



## **Legal information about our privacy policy**

The protection of your personal information is important to us. With the following remarks and the privacy policy, we will give you an overview regarding usage of our website, how we guarantee this protection and what type of data is collected for what purpose.

### **Legal notice**

Schwalbe is a brand of GOVECS AG, Grillparzerstr. 18, 81675 Munich (hereafter also: "GOVECS", "we", "us"). All texts, pictures and other works published on the Internet site [www.myschwalbe.com](http://www.myschwalbe.com) (hereinafter also: "website") are covered - unless otherwise indicated - by the copyright of GOVECS. Any duplication, distribution, storage, transmission, forwarding and reproduction or dissemination of the contents without written permission from GOVECS is strictly prohibited.

GOVECS composes the contents of these websites with great care and ensures that they are updated regularly. The information is only for purposes of non-binding general information and does not replace detailed individual consultation about a purchasing decision. The technical characteristics and configurations of the vehicles described are only examples. Such features and configurations may vary, particularly with regard to individual countries. The right to make alterations at any time is reserved. You will get binding, current information about the technical characteristics, configurations or features of our vehicles exclusively from your authorised dealer or importer.

GOVECS provides no guarantee as to the timeliness, correctness and completeness of the information on these sites or for uninterrupted access. If third parties are referenced on the website (through links), GOVECS is not responsible for the content of the linked pages. By clicking on the links, you are leaving the GOVECS website. Third-party sites may be subject to differing terms and conditions, particularly with regards to privacy protection. In addition, GOVECS excludes liability for services, particularly in downloading files provided by GOVECS on the GOVECS website, for breaches of duty caused by slight negligence, if these are based



neither on contractual obligations nor on injuries to life, health or body or to claims under the Product Liability Law. The same applies to any breaches of duty of our agents.

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### 1. General information about the collection of personal data

For GOVECS AG ("GOVECS"), protection of your personal data is particularly important. This privacy statement describes how GOVECS ("we", "us" and "our") uses and protects personal data collected through [www.govecs.com](http://www.govecs.com) and/or [www.govecsgroup.com](http://www.govecsgroup.com) ("GOVECS Website").

Personal data is all the data that is personally related to you, such as your title, your name, your address, your e-mail address, your IP address etc. Your personal data will only be



collected and handled by us according to the provisions of the EU General Data Protection Regulation ("GDPR"), as well as other provisions of the European as well as the currently applicable national data protection laws.

The collection and use of personal data takes place only after you have given your consent or the processing of the data is permitted by law. The following provisions inform you about the type, scope and purpose of the collection and processing of your personal data.

In the event that we use contracted service providers for individual functions of our offer and/or for our services, or use your data for advertising or analysis purposes, we will inform you in detail about the respective transactions. At this point, we also inform you about the defined criteria and the duration of storage. We also inform you about your rights regarding any data processing.

This privacy policy applies solely to our GOVECS website. In the event that you are forwarded to third-party websites through links on our GOVECS website, please enquire about the handling of your data there.

## **2. Contact information of the person responsible and the data protection officer**

GOVECS is responsible for the data protection law according to the GDPR, as well as all other applicable data protection law provisions of the EU ("liable"). If you have any questions, suggestions or criticism regarding the privacy of our website, please contact:

GOVECS AG  
Grillparzerstraße 18  
81675 München Deutschland  
E-Mail: [info@govecs.com](mailto:info@govecs.com)

Every data subject can also contact our data protection officer at any time with any questions or suggestions regarding data protection. You can do this by reaching out to the address given above, as well as by contacting



Deutsche Datenschutz Consult GmbH  
Christoph Heinrich  
www.deutsche-datenschutz-consult.de  
Stresemannstraße 29  
22769 Hamburg Germany  
Telefon: +49 40 228 60 70 402  
Email: [datenschutz@govecs.com](mailto:datenschutz@govecs.com)

### **3. Explanations for the legal framework and storage duration**

#### 3.1. Legal framework for processing personal data

Insofar as we obtain your consent for the processing of personal data, article 6, paragraph 1, sentence 1, point a of GDPR is the legal basis for the processing of personal data. Any consent can be revoked by you with future effect.

