

# Privacy Policy

Status: 2021

Protecting your data is an important aspect to us. Below we would like to inform you how we handle your data, of course always in accordance with the General Data Protection Regulation (GDPR).

## **1. Data acquisition**

The collection, processing and use of personal data is limited to the necessary extent and data. Personal data is any data that can be linked to you personally, e.g. name, address, email addresses, or user behavior.

## **2. Responsible party**

The responsible party of the collection, processing and use of your personal data is Quicklead kft. (hereinafter referred to as Airnip).

You can contact our Data Protection Officer at the following contacts:

E-mail address: [info@airnip.com](mailto:info@airnip.com)

Please contact the contact details above if you wish to rectify, erase or restrict the processing of your data or exercise your right to data portability. You can also raise an object if you believe that the data processing carried out by Airnip does not comply with the data protection regulations.

You can also file a complaint with a supervisory authority if you believe that the processing of your personal data is illegal.

## **3. Collecting of personal data**

Airnip distinguishes between statistical data and personal data. Statistical data are not personal data, but for example they are data we collect when you visit our website and which cannot be

directly linked to you personally. Personal data are such information on the (factual or personal) circumstances which can be linked to an identified or identifiable natural person.

When you visit our website, to ensure the stability and security of the connection we collect the following information:

- IP address
- Date and time
- Reason for the request
- Browser - version - language
- Http status code

Airnip processes these data for the following purposes:

to establish the connection of the websites, the testability of the websites and the security of the system for other administrative purposes.

The data will be collected, stored and retained for the duration of the processing of the request, the purchase and any possible warranty claims.

The transfer of the data is only permitted if Airnip is entitled or obliged to do so for legal reasons. The transfer of your data is necessary for organizational reasons to banks, to payment service providers, to parcel delivery services or to the postal service in order to process your orders, payments or the delivery of goods.

#### **4. Data processing**

After placing an online order, you authorize us to use your personal data to process the activities related to the order. We store and use the data primarily for order confirmation, identification in our system, and for queries and providing information.

We need your active consent to subscribe to the newsletter. By confirming your registration, you give your consent to Airnip to use your personal data to send you electronic newsletters and electronic advertising.

If you later want to unsubscribe from our newsletters, all you have to do is send a text message to Airnip's contact details; you will also find an unsubscribe link in each newsletter.

## **5. Google (Analytics and Adwords)**

Our website uses Google Analytics, a web analytics service provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (Google). The usage includes the Universal Analytics mode of operation. Google Analytics uses cookies.

The operator of the website entrusts Google with the use of information generated by cookies. Google evaluates your use of the website in order to compile reports for further website activity and to provide other services related to website activity.

The legal basis for using Google Analytics is Article 6 (1) (f) of the GDPR. The information generated by cookies on this website is usually transmitted to a Google server in the United States and ensured there. We use anonymous IP addresses in connection with Google Analytics, where IP addresses are only used for a short period of time. This excludes the possibility of personal references, because they use the IP addresses only for a short period of time. In exceptional cases, the full IP address may be forwarded, but these IP addresses will be shortened on a Google server in the United States. Forwarded IP addresses will not be merged with other data provided by Google.

The data sent by us and linked to cookies, user IDs or advertising IDs are deleted after 14 months. Deletion is automatic and monthly.

In our online advertising we use conversion tracking provided by Google, in particular Google AdWords. Your computer's hard disk is used to store conversion tracking when you click on a Google-activated ad. After 30 days these cookies expire and therefore no personal identification can be performed as they do not contain any personal data.

If the cookie has not expired during your visit to our website and/or subpage, Airnip and Google will recognize that you have clicked on an advertisement and you have been redirected to the website/subpage. AdWords customers are unable to track cookies on different websites because

each Google AdWords customer has a different cookie. The information obtained by means of the conversion cookies serves to generate statistics for AdWords customers who use conversion tracking. AdWords customers learn from the statistics the total number of users who have clicked on the ad shown by Google, and so visited a page provided with a conversion tracking tag. It is not possible for AdWords customers to personally identify individual users, as the relevant information is not included in the data they obtain.

If you do not wish to participate in tracking, you can prevent cookies from being installed by deactivating them. The storage of cookies can usually be disabled with appropriate settings, but please note that in this case you will not be able to use all the features of our website to their full extent.

