



# Data Privacy Policy

Data Privacy Policy of the Awin Group.

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We appreciate your interest in our group of companies and our technologies and services. Protection of your personal data is key to us. Aiming to make you feel safe when visiting our website and dealing with our technologies and services, this Privacy Policy offers you information on how we deal with your personal and non-personal data – whether you visit our website, whether we collect data from you as a client (Advertiser, Publisher or Agency) or whether you are a user (visitor of our website or our clients' website and platforms). The collection, processing and use of your data takes place in compliance with all applicable national data protection regulations.

Clients confide in us for effectively online marketing their products and services to customers. By providing our technologies and services we may collect information about your device (a computer, mobile phone or any other device that you use to browse and enter a website), e.g. its operating system and browser.

Highest standards of quality, transparency and openness are the reasons for our success. The integrity of internet users and in particular data protection are crucial to all our activities. Awin is a member of known industry associations, e.g. the IAB Europe, the German BVDW and other local Data Privacy organizations. More information about the IAB Europe is available [here](#).

## 1 Personal Data

Personal data (also “Personally identifiable information”) includes individual information by which you as a natural person are or can be identified by, e.g. your name, address, telephone number, email address or date of birth.

Non-personally identifiable data is information that cannot be connected to your real identity, e.g. the number of users visiting our website or other any other kind of aggregated information.

## 2 Collection of personal data and other information

The way you get in touch with us or our technologies and services determine the scope of how we collect and process personally identifiable information on you or other information. With this Privacy Policy we want to keep you informed which personal and other kinds of data we receive. Data as a general term may include all kinds of information such as your name, your address or information on your device (e.g. your operating system or browser).

### 2.1 When visiting our website [www.awin.com](http://www.awin.com)

This section provides information on how and which data we may collect from visitors of our website [www.awin.com](http://www.awin.com).

You can visit our website without providing information on yourself. Our webserver temporarily log traffic data provided by the device you use to enter our website (including the host name (IP address) of the requesting computer), date, time and duration of your visit, data specifications of your browser and operating system as well as the name of your access provider, and the website you were referred

from to our website (so called Referrer URL). This information is stored in a log file until it is automatically deleted.

The collection and processing of this data is carried out for the purposes of facilitating the use of our website (connection set-up) and to ensure the security and stability of our systems as well as the technical administration of the network infrastructure.

We do not record any personal data (not your name, address, telephone number or email address) other than voluntarily provided by you, e.g. as part of a survey or when attempting to enter into a contractual relationship.

### 2.1.1 Cookies

We use cookies on our website to optimise its usability. Cookies are small text files that are sent from our servers to your browser to be stored On your device (laptop, tablet, smartphone or similar). Cookies do not cause damage to your device, do not contain viruses, trojans or other malicious software. The cookie stores information, which is linked to respective device used. This does not mean, however, that we store personal information about you or are aware of your identity.

In general, cookies help to improve and optimise the usability of websites and other online services, including our own websites and online services and those of others. Our use of cookies is strictly compliant with any applicable cookie and data privacy legislation.

Cookies used on our website are listed below.

Domain	Cookie name	Purpose of the Cookie and further information
*.awin.com	_ga _gat	Analytic cookies by Google Analytics, please find more information <a href="#">here</a> .
*.awin.com www.awin.com	awinCookiePolicy	Stores the acceptance of the cookie banner, in order to avoid displaying it again after the acceptance. Cookie expires after one year.
	language	Stores browser language. Cookie expires at the end of the session when you close your browser.
	this.sid	Identifies the same session storing an ID. Cookie expires at the end of the session when you close your browser.
	awinCookieRebrand	Stores the click on the rebranding notice to avoid showing you the message multiple times. Cookie expires after one year.

Visiting and surfing on our website is possible without cookies. Most browsers accept cookies automatically. You may alter the security settings of your web browser in order to stop your device

receiving and storing cookies, to allow receiving and storing cookies from selected websites only, or to be notified before receiving cookies. Please note, however, that these settings may have negative effects on the usability and user guidance of websites and other online services. You may delete cookies stored in your browser at any time. Information stored in such cookies will be removed from your device.