While processing personal data that is required to complete a contract with you or your company, article 6, paragraph 1, sentence 1, point b of GDPR is the appropriate legal basis. This also applies to processing operations that are already pre-contractual-relevant.

As long as processing of your personal data is necessary to complete one of our legal obligations, article 6, paragraph 1, sentence 1, point c of GDPR serves as the legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party, and your interests, fundamental rights and fundamental freedoms do not outweigh our legitimate interest, then article 6, paragraph 1, sentence 1, point f of GDPR serves as the legal basis for the processing.

#### 3.2. Storage duration and deletion of data

The personal data collected, processed and stored by us is only stored as long as the specific purpose of the storage requires. If the purpose of storage is no longer necessary, your data will be deleted or its processing will be restricted.

However, in addition to this, it may be that European regulations, the applicable national laws or other regulations may require longer storage of the data that we process. If these periods of storage expire, we will delete your data or limit its processing.



## 4. Your rights

As long as we process your personal data, you are the "data subject" according to the GDPR. As the data subject, you have the following rights to GOVECS:

### 4.1. Right to information with respect to processing

At any time within the scope of the statutory provisions, you can request information from us as to whether personal data is being processed by us. If this is the case, you have the right to request information about the extent of data processing (see article 15 of GDPR).

### 4.2. Right to rectification

You have a right to correct and/or complete your data with GOVECS, if your personal data is incorrect or incomplete (see article 16 GDPR).

### 4.3. Right to restriction of processing

If the conditions are satisfied, you may request the restriction of processing of your personal data (see article 18 GDPR).

### 4.4. Right to delete

You may request GOVECS to immediately delete your personal information if the conditions are satisfied. The right to delete does not exist if processing is necessary (see article 17 GDPR).

### 4.5. Right to information

If you have asserted the right to rectify, delete or restrict the processing to GOVECS, GOVECS is obliged to notify all recipients to whom your personal data have been disclosed of this correction or deletion of data or restriction of processing, unless this proves to be impossible or involves a disproportionate effort (see article 19 GDPR).



#### 4.6. Right to data portability

You have the right to receive personally identifiable information you provide to GOVECS in a structured, common and machine-readable format. You also have the right to transfer this data to another company without any hindrance by GOVECS, to whom the personal data has been provided, if the conditions are met (see article 20 GDPR).

#### 4.7. Right to object

(see article 21, paragraph 1 GDPR).

The consequence of objection is that GOVECS no longer processes the personal data related to you, unless GOVECS can prove compelling legitimate reasons for processing that outweigh your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending of legal claims.

If the personal data related to you is processed in order to operate direct mail, you have the right to object at any time to the processing of your personal data for the purpose of such advertising (see article 21, paragraph 2 of GDPR).

Please appeal to us with your objection (paragraph 1 of this declaration). You have the right, at any time, to object to the processing of personal data concerning you, pursuant to article 6, paragraph 1, sentence 1, point f of GDPR for reasons arising from your particular situation.

#### 4.8. Right to revoke the data protection consent declaration

If you have submitted a data protection consent form, you can revoke it at any time (see article 7 of GDPR). The revocation of consent does not affect the legality of processing carried out on the basis of the consent until revocation.

#### 4.9. Right to complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the Member State of its residence, place of work or place of alleged infringement, if you believe that the processing of your personal data is against the GDPR (see article 77 GDPR).



## 5. Visit the GOVECS website and create logfiles

Each time you visit our GOVECS website, our system automatically collects data and information from your computer system. In particular, the following data will be collected:

- Information about your browser type
- Information about your operating system
- Information about your internet service provider
- Your IP address
- Date and time of your visit to our site
- Information about the website from which your system accessed our website
- Information about the website that is accessed by your system through our website.

The mentioned data that we have collected about you is stored in the log files of our system. Storing this data together with other personal data does not happen.

The legal basis for the temporary storage of data and log files is article 6, paragraph 1, sentence 1, point f of GDPR. We have a legitimate interest in collecting and temporarily storing such information as temporary storage of the IP address by the system is necessary to allow delivery of the website to your computer.

