

PRIVACY POLICY

January 2023

1 Data protection at a glance

General notes

The following notices provide a simple overview of what happens to your personal data when you visit this website. Personal data is any data by which you can be personally identified. For detailed information on the subject of data protection, please refer to our privacy policy listed below this text.

1.1 Data collection on this website

Who is responsible for the data collection on this website?

Data processing on this website is carried out by the website operator. You can find the contact details of the website operator in the section "Information on the data controller" in this data protection declaration.

1.2 How do we collect your data?

On the one hand, your data is collected when you provide it to us. This can be, for example, data that you enter in a contact form.

Other data is collected automatically or with your consent by our IT systems when you visit the website. This is mainly technical data (e.g. internet browser, operating system or time of page view). This data is collected automatically as soon as you enter this website.

1.3 What do we use your data for?

Part of the data is collected to ensure error-free provision of the website. Other data may be used to analyse your user behaviour.

1.4 What rights do you have regarding your data?

You have the right at any time to receive information free of charge about the origin, recipient and purpose of your stored personal data. You also have a right to request the correction or deletion of this data. If you have given your consent to data processing, you can revoke this consent at any time for the future. You also have the right to request the restriction of the processing of your personal data under certain circumstances.

Furthermore, you have the right to lodge a complaint with the competent supervisory authority. You can contact us at any time about this and other questions on the subject of data protection.

1.5 Third-party analysis tools and tools

When visiting this website, your surfing behaviour may be statistically analysed. This is mainly done with so-called analysis programs. Detailed information on these analysis programs can be found below.

2 Hosting

We host the content of our website with the following provider:

Mittwald CM Service GmbH & Co. KG, Königsberger Straße 4-6, 32339 Espelkamp (hereinafter Mittwald). For details, please refer to Mittwald's privacy policy:

<https://www.mittwald.de/datenschutz> .

The use of Mittwald is based on Art. 6 para. 1 lit. f GDPR / UK-GDPR. We have a legitimate interest in ensuring that our website is presented as reliably as possible. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR / UK-GDPR, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting). The consent can be revoked at any time.

2.1 Data processing

We have concluded a contract on data processing (DPA) for the use of the above-mentioned service. This is a contract required by data protection law, which ensures that this service only processes the personal data of our website visitors in accordance with our instructions and in compliance with the GDPR.

3 General notes and mandatory information

3.1 Data protection

The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this data protection declaration.

When you use this website, various personal data are collected.

Personal data is data that can be used to identify you personally. This privacy policy explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

3.2 Note on the responsible body

The data controller for this website is:

Frama AG
Dorfstrasse 6
3438 Lauperswil
Switzerland
Phone: 0041 34 496 98 41
Email: datenschutz@frama.com

The controller is the natural or legal person who alone or jointly with others determines the purposes and means of the processing of personal data (e.g. names, e-mail addresses or similar).

3.3 Storage period

Unless a more specific storage period has been specified within this privacy policy, your personal data will remain with us until the purpose for processing the data no longer applies. If you assert a justified request for deletion or revoke consent to data processing, your data will be deleted unless we have other legally permissible reasons for storing your personal data (e.g. retention periods under tax or commercial law); in the latter case, the data will be deleted after these reasons no longer apply.

4 General information on the legal basis for data processing on this website

If you have consented to data processing, we process your personal data on the basis of Art. 6 para. 1 lit. a GDPR / UK-GDPR or Art. 9 para. 2 lit. a GDPR / UK-GDPR if special categories of data are processed according to Art. 9 para. 1 GDPR / UK-GDPR. In the event of express consent to the transfer of personal data to third countries, data processing is also carried out on the basis of Art. 49 para. 1 lit. a GDPR / UK-GDPR. If you have consented to the storage of cookies or to the access to information in your terminal device (e.g. via device fingerprinting). This consent can be revoked at any time. If your data is required for the performance of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6 para. 1 lit. b GDPR / UK-GDPR. Furthermore, if your data is required for the fulfilment of a legal obligation, we process it on the basis of Art. 6 para. 1 lit. c GDPR / UK-GDPR.

The data processing may also be based on our legitimate interest pursuant to Art. 6 (1) lit. f GDPR / UK-GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this data protection declaration.

4.1 Note on data transfer to the USA and other third countries

Among other things, we use tools from companies based in the USA or other third countries that are not secure under data protection law. If these tools are active, your personal data may be transferred to these third countries and processed there. We would like to point out that no level of data protection comparable to that in the EU can be guaranteed in these countries.

