



Data privacy statement

Welcome to the website of www.dereco.de
and thank you for your interest in our company.

Protecting your personal data is a major concern for us. Personal data is information about personal or factual relationships of an identified or identifiable natural person. Such data can be a real name, address, telephone number or date of birth and any other data referring to an identifiable person. Since personal data enjoys legal protection, we only collect it where necessary to provide content on our internet website and to provide services. In the following sections we outline which personal data we capture when you visit our internet website and how we use it. Our data privacy policy is in line with any and all legal stipulations, in particular those under the German Data Protection Act (Bundesdatenschutzgesetz, BDSG), the German Telemedia Act (Telemediengesetz, TMG) and the EU General Data Protection Regulation (GDPR). We only collect, process and store your personal data where necessary for providing a functional internet website, functional content and services. Additionally, we do so in order to process requests and, where applicable, orders / contracts provided there is a legitimate interest for the purposes of the first sentence of Article 6(1)(f) of the GDPR or whenever there is another ground for permission to do so. Your data will only be used for other purposes if you grant specific authorisation; any other purpose shall be specified, e.g. the request to receive commercial information by newsletter.

1. Controller for the purposes of Article 4(7) of the GDPRV

For the purposes of the GDPR and under any other data privacy regulations in EU Member States and any other rules and regulations pertaining to data privacy, the controller is:

DERECO Holding GmbH
Gustav-Heinemann-Ufer 56
D-50968 Cologne/Köln, Germany

E-mail: info@dereco.de
Phone: +49 221 / 280535-0
Fax: +49 221 / 280535-11

2. Website provision and log filing

Whenever our internet website is visited, our system automatically captures data and information about the system of the computer from which it is accessed. In this context, data is collected as follows:

Scope of processed data

- (1) Browser information (type and version)
- (2) Operating system of the device used for opening our pages
- (3) IP which the user's system was referred to our internet website (referral tracking) address of the device from which our pages are accessed
- (4) Date and time of access
- (5) Websites and resources (pictures, files, other page content) retrieved on our internet website
- (6) Websites from

This data is saved in our system's log files. It is not saved in connection with any personal data of any actual user. Consequently, individual website visitors are not identified.

• Legal basis for processing personal data

GDPR, Article 6(1)(f) (legitimate interest): Our legitimate interest is to achieve the objective described below.

• Why we process data

Logging is intended to ensure our internet website is as compatible as possible for all users. Additionally, it facilitates fighting abuse and eliminating errors. For this purpose, it is required to log all technical data of the requesting computer in order to respond to display errors, attacks on our IT systems and/or functional errors of our internet website. Over and above this, such data helps us optimise the website and ensure our IT systems are generally safe.

- **Storage period**

Technical data as mentioned above will be deleted as soon as it is no longer needed in order to ensure compatibility of the internet website for all visitors and no later than three months after accessing our internet website.

- **Your right to object and your right to data erasure**

Any objection and erasure options shall be governed by the general rules on your right to object and your right to erasure described below in this data privacy statement.

3. Special functionalities of the internet website

Our internet website offers you several functionalities. If you use any of them, we collect, process and store personal data. In the following, we explain what happens with such data:

Newsletter subscription form:

- **Scope of personal data processed**

The data you entered upon subscribing to our newsletter.

- **Legal basis for processing personal data**

Article 6(i)(a) of the GDPR (consent by unambiguously confirming action and/or behaviour)

- **Purpose of data processing**

The data captured in the registration menu of our newsletter will be exclusively used by us to send the newsletter which we use as a means of communication about our services and news. Upon registration, we will send you a confirmation e-mail with a link for you to click on to complete the subscription process (double opt-in).

- **Period of storage**

You can unsubscribe from our newsletter any time by clicking on the unsubscribe link contained in each newsletter issue. Your data will be deleted by us as soon as you unsubscribe. Similarly, your data is immediately deleted by us if you do not complete the subscription process. We reserve the right to delete data without stating a reason and without informing you previously or subsequently.

- **Your right to object and your right to data erasure**

Any objection and erasure options shall be governed by the general rules on your right to object and your right to erasure described below in this data privacy statement.

Contact form(s):

- **Scope of personal data processed**

The data entered by you in our contact forms.

- **Legal basis for processing personal data**

Article 6(1)(a) of the GDPR (consent by unambiguously confirming action and/or behaviour).

- **Purpose of data processing**

The data captured via our contact form(s) will only be used to process the contact request actually received via contact form(s).

- **Period of storage**

Once your request is processed, any data captured will be deleted immediately unless the law provides for data retention.

