

# Privacy policy

Version 11.2023

We appreciate your interest in our website. The protection of your privacy is very important to us. In this privacy policy, we are going to inform you about the processing of your personal data in detail.

## The data controller responsible for data processing is:

Marine Classified Media AG  
Langstrasse 134  
8004 Zurich  
Switzerland

### 1. Access data and hosting

You can visit our website without providing any personal information. Each time a web page is called, the web server merely automatically saves a so-called server log file, which contains, for example, the name of the requested file, your IP address, the date and time of the retrieval, the transferred data volume and the requesting provider (access data) and documents the retrieval. This access data is evaluated exclusively for the purpose of ensuring that the site operates smoothly and to help us improve our offer. This serves to safeguard our legitimate interests, which predominate within the scope of a balancing of interests, in a correct presentation of our offer in accordance with Art. 6 (1) (1) f GDPR. All access data will be deleted no later than seven days after the end of your page visit.

#### Hosting services by a third party

A third-party provider renders the services for hosting and displaying the website within the context of processing data on our behalf. This serves to safeguard our legitimate interests, which predominate within the scope of a balancing of interests, in a correct presentation of our offer in accordance with Art. 6 (1) (1) f GDPR. All data collected as part of the use of this website or in the forms provided in the online shop as described below will be processed on its servers. Processing on other servers only takes place in the framework explained here. This service provider is located in a country outside the European Union, for which the European Commission has decided to set an appropriate level of data protection.

### 2. Data collection and use when sending an enquiry from an interested party

Personal data is only collected if the information is being provided voluntarily in connection with an inquiry directed at the respective advertiser. We use your data in accordance with Art. 6 (1) (1) b GDPR exclusively in order to offer you the desired services; i.e., only the information and data that is absolutely necessary to forward your inquiry, including the data you have provided, to the advertiser or to process the contractual relationship is stored and processed. The data entered in the contact form will be stored in the customer account for a period of 12 months and then deleted. This serves to safeguard our legitimate interests pursuant to Art. 6 (1) (1) f GDPR, which predominate within the scope of a balancing of interests, to enable or facilitate subsequent communication on our platform.

We use a spam filter to guard against automatically generated spam inquiries. This analyzes submitted inquiries based on certain criteria in order to automatically prevent unwanted messages, such as advertising. The legal basis is Art. 6 (1) (1) f GDPR. No data will be transmitted to third parties for this purpose and only data submitted by the data subject will be processed. If you contact us without opening a customer account, your data will be deleted from our customer database if you so desire.

### 3. Data collection and use for the purpose of establishing contact and customer support

#### Hotline via Starbüro

As part of customer communication, we collect personal data to process your inquiries in accordance with Art. 6 (1) (1) b GDPR if you voluntarily provide us with this data when contacting us via our hotline service. Our service provider is based in Germany and works on our behalf.

#### Zendesk Helpdesk

To help you with individual topics on the website, we use the helpdesk solution from Zendesk, Inc, 1019 Market Street, San Francisco, CA 94103, USA ("Zendesk"). This serves to safeguard our legitimate interests in effective and improved customer communication in accordance with Art. 6 (1) (1) f GDPR, which predominate within the scope of a balancing of interests. For the United States, there is a decision by the European Commission on an adequate level of data protection as the basis for a third country transfer, provided that the respective service provider is certified. Certification is available. Our cooperation is also based on standard data protection clauses of the European Commission. Zendesk works on our behalf.

### 4. Data collection and use when submitting for contract processing at the opening of a customer account

We collect personal data if you voluntarily provide it to us as part of your order, if you contact us (e.g., via the contact form or by e-mail) or if you open a customer account. Mandatory fields are marked as such as, in these cases, we require the data for contract processing in accordance with Art. 6 (1) (1) b GDPR or for processing your contact or opening a customer account and you cannot complete the order and/or open the account or send the contact without providing it. The data collected is shown in the respective entry forms. We use the information you provided to process the contract and handle your inquiries. After settlement of the contract or deletion of your customer account, your data will be restricted for further processing and deleted after expiry of the retention periods under tax and commercial law unless you have expressly consented to further use of your data or we reserve the right to use data beyond the retention period, which is permitted by law and about which we inform you in this declaration.