## 2.1.2 Social Plugins

As AWIN is participating in social networks, there are some social plugins on our websites which we would like to inform you about.

Visitors wishing to avoid connecting to plugins used on our websites may install privacy-enhancing browser plugins, such as Ghostery (<https://www.ghostery.com/>), NoScript (<https://noscript.net/>) or DoNotTrackMe (<https://www.abine.com/index.html>) etc.

### a. Facebook

Facebook is a social network of Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland (hereinafter „Facebook“). In our online services, we have included different Facebook plugins (for example, "Like", "Share"). These are marked with the Facebook logo. Depending on the type of function, additional information may be added (e.g., "Like", "Recommend"). For a summary of all Facebook plugins please refer to <http://developers.facebook.com/docs/plugins/>

When you enter a page on our website that contains a Facebook plugin your browser or app will establish a direct connection to Facebook's servers where the plugin is loaded from. The information that your browser has visited the corresponding page of our online services will be transmitted to Facebook, even if you do not have a Facebook account or are not logged into your account. This information (including your IP address) will be sent by your browser directly to a server of Facebook in the USA and stored there.

If you are logged into your Facebook account at the same time, it is also possible to assign the page impression to your Facebook profile. If you click on embedded Facebook buttons and log into your Facebook account (or are already logged in), this information will be sent directly to a Facebook server and stored there. The corresponding information is published on your Facebook profile and in your chronicle/timeline in short form. Facebook can thus collect and store additional usage data. If you want to prevent the transmission and storage of your data and your behaviour on our online services through Facebook, you must log out of your Facebook account before you visit our sites and delete any cookies placed by Facebook. You can also prevent the loading of the Facebook plugins with add-ons for your browser, e.g. with the online "Facebook Blocker".

For more information on your rights and on how Facebook is recording and processing data please see Facebook's Data Privacy Policy which is available at <http://www.facebook.com/about/privacy/> and <https://www.facebook.com/help/443483272359009#!/help/340599879348142/>.

### b. Twitter

Twitter is a microblogging service of Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA (hereinafter "Twitter"). Twitter plugins on our websites are usually marked with Twitter's logo which is a little bird.

When you enter a page on our website that contains a Twitter plugin your browser will directly connect to Twitter's servers where the plugin is loaded from. The information that you (including your IP address) have visited our online services will be transmitted to Twitter, even if you are not logged into your account. If you are actively using a Twitter plugin, Twitter may even process more data and publish content that you are entering into the dialogue box ("twittering"). This allows Twitter to map the visit of our pages to your user account. We would like to point out that as a provider of the pages we are not aware of the content of the transmitted data as well as their use by Twitter.

If you want to prevent the assignment of your visit of our websites to Twitter, you must log out of your Twitter account before you visit our site and delete any cookies placed by Twitter.

For more information on your rights and on how Twitter is recording and processing data please see Twitter's Privacy Policy which is available here: <https://twitter.com/privacy/>. You can change your privacy settings in the account settings of your Twitter profile at <http://twitter.com/account/settings>.

### **c. LinkedIn**

LinkedIn is a social network of LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA (hereinafter „LinkedIn“). LinkedIn's plugins are integrated on this website. You can recognize the LinkedIn plugins through the LinkedIn logo or the "Share" button on this website. When you visit this website, the plugin is used to establish a direct connection between your browser and the LinkedIn server. The information (which online service was being visited) is transmitted to LinkedIn, even if you are not logged into your LinkedIn account.

If you click on the LinkedIn "Share Button" while being logged into your LinkedIn account, you can link the content of this website on your LinkedIn profile. This allows LinkedIn to map the visit of this website to your user account. For details on data collection (purpose, scope, further processing, usage), as well as your rights and settings, please refer to LinkedIn's Privacy Policy [http://www.linkedin.com/static?key=privacy\\_policy&trk=hb\\_ft\\_priv](http://www.linkedin.com/static?key=privacy_policy&trk=hb_ft_priv).