- **Your right to object and your right to data erasure**

Any objection and erasure options shall be governed by the general rules on your right to object and your right to erasure described below in this data privacy statement.

Online objection form:

- **Scope of personal data processed**

The data entered by you into the fields of the online objection form.

- **Legal basis for processing personal data**

Article 6(1)(b) of the GDPR (activities [prior to and/or associated with] performing a contract).

- **Purpose of data processing**

Processing statements of objection received via the online objection form.

- **Period of storage**

Data collected in connection with our online objection form is deleted immediately when the objection has been fully processed unless the law provides for data retention.

- **Your right to object and your right to data erasure**

Any objection and erasure options shall be governed by the general rules on your right to object and your right to erasure described below in this data privacy statement.

4. Automatic credit risk checks – the total score method

In the event we perform the first commercial activity, we reserve the right to obtain automated credit risk information based on mathematical/statistical methods from the company/companies listed below in order to protect our legitimate interests. We receive information about the statistical probability of default from the service provider stated below. Credit risk information may contain probability values (output as a score) calculated on the grounds of scientifically recognised mathematical/statistical methods. In this context, a variety of features such as income, address

data, job title, marital status and previous payment practices allow for a conclusion as to the future default risk associated with a client. This conclusion is expressed by a payment value (a total score). Information obtained like this forms a basis for our decision whether or not to establish, perform and/or end a contractual relationship. However, payment options offered do not depend on such information. Any objection and erasure options shall be governed by the general rules on your right to object and your right to erasure described below in this data privacy statement. As for details:

- **Creditreform Köln v. Padberg KG:**

Regularly, when contracts are concluded, and in cases where there is a legitimate interest with regard to existing customers our company performs checks with regard to credit risk. For this purpose, we have cooperated with Creditreform Köln v. Padberg KG, Gustav-Heinemann-Ufer 68, 50968 Cologne/Köln, Germany (www.creditreform-koeln.de) from whom we obtain the data needed to perform this task. On behalf of Creditreform Köln v. Padberg KG, we inform you as follows before any such check under Article 14 of the EU GDPR occurs:

Creditreform Köln v. Padberg KG is a consumer credit bureau operating a database where credit-relevant information about private persons is stored. Such information is used by Creditreform Köln v. Padberg KG in order to inform clients with regard to their contacts' creditworthiness. The bureau's clients include banks, leasing companies, insurance companies, telecommunications companies, companies in the field of debt management, mail order, wholesale and retail companies and other companies providing products or services. In compliance with applicable legal stipulations, part of the data stored in the information database is also used to feed other company databases, e.g. for address trading purposes. Creditreform Köln v. Padberg KG's database contains data with a focus on name, address, date of birth, e-mail (if available), payment practices and shareholdings held by persons. The purpose of processing stored data is to grant requested information about a person's creditworthiness. The legal basis for processing is Article 6(1)(f) of the EU GDPR. In line with these provisions, data is only made available if a customer credibly shows that he or she has a legitimate interest in obtaining such information. If data is transmitted to third states outside the EU, this will be done in line with the "Standard contractual clauses" which you can download or have sent from the following link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32001D0497>

Data is saved as long as needed for the respective purpose. As a rule, it is necessary to know data for a minimum storage period of three years. After three years, it is checked whether further storage is required; otherwise, data is deleted exactly three years after collection. In the event that facts and circumstances are out of date, data is deleted exactly three years after facts and figures become out of date. Entries in the debtors' register are deleted exactly three years after the entry had been ordered in compliance with Section 882(3) of the German Code of Civil Procedure (Zivilprozessordnung, ZPO). For the purposes of Article 6(1)(f) of the EU GDPR, a legitimate interest may be a pending loan decision, first business contact, shareholding structure, debt, credit risk assessment, insurance policy, information in order to obtain legal title to assets in the event of