The deletion of your customer account is possible at any time and can be done either by a message to the contact option listed below or via a designated function in the customer account.

#### User account

In addition, we reserve the right to temporarily make individual contact details of interested parties unrecognisable in the customer account if we have outstanding payment claims against the respect-

tive customer. This serves to safeguard our legitimate interests in the effective assertion or enforcement of our payment claim in accordance with Art. 6 (1) (1) f GDPR, which predominate within the scope of a balancing of interests.

## 5. USE OF DATA FOR THE PURPOSE OF ABUSE PREVENTION

We may also check, by means of a comparison, messages or information recorded during the use of our communication channels for any existing advertising content that violates our GTC or applicable laws, particularly if the respective message/information is directed at consumers. Such messages/information will not be forwarded to the recipient. Pursuant to Article 6 (1) (1) f GDPR, this serves the purpose of protecting our overriding legitimate interest in the prevention of misuse or unlawful use of our platform.

## 6. DATA TRANSFER

Depending on which payment service provider you select during the ordering process, we will pass on the payment data collected for this purpose to the credit institution commissioned with the payment and, if applicable, to the payment service provider commissioned by us or to the selected payment service in order to process payments. The legal basis is Art. 6 (1) (1) b GDPR. To some extent, the selected payment service providers also collect data by themselves as long as you open an account with them. In such a case, you have to log in to the payment service provider with your access data during the ordering process. In this respect, the privacy policy of the respective payment service provider applies.

We use payment service providers based in the United States. For the United States, there is a decision by the European Commission on an adequate level of data protection as the basis for a third country transfer, provided that the respective service provider is certified. Our cooperation is also based on standard data protection clauses of the European Commission. The transfer of personal data to this company only takes place within the scope of necessity for the fulfilment of the contract.

## 7. E-MAIL NEWSLETTER AND POSTAL ADVERTISING

E-mail advertising with registration for the newsletter: If you register for our newsletter, we use the data required for this or separately provided by you to regularly send you our e-mail newsletter based on your consent in accordance with Art. 6 (1) (1) a GDPR.

It is possible to unsubscribe from the newsletter at any time either by a message to the contact option listed below or via a dedicated link in the newsletter. After cancellation, we will delete your e-mail address unless you have expressly consented to further use of your data or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this declaration.

### E-mail advertising without registration for the newsletter and your right to object

If we receive your e-mail address in connection with the sale of a product or service and you have not objected to this, we reserve the right to send you regular offers for similar products, such as those already purchased from our product range by e-mail.

This serves to safeguard our legitimate interests, which predominate within the scope of a balancing of interests, in an advertising approach to our customers, Art. 6 (1) (1) f GDPR. You may object to the use of your e-mail address at any time by sending a message to the contact option described below or through a dedicated link in the e-mail, without incurring any costs other than the transmission costs according to the basic tariffs.

### Postal advertising and your right to object

In addition, we reserve the right to use your first and last name, as well as your postal address for our own advertising purposes, e.g., to send interesting offers and information about our products by

post. This serves to safeguard our legitimate interests, which predominate within the scope of a balancing of interests, in an advertising approach to our customers in accordance with Art. 6 (1) (1) f GDPR. You can object to the storage and use of your data for these purposes at any time by sending a message to the contact option described below.

The advertising mailings are provided as part of processing by a service provider on our behalf, whom we forward your data for this purpose.

## 8. INTEGRATION OF THE TRUSTED SHOPS TRUSTBADGE

The Trusted Shops Trustbadge is integrated into our online shop to display our Trusted Shops seal of approval and any collected reviews, as well as to offer Trusted Shops products to buyers after an order. This serves to safeguard our legitimate interests, which predominate within the scope of a balancing of interests, in optimum marketing by enabling secure purchasing in accordance with Art. 6 (1) (1) f GDPR.

When the Trustbadge is called, the web server automatically saves a so-called server log file, which also contains your IP address, the date and time of the call, the amount of data transferred and the requesting provider (access data) and documents the call. Individual access data is stored in a security database for analysing security anomalies. The log files are automatically deleted no later than 90 days after creation.