### **d. Disqus**

Disqus is an online service provider of Disqus, Inc, 301 Howard St, San Francisco, CA 94105, USA (hereinafter „Disqus“), which provides a centralized discussion platform for websites. In our online services, we have integrated Disqus plugins that allow website visitors to post comments on our websites and link comments across multiple sites (including third party websites).

If you enter a page on our website which includes a Disqus plugin, your browser will establish a direct connection to the Disqus servers where the Plugin is loaded from. The information that your browser visited the corresponding page of our online services is transmitted to Disqus, even if you do not have a Disqus account or are not logged into your account. This information is sent directly from your browser to a Disqus server in the USA and stored there.

If you log into your Disqus account at the same time, it is also possible to assign the page retrieval to your Disqus account and allow Disqus to assign your surfing behavior directly to your account.

If you want to block the transmission and storage of your data and your behavior on our online services through Disqus, you must log out of your Disqus account before you visit our website and delete any cookies placed by Disqus.

To post a comment on our website (using a Disqus plug-in), you must log into your Disqus account. When you post a comment on the website, Disqus collects information about your visit to this and other websites, including the information you post and your IP address. Your comment will be sent directly to the Disqus servers through an iframe.

For more information about Disqus, visit <https://help.disqus.com/customer/portal/articles/466187> and Disqus privacy policy at <https://help.disqus.com/customer/portal/articles/466259-privacy>.

#### **e. YouTube**

YouTube is a video portal of YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA (hereinafter "YouTube"). We have integrated at least one plugin from YouTube in our online services.

If you enter a page on our website which includes a YouTube plugin, your browser will establish a direct connection to the YouTube servers. The information that your browser visited the corresponding page of our online services is transmitted to YouTube, even if you do not have a YouTube account or are not logged into your account. This information is sent directly from your browser to a YouTube server in the USA and stored there.

If you are logged into your YouTube account at the same time, it is also possible to map the page to your YouTube account and you would allow YouTube to assign your surfing behavior directly to your personal profile.

If you want to prevent this transmission and storage of your data and your behavior on our online services through YouTube, you must log out of your YouTube account before you visit our site and delete any cookies placed by YouTube.

For more information about how YouTube collects and uses your information, please visit [https://www.YouTube.com/static?template=privacy\\_guidelines](https://www.YouTube.com/static?template=privacy_guidelines) and Google's privacy policy at <https://www.google.com/policies/privacy/>.

### **2.1.3 Analysis: Google Analytics**

We use Google Analytics which is a web analysing tool of Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter "Google") for the purposes of the adequate design and continuous optimization of our website. Google Analytics works with cookies and creates pseudonymised usage profiles, which enable an analysis of your use of our website. Information stored in such cookies (such as browser type/version, operating system used, referrer URL, Hostname of the accessing computer, time of server request) are usually transmitted to and stored on Google's servers in the USA.

Due to the activation of the IP anonymization (IP masking), Google will truncate and therefore anonymize the IP address of your device within the European Union or the European Economic Area.

We contracted Google to analyse your use of this website in order to produce reports on the activities on our website and provide more services connected to the use of our website and the internet in general. The IP address provided by your browser will not be combined with other Google data. The information may be transferred to third parties if this is required by law or if third parties process this data on behalf of Google. You can prevent cookies from being stored on your device by adjusting your browser software accordingly. Please note, however, that changing your settings may have negative effects on the usability of our website. You may prevent Google from recording and processing data on

your use of our website (including your device's IP address) and storing such information in a cookie by downloading and installing a browser deactivation add-on from <http://tools.google.com/dlpage/gaoptout?hl=en>.

For more information, see Google's privacy policy: <https://www.google.com/intl/en/policies/privacy/>.