Storage in log files is done to ensure the functionality of the website. In addition, this data is used to optimize our website and to ensure the security of our information technology systems. An evaluation of your log files for marketing purposes does not take place. One exception is the information we collect about your browser settings. This also includes checking the language setting in your browser in order to be able to display the corresponding language version of the GOVECS website.

The data is deleted or alienated, so that allocation to you is no longer possible, as soon as it is no longer necessary for the purpose mentioned here. If the data is stored in log files, the data is deleted after seven days.



## 6. Newsletter

On [www.myschwalbe.com](http://www.myschwalbe.com), you have the option to subscribe to a free newsletter. If you agree, we will inform you about the latest GOVECS e-scooters, especially about the Schwalbe, about helmets, other accessories and features for your Schwalbe. We will also inform you at which event we are representing the electric Schwalbe and where you can test drive it. We will also inform you about the possibility of participating in competitions, cash back campaigns and other sales promotions. In this process, the data you enter in the entry form when you sign up for the newsletter will be sent to us. Usually, this will contain:

- Your e-mail-address
- Your first and last name

We need your e-mail address to send you the newsletter and to identify and check your consent. Your first and last name are used to personalize the newsletter and are not mandatory for registration.

To register for our newsletter, we use the so-called double opt-in process. This means that once you have registered, we will send you an e-mail to the e-mail address that you have provided, in which we will ask you to confirm whether you wish to receive the newsletter. If you do not confirm your registration within 24 hours, your data will be automatically deleted after one month. After your confirmation, we will save your e-mail address as well as further details, for the purpose of sending the newsletter. The legal basis for this is Article 6, para. 1, sentence 1, point a of DSGVO.

We also store your IP addresses and time of registration and confirmation. The purpose of the procedure is to prove your registration and, if necessary, to clarify possible misuse of your personal data. The legal basis is Article 6, para. 1, sentence 1, point f of DSGVO.

We will delete your data as soon as you have unsubscribed from the newsletter or it will be cancelled by us. You may cancel the newsletter subscription at any time by revoking your consent with future effect. Each newsletter sent to you contains a link that allows you to unsubscribe easily. You can also send an email to [datenschutz@govecs.com](mailto:datenschutz@govecs.com) or send a message to the person-in-charge named above for this privacy policy. The newsletter is sent regularly by CleverReach GmbH & Co. KG, Mühlenstraße 43, 26180 Rastede, Germany. CleverReach's data protection regulations can be found here: <https://www.cleverreach.com/de/datenschutz/>. CleverReach acts on our behalf and does not





use the data of our newsletter recipients to write to them itself or to pass the data on to third parties.

## **7. Partner-Log-In**

You can log in as a GOVECS partner to [govecs.de](http://govecs.de). To do this, enter the user name assigned to you, as well as your password.

We use, store and process this data, as this is necessary for justification, the content or modification of the contractual relationship between you and GOVECS as well as for the use and billing of the related services.

The legal bases for the aforementioned data processing on the GOVECS website are article 6, paragraph 1, sentence 1, point b and f of GDPR. We delete your data, as long as it is no longer necessary for the purpose mentioned and there are no contractual or legal retention periods. This is the case here latest after 10 years.

## **8. Contact with GOVECS**

### 8.1. E-Mail

On our GOVECS website, you will find several e-mail addresses which you can use depending on the nature of your request (for example sales or press) to contact us. Send us an e-mail and we will save your e-mail address as well as other data provided by you.

The legal basis for the processing is article 6, paragraph 1, sentence 1, point b and f of GDPR, since the establishment of contact can be an initiation of an agreement. GOVECS also has a legitimate interest in processing your data in order to respond to you. The data will be deleted as soon as it is no longer necessary for the purpose of collection and the deletion also does not conflict with any legal or contractual archiving obligations. The conversation ends when it can be inferred from the circumstances that the facts are finally clarified.



