

# PRIVACY POLICY

## DATA PROTECTION AT A GLANCE

### General Information

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 data protection declaration listed below this text.

### 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.

How do we collect your data?

- Firstly, your data is collected when you provide it to us. This may be data that you enter during the registration or in a contact form, for example.
- 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 access). This data is collected automatically as soon as you enter this website.

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.

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.

Third-party analysis tools and tools

- When visiting this website, your surfing behaviors may be statistically analyzed. This is done primarily with so-called analysis programmes.

- Detailed information on these analysis programmes can be found in the following data protection declaration.

## HOSTING

### Hosting with GDPR compliant providers

We host our website with different providers located within Europe. The use of the providers are based on the applicable data protection law. We have a legitimate interest in ensuring that our website is presented as reliably as possible. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of the applicable law; the consent can be revoked at any time.

### Data Processing

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

## GENERAL NOTES AND MANDATORY INFORMATION

### 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 by which you can be personally identified. This Privacy Policy explains what information we collect and how we use it. 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. when communicating by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

### Note on the responsible body

The data controller for this website is:

TOO Mountain Wolf

K.Amazholov Street 174

090000 Uralsk

Kazakhstan

E-mail address: [legal@mountainwolf.com](mailto:legal@mountainwolf.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, etc.)

### 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, deletion will take place after these reasons cease to apply.

#### Data Protection Officer

We have appointed a data protection officer for our company who is available under E-mail: [legal@mountainwolf.com](mailto:legal@mountainwolf.com)

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

Among other things, we might 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 for example 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 person concerned 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.

#### 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.

#### Right to object to the collection of data in specific cases and to direct marketing

IF THE DATA PROCESSING IS BASED ON APPLICABLE LAW, 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 DATA PROTECTION DECLARATION. 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 IS FOR THE PURPOSE OF ASSERTING, EXERCISING OR DEFENDING LEGAL CLAIMS.

IF YOUR PERSONAL DATA ARE PROCESSED FOR THE PURPOSE OF DIRECT MARKETING, YOU HAVE THE RIGHT TO OBJECT AT ANY TIME TO THE PROCESSING OF PERSONAL DATA CONCERNING YOU FOR THE PURPOSE OF SUCH MARKETING; THIS ALSO APPLIES TO PROFILING INSOFAR AS IT IS RELATED TO SUCH DIRECT MARKETING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR THE PURPOSE OF DIRECT MARKETING.

### Right of appeal to the competent supervisory authority

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

### 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.

### SSL or 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, this site uses SSL or TLS encryption. You can recognize 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 SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

### 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 and for further questions on the subject of personal data.

### Right to restricted processing

You have the right to request the restriction of the processing of your personal data. To do this, you can contact us at any time. The right to restriction of 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 assert legal claims, you have the right to request restriction of the processing of your personal data instead of erasure.
- If you have lodged an objection pursuant to the data protection regulations, a balancing of your and our interests 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, this data may - apart from being stored - only be processed with your consent or for the assertion, exercise, or

defense of legal claims or for the protection of the rights of another natural or legal person or on grounds of an important public interest of the State.

#### Objection to advertising e-mails

The use of contact data published within the scope 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, for example through spam e-mails.

### **DATA COLLECTION ON THIS WEBSITE**

#### Cookies

Our internet pages use so-called "cookies". Cookies are small text files and do not cause any damage to your terminal 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 end 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. the shopping cart function or the display of videos). Other cookies are used to evaluate user behavior or to display advertising. Cookies that are necessary to carry out the electronic communication process (necessary cookies) or to provide certain functions desired by you (functional cookies, e.g. for the shopping cart function) or to optimize the website (e.g. cookies to measure the web audience) are stored on the basis of data protection regulations, unless another legal basis is specified. The website operator has a legitimate interest in storing cookies for the technically error-free and optimized provision of its services. If consent to the storage of cookies has been requested, the cookies in question are stored exclusively on the basis of this consent; 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. Insofar as cookies are used by third-party companies or for analysis purposes, we will inform you separately about this within the framework of this data protection declaration and, if necessary, request your consent.

### 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:

- Browser type and browser version
- Operating system used
- Referrer URL
- Host name of the accessing computer
- Time of the server request
- IP address

This data is not merged with other data sources.

The collection of this data is based on data protection regulations. The website operator has a legitimate interest in the technically error-free presentation and optimization of its website - for this purpose, the server log files must be recorded.

