



I. Introduction

We would like to use the information below to provide you as the "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering any personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and if there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to "SPIR STAR AG". The aim of this Privacy Policy is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organizational measures to ensure the best possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data by alternative methods, such as by phone or by post to us.

You may contact our data protection officer or our data protection coordinator directly at any time if you have any questions or suggestions regarding data protection.

II. Data controller

The data controller, as defined by the GDPR, is:

SPIR STAR AG

Auf der Rut 7, 64668 Rimbach-Mitlechtern, Germany

Phone: +49 (0) 6253-9889 0

E-Mail: privacy-policy@spirstar.de

Internet: www.spirstar.de

Data controller's representative: Ruben de Graaf

III. Data protection officer

You can reach the data protection officer as follows:

AR Datenschutz

Andreas Rößling

Bürgermeister-Arnold-Straße 3, 69483 Wald-Michelbach, Germany

Phone: +49 6207 920106

E-Mail: kontakt@ar-datenschutz.de

Internet: www.ar-datenschutz.de

IV. Definitions

This Privacy Policy is based on the terminology used by the European body issuing directives and regulations in the promulgation of the General Data Protection Regulation (GDPR). Our Privacy Policy should be easy to read and understand, both for the public and for our customers and business partners. In order to ensure this, we would like to explain in advance the terminology used.

We use the following terms in this Privacy Policy, among others:

1) *Personal data*

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2) *Data subject*

A data subject is any identified or identifiable natural person whose personal data is processed by the data controller (our company).

3) *Processing*

Processing means any operation or set of operations which is performed in connection with personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4) *Restriction to processing*

Restriction to processing means marking stored personal data with the aim of limiting its processing in future.

5) *Profiling*

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

6) *Pseudonymization*

Pseudonymization is the processing of personal data in such a way that the personal data can no longer be assigned to a specific data subject without additional information being provided, given that such additional information is kept separate and subject to appropriate technical and organizational measures that ensure that personal data cannot be attributed to an identified or identifiable natural person.

7) *Data processor*

The data processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

8) *Recipient*

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

9) *Third party*

Third party means a natural or legal person, public authority, agency or body other than the data subject, the controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

10) Consent

Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

11) Controller

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

V. Legal basis for processing

Article 6 Paragraph 1(a) GDPR (in conjunction with Section 25 TDDDGD serves as our company's legal basis for processing operations in which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of other services or consideration, processing is based on Article 6 Paragraph 1(b) GDPR. The same applies to those processing operations required to carry out pre-contractual measures, such as in cases of inquiries regarding our products or services.

If our company is subject to a legal obligation requiring the processing of personal data, such as for the fulfilment of tax obligations, processing is based on Article 6 Paragraph 1(c) GDPR.

In rare cases, processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if someone visiting our business were to be injured and their name, age, health insurance data or other vital information needed to be disclosed to a doctor, hospital or other third party. Processing would then be based on Article 6 Paragraph 1(d) GDPR.

Finally, processing operations could be based on Article 6 Paragraph 1(f) GDPR. Processing operations not covered by any of the above-mentioned legal bases may be carried out on the basis of Article 6 Paragraph 1(f) GDPR if processing is necessary to safeguard the legitimate interests of our company or those of a third party, except where such interests are overridden by the interests and fundamental rights and freedoms of the data subject. We are permitted to engage in such processing operations in particular because they have been specifically mentioned in European law. In this respect, the legislator took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47 Overriding legitimate interest Sentence 2 GDPR).

Our offer is generally aimed at adults. Persons under the age of 16 are not permitted to transmit any personal data without the consent of their parents or legal guardians. We do not request any personal data from children or adolescents, do not collect these and do not forward these to third parties.

VI. Technology

1) SSL/TLS- encryption

This site uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login details or contact requests that you send to us as the website operator. You can recognize an encrypted connection by your browser's address bar reading "https://" instead of "http://" and the lock symbol in the browser bar.

We use this technology to protect the data you transmitted.