Further information about data protection and the terms and conditions of use may be found by following these links:

<https://www.google.com/analytics/terms/en.html>

<https://policies.google.com>

<http://www.google.com/policies/technologies/ads/>

<http://www.google.de/policies/privacy/>

When you use our website you consent to the collection and processing of your data by Google as described above.

By using the website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

For the possibility of disabling cookies on our website, see clause 9.

## **6. Facebook**

By using the Airnip website, you agree to the Pixel conversion tracking service provided by Facebook, Inc. (1601 S. California Ave., Palo Alto, CA 94304, USA).

We use Facebook tracking pixels in order to be able to evaluate the effectiveness of our Facebook ads statistically and in terms of ads. We can track your actions when, by clicking on a Facebook ad, you get redirected to our website.

However, we cannot see the personal data of individual users, all data remains anonymous. You will be informed about this in the current notifications. However, please note that Facebook may associate your data to your Facebook account and use that for its own advertising purposes. This happens in accordance with Facebook's privacy policy:

<https://www.facebook.com/about/privacy/>.

Facebook policy allows Facebook and its partners to show you advertisements on Facebook and on other apps and websites. For this purpose we store a cookie on your computer.

If you are under the age of 16, only your parent or guardian can give this authorisation on your behalf.

You can revoke your consent and change your privacy settings by clicking here:

[https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

## **7. Remarketing and retargeting**

On this website Airnip uses Facebook (1601 South California Avenue, Palo Alto, CA 94304, USA) social network remarketing tags. When you visit our website a direct connection is established between your browser and Facebook's server through remarketing tags.

If you visit our website through your IP address, Facebook will receive direct information about your visit which Facebook may associate to your user account. Airnip may use this information to display Facebook Ads. In terms of Facebook's privacy policy, we must point out that Airnip, as the operator of the website, is not allowed to receive information about the use and content of the data. Find out more about Facebook's privacy policy here:

<https://www.facebook.com/about/privacy/>

You can revoke your consent and change your privacy settings by clicking here:

[https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/)

## **8. Social Media Plugins**

We use social media plugins of facebook.com, a social network operated by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook").

A direct connection with Facebook is established when you visit our website by using a social plugin. The content of the plugin is sent directly by Facebook to your browser, which then integrates it into the website. This integration allows Facebook to receive information that you have visited our website. Facebook may associate your visit to your user account if you are logged in to Facebook. Your interactions with plugins are transmitted directly to Facebook by your browser and stored there. We process your data in accordance with Facebook's Privacy Policy, which covers the collection and protection of your data as well as your rights and settings options. You can find out more about how we process and use your personal data by following the link below: <https://www.facebook.com/about/privacy/>.

If you log out of your Facebook account when visiting our website, you are protected from data collection by Facebook.

## **9. Cookies**

In order to make our website more user friendly, we use cookies in certain areas.

Cookies are small text files that are assigned to the browser you use and stored on your hard drive. They provide certain information to the party that sets the cookies (in this case to us). These text files cannot execute programs or transfer viruses to your computer. The cookies are designed to make the website as a whole more user friendly and better.

Most of Airnip's cookies are session cookies, which are deleted from your hard drive when you close your browser. Airnip's long-term cookies are deleted after 30 days. These cookies are used to automatically recognise your previous visit to the website and help to remember your settings and personal preferences.

Scope and function of cookies: Temporary cookies are cookies that are automatically deleted when you close your browser. These include, in particular, session cookies. They store a so-called

session identifier, which is used to associate different browser requests with a common session. This allows us to recognise your computer when you return to our website. Session cookies are deleted when you log out or close your browser.

Long term cookies are cookies that allow your browser to configure its settings to suit your preferences. Here, for example, you can refuse to accept third-party cookies or all cookies. Please note that if you do so, you may not be able to use all the features of the website.

By using the Airnip website, you expressly consent to the use of our web services and to the acceptance of cookies in accordance with your browser settings. Most browsers accept all cookies by default settings. However, you have the possibility to change your browser settings to display cookies before they are stored, to accept or reject only certain cookies, or to reject or delete cookies in general.

We would like to point out that any changes to browser settings always affect only that specific browser. If you use a different browser or if you change your device, you will need to configure your settings again. You can delete the cookies from your hard disk at any time. For more information about cookie settings and how to manage or delete cookies, please see the help function of your web browser.

You have the option to disable cookies on our website.

## **10. Instagram**

For the Instagram button (and to operate our Instagram fan pages), we use the infrastructures of Facebook and Instagram services. Through these services, data is aggregated that allows us to gain insight into how users interact with our online content. For more information about Instagram's social plugins, please visit: <https://help.instagram.com/>.