### 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 data protection regulations 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 effectively processing the enquiries sent to us or on your consent if this has been requested. 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 your request has been processed). Mandatory legal provisions - in particular retention periods - remain unaffected.

### 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 do not pass on this data without your consent. The processing of this data is based on data protection regulations 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 sent to us or on your consent if this has been requested. The data you send us via contact requests 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.

## SOCIAL MEDIA

### Facebook Plugins (Like & Share-Button)

Plugins of the social network Facebook are integrated on this website. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. However, according to Facebook, the data collected is also transferred to the USA and other third countries. You can recognise the Facebook plugins by the Facebook logo or the "Like" button on this website. You can find an overview of the Facebook plugins here: [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE) ([https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE)).

When you visit this website, a direct connection is established between your browser and the Facebook server via the plugin. Facebook thereby receives the information that you have visited this website with your IP address. If you click the Facebook "Like" button while you are logged into your Facebook account, you can link the content of this website to your Facebook profile. This allows Facebook to associate your visit to this website with your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Facebook. You can find more information on this in Facebook's privacy policy at: <https://de-de.facebook.com/privacy/explanation> (<https://de-de.facebook.com/privacy/explanation>).

If you do not want Facebook to be able to associate your visit to this website with your Facebook user account, please log out of your Facebook user account. The use of Facebook plugins is based on data protection regulations. The website operator has a legitimate interest in ensuring the greatest possible visibility in social media. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time. Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing. The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the forwarding is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The text of the agreement can be found at: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum) ([https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)). According to this agreement, we are responsible for providing the data protection information when using the Facebook tool and for implementing the tool on our website in a way that is secure from a data protection perspective. Facebook is responsible for the data security of the Facebook products. You can assert data subjects' rights (e.g. requests for information) regarding the data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

The data transfer to the USA is based on the standard contractual clauses of the EU Commission.

Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)  
([https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)),  
<https://de-en.facebook.com/help/566994660333381>  
(<https://de-en.facebook.com/help/566994660333381>) and  
<https://www.facebook.com/policy.php>  
(<https://www.facebook.com/policy.php>).

## **ANALYSIS TOOLS AND ADVERTISING**

### Google Tag Manager

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The Google Tag Manager is a tool with the help of which we can integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create user profiles, does not store cookies and does not perform any independent analyses. It only serves to manage and play out the tools integrated via it. However, the Google Tag Manager records your IP address, which may also be transmitted to Google's parent company in the United States.

The use of the Google Tag Manager is based on data protection regulations. The website operator has a legitimate interest in a quick and uncomplicated integration and management of various tools on his website. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time.

### Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics enables the website operator to analyse the behaviour of website visitors. In doing so, the website operator receives various usage data, such as page views, length of stay, operating systems used and the origin of the user. This data may be summarised by Google in a profile that is assigned to the respective user or their end device. Furthermore, Google Analytics may record your mouse and scroll movements and clicks, among other things. Furthermore, Google Analytics uses various modelling approaches to supplement the collected data sets and uses machine learning technologies in the data analysis. Google Analytics uses technologies that enable the recognition of the user for the purpose of analysing user behaviour (e.g. cookies or device fingerprinting). The information collected by Google about the use of this website is usually transferred to a Google server in the USA and stored there.

The use of this analysis tool is based on data protection regulations. The website operator has a legitimate interest in analysing user behaviour in order to optimise both its website and its advertising. If a corresponding consent has been requested (e.g. consent to the storage of cookies), the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here:

<https://privacy.google.com/businesses/controllerterms/mccs/>  
(<https://privacy.google.com/businesses/controllerterms/mccs/>).

### IP anonymisation

We have activated the IP anonymisation function on this website. This means that your IP address is shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area before being transmitted to the USA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

### Browser Plugin

You can prevent the collection and processing of your data by Google by downloading and installing the browser plugin available under the following link: (<https://tools.google.com/dlpage/gaoptout?hl=de>). available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>. You can find more information on how Google Analytics handles user data in Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=de> (<https://support.google.com/analytics/answer/6004245?hl=de>).

### Data processing contract

We have concluded an order processing contract with Google and fully implement the strict requirements of the German data protection authorities when using Google Analytics.

### Storage period

Data stored by Google at user and event level that are linked to cookies, user identifiers (e.g. user ID) or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) are anonymised or deleted after 2 months. Details on this can be found under the following link:

<https://support.google.com/analytics/answer/7667196?hl=de>  
(<https://support.google.com/analytics/answer/7667196?hl=de>).

