surfing behaviour and then display targeted product recommendations as appropriate advertising banners when other websites are visited. Under no circumstances can the anonymised data be used to personally identify visitors to the website. The data collected by RTB House is only used to improve the advertising offer. You can find out more about RTB House's privacy policy and data protection information in general at <https://www.rtbhouse.com/de/privacy/>.

| Data | Processing purpose | Legal basis | Retention period |
|---|---|---------------------------------------|--|
| Technical data such as: Operating system used, browser type and version, device (smartphones, tablets or other end device), date and time of access, ... | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 13 months at the latest |
| Behaviour-related data such as registration date, products viewed, products ordered, name of the page accessed | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 13 months at the latest |
| User key, device key, such as Customer ID, Advertising ID and Client ID | Evaluation of user behaviour on different devices and browsers for the placement of advertisements on different end devices | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after 13 months at the latest |

Pinterest Ads

We also use the Pinterest tag of Pinterest Europe Limited Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland. This allows us to track the behaviour of users after they have viewed a Pinterest ad. We can also use the Pinterest tag to measure the conversion of a campaign. This allows us to use the Pinterest tag to check the effectiveness of a Pinterest ad, optimise future advertising campaigns and adapt them to the needs of users. We cannot draw any conclusions about the identity of the user from the data collected. However, the data is also retained by Pinterest and can be linked to the user profile and used for advertising

purposes. Further information on data protection can be found at <https://policy.pinterest.com/de/privacy-policy>.

| Data | Processing purpose | Legal basis | Retention period |
|---|---------------------------------------|---------------------------------------|-------------------------|
| Technical data such as: Device information, operating system used, device ID, date and time of access | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Up to 12 months |
| Behavioural data such as: Registration date, products viewed, products ordered, name of the page accessed | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Up to 12 months |
| Personal data such as email address, IP address, Pinterest client ID, mobile advertising ID, order ID | Placement of ads to customer segments | Art. 6 para. 1 sentence 1 lit. a GDPR | Up to 12 months |

Adjust

For our BESTSECRET apps, we use the Adjust-provided service provided by Adjust GmbH, Saarbrücker Str. 37A, 10405 Berlin/Germany, to analyse the use of our app and improve our mobile advertising measures. With the help of Adjust, we can record installations of our app and how they are used and evaluate and optimise the performance of mobile advertising campaigns on various marketing channels.

Adjust uses the data listed in the table below in particular for the aforementioned analysis functions, using tracking technologies. The data collected via Adjust can provide information about the installation and first opening of an app on the mobile device, as well as about interactions within an app (e.g. in-app purchases, login). The data also provides information about which ads have been seen or clicked on.

The legal basis for processing is your consent in accordance with Art. 6 para. 1 sentence 1 lit. a GDPR. Once you have given your consent, you can withdraw it at any time with effect for the future.

| Data | Processing purpose | Legal basis | Retention period |
|---|--|---------------------------------------|--|
| Technical data such as: Operating system and version used, browser type and version, device type (smartphones, tablets), HTTP header, user agent, app version, SDK version, app token, event token, date and time of activity | Evaluation of user behaviour to optimise the app applications and analysis of mobile advertising campaigns on various marketing channels | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after discontinuation of purpose (e.g. withdrawal of consent) |

| | | | |
|---|--|---------------------------------------|--|
| Behavioural data such as registration date, installation and first opening of an app on the mobile device, interactions within the app (e.g. products viewed, products ordered, product searches) or information about which advertisements were seen or clicked on | Evaluation of user behaviour to optimise the app applications and analysis of mobile advertising campaigns on different marketing channels Art. 6 para. 1 sentence 1 lit. a GDPR | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after discontinuation of purpose (e.g. withdrawal of consent) |
| Adjust device ID (MAC address hashed), Google Click ID, Google Marketing Platform Click ID, Meta Click ID, IP address, mobile advertising ID, manufacturer ID (IDFV, only for iOS), order ID, user ID | Evaluation of user behaviour to optimise the app applications and analysis of mobile advertising campaigns on different marketing channels Art. 6 para. 1 sentence 1 lit. a GDPR | Art. 6 para. 1 sentence 1 lit. a GDPR | Deletion after purpose no longer applies (e.g. withdrawal of consent) |

Adjust uses data centres of the provider Leaseweb Netherlands B.V., Hessenbergweg 95, 1101 CX Amsterdam, Netherlands in the EU (Frankfurt am Main, Amsterdam) and the USA to operate its application.

If personal data is processed on servers outside the EU/EEA, e.g. in the USA, the contract for order processing stipulates that Adjust shall ensure an adequate level of protection with regard to data processing in the third country within the meaning of Art. 44 ff GDPR, which is achieved by using the so-called EU standard contractual clauses in accordance with Art. 46 GDPR and other measures.

Further data protection information from Adjust can be found at

<https://www.adjust.com/terms/privacy-policy/> and <https://www.adjust.com/terms/gdpr/>