At the time of sending your message, the following data is also stored:

- Your IP address
- Date and time of your contact

This other personal data processed during the submission process is intended to prevent misuse of the e-mail and to ensure the security of our information technology systems. The additional personal data collected during the sending process will be deleted at the latest after a period of seven days. The data is used exclusively for processing the conversation. The legal basis for the processing of the data is article 6, paragraph 1 sentence 1 point b or f of GDPR.

#### 7.2. Transfer to our partners

The data sent to us by you may be forwarded to our partners, as long as the content of your request thematically and regionally refers to them (order processing). However, GOVECS remains your first point of contact in this case and you can continue to assert your rights against GOVECS.

By submitting your request, you declare your consent to the transfer of the data entered by you into the contact form to the GOVECS partners, provided that the content of your request relates thematically and regionally to the partners concerned. You can revoke your consent at any time to GOVECS with future effect.

The legal basis for forwarding to our partners is article 6 paragraph 1 sentence 1 points a, b and f of GDPR. As long as your request relates to our partners, GOVECS has an interest in turning them in to handle your request. We will delete your data if it is no longer necessary and there are no legal contractual obligations.

## **9. Use of cookies**

In addition to the aforementioned data, when using our GOVECS website, various types of cookies are used and stored on your computer. Cookies are small text files that are stored on your computer or mobile devices when you visit our GOVECS website. We get different information by setting cookies.



We use the following types of cookies:

- Cookies may be required for our website to function properly. For example, by setting cookies we may find that you have visited our website.
- By using cookies, we can also provide you with more user-friendly services that would not be possible without the use of cookies.
- By setting a cookie, the information and offers on our website, for example, can be optimized to the user's needs. Cookies allow us, as already mentioned, to recognize you on our website. The purpose of this recognition is to facilitate the use of our website.
- Cookies can also be used to analyse website usage. Here, it is determined, as to e.g. how many users visit the site and where the site may be improved. However, this analysis does not establish any link between you and the statistics generated from the collected data. As long as we use cookies for website analysis, we will inform you.

Cookies are stored on your computer. You can always decide if you want to delete the cookies from your computer. The settings in your browser allow you to decide whether the transfer of cookies from your computer to us should be deactivated, limited or even completely deleted. If you deactivate all cookies for our website, it may not be possible to use all functions of the website to the fullest.

The following list provides more information about disabling or managing your cookie settings in the browser you are using:

- Safari: <http://help.apple.com/safari/mac/8.0/#/sfri11471>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Internet Explorer / Edge: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>



## 10. Use of Google Analytics

Our GOVECS website uses Google Analytics, a web analytics service provided by Google. Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics uses "cookies". These are text files that are stored on your computer and that allow you to analyse the use of the GOVECS website. The information generated by the cookies about your use of our GOVECS website is usually transmitted to a Google server in the USA and stored there. IP anonymisation will be carried out on the GOVECS website, so that your IP address is truncated beforehand, within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and only then shortened. Google, on behalf of the operator of our GOVECS website, will use this information to evaluate your use of the GOVECS website, to compile reports on GOVECS website activity, and to provide other services related to GOVECS website and internet usage to GOVECS. The IP address sent by your browser as part of reCAPTCHA will not be merged with other data provided by Google.

For the exceptional cases in which personal data is transferred to the US, Google is subject to the EU-US Privacy Shield. <https://www.privacyshield.gov/EU-US-Framework>.

A justification for the use of Google Analytics is provided in accordance with article 6, paragraph 1, sentence 1, point a of GDPR, if a prior consent has been obtained from you and pursuant to article 6 paragraph 1 sentence 1 point f GDPR, since GOVECS has a legitimate interest in the processing of data. We use Google Analytics to analyse and regularly improve the use of our GOVECS website.

You can prevent the storage of cookies using an appropriate setting of your browser software; however, please note that in this case, you may not be able to fully use all features of the GOVECS website. In addition, you can prevent the collection of data generated by the cookie and related to your use of the GOVECS website (including your IP address) and the processing of this data by Google, by downloading the browser plug-in available under the following link and install: <https://tools.google.com/dlpage/gaoptout?hl=de>.