2) Data collection when visiting the website

If you only use our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we only collect the data your browser sends our server (in what is known as "server log files"). Our website collects a range of general data and information each time you or an automated system access a website. This general data and information is stored in the server's log files. The following data may be collected:

- a) the browser types and versions used,
- b) the operating system used by the accessing system,
- c) the website from which an accessing system accesses our website (called a referrer),
- d) the sub-pages accessed via an accessing system on our website,
- e) the date and time the website is accessed,
- f) an internet protocol address (IP address), and
- g) the accessing system's internet service provider.

> We draw no conclusions about you when we use this general data and information. Instead, this information is needed to

- a) properly deliver our website content,
- b) optimize the content of the website as well as the advertising for it,
- c) ensure the continued functioning of our information technology systems and our website's technology, and
- d) provide the information necessary for law enforcement authorities to prosecute in the event of a cyber-attack.

> This data and information collected is therefore statistically analyzed and further analyzed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The data from the server log files is stored separately from all personal data provided by a data subject.

To comply with the principles of data minimization, we collect personal data only to the extent and as long as this is necessary for the use of our website or prescribed by law, respectively.

Where we collect personal data from you, such as your name, your address or email address, you provide such data to us on a voluntary basis.

We take the protection of your personal data seriously and strictly comply with the relevant legal provisions and this data privacy policy when we collect and process personal data.

As soon as the purpose of the collection of personal data ceases to exist or if the statutory storage period has expired, the data collected will be blocked or erased.

The legal basis for data processing is Article 6 Paragraph 1 Sentence 1(f) GDPR. Our legitimate interest is based on the purposes listed above for the collection of data.

VII. Cookies

1) General information about cookies

We use cookies on our website. Cookies are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone, etc.) when you visit our website.

Information generated by the specific device used is stored in cookies. This does not mean, however, that we will gain immediate knowledge of your identity because of this.

The use of cookies helps us make it more convenient for you to use our website. For example, we use so-called session cookies to detect whether you have already visited individual pages on our website. These are erased automatically when you leave our website.

We also use temporary cookies to optimize user-friendliness. These cookies are stored on your device for a specific period of time. If you return to our website to use our services, cookies allow us to automatically recognize that you have visited our website previously and remember the inputs and settings you have made so that you do not have to enter them again.

We also use cookies to statistically record the use of our website and analyze it for the purpose of optimizing our offer. These cookies allow us to automatically recognize that you have already visited our website when you visit our website again. These cookies are automatically erased after a defined period of time. How long the cookies are stored can be found in the settings of the consent tool used. You can also use our website without cookies but disabling cookies may limit the display and the functions of our website.

If you wish to disable the cookies you can do so via special settings of your browser. Please use this auxiliary function of your browser to make the changes you want.

2) *Legal basis for the use of cookies*

The data processed by cookies, which are required for the proper functioning of the website, are to safeguard our legitimate interests and those of third parties pursuant to Article 6 Paragraph 1 Sentence 1(f) GDPR.

As regards all other cookies you have given your consent to this through our opt-in cookie banner in accordance with Article 6 Paragraph 1(a) GDPR.

VIII. Contents of our website

1) *Contact/contact form*

Personal data is collected when you contact us (e.g. by using our contact form or by email). If you use a contact form to get in touch with us, the contact form you use will indicate the data being collected. This data is stored and used exclusively for the purpose of responding to your request or establishing contact and the associated technical administration. The legal basis for data processing is our legitimate interest in responding to your request pursuant to Article 6 Paragraph 1(f) GDPR. If the aim of you contacting us is to conclude a contract, the additional legal basis of processing is Article 6 Paragraph 1(b) GDPR. Your data will be erased once we have finished processing your inquiry. This is the case when it can be inferred from the circumstances that the relevant facts have been clarified in a conclusive manner and there are no statutory retention obligations in place that prevent its erasure.