### Google Ads

The website operator uses Google Ads. Google Ads is an online advertising programme of Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Ads enables us to display advertisements in the Google search engine or on third-party

websites when the user enters certain search terms on Google (keyword targeting). Furthermore, targeted advertisements can be played on the basis of the user data available at Google (e.g. location data and interests) (target group targeting). As the website operator, we can evaluate this data quantitatively by analysing, for example, which search terms have led to the display of our advertisements and how many advertisements have led to corresponding clicks.

The use of Google Ads is based on data protection regulations. The website operator has a legitimate interest in marketing its service products as effectively as possible. The data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: <https://policies.google.com/privacy/frameworks> (<https://policies.google.com/privacy/frameworks>) and <https://privacy.google.com/businesses/controllerterms/mccs/> (<https://privacy.google.com/businesses/controllerterms/mccs/>).

### Google Remarketing

This website uses the functions of Google Analytics Remarketing. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. Google Remarketing analyses your user behaviour on our website (e.g. clicking on certain products) in order to classify you in certain advertising target groups and subsequently play suitable advertising messages to you when you visit other online offers (remarketing or retargeting).

Furthermore, the advertising target groups created with Google Remarketing can be linked with Google's cross-device functions. In this way, interest-based, personalised advertising messages that have been adapted to you depending on your previous usage and surfing behaviour on one end device (e.g. mobile phone) can also be displayed on another of your end devices (e.g. tablet or PC).

If you have a Google account, you can object to personalised advertising using the following link: <https://www.google.com/settings/ads/onweb/> (<https://www.google.com/settings/ads/onweb/>). The use of Google Remarketing is based on data protection regulations. The website operator has a legitimate interest in marketing its products as effectively as possible. Insofar as a corresponding consent has been requested, the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time.

Further information and the data protection provisions can be found in Google's data protection declaration at:

<https://policies.google.com/technologies/ads?hl=de>  
(<https://policies.google.com/technologies/ads?hl=de>).

### Target group formation with customer matching

To create target groups, we use, among other things, Google Remarketing's customer matching. In this process, we transfer certain customer data (e.g. email addresses) from our customer lists to Google. If the customers in question are Google users and logged into their Google account, they are shown suitable advertising messages within the Google network (e.g. on YouTube, Gmail or in the search engine).

### Google Conversion Tracking

This website uses Google Conversion Tracking. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

With the help of Google conversion tracking, Google and we can recognise whether the user has performed certain actions. For example, we can evaluate which buttons on our website were clicked how often and which products were viewed or purchased particularly frequently. This information is used to create conversion statistics. We learn the total number of users who clicked on our ads and what actions they took. We do not receive any information with which we can personally identify the user. Google itself uses cookies or comparable recognition technologies for identification.

The use of Google conversion tracking is based on data protection regulations. The website operator has a legitimate interest in analysing user behaviour in order to optimise both its website and its advertising. If a corresponding consent has been requested (e.g. consent to the storage of cookies), the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time. More information on Google conversion tracking can be found in Google's privacy policy: <https://policies.google.com/privacy?hl=de> (<https://policies.google.com/privacy?hl=de>).

### Facebook Pixel

This website uses the visitor action pixel from Facebook to measure conversions. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. However, according to Facebook, the data collected is also transferred to the USA and other third countries. In this way, the behaviour of page visitors can be tracked after they have been redirected to the provider's website by clicking on a Facebook advertisement. This allows the effectiveness of the Facebook ads to be evaluated for statistical and market research purposes and future advertising measures to be optimized.

The data collected is anonymous for us as the operator of this website, we cannot draw any conclusions about the identity of the users. However, the data is stored and processed by Facebook so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, in accordance with the Facebook data usage policy (<https://de-de.facebook.com/about/privacy/>). This enables Facebook to display advertisements on Facebook pages as well as outside of Facebook. This use of data cannot be influenced by us as site operator. The use of Facebook Pixel is based on data protection regulations. The website operator has a legitimate interest in effective advertising measures including social media. If a corresponding consent has been requested (e.g. consent to store cookies), the processing is carried out exclusively on the basis of data protection regulations VO; the consent can be revoked at any time. Data transfer to the USA is based on the standard contractual clauses of the EU Commission. Details can be found here: [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) ([https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)) and <https://de-de.facebook.com/help/566994660333381> (<https://de-de.facebook.com/help/566994660333381>).