You can also prevent the collection by setting an opt-out cookie. If you wish to prevent the future collection of your data when visiting this GOVECS website, data click here: <https://tools.google.com/dlpage/gaoptout?hl=de>.

We will only process your data for as long as it is necessary for the purpose of collecting the data (here, creation of statistics and their evaluation). The data sent by us and linked to cookies, user IDs (e.g. user ID) or advertising IDs will therefore be automatically deleted after 38 months. The deletion of data whose retention period has been reached is done automatically once a month. For more information about terms of use and privacy, see: <https://www.google.de/analytics/terms/de.html>.

## 11. Using Google Maps

Some of the GOVECS websites use Google Maps API, a map service operated by Google Inc. ("Google"). Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. This allows us to show you interactive maps directly on the GOVECS website and to provide you with convenient use of the map feature.

By visiting the GOVECS website offering map services, Google receives the information that you have accessed the corresponding sub-page of our GOVECS website. In addition, the following data is provided to Google:

- Your IP address
- Date and time of the request
- the time zone difference to Greenwich Mean Time (GMT)
- Content of the requirement (concrete page)
- Access Status / HTTP status code
- Amount of data transferred
- Website from which the request comes
- Your browser type



- Your operating system and its interface
- Your language and version of the browser software.

This is done regardless of whether Google provides a user account that you are logged in on or if there is no user account. When you're logged in to Google, your data will be assigned directly to your account. If you do not wish to be associated with your profile on Google, you must log out before activating the button. Google stores your data as usage profiles and uses them for purposes of advertising, market research and / or tailor-made website design. Such evaluation will be done in particular (even for non-logged-in users) to provide on-demand advertising and to inform other users of the social network about your activities on our GOVECS website. You have a right to object to the formation of these user profiles, and you must appeal to Google to exercise this.

You can easily deactivate the service of Google Maps and thus prevent the data transfer to Google: Deactivate JavaScript in your browser. We point out, however, that you cannot use the map display in this case.

Google also processes your personal data in the United States, subject to the EU-US Privacy Shield: [https://www.privacyshield.gov/EU-US- Framework](https://www.privacyshield.gov/EU-US-Framework).

A justification for the use of the Google Maps API is done in accordance with article 6, paragraph 1, sentence 1, letter f of GDPR, since GOVECS has a legitimate interest in the processing of data in the present case. We use Google Maps API to offer you a map feature. We will only process your data for as long as it is necessary for the purpose of the data collection.

For more information on the purpose and scope of Google's data collection and processing, please see Google's Privacy Policy. There, you will also find further information about your rights and settings options for the protection of your privacy: <http://www.google.de/intl/de/policies/privacy>.



### 11.1. ReCaptcha

To protect your blog comments by a form, GOVECS uses the reCAPTCHA service by Google Inc. ("Google"). Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. The query is used to distinguish whether the input is made by a human or somebody has abused it through automated, mechanical processing. The query includes the sending of the IP address and any other data required by Google for the reCAPTCHA service to Google. For this purpose, your input will be transmitted to Google and may be used there. IP anonymisation will be done on the GOVECS website, so that your IP address is truncated, within the member states of the European Union or other contracting states of the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there. On behalf of GOVECS, Google will use this information solely to evaluate your use of this service. The IP address sent by your browser as part of reCAPTCHA will not be merged with other data provided by Google.

For the exceptional cases in which personal data is transferred to the US, Google is subject to the EU-US Privacy Shield. <https://www.privacyshield.gov/EU-US-Framework>.

The use of reCAPTCHA is justified in accordance with article 6, paragraph 1, point f of GDPR, as GOVECS has a legitimate interest in the processing of the data in the present case. We use reCAPTCHA to prevent the misuse of our website. We will process your data only as long as it is necessary for the purpose of collecting data (in this case, preventing the misuse of our website). For more information about Google's privacy policy, see: <http://www.google.com/intl/de/policies/privacy/>.