## 2.2 When you are our client or becoming one

### 2.2.1 Registration in our Network

You need to register in our Network in order to obtain access to our technologies and services as contractually agreed upon. If you enter into a contractual relationship with us and/or register in our Network, we record all data, including personal data, which has been provided by you such as your name, address, telephone number or email address. You can see from our online registration form which personal data in detail we record. We do not record any further personal data other than voluntarily provided by you (e.g. as part of a survey or a request for information).

We may also collect information on the device you are using to enter our User Interface pages (the zanox marketplace Interface (referred to as "marketplace") and AWIN User Interface (referred to as "UI")) such as your operating system and browser of your device.

### 2.2.2 Cookies in the zanox marketplace Interface and AWIN User Interface

We use cookies on our User Interface pages with the purpose of improving and optimising usability for our clients.

Please find some general information on cookies [here](#). Cookies used on our User Interface pages are listed below.

Domain	Cookie name	Purpose of the Cookie and further information
*.zanox.com zanox.com	zpsc	Identifies the logged in user when navigating in the user interface. Cookie expires after one year.
	ztsc	Identifies the logged in user when navigating in the user interface. Cookie expires when the browser is closed.
	zxlc	Records the language settings of the logged in user during his session. Cookie expires after one year.



*.awin.com ui.awin.com *.zanox.com marketplace.zanox.com	AWINSESSID, DARWINSESSIONID	Set when you log in to our website, used to keep you logged in. Stores a unique id for your current session and expires when you close your browser.
	darwinLocale	Used to store your language and other localisation preferences in a string that represents your region and language, i.e. en_GB. Cookie expires after one year.
marketplace.zanox.com	serialised_adspace	Stores the user-selected ad space ID and expires when you close your browser.
*.zanox.com zanox.com advertiser.zanox.com publisher.zanox.com	JSESSIONID	Detects a logged-in user during his session in the UI and expires when you close your browser.
marketplace.zanox.com	darwinLocale	Records the chosen language settings of the user.
advertiser.zanox.com	zx_advertiser_stats_report_type	Records the preferred reporting settings of the user.
advertiser.zanox.com publisher.zanox.com	* name of the cookie may vary, depending on the connection	Technical Session Cookie for load balancing purposes, expires at the end of the session when you close your browser.
*.awin.com ui.awin.com wiki.awin.com *.zanox.com	__utma __utmb __utmc __utmli	Analysis cookies by Google, more information available <a href="#">here</a> .

<b>zanox.com</b> <b>marketplace.zanox.com</b>	__utmt __utmz	
<b>getSatisfaction.com</b>	__utma __utmb __utmc __utmz _sfm_session	Analysis cookies by Google, more information available <a href="#">here</a> .
<b>*.awin.com</b> <b>awin.com</b> <b>wiki.awin.com</b>	wiki_sw_session, wiki_sw_Token, wiki_sw_UserID, wiki_sw_LoggedOut	Used to authenticate users of the Affiliate Window wiki. Stores a unique ID for your current session. Expires after 30 days.
	wiki_sw_UserName	Stores the username, expires after 30 days.
<b>ui.awin.com</b>	sessionRedirect	Stores last visited URL before session expiration to redirect you back to it at your next login.
	lastAwinMerchantVisited	Stores the ID of the last visited Advertiser/Merchant. Expires at the end of the session, when you close your browser.

### 2.2.3 Google Analytics

We use Google Analytics which is a web analysing tool of Google Inc. on our User Interface pages. More information is available [here](#).

### 2.2.4 Newsletter

With the following information, we will inform you about the contents of our newsletter as well as the registration, dispatch, statistical evaluation procedure and your right of objection. By subscribing to our newsletter, you agree to the receipt of the newsletter and the procedures described.

We send out newsletters, e-mails and other electronic notifications with promotional information (hereinafter "Newsletter") subject to the consent of the recipient or a legal permission.

The registration for our newsletter is handled through a so-called double opt-in procedure, which means you will receive an e-mail after your registration, in which you will be asked to confirm your registration once again. The registrations for the newsletter are recorded in order to prove the accurate registration process according to legal requirements. This includes storing the time of logon and confirmation. Furthermore changes to the data stored by Mailchimp are being recorded.