Further personal data will be transferred to Trusted Shops GmbH if you decide to use Trusted Shops products after completing an order or if you have already registered to use them. The contractual agreement concluded between you and Trusted Shops applies. For this purpose, personal data is automatically collected from the order data.

This is an offer from Trusted Shops GmbH, Subbelrather Str. 15C, 50823 Cologne, Germany. Information about their privacy policy: <https://www.trustedshops.de/>

## 9. COOKIES AND OTHER TECHNOLOGIES

### General information

In order to make visiting our website attractive and enable the use of certain functions, we use technologies including so-called cookies on various pages. Cookies are small text files that are automatically stored on your device. Some of the cookies we use are deleted after the end of the browser session, i.e., after closing your browser (so-called session cookies). Other cookies remain on your device and allow us to recognize your browser on your next visit (persistent cookies).

### Privacy protection for end devices

When using our online offer, we use absolutely necessary technologies in order to provide the expressly requested telemedia service. The storage of information in your end device or access to information that is already stored in your end device does not require consent in this respect.

For functions that are not absolutely necessary, the storage of information in your end device or access to information that is already stored in your end device requires your consent. We would like to point out that if you do not give your consent, parts of the website may not be fully usable. Any consent you have given will remain in place until you adjust or reset the respective settings in your end device.

### Any downstream data processing by cookies and other technologies

We use such technologies that are absolutely necessary for the use of certain functions of our website (e.g., shopping basket function). These technologies are used to collect and process the IP address, time of visit, device and browser information, as well as information about your use of our website (e.g., information about the contents

of the shopping basket). This serves to safeguard our legitimate interests, which predominate within the scope of a balancing of interests, in an optimised presentation of our offer in accordance with Art. 6 (1) (1) f GDPR.

We also use technologies to fulfil the legal obligations to which we are subject (e.g., to be able to prove consent to the processing of your personal data), as well as for web analysis and online marketing. Further information on this topic, including the respective legal basis for data processing, can be found in the following sections of this privacy policy.

You can find the cookie settings for your browser under the following links:

[Microsoft Edge™ / Safari™ / Chrome™ / Firefox™ / Opera™](#)

If you have consented to the use of the technologies in accordance with Art. 6 (1) (1) a GDPR, you can revoke your consent at any time by sending a message to the contact option described in the data protection declaration. Alternatively, you can also call the following link: o. If you do not accept cookies, the functionality of our website may be limited.

### **Cookiebot Consent Management Platform**

We use Cookiebot on our website to inform you about the cookies and other technologies we use on our website and to obtain, manage and document your consent to the processing of your personal data by these technologies, if required. This is necessary according Art. 6 (1) (1) c GDPR in order to fulfil our legal obligation pursuant to Art. 7 para. 1 GDPR and in order to prove your consent to the processing of your personal data to which we are subject. Cookiebot is a service provided by Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark, which processes your data on our behalf.

After you submit your cookie declaration on our website, Cookiebot's web server stores your anonymised IP address, the date and time of your declaration, browser information, the URL from which the declaration was sent, information about your consent behaviour and an anonymous random key. In addition, a cookie is used that contains information about your consent behaviour and the key. Your data will be deleted after twelve months unless you have expressly consented to further use of your data in accordance with Art. 6 (1) (1) a GDPR or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this declaration.

Our service providers are located and/or use servers in the following countries for which the European Commission has determined an adequate level of data protection by decision: United States.

There is a decision by the European Commission on an adequate level of data protection for the United States as a basis for a third country transfer, provided that the respective service provider is certified. Until certification by our service providers, data transmission will continue to be based on this basis: Standard data protection clauses of the European Commission.

## **10. USE OF COOKIES AND OTHER TECHNOLOGIES FOR WEB ANALYTICS AND ADVERTISING PURPOSES**

Insofar as you have given your consent in accordance with Art. 6 (1) (1) a GDPR, we use the following cookies and other third-party technologies on our website. The data collected in this context will be deleted after the end of the purpose and use of the respective technology by us. You can revoke your consent at any time with effect for the future. Further information on your cancellation options can be found in the section "Cookies and other technologies". Further information, including the basis of our cooperation with the individual providers, can be found under the individual technologies. If you have any questions about the providers and the basis of our cooperation with them, please use the contact option described in this privacy policy.