## **12. Social Media Links and Plugins**

### 12.1. General Information

On the GOVECS website, we use the following simple social media links to the GOVECS social media profiles. Here, a simple link to the respective website of the social networks is provided. As a result, when visiting the GOVECS website, personal data is not automatically exchanged or transferred to the respective providers of the social media networks - unless it is described more in detail below. Only by clicking on the respective link with which a pop-up opens, and then entering your access data to the social network or in the case of already being registered, data will be processed by the respective networks themselves.



You can use the privacy settings that are available on most social media platforms to control what data you share on the networks. For more information about how to customize your privacy settings and how external social media sites handle your personally identifiable data, see the following:

#### 12.2. Facebook

We link to Facebook ("Facebook"). Facebook is operated by Facebook Ireland Ltd., 4 Grand Canal Square, Dublin, Ireland. The link is indicated with the Facebook logo. Once you click on the link, a connection will be established between your web browser and Facebook.

The data of the visitors of our Facebook Fan Page is evaluated by Facebook and the anonymized data is made available to us. This is not optional when operating a fan page on Facebook. The provision of our online presence on the platform for which we are responsible and the related statistical evaluations of our visitors on this online presence are carried out in our legitimate interest in maintaining an online presence on Facebook, being able to evaluate our offer and evaluating our market reach, Art. 6 Para. 1 lit. f DSGVO.

The actual statistical evaluation is the responsibility of Facebook. The nature, extent, purpose of collection and processing of data by Facebook and the rights and options to protect the privacy of the user, can be found in the privacy policy of Facebook: (<https://www.facebook.com/about/privacy>). You can find more information about the existing joint responsibility between Facebook and us as operator of a fan page here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

#### 12.3. Twitter

We link to Twitter ("Twitter"), a service of Twitter Inc. 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. The link is indicated with the Twitter logo. Each click on the Twitter logo on the GOVECS website will cause your web browser to connect to the Twitter server. Details on handling of your data by Twitter as well as your rights and options to protect your personal data can be found in the privacy policy of Twitter (<https://twitter.com/de/privacy#update>).

#### 12.4. LinkedIn

We link to the LinkedIn Corporation network ("LinkedIn"). LinkedIn is operated by the LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. The link is indicated with the





LinkedIn logo. If you click on the link, your web browser will connect to the LinkedIn server. LinkedIn's privacy policy is available at <https://www.linkedin.com/legal/privacy-policy>. LinkedIn's cookie policy is available at <https://www.linkedin.com/legal/cookie-policy>.

#### 12.5. Instagram

We also use a link to Instagram on our GOVECS website, which is provided by Instagram LLC. ("Instagram"), 1601 Willow Road, Menlo Park, CA 94025, USA. The link is marked with the Instagram logo in the form of an "Instagram camera". If you click on the Instagram logo, your browser connects directly to Instagram servers. The purpose and scope of the data collection and further processing and use of data by Instagram as well as your rights and setting options for protection of your privacy, can be found in the privacy policy of Instagram: <https://help.instagram.com/155833707900388/>.

#### 12.6. YouTube

On our GOVECS website, we also use embedded content (videos) from YouTube LLC, ("YouTube ") 901 Cherry Ave., 94066 San Bruno, CA, a company of Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA. When you access the GOVECS website with such content, you will be connected to the YouTube servers, and the content will be displayed on the website by notifying your browser. This will report to the YouTube server, as to which of our GOVECS sites you have visited. If you are also logged in as a member of YouTube, YouTube assigns this information to your personal user account of the platform. To prevent such association, log out of your YouTube user account before visiting our GOVECS website.

So Google processes your personal data in the United States, subject to the EU-US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

A justification for the use of YouTube is provided in accordance with Article 6, para. 1, sentence 1, point f of the DSGVO. GOVECS has a legitimate interest in it, because we would like to introduce you to the products, as well as the philosophy of GOVECS through integrated videos. We use YouTube to provide you with video content. We will only process your data for as long as it is necessary for the purpose of the data collection.

YouTube's privacy policy is available at <https://www.google.de/intl/de/policies/privacy/> .