The newsletter will be sent by means of "MailChimp", a newsletter platform of the US company Rocket Science Group // 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

The e-mail addresses of our newsletter recipients, as well as further data described in the context of this information, are being stored on the servers of MailChimp in the USA. MailChimp uses this information to send out and evaluate the newsletters on our behalf. In addition, MailChimp can use this data to optimize or improve its own services, e.g. for the technical optimization of the dispatch and the presentation of the newsletter or for economic purposes in order to determine from which countries the recipients come from. However, MailChimp does not use the data of our newsletter recipients to contact them independently or transfer data to third parties.

MailChimp is certified under the US-EU-Data-Privacy-Agreement the "Privacy Shield" and is committed to comply with EU data protection requirements. Furthermore, we have concluded the "EU Model Clauses" with MailChimp. This is a data protection agreement which obliges MailChimp to protect the data of our users, to process according to its privacy regulations on our behalf and in particular not to pass data on to third parties. You can view the privacy policy of MailChimp here: <https://mailchimp.com/legal/privacy/>.

In order to register for the newsletter, we only need your e-mail address. Further voluntarily provided information about you is only used to personalize the newsletter.

There are cases where we direct the newsletter recipients to the MailChimp websites. E.g. our newsletters contain a link with which the newsletter recipients can access the newsletters online (for example in the case of display problems in the e-mail program). Furthermore, newsletter recipients can subsequently change their data (like their e-mail address). Likewise, the data privacy policy of MailChimp is only available on their website.

You may terminate the receipt of our newsletter at any time, which means revoke your consent. Therewith your consent to the dispatch of the newsletter via MailChimp as well as the statistical analyses expire at the same time. A separate cancellation of the dispatch via MailChimp or the statistical evaluation is unfortunately not possible. You will find a link to unsubscribe from our newsletter at the bottom of each newsletter.

## **2.3 When using our technologies and services via websites and online services of our clients**

### **2.3.1 Our Tracking | Use of Cookies**

We use cookies to provide our tracking services. Please find some general information on cookies [here](#).

We store cookies on devices of users who are visiting websites and using online services of our clients in order to record business transactions (leads and sales such as signing up for a newsletter or placing an order in a web shop). The only purposes of our tracking cookies are to allocate one successful advertisement to a particular business transaction, and to perform corresponding billing services. Personally identifiable information on the user are neither collected nor processed nor used in tracking. Nothing but the information when and on which device a click on an advertisement occurred is stored in tracking cookies. We only store an individual sequence of figures that cannot be allocated to a particular user and contains information on

- the Advertiser's Partner Programme
- the Publisher
- the specific time of the user's action (click or view)

While tracking we may also collect information on the device that is used to perform a business transaction such as the device's operating system and browser.

Our tracking cookies are listed below.

Domain	Cookie name	Purpose of the Cookie and further information
<b>ad.zanox.com</b> <b>www.zanox-affiliate.de</b>	zttpvc  ztvc	Set when you see an advertisement. Stores an ID for the website that shows the advertisement and the time you saw the advertisement.  Cookie expires at the end of the session when you close your browser*. *(depending on the browser) Example: 5C331993S2271596517536436224T
	zptpvc  zpvc	Set when you see an advertisement. Stores an ID for the website that showed the advertisement and the time you saw the advertisement.  Cookie expires after a maximum of 90 days. Example: 5C331993S2271596517536436224T
	ztcc	Set when you click on one of our links. Stores IDs for referring website, advertisement on which you clicked, group of advertisements to which the advertisement belongs, time you clicked on it, ID for the type of advertisement and any reference the referring site adds to the click.  Cookie expires at the end of the session when you close your browser*. *(depending on the browser)