execution. Vis-à-vis Creditreform Köln v. Padberg KG, you have a right to be informed about your personal data stored. To the extent where your personal data stored is incorrect, you are entitled to correction or deletion of such data. If it is not possible to establish immediately if data is correct or incorrect, you have the right to having such data blocked until clarification. If your data is incomplete, you are entitled to request additions. If you have authorised Creditreform Köln v. Padberg KG to process stored data, you have the right to withdraw such authorisation any time. Such withdrawal will have no impact on the lawfulness of data processing between giving consent and potential withdrawal of consent. If you have any objections, wishes or complaints pertaining to data privacy, you may contact Creditreform Köln v. Padberg KG's data privacy officer any time. He or she will assist you quickly and confidentially as far as any issues in connection with data privacy are concerned. Additionally, you may complain to the public data privacy officer responsible for the state of Germany you live in about the processing of data by Creditreform Köln v. Padberg KG. Any personal data about you stored by Creditreform Köln v. Padberg KG is from publicly accessible sources, debt collection agencies and their clients. In order to describe your creditworthiness, Creditreform Köln v. Padberg KG derives a total score from your data. This total includes data on age and sex, address and sometimes payment practices. In varying proportions, this data feeds into a total score. Creditreform Köln v. Padberg KG's clients use score values as a tool to take loan decisions. Your right to object: Data stored by Creditreform Köln v. Padberg KG is processed for reasons of creditor and loan protection forcibly worth protecting. These reasons regularly outweigh personal interests, rights and freedoms and/or they are associated with establishing, exercising or defending legal entitlements. You may only object to your personal data being processed if special reasons arise from a situation given in your case. Such reasons must be substantiated. If special reasons are substantiated, your data will no longer be processed. If you disagree with the processing of your data for advertising and marketing purposes, your data will no longer be used for such purposes. The controller under Article 4(7) of the EU GDPR is Creditreform Köln v. Padberg KG, Gustav-Heinemann-Ufer 68, 50968 Köln/Cologne, Germany (www.creditreform-koeln.de).

If you have a question, please contact Creditreform Köln v. Padberg KG:

Data is saved as long as needed for the respective purpose. As a rule, it is necessary to know data for a minimum storage period of three years. After three years, it is checked whether further storage is required; otherwise, data is deleted exactly three years after collection. In the event that facts and circumstances are out of date, data is deleted exactly three years after facts and figures become out of date. Entries in the debtors' register are deleted exactly three years after the entry had been ordered in compliance with Section 882(3) of the German Code of Civil Procedure (Zivilprozessordnung, ZPO). For the purposes of Article 6(1)(f) of the EU GDPR, a legitimate interest may be a pending loan decision, first business contact, shareholding structure, debt, credit risk assessment, insurance policy, information in order to obtain legal title to assets in the event of execution. Vis-à-vis Creditreform Köln v. Padberg KG, you have a right to be informed about your personal data stored. To the extent where your personal data stored is incorrect, you are entitled to correction or deletion of such data. If it is not possible to establish immediately if data is cor-

rect or incorrect, you have the right to having such data blocked until clarification. If your data is incomplete, you are entitled to request additions. If you have authorised Creditreform Köln v. Padberg KG to process stored data, you have the right to withdraw such authorisation any time. Such withdrawal will have no impact on the lawfulness of data processing between giving consent and potential withdrawal of consent. If you have any objections, wishes or complaints pertaining to data privacy, you may contact Creditreform Köln v. Padberg KG's data privacy officer any time. He or she will assist you quickly and confidentially as far as any issues in connection with data privacy are concerned. Additionally, you may complain to the public data privacy officer responsible for the state of Germany you live in about the processing of data by Creditreform Köln v. Padberg KG. Any personal data about you stored by Creditreform Köln v. Padberg KG is from publicly accessible sources, debt collection agencies and their clients. In order to describe your creditworthiness, Creditreform Köln v. Padberg KG derives a total score from your data. This total includes data on age and sex, address and sometimes payment practices. In varying proportions, this data feeds into a total score. Creditreform Köln v. Padberg KG's clients use score values as a tool to take loan decisions. Your right to object:

Data stored by Creditreform Köln v. Padberg KG is processed for reasons of creditor and loan protection forcibly worth protecting. These reasons regularly outweigh personal interests, rights and freedoms and/or they are associated with establishing, exercising or defending legal entitlements. You may only object to your personal data being processed if special reasons arise from a situation given in your case. Such reasons must be substantiated. If special reasons are substantiated, your data will no longer be processed. If you disagree with the processing of your data for advertising and marketing purposes, your data will no longer be used for such purposes. The controller under Article 4(7) of the EU GDPR is Creditreform Köln v. Padberg KG, Gustav-Heinemann-Ufer 68, 50968 Köln/Cologne, Germany (www.creditreform-koeln.de).