### **10.1 Use of Google services**

We use the following technologies from Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). The information automatically collected by Google technologies about your use of our website is usually transmitted to a server of Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, and stored there. Unless otherwise specified for the individual technologies, data processing is carried out on the basis of an agreement concluded for the respective technology between jointly responsible parties in accordance with Art. 26 GDPR. Further information about data processing by Google can be found in [Google's privacy policy](#).

For the United States, there is a decision by the European Commission on an adequate level of data protection as the basis for a third country transfer, provided that the respective service provider is certified. Our cooperation is also based on standard data protection clauses of the European Commission.

#### **Google Analytics**

For the purpose of website analysis, Google Analytics automatically collects and stores data (IP address, time of visit, device and browser information, as well as information on your use of our website), from which user profiles are created using pseudonyms. Cookies can be used for this purpose. If you visit our website from the EU, your IP address will be stored on a server located in the EU to derive location data and then immediately deleted before the traffic is forwarded to other Google servers for processing. Data processing is carried out on the basis of an agreement on order processing by Google.

#### **Google Ads**

For website analysis and event tracking, we use Google Ads "Conversion Tracking" to measure your subsequent usage behaviour if you have reached our website via a Google Ads advertisement. For this purpose, cookies may be used and data (IP address, time of visit, information about your use of our website and device and browser information based on events specified by us, such as visiting a website or subscribing to a newsletter) may be collected from which user profiles are created using pseudonyms.

#### **Google Tag Manager**

Google Tag Manager allows us to manage various codes and services on our website. When implementing the individual tags, Google may also process personal data (e.g., IP address, online identifiers (including cookies)). Data processing is carried out on the basis of an agreement on order processing by Google.

Various services/technologies can be integrated by using the Google Tag Manager.

If you do not wish to use individual tracking services and have therefore deactivated them, the deactivation remains in place for all affected tracking tags that are integrated by the Google Tag Manager.

#### **YouTube video plugin**

To integrate third-party content, data (IP address, time of visit, device and browser information) is collected via the YouTube video plugin in the extended data protection mode used by us, transmitted to Google and then processed by Google only when you play a video.

### **10.2. Other providers of web analytics and online Marketing services**

#### **Use of Hotjar for web analysis**

For the purpose of website analysis, technologies from [Hotjar](#) Ltd, Dragonara Business Centre 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta ("Hotjar") automatically collect and store data (IP address, time of visit, device and browser information, as well as information on your use of our website), from which user profiles are created using pseudonyms. Cookies can be used for this purpose. The pseudonymised user profiles are not merged with personal data about the bearer of the pseudonym without separate, express consent. Hotjar works on our behalf.

## Kameleoon

Kameleoon is a service for website optimisation and analysis. This helps us to compare the use of different design options for elements of our website in order to use these findings to optimise our online shop and increase visitor satisfaction. With your consent, information about your use of our online shop is transmitted to a Kameleoon server in Germany via browser cookies and stored there in a pseudonymised form for a maximum of one year. Your IP address is completely anonymised and not stored. This is an offer from Kameleoon GmbH, Beim Alten Ausbesserungswerk 4, 77654 Offenburg, Germany. You can find information on their data protection guidelines at [www.kameleoon.com](http://www.kameleoon.com)

## 11. SOCIAL MEDIA

### 11.1. narando

On our website, you have the option of playing audio files via the narando plug-in. narando is a service offering from narando GmbH, Rahdenstrasse 35, 49326 Melle, Germany. The respective file is transmitted directly via the narando server. To enable the service, an HTTP request is sent from your browser to the IP address of the narando servers. Your IP address is only used for data transmission and is not processed further. This act takes place on the basis of our predominant legitimate interest in providing you with the narando service, Art. 6 (1) f GDPR.

When the service is used, the number and duration of the respective audio sessions are also measured, from which we can obtain aggregated statistics. Individual usage data (e.g., "Play", "played completely", etc.) is transmitted to narando for this purpose. There is no personal reference in this context. Only if you are registered and logged in to narando will the provider create a corresponding user profile and use it to display recommendations. In this respect, please take the [privacy policy of narando](#) into account.