		Example: 5C331993S2271596517536436224T
	zcc	<p>Set when you click on one of our links. Stores IDs for referring website, advertisements on which you clicked, group of advertisements to which the advertisement belongs, time you clicked on it, ID for the type of advertisement and any reference the referring site adds to the click.</p> <p>Expires after a maximum of one year. For the correct allocation of the success of an advertising material and the corresponding billing services, clicks are taken into consideration for a maximum of 90 days.</p> <p>Example: 5C331993S2271596517536436224T</p>
<b>awin1.com</b>	bld	Sets a browser-specific ID to identify a new click on the same browser. Cookie expires after one year.
	aw***** (The cookie name will be different for each Advertiser, but will be the letters 'aw' followed by an id to represent the Advertiser, e.g. aw1001)	<p>Set when you click on one of our links. Stores IDs for referring website, advertisement on which you clicked, group of advertisements to which the advertisement belongs, time you clicked on it, ID for the type of advertisement, ID for the product and any reference the referring site adds to the click.</p> <p>Expiry varies depending on the Advertiser and the referring website, but typically will be 30 days.</p>
	AWSESS	<p>Set when you see an advertisement and used to help us make sure we don't keep showing you the same advertisement.</p> <p>An ID for the advertisement you have seen. Expires at the end of the session, when you close your browser.</p>
	awpv***** (The cookie name will be different for each Advertiser, but will be the letters 'awpv' followed by an id to represent the	<p>Set when you see an advertisement. Stores an ID for the website that showed the advertisement and the time you saw the advertisement.</p> <p>Expiry varies depending on the Advertiser, but is typically 24 hours.</p>

	Advertiser, e.g. awpv1001)	
	AW (flash cookie)	Set when you click on one of our links. Stores IDs for referring website, advertisement on which you clicked, group of advertisements to which the advertisement belongs, time you clicked on it, ID for the type of advertisement, ID for the product and any reference the referring site adds to the click.  Expiry varies depending on the Advertiser and the referring website, but typically will be 30 days.
* <b>Tracking cookies set for AWIN by Advertisers on the Advertiser's domain</b>	<code>_aw_m_*****</code> (The cookie name will be different for each Advertiser, but will be the characters <code>'_aw_m_'</code> followed by an id to represent the Advertiser, e.g. <code>_aw_m_1001</code> )	Set when you click on one of our links. Stores IDs for referring website, advertisement on which you clicked, group of advertisement s to which the advertisement belongs, time you clicked on it, ID for the type of advertisement, ID for the product and any reference the referring site adds to the click.  Expiry varies depending on the Advertiser and the referring website, but typically will be 30 days.

You may alter the security settings of your browser in order to limit the use of cookies on your device. You may choose to stop your device receiving and storing cookies at all, to allow receiving and storing cookies from selected websites only, or to be notified before receiving cookies. Please note, however, that these settings may have negative effects on the usability and user guidance of websites and other online services. You may delete cookies stored to your browser at any time. Information stored in such cookies will be removed from your device.

### 2.3.2 Information on Cookies and Third Party Cookies

In contrast to “normal” cookies (so-called first party cookies), which are mostly used by the website operator itself, third party cookies are cookies from a third party that place their cookies on the website of another website operator. As a Publisher you may be obliged – depending on the jurisdiction you are active in – to inform users of your website about cookies that are used on your website, including such placed by AWIN (as so called third party cookies). This obligation to provide information also includes information on the purpose of the cookie and how the user may prevent cookies being placed on his/her device. A user must give his/her consent to the use of cookies on the Publisher’s website, before a cookie is placed, either by the Publisher or a third party. The Publisher who operates the website is responsible for receiving this consent which shall include the consent regarding cookies placed by AWIN. Please see [here](#) for a list and description of cookies used for tracking purposes by AWIN.