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Facebook Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (data protection regulations data protection regulations). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the forwarding is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The text of the agreement can be found at:

[https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)

([https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)). According to this agreement, we are responsible for providing the data protection information when using the Facebook tool and for implementing the tool on our website in a way that is secure from a data protection perspective. Facebook is responsible for the data security of the Facebook products. You can assert data subjects' rights (e.g. requests for information) regarding the data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

You can find further information on protecting your privacy in Facebook's data protection information:

<https://de-de.facebook.com/about/privacy/>

(<https://de-de.facebook.com/about/privacy/>). You can also deactivate the "Custom Audiences" remarketing function in the Ad Settings section at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen).

([https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen)). To do this, you must be logged into Facebook. If you do not have a Facebook account, you can disable usage-based advertising from Facebook on the European Interactive Digital Advertising Alliance website at website:

<http://www.youonlinechoices.com/de/praferenzmanagement/>

(<http://www.youonlinechoices.com/de/praferenzmanagement/>)

## **NEWSLETTER**

### Newsletter Data

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 check 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. For the processing of the newsletter we use newsletter service providers, which are described below

### MailJet

This website uses the services of MailJet for sending newsletters. The provider is Flowmailer BV, Van Nelleweg1, 3044 BC, Rotterdam, Netherlands.

MailJet is a service with which, among other things, the sending of newsletters can be organised and analysed. When you enter data for the purpose of receiving newsletters (e.g. email address), this data is stored on MailJet's servers in the EU. With the help of MailJet, we can analyse our newsletter campaigns. When you open an email sent with MailJet, a file contained in the email (known as a web beacon) connects to MailJet's servers in the EU. This makes it possible to determine whether a newsletter message has been opened and which links, if any, have been clicked on. In addition, technical information is recorded (e.g. time of retrieval, IP address, browser type and operating system). This information cannot be assigned to the respective newsletter recipient. It is used exclusively for the statistical analysis of newsletter campaigns.

The results of these analyses can be used to better adapt future newsletters to the interests of the recipients.

If you do not want any analysis by MailJet, you must unsubscribe from the newsletter. For this purpose, we provide a corresponding link in every newsletter message. The data processing is based on your consent. You can revoke this consent at any time by unsubscribing from 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. Data that has been stored by us for other purposes remains unaffected by this. After you have unsubscribed from the newsletter distribution list, your e-mail address will be stored by us or the newsletter service provider in a blacklist, if necessary, in order 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 the legal requirements when sending newsletters (legitimate interest within the meaning of data protection regulations). The storage in the blacklist is not limited in time. You can object to the storage if your interests outweigh our legitimate interest. For more details, please refer to the data protection provisions of MailJet at:

<https://flowmailer.com/privacy-policy>

### Data processing contract

We have concluded a contract on order processing (AVV) with the above-mentioned provider. This is a contract required by data protection law, which ensures that the provider only processes the personal data of our website visitors in accordance with our instructions and in compliance with the data protection regulations.

### Sendgrid

This website uses the services of Sendgrid for sending newsletters. Twilio Inc., a Delaware

corporation, with a place of business at 101 Spear Street, 5th Floor, San Francisco, California, 94105, United States of America.

Sendgrid is a service with which, among other things, the sending of newsletters can be organised and analysed. When you enter data for the purpose of receiving newsletters (e.g. email address), this data is stored on Sendgrid's servers in the EU. With the help of Sendgrid, we can analyse our newsletter campaigns. When you open an email sent with Sendgrid, a file contained in the email (known as a web beacon) connects to Sendgrid's servers in the EU. This makes it possible to determine whether a newsletter message has been opened and which links, if any, have been clicked on. In addition, technical information is recorded (e.g. time of retrieval, IP address, browser type and operating system). This information cannot be assigned to the respective newsletter recipient. It is used exclusively for the statistical analysis of newsletter campaigns. The results of these analyses can be used to better adapt future newsletters to the interests of the recipients.

If you do not want any analysis by Sendgrid, you must unsubscribe from the newsletter. For this purpose, we provide a corresponding link in every newsletter message. The data processing is based on your consent. You can revoke this consent at any time by unsubscribing from 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. Data that has been stored by us for other purposes remains unaffected by this. After you have unsubscribed from the newsletter distribution list, your e-mail address will be stored by us or the newsletter service provider in a blacklist, if necessary, in order 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 the legal requirements when sending newsletters (legitimate interest within the meaning of data protection regulations). The storage in the blacklist is not limited in time. You can object to the storage if your interests outweigh our legitimate interest. For more details, please refer to the data protection provisions of Sendgrid at:

<https://www.twilio.com/en-us/legal/privacy>

#### Data processing contract

We have concluded a contract on order processing (AVV) with the above-mentioned provider. This is a contract required by data protection law, which ensures that the provider only processes the personal data of our website visitors in accordance with our instructions and in compliance with the data protection regulations.