For example, US companies are obliged to hand over personal data to security authorities without you as the data subject being able to take legal action against this. It can therefore not be ruled out that US

authorities (e.g. intelligence services) process, evaluate and permanently store your data located on US servers for monitoring purposes. We have no influence on these processing activities.

4.2 Revocation of your consent to data processing

Many data processing operations are only possible with your express consent. You can revoke consent you have already given at any time. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

4.3 Right to object to the collection of data in specific cases and to direct marketing (Art. 21 GDPR)

If the data processing is based on art. 6 para. 1 lit. E or f GDPR / UK-GDPR, you have the right to object to the processing of your personal data at any time for reasons arising from your particular situation; this also applies to profiling based on these provisions.

The respective legal basis on which processing is based can be found in this privacy policy. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending legal claims (objection under Article 21(1) of the GDPR).

If their personal data is processed for the purpose of direct marketing, they have the right to object at any time to the processing of personal data concerning them for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing. If they object, their personal data will subsequently no longer be used for the purpose of direct advertising (objection pursuant to Art. 21 (2) GDPR / UK-GDPR).

4.4 Right of appeal to the competent supervisory authority

In the event of breaches of the GDPR, the data subjects have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, their place of work or the place of the alleged infringement. The right of appeal is without prejudice to any other administrative or judicial remedy.

4.5 Right to data portability

You have the right to have data that we process automatically on the basis of your consent or in fulfilment of a contract handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another controller, this will only be done insofar as it is technically feasible.

4.6 Information, deletion and correction

Within the framework of the applicable legal provisions, you have the right at any time to free information about your stored personal data, its origin and recipient and the purpose of the data

processing and, if applicable, a right to correction or deletion of this data. You can contact us at any time for this purpose and for further questions on the subject of personal data.

4.7 Right to restrict processing

You have the right to request the restriction of the processing of your personal data.

For this purpose, you can contact us at any time. The right to restrict processing exists in the following cases: If you dispute the accuracy of your personal data stored by us, we usually need time to check this. For the duration of the verification, you have the right to request the restriction of the processing of your personal data.

If the processing of your personal data happened/is happening unlawfully, you can request the restriction of data processing instead of erasure.

If we no longer need your personal data, but you need it to exercise, defend or enforce legal claims, you have the right to request restriction of the processing of your personal data instead of deletion.

If you have lodged an objection pursuant to Art. 21 (1) GDPR / UK-GDPR, a balancing of your interests and ours must be carried out. As long as it has not yet been determined whose interests prevail, you have the right to demand the restriction of the processing of your personal data.

If you have restricted the processing of your personal data, such data may - apart from being stored - only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or a Member State.

4.8 TLS encryption

This site uses TLS encryption for security reasons and to protect the transmission of confidential content, such as orders or enquiries that you send to us as the site operator.

You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line. If TLS encryption is activated, the data you transmit to us cannot be read by third parties.

4.9 Objection to advertising e-mails

The use of contact data published within the framework of the imprint obligation to send advertising and information material that has not been expressly requested is hereby prohibited. The operators of the pages expressly reserve the right to take legal action in the event of the unsolicited sending of advertising information, such as spam e-mails.

5 Data collection on this website

Cookies

Our internet pages use so-called "cookies". Cookies are small data packets and do not cause any damage to your end device. They are stored either temporarily for the duration of a session (session cookies) or permanently (permanent cookies) on your end device.

Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your terminal device until you delete them yourself or until they are automatically deleted by your web browser.

In some cases, cookies from third-party companies may also be stored on your terminal device when you enter our site (third-party cookies). These enable us or you to use certain services of the third-party company (e.g. cookies for processing payment services).

Cookies have various functions. Many cookies are technically necessary, as certain website functions would not work without them (e.g. language selection or the display of videos). Other cookies are used to evaluate user behaviour or display advertising.

Cookies that are necessary to carry out the electronic communication process, to provide certain functions that you have requested (e.g. for the shopping cart function) or to optimise the website (e.g. cookies to measure the web audience) (necessary cookies) are stored on the basis of Art. 6 para. 1 lit. f GDPR / UK-GDPR, unless another legal basis is specified.

The website operator has a legitimate interest in storing necessary cookies for the technically error-free and optimised provision of its services. If consent to the storage of cookies and comparable recognition technologies has been requested, processing is carried out exclusively on the basis of this consent (Art. 6 para. 1 lit. a GDPR / UK-GDPR); consent can be revoked at any time.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If you deactivate cookies, the functionality of this website may be limited.