### 2.3.3 Behavioural Advertising and MasterTag

Online Behavioural Advertising (also known as OBA or targeted advertising), is a technology that allows the display of advertisements that are tailored to your preferences and therefore more interesting for you. Based on the previous anonymous surfing behaviour of Internet users, their interests are grouped into user profiles. According to the assumed user interests, relevant advertisements are then shown to the internet user. This allows advertisements to be delivered as targeted as possible. Some providers are using cookies for this. More information on online behavioural advertising can be found on the websites of the European Interactive Digital Advertising Alliance (EDAA) as well as on their information page on user based online advertising and online data protection: <http://www.youronlinechoices.com/en/> and on the websites of the German Data Protection Council Online-Advertising: <http://meine-cookies.org/DDOW/>. The DDOW is the voluntary self-control organization of the digital advertising industry for user-based online advertising in Germany.

AWIN does not conduct behavioural advertising and neither our tracking services, nor does the tag management tool "MasterTag" provided by AWIN to its customers collect data for these purposes. However, the tracking codes used by the MasterTag through our Publishers may use cookies for purposes of behavioural advertising.

For this reason, we would like to draw your attention to the possibilities to object against the collection of data for purposes targeted advertising on the following websites <http://www.aboutads.info/choices/> and <http://www.youronlinechoices.com/en/> (for the European area).

## 3 Processing and use of personal data

We use personal data provided by our clients only for administrating and providing our technologies and services, for responding to clients' enquiries and, where applicable, executing the contract between a client and AWIN. We store personal and any other kind of data strictly in compliance with applicable data protection and privacy legislation and our contractual duties, and will prevent unauthorized access to data to the best of our abilities.

Provided you have given your consent or have not objected – where legal provisions allow so – we may use your personal data for advertising and market research. By registering with our Network you give your consent that we may contact you via telephone, via mail and email in order to provide you with information on AWIN offers. You may withdraw your consent at any time.

We may transmit your data to our subcontracted service providers, but only if we contractually assigned these to process data on our behalf and, both ourselves and the subcontracted service providers comply with all requirements of commissioned data processing regulations pursuant to the German law on data protection. Data is stored within the European Union and the European Economic Area.

In order to fulfil our contractual obligations we may transmit your data to companies that we control and subsidiaries of such provided that these companies are subject to this Privacy Policy or privacy guidelines ensuring at least equal protection for your data.

We do not transmit data to other third parties unless you have given your consent thereto or the transmission is made to state institutions on the basis of mandatory national legislation..

## 4 Data security

AWIN takes all technical and organisational security measures required to protect your personal data from loss, unauthorised disclosure or other forms of misuse. Data is stored in a safe environment that is not open to public access. Your personal data may be encrypted before transmission in certain cases (e.g. processing your login data). This means that – support by your browser provided – communication between your device and our servers will include recognized encryption measures.

Our staff has been trained in privacy matters and in dealing with data and information, which they gain access to in a responsible manner.

Please be aware that should you contact us via email, confidentiality of information therein may not be ensured. Third persons may have access to contents of emails.

## 5 Access, rectification, deletion and blockage

You have the right of access to your personal data at any time and may demand rectification.

In case you registered as a client on our website, you may access your client account and rectify some of your data yourself.

You may exercise your legal rights by contacting us via email to [global-privacy@awin.com](mailto:global-privacy@awin.com), via fax to +49(0)30 50 96 91-99 or via mail to AWIN AG, Eichhornstr. 3, 10785 Berlin, GERMANY.

While observing applicable privacy legislation we will erase your data without any action required by you, if retention of your data is no longer necessary for the purpose pursued or retention is no longer allowed for any legal reason. We may restrict processing instead of erasing your data where legally not allowed to erase (e.g. legal obligations to maintain your personal data).

## 6 Amendments

We may modify this Privacy Policy and our data security provisions from time to time, in particular if new laws and regulations need to be adopted or we regard amendments reasonable. The date of amendments will be posted below the heading of this Privacy Policy.

## 7 Questions / Contact

Please bring any questions regarding this Privacy Policy, requests for further information on how we process your data, suggestions and possible complaints to the attention of the Data Protection Officer of AWIN AG via email: [global-privacy@awin.com](mailto:global-privacy@awin.com), fax: +49(0)30 50 96 91-99 or mail: AWIN AG, Eichhornstr. 3, 10785 Berlin, GERMANY.