## PLUGINS AND TOOLS

### Google Web Fonts

This site uses so-called web fonts provided by Google, but stored locally, for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly.

The use of Google WebFonts is based on data protection regulations. The website operator has a legitimate interest in the uniform presentation of the typeface on his website. If a corresponding consent has been requested (e.g. consent to the storage of cookies), the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time. If your browser does not support web fonts, a standard font from your computer will be used.

Further information on Google Web Fonts can be found at <https://developers.google.com/fonts/faq> (<https://developers.google.com/fonts/faq>) and in the privacy policy of Google:

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

## **ECOMMERCE**

### Processing data (customer and contract data)

We collect, process and use personal data only insofar as they are necessary for the establishment, content or amendment of the legal relationship (inventory data). This is done on the basis of the data protection regulations, which permits the processing of data for the fulfilment of a contract or pre-contractual measures. We collect, process and use personal data about the use of this website (usage data) only insofar as this is necessary to enable the user to use the service or to bill the user.

The collected customer data will be deleted after completion of the order or termination of the business relationship. Statutory retention periods remain unaffected.

### Data transmission upon conclusion of a contract for services and digital content

We only transmit personal data to third parties if this is necessary for the processing of the contract, for example to the credit institution commissioned with the processing of payments. Further transmission of data does not take place or only if you have expressly consented to the transmission. Your data will not be passed on to third parties without your express consent, for example for advertising purposes.

The basis for data processing is the data protection regulations, which permits the processing of data for the fulfilment of a contract or pre-contractual measures.

## **SERVICE PROVIDERS**

We may share personal and anonymous information with agents, subsidiaries, affiliates, partners and other third parties that perform functions on our behalf, such as hosting, billing, content management tools, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are obligated to maintain the

confidentiality and security of that Personal Information under the GDPR Law Article 5. The Service Providers are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services.

## **BUSINESS PARTNERS**

We provide products and services to customers through a number of affiliated banks and companies. To the extent permitted under applicable laws, we may share your Personal Information with our business partners or other third parties that enable us to serve your processing needs. We may contact our existing customers by mail, telephone, or email to offer additional products or services that we believe may be of interest to you. Although our treatment of your Personal Information is governed by this Privacy Policy, the business partner or third party's treatment of your Personal Information will be governed by the business partner or third party's privacy policy. Mountain Wolf does not guarantee and is not responsible for the actions and privacy policies of third parties or its affiliates or their websites and we therefore encourage you to familiarize yourself with the privacy policies provided by those parties.

## **KYC Identification**

### IDenfy

We use IDenfy to conduct a verification process with our clients. If you conduct the verification process, your personal data will be collected and processed by us and the provider of the verification tool.

IDenfy's data policies can be viewed under <https://www.idenfy.com/privacy-policy/>

### Purpose and legal basis

The verification tool is used to communicate with existing contractual partners to offer the service to our customers. Furthermore, the use of the tool serves the general simplification of verification towards us or our company (legitimate interest within the meaning of the data protection regulations). If consent has been requested, the tool in question are used on the basis of this consent; consent can be revoked at any time with effect for the future.

### Storage period

The data collected is deleted from our systems as soon as you request us to delete it, revoke your consent to store it or the purpose for storing the data no longer applies. Stored cookies remain on your terminal device until you delete them.

Mandatory legal retention periods remain unaffected.

We have no influence on the storage period of your data, which is stored by the operators of the tool for their own purposes. For details, please contact the operators of the conference tools directly.

## **OWN SERVICES**

### OneDrive

We have integrated OneDrive on this website. The provider is Microsoft, Konrad-Zuse-Street 1, 85716 Unterschleißheim, Germany. When we upload content, it is stored on OneDrive's EU servers.

The website operator has a legitimate interest in a reliable upload area on its website. If a corresponding consent has been requested, the processing is carried out exclusively on the basis of data protection regulations; the consent can be revoked at any time.

<https://www.microsoft.com/en-us/trust-center/privacy>

### Data processing contract

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**Policy Privacy version: 24<sup>th</sup> October 2023**