If cookies are used by third-party companies or for analysis purposes, we will inform you about this separately within the framework of this data protection declaration and, if necessary, request your consent.

5.1 Server log files

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- IP-Adress
- Date and time of IP-requests
- Time zone difference against Greenwich Mean Time (GMT)
- Content of IP request (page address)
- Access status / HTTP-Status code
- Transmitted data volumes
- Website which originated the access to this website
- Browser
- Operating system and UI version
- Language and version of browser software

This data is not merged with other data sources. The collection of this data is based on Art. 6 para. 1 lit. f GDPR / UK-GDPR. The website operator has a legitimate interest in the technically error-free resresentation and optimisation of its website, for which the server log files must be collected.

5.2 Contact form

If you send us enquiries via the contact form, your details from the enquiry form, including the contact details you provide there, will be stored by us for the purpose of processing the enquiry and in the event of follow-up questions. We do not pass on this data without your consent.

The processing of this data is based on Art. 6 (1) lit. b GDPR / UK-GDPR if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the enquiries addressed to us (Art. 6 para. 1 lit. f GDPR / UK-GDPR) or on your consent (Art. 6 para. 1 lit. a GDPR / UK-GDPR) if this has been requested; the consent can be revoked at any time.

The data you enter in the contact form will remain with us until you request us to delete it, revoke your consent to store it or the purpose for storing the data no longer applies (e.g. after we have completed processing your enquiry). Mandatory legal provisions - in particular retention periods - shall remain unaffected.

5.3 Request by e-mail, telephone or fax

If you contact us by e-mail, telephone or fax, your enquiry including all resulting personal data (name, enquiry) will be stored and processed by us for the purpose of processing your request. We will not pass on this data without your consent.

The processing of this data is based on Art. 6 (1) lit. b GDPR / UK-GDPR if your request is related to the performance of a contract or is necessary for the implementation of pre-contractual measures. In all other cases, the processing is based on our legitimate interest in the effective processing of the enquiries addressed to us (Art. 6 para. 1 lit. f GDPR / UK-GDPR) or on your consent (Art. 6 para. 1 lit. a GDPR / UK-GDPR) if this has been requested; the consent can be revoked at any time.

The data you send us via contact enquiries will remain with us until you request us to delete it, revoke your consent to store it or the purpose for storing the data no longer applies (e.g. after your request has been processed). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

6 Analysis tools and advertising

Matomo

This website uses the open source web analytics service Matomo. With the help of Matomo, we are able to collect and analyse data about the use of our website by website visitors. This enables us to find out, among other things, when which page views were made and from which region they came. We also collect various log files (e.g. IP address, referrer, browsers and operating systems used) and can measure whether our website visitors perform certain actions (e.g. clicks, purchases, etc.).

The use of this analysis tool is based on Art. 6 para. 1 lit. f GDPR / UK-GDPR. The website operator has a legitimate interest in analysing user behaviour in order to optimise both its website and its advertising. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR / UK-GDPR, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting). The consent can be revoked at any time.

Matomo Provider: <https://matomo.org/>

Privacy policy: <https://matomo.org/matomo-cloud-privacy-policy/>

7 Newsletter

If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the specified e-mail address and that you agree to receive the newsletter. Further data will not be collected or will only be collected on a voluntary basis. We use this data exclusively for sending the requested information and do not pass it on to third parties.

The data entered in the newsletter registration form is processed exclusively on the basis of your consent (Art. 6 para. 1 lit. a GDPR / UK-GDPR). You can revoke your consent to the storage of the data, the email address and their use for sending the newsletter at any time, for example via the "unsubscribe" link in the newsletter. The legality of the data processing operations already carried out remains unaffected by the revocation.

The data you provide for the purpose of receiving the newsletter will be stored by us or the newsletter service provider until you unsubscribe from the newsletter and will be deleted from the newsletter distribution list after you unsubscribe from the newsletter or after the purpose has ceased to exist. We reserve the right to delete or block e-mail addresses from our newsletter distribution list at our own discretion within the scope of our legitimate interest pursuant to Art. 6 (1) lit. f GDPR / UK-GDPR. Data that has been stored by us for other purposes remains unaffected by this.

After you have unsubscribed from the newsletter distribution list, your email address will be stored by us or the newsletter service provider in a blacklist if necessary to prevent future mailings. The data from the blacklist will only be used for this purpose and will not be merged with other data. This serves both your interest and our interest in complying with legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 Para. 1 lit. f GDPR / UK-GDPR). The storage in the blacklist is not limited in time.