If you have a question, please contact Creditreform Köln v. Padberg KG:

Tel.: +49 221 37 66 0 -7
+49 221 37 66 0-61

E-Mail: datenschutz@koeln.creditreform.de

Data privacy officer – contact information:

Creditreform Köln v. Padberg KG, Datenschutzbeauftragter,
Gustav-Heinemann-Ufer 68, 50968 Köln /Cologne, Germany
E-Mail: datenschutz@koeln.creditreform.de

5. Link-up to external web-based services and data processing outside the EU

On our internet website, we use active JavaScript content from external providers, i.e. web-based services. As you visit our internet website, these external providers may receive personal informa-

tion about your visit to our internet website. In this context, your data may be processed outside the EU. You can prevent this by installing a JavaScript blocker such as the “No Script” browser plug-in (www.noscript.net) or by deactivating JavaScript in your browser. This may result in functional restrictions on internet websites as you visit them. We use the following web-based services:

- **CloudFlare**

On our internet website, a web-based service by a company called CloudFlare Inc., 101 Townsend St, 94107 San Francisco (hereinafter: CloudFlare) is loaded. We use such data in order to guarantee full functioning of our internet website. In this context, your browser may transmit personal data to CloudFare. The legal basis for data processing is Article 6(1)(f) of the GDPR. Legitimate interest is based on error-free internet website functioning. Under the EU-US Privacy Shield Agreement, CloudFlare has certified itself (cf. <https://www.privacyshield.gov/list>). Data is deleted as soon as the purpose of collection has been fulfilled. For further information on the handling of transmitted data, please visit the data security statement by CloudFlare:

https://www.cloudflare.com/security-policy/?utm_referrer=https://www.google.de/

You can prevent CloudFlare from capturing and processing your data by deactivating the execution of script code in your browser or by installing a script blocker in your browser (to be found, for instance, at www.noscript.net or www.ghostery.com).

- **Google-Apis**

On our internet website, a web-based service operated by Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland (hereinafter: Google Apis) is loaded. We use such data in order to ensure full functioning of our internet website. In this context, your browser may transmit personal data to Google Apis. The legal basis for data processing is Article 6(1)(f) of the GDPR. Legitimate interest is based on error-free internet website functioning. Under the EU-US Privacy Shield Agreement, Google Apis has certified itself (cf. <https://www.privacyshield.gov/list>). Data is deleted as soon as the purpose of collection has been fulfilled. For further information on the handling of transmitted data, please visit the data security statement by Google Apis:

<https://policies.google.com/privacy?hl=en>. You can prevent Google Apis from capturing and processing your data by deactivating the execution of script code in your browser or by installing a script blocker in your browser (to be found, for instance, at www.noscript.net or www.ghostery.com).

- **gstatic**

On our internet website, a web-based service by Google Ireland Limited, Gordon House, Barrow Street, 4 Dublin, Ireland (hereinafter: gstatic) is loaded. We use such data in order to guarantee full functioning of our internet website. In this context, your browser may transmit personal data to CloudFare. The legal basis for data processing is Article 6(1)(f) of the GDPR. Legitimate interest is based on error-free internet website functioning. Under the EU-US Privacy Shield Agreement, gstatic has certified itself (cf. <https://www.privacyshield.gov/list>). Data is deleted as soon as the purpose of collection has been fulfilled. For further information on the handling of transmitted

data, please visit the data security statement by gstatic: <https://policies.google.com/privacy?hl=en>
You can prevent gstatic from capturing and processing your data by deactivating the execution of script code in your browser or by installing a script blocker in your browser (to be found, for instance, at www.noscript.net or www.ghostery.com).

- [website-check.de](http://www.website-check.de)

On our internet website, an approval seal by a company called Website-Check GmbH, Beethovenstraße 24 in 66111 Saarbrücken, Germany (hereinafter: [website-check.de](http://www.website-check.de)) is loaded. We have integrated this seal on our internet website in order to show that we are taking the issue of “data privacy” seriously. Due to the integration of the website-check approval seal, non-personal data is transmitted to Website-Check GmbH, the issuer of the approval seal. In this context, the latter only receives your IP address in order to deliver the picture file of the approval seal. For Website-Check GmbH, your IP address is not connected with any personal data. The legal basis for data processing is Article 6(1)(f) of the GDPR (legitimate interest). Legitimate interest consists in facilitating error-free display of the website-check approval seal on our internet website. For further information on the handling of transmitted data, please visit the data security statement by website-check.de: <https://www.website-check.de/datenschutzerklaerung/>

You can prevent loading of the website-check approval seal and, thus, transmitting your IP address (which would be anonymous for Website-Check GmbH) by deactivating the execution of Website-Check GmbH’s script code or by installing a script blocker in your browser (to be found, for instance, at www.noscript.net or www.ghostery.com).

6. Information about the use of cookies

- [Scope of personal data processed](#)

We use cookies on a number of pages in order to enable certain features of our internet website. “Cookies” are small text files a browser can save on your computer. These text files contain characteristic sequences of characters to identify your browser clearly when you re-visit our internet website. Saving a cookie file is also referred to as “setting cookies.”