The aggregated data may be based on personal information collected about the individuals' visits on our online content or about their interactions with them. Regarding the services mentioned above we and Facebook Ireland Limited ("Facebook Ireland") are jointly responsible for the processing of the relevant data.

Facebook Ireland takes primary responsibility for the processing of the data and undertakes to fulfill all its obligations in relation to the processing of such data.

The data is stored in order to create user profiles and use them for advertising, market research and / or tailoring online content to the user's needs. Such evaluation is carried out (including for users who are not logged in) in particular for the purpose of displaying demand-based advertising and informing other users of the social network about our website activities. You have the right to object to the creation of these user profiles, to exercise this right you need to contact Facebook Ireland.

We accept that only Facebook Ireland may make and enforce decisions regarding the processing of relevant data collected through the Instagram fan page. Facebook Ireland has the discretion to decide how to meet its obligations relating to these data. We agree that Facebook Ireland is the primary data controller in the EU for all data controllers for the processing of adequate data. We also take note of the fact that the Irish Data Protection Commission is the lead supervisory authority for such processing.

If we are contacted by a data subject or a supervisory authority in regard to the processing of such data and the obligations of Facebook Ireland ("Request"), we are obligated to provide Facebook Ireland with all relevant information without undue delay and no later than 7 calendar days. We will make every reasonable effort to cooperate with Facebook Ireland in responding to any such Request. We are not authorized to act or respond on behalf of Facebook Ireland.

See page <https://help.instagram.com/519522125107875> and [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum) for more information on the purpose and scope of data collection and processing by Facebook Ireland Limited (4 Grand Canal Square, Dublin).

## **11. Newsletter**

With your consent you can receive more information about current and future offers.

The only data required to send newsletters is your email address. Providing additional, separately marked data is voluntary and is used to contact you personally. After confirmation, your email address will be stored for the purpose of sending the newsletters.

You can withdraw your consent and unsubscribe from receiving information about current and future offers at any time. You can do this by clicking on the unsubscribe link which can be found in each newsletter.

We would draw your attention to the fact that we will evaluate your user habits when sending newsletters. To do so, the emails sent contain so-called web beacons or tracking pixels which represent one-pixel image files which are stored on our website. For these evaluations, we combine the data collected and the web beacons with your email address and an individual ID.

Links received in the newsletter also contain this ID. We use the data thus acquired to create a user profile to tailor the newsletter to your individual interests. In the process, we record when you read our newsletter, which links you click on and from this we deduce your personal interests. We combine these data with the actions you perform on our website.

## **12. Hotjar**

We use Hotjar in order to better understand the needs of our users and to optimize the offer on our website. Using Hotjar's technology service helps us better understand the experience of our users (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on the behavior of our users and their devices (in particular the IP address of the device - we capture and store only in anonymized form -, the device screen size, the device type - we use unique device identifiers -, information about the used browser, the geographic location - country only -, the preferred language used to display our website). Hotjar stores this data in a pseudonymized user profile. Neither Hotjar nor we use this data to identify individual users and we do not match it with further data on an individual user. More information is available at <https://www.hotjar.com/legal/policies/privacy>.

You may object to Hotjar storing your user profile and data about your visit to our website, as well as to Hotjar setting tracking cookies on other websites, by following this link:

<https://www.hotjar.com/legal/compliance/opt-out>.

### **13. Server log**

When you visit our website, we automatically log and temporarily store log data that does not allow us to draw any conclusions about you. This information includes, for example, the type and version of the browser, the referring URL, the abbreviated IP address, the name of the service provider and the operating system used. All log data is evaluated anonymously by us or by the service provider we commission for statistical purposes only, to improve our offer, to facilitate troubleshooting, and to protect against attacks on our website.

### **14. Data security**

The security of your data is very important to us. All personal information we request is transmitted in encrypted form over a secure SSL connection, thus protecting it from unauthorized access. In addition, we take additional technical and organizational security precautions to prevent data loss, destruction, and misuse. Always keep your access details confidential and close the browser window when you have finished communicating with us, especially if you share your computer with others. We protect the personal data and information you provide us with the utmost care against unauthorized access by third parties. We take all reasonable steps to ensure the security of your personal data. However, we would like to draw your attention to the fact that the World Wide Web is accessible worldwide and, in particular, that misuses cannot be excluded, so that unauthorized access to such data and information by third parties cannot be excluded, despite the utmost care.