2) *Application management/job exchange*

We collect and process the personal data of applicants for the purpose of carrying out the application process. Processing may also be carried out electronically. This is particularly the case if an applicant submits corresponding application documents to us electronically, for example by email or via a web form on the website. If we conclude an employment contract with an applicant, the data transmitted will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. If we do not conclude an employment contract with the applicant, the application documents will be automatically erased two (2) months after the candidate has been notified of our rejection decision, provided that no other legitimate interests of ours prevent their erasure. Other legitimate interests in this context include, for example, the duty to provide evidence in proceedings under the German Equal Treatment Act (*Allgemeines Gleichbehandlungsgesetz [AGG]*).

Article 88 GDPR in conjunction with Section 26 Subsect.1 BDSG [*German Federal Data Protection Act*] is the legal basis for the processing of the data.

IX. Newsletters

1) Newsletter for regular customers

If you have provided us with your email address when purchasing goods or services, we reserve the right to send you regular emails with offers of products or services from our range similar to those you have already purchased. We do not require your specific consent for such purposes as per Section 7 Subsect. 3 of the UWG [German Unfair Competition Act]. The sole basis for the data processing is our legitimate interest in personalized direct marketing in line with Article 6, paragraph 1 (f) GDPR. We will not send you any emails should you expressly have objected to the use of your email address for that purpose at the beginning. You are entitled to object to the use of your email address for the aforementioned purpose at any time with immediate effect by notifying the data controller listed in the opening of this policy. By taking this action, you will incur submission fees only in line with basic rates. After our receipt of your objection, your email address will immediately be removed for marketing purposes.

2) Advertising newsletters

You can subscribe to our newsletter via our website. The input screen determines which personal data are shared with us when you subscribe to the newsletter.

We use our newsletter to regularly communicate our offers to our customers and business partners. You can, therefore, only receive our company's newsletter if

- (1) you have a valid email address and
- (2) have registered for the newsletter.

For legal reasons, as part of the double opt-in procedure a confirmation email will be sent to the email address you provided when registering for the newsletter. This confirmation email is sent to check if you are the holder of the email address and have authorized the receipt of newsletter.

When you register for the newsletter, we also store the IP address used by your IT system at the time of registration, which is issued by your Internet Service Provider (ISP) as well as the date and time of registration. We are obliged to collect this data to investigate any (possible) misuse of your email address at a later stage and it serves for our legal protection.

The personal data collected during registration are used solely for sending our newsletter. Furthermore, subscribers to the newsletter may receive information via email if this is required in order to operate the newsletter service or for registration purposes, which may be the case if our newsletter is amended or technical circumstances change. Personal data collected for our newsletter service are not shared with third parties. You may terminate your subscription to our newsletter at any time. You can at any time withdraw your consent to the storage of the personal data you shared during registration for the newsletter. A link is provided in each newsletter to allow you to withdraw your consent. It is also possible to unsubscribe from our newsletter directly through our website or to let us know in another manner.

Article 6, paragraph 1 (a) GDPR is the legal basis for data processing for the purposes of sending a newsletter.

3) CleverReach

This website uses CleverReach to send newsletters. The provider is CleverReach GmbH & Co. KG, (CRASH Building), Schafjückenweg 2, 26180 Rastede, Germany. CleverReach is a service which enables the management and analysis of newsletters. The data you have provided for your subscription to the newsletter (e.g. email address) are stored on CleverReach's servers in Germany and/or Ireland.

The newsletters sent through CleverReach enable us to analyze the behavior of newsletter recipients. Examples of analyses include determining how many recipients have opened the newsletter email and how often they have clicked on certain links contained within the newsletter. Conversion Tracking can also be used to analyze if clicking on the link led to a pre-determined action (e.g. if a product was purchased on our

website). For further information on the analysis of data by the CleverReach newsletter, please visit: <https://www.cleverreach.com/en/features/reporting-tracking/>.

The legal basis for data processing is your consent (Article 6 Paragraph 1(a) GDPR). You can withdraw your consent at any time by unsubscribing from the newsletter. Withdrawal of consent does not affect the legality of data processing carried out previously.