- [Legal basis for processing personal data](#)

Article 6(1)(f) of the GDPR (legitimate interest). Our legitimate interest is to ensure full functioning of our internet pages, enhancing operability and customising our offer. Identifying individual visitors to our website is only possible by means of cookie technology if the page visitor has entered personal data before and given special consent.

- [Purpose of data processing](#)

Cookies are set on our website in order to sustain full functioning of our internet website and improve operability. Additionally, cookie technology makes it possible to recognise individual visitors by pseudonyms such as an individual ID. In this way, we can offer more customised services.

- **Period of storage**

Our cookies are stored until deleted in your browser or, in the event of a session cookie, until the end of session.

- **Your right to object and your right to data erasure**

refused. You can then decide on a case-by-case basis if you wish to accept cookies individually or in general. Cookies can be used for various purposes such as to recognise if your PC has already been connected to our advertising offer (permanent cookies) or in order to save any content last viewed (session cookies). We use cookies in order to enhance user-friendliness. In order to use our comfort functions, we recommend you allow cookies for our content. Any objection and erasure options shall be governed by the general rules on your right to object and your right to erasure under data privacy law described below in this data privacy statement.

7. Data safety and data privacy, e-mail communications

Your personal data is protected against third-party access while it is collected, stored and Your personal data is protected against third-party access while it is collected, stored and processed by technical and organisational measures. Full data safety cannot be guaranteed by us for unencrypted e-mails when they are sent to our IT systems. Therefore, we recommend encryption or postal services for information requiring a high level of secrecy.

8. Automated e-mail archiving

- **Scope of personal data processed**

Please note that our e-mail system automatically archives mail; any received or sent e-mails are digitally archived modification-proof.

- **Legal basis for processing personal data**

Article 6(1)(f) of the GDPR (legitimate interest). Our legitimate interest is to comply with applicable fiscal and commercial law (e.g. Sections 146 and 147 of the German Tax Code, Abgabenordnung/AO)

- **Purpose of data processing**

The purpose of archiving is to comply with applicable fiscal and commercial law (e.g. Sections 146 and 147 of the German Tax Code, Abgabenordnung/AO).

- **Period of storage**

Our e-mail correspondence is saved in line with retention periods under fiscal and commercial law. Retention periods may last for up to ten years.

- **Your right to object and your right to data erasure**

Additionally, please note that we only consider application files submitted as PDFs. Zipped files (WinZip, WinRAR, 7Zip etc.) are filtered out by our safety systems and remain undelivered. We do not consider applications in the Word format or other file formats. Such files are deleted unread. Please note that application documents sent via e-mail without encryption may be opened by third parties before they arrive at our IT systems. We assume that we may respond to non-encrypted application mails by non-encrypted mail. If you wish us to do otherwise, please specify in your application mail.

9. Withdrawal of authorisation – data information – data deletion and blocking

At appropriate intervals you have a right to be given free-of-charge information about your personal data stored by us. Likewise, you have a right to have your data corrected, blocked or deleted. Your data will be deleted by us immediately upon request unless otherwise stipulated by law. This means that you can withdraw any consent given to us to use your personal data any time. Alternatively, you may always send requests for information, deletion and correction concerning your data and/or any suggestions you might have – which are indeed welcome – to the following address:

DERECO Holding GmbH
Gustav-Heinemann-Ufer 56
50968 Cologne/Köln, Germany

E-mail: info@dereco.de
Tel.: +49 221 / 280535-0
Fax: +49 221 / 280535-11

10. Your right to data portability

You have the right that any personal data – concerning you, submitted to us by you – is made available to you by us in a structured, common, machine-readable format. Additionally, you may request that we transmit such data to a third party immediately upon your instruction provided that processing is based on consent under Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR or a contract under Article 6(1)(b) of the GDPR and provided that processing by us is done in the context of automated data processing. In exercising your right to portable data, you also have the right to have the personal data transmitted directly to a different controller where technically feasible. Freedoms and rights of other persons must not be adversely impacted by this. Your right to data portability shall be waived for the processing of personal data where necessary for performing a task carried out in the public interest or in the exercise of official authority vested in the controller.

11. Your right to lodge a complaint with a supervisory authority under Article 77(1) of the GDPR

If you suspect that your data is processed unlawfully on our website you can naturally provide for a court of justice to clarify the issue. Additionally or alternatively, you may contact a supervisory authority. You have the right to lodge a complaint in the EU Member State of your habitual residence, place of work or the place of the alleged infringement, i.e. you can choose the supervisory authority you wish to address among the places mentioned. The supervisory authority with which the complaint has been lodged shall inform you on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78 of the GDPR.

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