## **13. Comment function blog**

### 13.1. Comment blog

In our blog, where we publish various articles about Schwalbe-related topics, you can make public comments. When you submit a comment, it will be posted to the relevant post, with the name (possibly pseudonym) you provide. In particular, we will ask you for the following data:

- Your name
- Your e-mail-address
- Your website, if available
- Your IP address

We store your information in order to give you the opportunity to actively participate in our blog and to express your opinion about the Schwalbe.

The legal basis for the processing of your data is article 6, paragraph 1 sentence 1 point f of GDPR. We will delete your data if you want or if it is no longer necessary for the above purpose and there are no statutory storage requirements.

## **14. Transfer to third parties**

### 14.1. General information

In general, we will only pass on your personal data to service providers, business partners, affiliated companies and other third parties within the framework of applicable data protection laws.

We may disclose personally identifiable information to those of our service providers and oblige them to perform services on our behalf (order processing). Such service providers may be affiliates of GOVECS or external service providers. In doing so, we observe the strictly applicable national and European data protection regulations. The service providers are subject to our instructions and are subject to strict contractual restrictions with regard to the processing of personal data. Thereafter, processing is allowed as long as it is necessary for



the performance of the services on our behalf or for compliance with legal requirements. It is decided in advance as to what rights and obligations our service providers should have in relation to personal data.

We may disclose personal information to a third party if required by law or legal process or to provide and manage our products and services. We may also be required to provide information to a law enforcement agency or other authority. If you require any information to cooperate and provide GOVECS services to you, or if you consent, we may also disclose your information. Also, when audits are pending, a disclosure is usually unavoidable.

The legal basis for the processing of your data is article 6, paragraph 1 sentence 1 point f of GDPR.

#### 14.2. Hosting Provider

Our servers, and therefore even your data, is hosted at an external service provider, LimTec GmbH, Halderstr. 16, 86150 Augsburg ("LimTec"). LimTec may only access your data as part of our instructions (order processing). LimTec also takes strict technical measures to protect your personal information. LimTec does not disclose your personal information to third parties unless the disclosure is required to complete the agreed services, or LimTec must do so to comply with the law or a valid and mandatory instruction from a government or regulatory body. The data transmitted is limited to the necessary minimum. LimTec stores all information exclusively on servers in Germany.

LimTec is subject to our instructions and is subject to strict contractual restrictions regarding the processing of personal data. Thereafter, processing is only permitted if it is necessary for the performance of the services on our behalf or for compliance with legal requirements. It is decided in advance as to what rights and obligations our service providers should have in relation to personal data.

The legal basis for the processing of your data is article 6, paragraph 1, point f of GDPR. The purpose of data processing is that LimTec offers us the opportunity to use its servers. We only save your data for as long as it is necessary.

More information can be found at <https://www.limtec.de/de/Datenschutz/>.



### 14.3. Quisa

GOVECS uses the customer service (CRM) "Quisa" of the company energy GmbH ("energy"), Lohnerhofstraße 2, 78467 Konstanz (order processing). energy also takes rigorous technical measures to protect your personal information. energy does not disclose your personal information to third parties unless the disclosure is required to complete the agreed services, or energy must do so to comply with the law or a valid and mandatory instruction from the government or a regulatory body. The transmitted data is limited to the necessary minimum. energy stores all information exclusively on servers in Germany.

energy is subject to our instructions and is subject to strict contractual restrictions regarding the processing of personal data. Thereafter, processing is only permitted if it is necessary for the performance of the services on our behalf or for compliance with legal requirements. It is decided in advance as to what rights and obligations our service providers should have in relation to personal data.

More information can be found at <https://www.quisa.de/datenschutzbestimmungen/>

### 13.4. Other processors

GOVECS uses the following additional service providers for order processing:

- Website design and maintenance

## **14. Safety standards**

GOVECS has implemented appropriate physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. Our service providers and affiliates have a contractual obligation to protect the confidentiality of personal information. In addition, they may not use the data purposes that are not authorized by us.



## **15. Changes to this policy**

We may update this privacy policy from time to time. We therefore recommend that you read this privacy policy regularly to understand our privacy practices. This privacy policy was last updated on 17.01.2019.