If you do not want CleverReach to perform the data analysis, you must unsubscribe from the newsletter. We provide a link for this in each newsletter. You can also unsubscribe from the newsletter directly on our website.

The consent given by you can be withdrawn at any time. You can also prevent the processing at any time by unsubscribing from the newsletter. You can also prevent the storage of cookies by setting your web browser accordingly. Also, disabling Java Script in your web browser or installing a Java Script Blocker (such as <https://noscript.net> or <https://www.ghostery.com>) may prevent the storage and transfer of personal data. Please remember that through these measures not all the features of our website may be available any more.

We will store your personal data which we retain for the purposes of sending the newsletter until you are removed from the newsletter service and once you have unsubscribed from the newsletter. The data will then be deleted from our servers and the CleverReach servers. Data we retain for other purposes (e.g. email addresses for the members area) will remain unaffected.

For further information, please refer to CleverReach's privacy policy at: <https://www.cleverreach.com/en/privacy-policy/>.

X. Our activities in social networks

In order to allow us to communicate with you in social networks as well and inform you about our products and services, we run our own pages in these social networks. If you visit one of our social media pages, we and the provider of the social media network are joint controllers as defined by Art. 26 GDPR regarding the personal data processing operations triggered thereby.

We are not the original provider of these pages, but only use them within the scope of the options offered to us by the respective providers.

We would therefore like to point out as a precautionary measure that your data may also be processed outside of the European Union or the European Economic Area. Use of these networks may therefore involve data protection risks for you since the protection of your rights may be difficult, e.g. your rights to information, erasure, objection, etc. and as processing in social networks frequently takes place directly for advertising purposes or for the analysis of user behavior by network providers without us having any control over this. If the provider creates user profiles, cookies are often used or user behavior may be assigned directly to your own member profile in the respective social network.

The processing operations of personal data described are carried out in accordance with Article 6 Paragraph 1(f) GDPR on the basis of our legitimate interests and the legitimate interests of the respective provider in order to communicate with you in an up-to-date manner and/or to inform you about our products and services. If you have to grant your consent to the respective providers to allow them to process your data as a user, the legal basis for this processing is Article 6 Paragraph 1(a) GDPR in conjunction with Article 7 GDPR.

Since we have no access to these providers' databases, we would like to point out that you would be best placed to exercise your rights (e.g. to information, rectification, erasure, etc.) directly with the respective provider. More information on the processing of your data in social networks and your options for exercising your right to object or your right of revocation (so-called opt out) is listed below for each of the social network providers we use:

1) Facebook

(Joint) controller responsible for data processing in Europe:

Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Privacy Policy (Data Policy): <https://www.facebook.com/about/privacy>

2) Instagram

(Joint) controller responsible for data processing in Germany:

Meta Platforms Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Privacy Policy (Data Policy): <http://instagram.com/legal/privacy/>

3) LinkedIn

(Joint) controller responsible for data processing in Europe:

LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland

Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

4) YouTube

(Joint) controller responsible for data processing in Europe:

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Privacy Policy: <https://policies.google.com/privacy>

XI. Web analytics

1) Google Analytics

We use Google Analytics, a web analytics service provided by Google Ireland Limited (<https://www.google.com/about/>), Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter referred to as "Google"), on our websites. As part of this, pseudonymized user profiles are created and cookies (see the section on "Cookies") are used. The information generated by the cookie about your use of this website, such as your

- a) browser type/version
- b) operating system
- c) referrer URL (website previously visited)
- d) host name of the accessing computer (IP address) and
- e) time of server request

will be transmitted to a Google server in the US and stored there. This information is used to evaluate your use of this website, to compile reports on the website activities, and to provide further services linked to website and internet use for market research purposes and to tailor the design of this website to suit the needs of the market. This information may also be sent to third parties if this is required by law or if third parties process this data on behalf of Google. Under no circumstances will your IP address be merged with any other data available at Google. IP addresses are anonymized so that it is not possible to assign them to individuals (known as IP masking).