### 11.2. Social plugins from Facebook and Twitter

Social buttons from social networks are used on our website. These buttons are only integrated into the page as HTML links so that no connection to the servers of the respective provider is established when our website is accessed. If you click one of the buttons, the website of the respective social network will open in a new window of your browser. There you can, for example, press the Like or Share button.

### 11.3. Our online presence on Facebook

If you have given your consent to the respective social media provider in accordance with Art. 6 (1) (1) a GDPR, your data will be automatically collected and stored for market research and advertising purposes when you visit our online presences on the social media mentioned above, from which user profiles are created using pseudonyms. These pseudonyms can be used, for example, to place adverts inside and outside the platforms that presumably correspond to your interests. Cookies are generally used for this purpose. For detailed information on the processing and use of the data by the respective social media provider, as well as a contact option and your rights and setting options for protecting your privacy, please refer to the providers' data protection notices linked below. If you still need help in this regard, you can contact us.

Facebook is a service provided by Meta Platforms Ireland Ltd, 4 Grand Canal Square, Dublin 2, Ireland ("Facebook (by Meta)" or "Meta Platforms Ireland"). The information automatically collected by Meta Platforms Ireland about your use of our online presence on Facebook is usually transferred to a server of Facebook, Inc., 1601 Willow Road, Menlo Park, California 94025, USA, and stored there. There is a decision of the European Commission on an adequate level of data protection for the United States as a basis for a third country transfer, provided that the respective service provider is certified. Certification is available. Our cooperation is also based on standard data protection clauses of the European Commission. Data processing within the scope of a visit to a Facebook fan page is based on an agreement between jointly responsible parties in accordance with Art. 26 GDPR. Further information (information on Insights data) can be found [here](#).

## 12. SENDING ASSESSMENT REMINDERS BY E-MAIL

### Evaluation reminder by Trusted Shops

If you have given us your express consent in this regard during or after your order in accordance with Art. 6 (1) (1) a GDPR, we will send your e-mail address to Trusted Shops GmbH, Subbelrather Str. 15c, 50823 Cologne ([www.trustedshops.de](http://www.trustedshops.de)), so that they can send you a review reminder by e-mail. This consent can be revoked at any time by sending a message to the contact option described below or directly to Trusted Shops.

## 13. CONTACT OPTIONS AND YOUR RIGHTS

As the data subject, you have the following rights:

- in accordance with Art. 15 GDPR, the right to request information about your personal data processed by us to the extent specified therein;
- in accordance with Art. 16 GDPR, the right to demand the immediate correction of incorrect or incomplete personal data stored by us;
- in accordance with Art. 17 GDPR, the right to demand the deletion of your personal data stored by us, unless further processing is necessary
  - to exercise the right to freedom of expression and information;
  - to fulfil a legal obligation;
  - for reasons of public interest or
  - for the establishment, exercise or defence of legal claims;
- in accordance with Art. 18 GDPR, the right to demand the restriction of the processing of your personal data, insofar as
  - the accuracy of the data is disputed by you;
  - the processing is unlawful, but you oppose its erasure;
  - we no longer need the data, but you require it for the establishment, exercise or defence of legal claims, or
  - you have objected to the processing pursuant to Art. 21 GDPR;
- in accordance with Art. 20 GDPR, the right to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request that it be transferred to another controller;
- in accordance with Art. 77 GDPR, the right to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our company headquarters.

If you have any questions regarding the collection, processing, or use of your personal data or if you have any requests for information, correction, restriction or deletion of data, as well as the revocation of consent granted or objection to a specific use of data, please contact us directly via the contact details in our imprint.

**Right to object**

To the extent that we process personal data as explained above in order to safeguard our legitimate interests, which are predominant as part of a balancing of interests, you can object to this processing with effect for the future. If the processing is for the purpose of direct marketing, you can exercise this right at any time as described above. Insofar as the processing takes place for other purposes, you have a right to object only if there are reasons that arise from your particular situation.

After exercising your right to object, we will not continue to process your personal data for these purposes unless we can demonstrate compelling legitimate grounds for processing that outweigh your interests, rights and freedoms or if the processing serves the assertion, exercise or defence of legal claims.

This does not apply if the processing is for direct marketing purposes. In this case, we will not process your personal data for this purpose.