You can object to the storage if your interests outweigh our legitimate interest.

8 Plugins and tools

8.1 YouTube

This website embeds videos from the website YouTube. The operator of the website is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

When you visit one of our websites on which YouTube is integrated, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited. Furthermore, YouTube may store various cookies on your terminal device or use comparable technologies for recognition (e.g. device fingerprinting). In this way, YouTube can obtain information about visitors to this website. This information is used, among other things, to collect video statistics, improve the user experience and prevent fraud attempts.

If you are logged into your YouTube account, you enable YouTube to assign your surfing behaviour directly to your personal profile. You can prevent this by logging out of your YouTube account. YouTube is used in the interest of an appealing presentation of our online offers. This represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR / UK-GDPR. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR / UK-GDPR, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting). The consent can be revoked at any time.

For more information on the handling of user data, please see YouTube's privacy policy at: <https://policies.google.com/privacy?hl=de>

8.2 Vimeo

This website uses plugins from the video portal Vimeo. The provider is Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

When you visit one of our pages equipped with a Vimeo video, a connection to the Vimeo servers is established. This tells the Vimeo server which of our pages you have visited. In addition, Vimeo obtains your IP address. This also applies if you are not logged in to Vimeo or do not have an account with Vimeo. The information collected by Vimeo is transmitted to the Vimeo server in the USA.

If you are logged into your Vimeo account, you enable Vimeo to assign your surfing behaviour directly to your personal profile. You can prevent this by logging out of your Vimeo account.

Vimeo uses cookies or comparable recognition technologies (e.g. device fingerprinting) to recognise website visitors.

The use of Vimeo is in the interest of an appealing presentation of our online offers. This represents a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR / UK-GDPR. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR / UK-GDPR, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting). The consent can be revoked at any time.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission and, according to Vimeo, on "legitimate business interests". Details can be found here:

<https://vimeo.com/privacy> .

For further information on the handling of user data, please refer to Vimeo's privacy policy at:

<https://vimeo.com/privacy> .

8.3 Google Maps

This site uses the map service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

To use the functions of Google Maps, it is necessary to save your IP address. This information is usually transferred to a Google server in the USA and stored there.

The provider of this site has no influence on this data transmission. If Google Maps is activated, Google may use Google Fonts for the purpose of uniform display of fonts. When you call up Google Maps, your

browser loads the required web fonts into your browser cache in order to display texts and fonts correctly.

Google Maps is used in the interest of an appealing presentation of our online offers and to make it easy to find the places we have indicated on the website. This constitutes a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR / UK-GDPR. Insofar as a corresponding consent has been requested, processing is carried out exclusively on the basis of Art. 6 para. 1 lit. a GDPR / UK-GDPR, insofar as the consent includes the storage of cookies or access to information in the user's terminal device (e.g. device fingerprinting). The consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here:

<https://privacy.google.com/businesses/gdprcontrollerterms/> / and

<https://privacy.google.com/businesses/gdprcontrollerterms/sccs/> .

You can find more information on the handling of user data in Google's privacy policy:

<https://policies.google.com/privacy?hl=de> .

9 Customer account / imnudoo / serema

You can create a customer account on our websites in order to use certain contents and services of our online offers. In doing so, we collect the following data:

- Company name
- Postcode, place
- Country
- Telephone number
- Salutation
- First name
- Last name
- Phone number orderer
- E-mail address

The legal basis for the processing of your data is Art. 6 para. 1 lit. b and f GDPR / UK-GDPR. Our legitimate interest in data processing in this case is to be able to provide you with the special content and services.

You have the option to cancel your customer account at any time. In this case, your data will be deleted unless we are obliged to retain it (regularly for up to 10 years) for reasons of commercial or tax law.

9.1 Data processing on behalf of imnudoo / serema

If you use our online service imnudoo, you must create a customer account. We collect the following data in the process:

- Company name
- Postcode, place
- Country
- Telephone number
- Salutation
- First name
- Last name
- Phone number orderer
- E-mail address

Since you are using imnudoo in this case as an employee or vicarious agent of our customer (e.g. a company, association or other legal entity), the legal basis for processing your personal data is Art. 6 (1) lit. f GDPR / UK-GDPR. Our legitimate interest in data processing in this case is to be able to conclude and execute the respective contract with our customer.

You have the option to cancel your customer account at any time. In this case, your data will be deleted unless we are obliged to retain it (regularly for up to 10 years) for reasons of commercial or tax law.