You may refuse the installation of cookies by selecting the appropriate settings on your browser; however, we would point out that this may result in you not being able to use all the features of this website.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

You can also prevent the data generated by the cookie about your use of the website (including your IP address) from being sent to and processed by Google by downloading and installing a browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent Google Analytics from collecting data by clicking on the following link: Deactivate Google Analytics. This sets an opt-out cookie that prevents the future collection of your data when you visit this website. The opt-out cookie is only valid on this browser and only for our website and is stored on your device. If you erase the cookies stored for this browser, you will need to reset the opt-out cookie.

You can view the data protection policy of Google Analytics at: <https://support.google.com/analytics/answer/6004245?hl=en>

XII. Plugins and other services

1) Google Maps

We use Google Maps (API) on our website. The operator of Google Maps is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Ireland Limited is part of the Google Group headquartered in 1600 Amphitheatre Parkway, Mountain View, CA 04043, USA. Google Maps is a web service for displaying interactive maps to visually display geographic information. For example, by using this service, you can view our location and make it easier for you to reach us.

When you access sub-pages in which a Google Maps map is integrated, information about your use of our website (such as your IP address) is transferred to Google's servers in the US and stored there. This occurs regardless of whether Google provides a user account that you are logged into or whether you have no user account with them at all. When you are logged in to Google, your data will be directly allocated to your account. If you do not want your profile to be allocated by Google, you will need to log out of your Google account. Google stores your data (even for users who are not logged in) as usage profiles and analyses it. You have the right to object to the creation of these user profiles, and you must contact Google to exercise this right.

If you do not agree with the future transmission of your data to Google as part of your use of Google Maps, you have the option of completely deactivating the Google Maps web service by switching off the JavaScript application in your browser. You will then be unable to use Google Maps and consequently the map displayed on this website.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

The Google terms of use can be found at <https://www.google.com/policies/terms/regional.html>, and the additional Google Maps terms of use can be found at https://www.google.com/intl/de_US/help/terms_maps.html.

The data privacy policy of Google Maps ("Google Privacy Policy") is available at <https://www.google.com/policies/privacy>.

2) YouTube (videos)

We have integrated YouTube components on this website. The operator of YouTube is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

If you are logged into YouTube at the same time as you visit our website, YouTube identifies the specific sub-page of our website you visit when you access a sub-page containing a YouTube video. This information is collected through YouTube and Google and allocated to your YouTube account.

Through the YouTube component, YouTube and Google receive information that you have visited our website whenever you are logged in to YouTube at the same time as accessing our website, regardless of whether you click on a YouTube video or not. If you do not want this information to be transferred to YouTube and Google, you can prevent this by logging out of your YouTube account before visiting our website.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

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

XIII. Your rights as a data subject

1) *Right to confirmation*

You have the right to request confirmation from us as to whether personal data relating to you will be processed.

2) *Right to information (Article 15 GDPR)*

You have the right to obtain information about the personal data stored about you at any time free of charge as well as the right to receive a copy of such data from us in accordance with the statutory provisions.

3) *Right to rectification (Article 16 GDPR)*

You have the right to request the rectification of incorrect personal data relating to yourself. Furthermore, you have the right to request the completion of incomplete personal data, considering the purposes of the processing.

4) *Erasure (Article 17 GDPR)*

You have the right to request that we erase the personal data relating to you without delay, if one of the reasons provided by law applies and if processing or storage is not required. Please send your request for erasure in writing to privacy-policy@spirstar.de.

5) *Restriction to processing (Article 18 GDPR)*

You have the right to request that we restrict the processing of your data if one of the statutory requirements is met.

6) *Data portability (Article 20 GDPR)*

You have the right obtain personal data relating to you that you provided to us in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another controller to whom the personal data was furnished without hindrance from us, provided that the processing is based on consent pursuant to Article 6 Paragraph 1(a) GDPR or Article 9 Paragraph 2 (a) GDPR or on a contract pursuant to Article 6 Paragraph 1(b) GDPR, and the data is processed by automated means, unless processing is necessary for the performance of a task that is in the public interest or is carried out in the exercise of official authority vested in us.

Furthermore, when exercising your right to data portability pursuant to Article 20 Paragraph 1 GDPR, you have the right to have personal data transferred directly from one controller to another, provided this is technically feasible and does not interfere with the rights and freedoms of other persons.

7) *Objection (Article 21 GDPR)*

You have the right to lodge an objection to the processing of personal data relating to you at any time for reasons concerning your particular situation where this is done on the basis of Article 6 Paragraph 1(e) (data processing in the public interest) or (f) GDPR (data processing on the basis of the weighing of legitimate interests).

This also applies to profiling based on these provisions pursuant to Article 4 No. 4 GDPR.

Should you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling and legitimate reasons for such processing that override your interests, rights and freedoms, or where processing serves the assertion, exercise or defense of legal claims.

In individual cases, we process personal data for direct marketing purposes. You have the right to object at any time to the processing of your personal data for the purpose of such advertising. This also applies to profiling where this is connected to this kind of direct marketing. Should you object to the processing of your data for direct marketing purposes, we will no longer process your personal data for this purpose.

In addition, you have the right to object to our processing of your personal data for scientific or historical research purposes or for statistical purposes pursuant to Article 89 Paragraph 1 GDPR for reasons arising from your particular situation, unless such processing is necessary for the performance of a task in the public interest.

You are free to exercise your right to lodge an objection in relation to the use of information society services, notwithstanding Directive 2002/58/EC, by means of automated procedures using technical specifications.

8) *Revocation of consent regarding data protection*

You have the right to revoke any consent to the processing of personal data at any time with future effect. Please send your revocation in writing to privacy-policy@spirstar.de.

9) *Lodging a complaint with a supervisory authority*

You have the right to lodge a complaint with a competent supervisory authority about our processing of personal data.

XIV. Routine storage, erasure and blocking of personal data

We process and store your personal data only for the period of time necessary to meet the storage purpose or as required by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a required retention period expires, personal data will be routinely blocked or erased in accordance with the statutory provisions.

XV. Duration of storage of personal data

The criterion for the duration of the storage of personal data is the respective statutory retention period. Once this period expires, the data in question will be routinely erased, provided it is no longer required for the performance or initiation of a contract.

XVI. Transfer of data to third parties

Your personal data will not be transferred to third parties except for the purposes specified below. We will only transfer your data to third parties if:

1. you have given us your express consent pursuant to Art. 6 Section 1 (a) of the GDPR;
2. the transfer of personal data is admissible pursuant to Art. 6 Section 1 (f) of the GDPR for the purpose of our legitimate interests and if there is no reason to suppose that you have an overriding interest in the non-forwarding of your personal data;
3. there is a legal obligation for the transfer pursuant to Art. 6 Section 1 (c) of the GDPR; and
4. this is permitted by law and necessary for the performance of a contract with you pursuant to Art. 6 Section 1 lit (b) of the GDPR.

In order to protect your data and to enable us to transfer data to third countries, if necessary, (outside the EU/EEA), we have entered into third-party processing agreements based on the standard contract clauses of the European Commission. Should the standard contract clauses not suffice to reach an adequate level of security, your consent pursuant to Art. 49 Section 1 (a) of the GDPR may serve as a legal basis for the transfer of data to third countries. This may sometimes not apply to a transfer of data to third countries for which the European Commission has issued an adequacy decision pursuant to Art. 45 GDPR.

XVII. Up-to-dateness of and amendments to the Privacy Policy

This Privacy Policy is currently valid and was last updated in June 2024.

It may be necessary for us to amend this Privacy Policy in the process of further developing our websites and the products services we offer through our websites or due to changes in legal or regulatory requirements. You can retrieve and print our current Privacy Policy on our website at any time by visiting "<https://www.spirstar.de/de/datenschutz>".