

General Data Protection Regulation

1. General Information

We take the protection of personal data very seriously. We treat personal data confidentially and in accordance with legal data protection regulations as well as this privacy policy. The legal basis for this can be found primarily in the General Data Protection Regulation (GDPR).

Personal data refers to information related to an identified or identifiable natural person (hereinafter referred to as "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, by means such as assignment to an online identifier. This includes information such as name, address, telephone number, and date of birth.

This privacy policy informs you, according to Articles 12 and subsequent of the GDPR, about the handling of your personal data when using our website and our services. It specifically explains which data we collect and for what purposes we use it. It also informs you about how and for what purposes this is done.

2. Responsible

The responsible party is the natural or legal person who alone or jointly with others decides on the purposes and means of processing personal data (e.g. names, e-mail addresses, etc.). The responsible party within the meaning of the GDPR and the applicable national data protection laws as well as other data protection regulations is

THE ANSWER Club s.r.o.
Kopcianska 14
85101 Bratislava
Slovakia

represented by its Managing Director/CEO Mrs Birgit Lang

E-mail: office@theanswerclub.com

Website:

(hereinafter: THE ANSWER CLUB)

Access data and hosting

For the purpose of the technical provision of the website, it is necessary for us to process certain information automatically transmitted by your browser so that our website can be displayed in your browser and you can use the website. This information is automatically collected each time you visit our website and automatically stored in so-called server log files. These are:

- Browser type and browser version
- Operating system used
- Website from which the access is made (referrer URL)
- Host name of the accessing computer
- Date and time of access
- IP address of the requesting computer

The storage of the aforementioned access data is necessary for technical reasons to provide a functional website and to ensure system security. This also applies to the storage of your IP address, which is necessary and can theoretically allow assignment to your person under further conditions. Beyond the aforementioned purposes, we use server log files exclusively for the needs-based design and optimization of our internet offer purely statistically and without any inference to your person. A merging of this data with other data sources is not carried out, nor is the data evaluated for marketing purposes.

The access data collected during the use of our website is only retained for the period required to achieve the aforementioned purposes. Your IP address is stored on our web server for a maximum of 7 days for IT security purposes.

Insofar as you visit our website to inform yourself about our products and services or to use them, the basis for the temporary storage and processing of access data is Art. 6 para. 1 s. 1 lit. b GDPR (legal basis), which permits the processing of data for the performance of a contract or pre-contractual measures. In addition, the temporary storage of technical access data is based on Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest here is to provide you with a technically functional and user-friendly website and to ensure the security of our systems.

Hosting Services by a Third Party

As part of processing on our behalf, a third-party provider provides services for hosting and displaying the webpage for us. This serves to protect our overriding legitimate interests in the correct presentation of our offer according to Art. 6 para. 1 s. 1 lit. f GDPR. All data collected in the course of using this website or in forms provided for in the online store as described below are processed on its servers. Processing on other servers takes place only in the framework explained here.

This service provider is located within a country of the European Union or the European Economic Area.

4. Data Processing for Contract Execution and When Opening a Customer Account

We collect personal data when you voluntarily provide it to us as part of your order, when contacting us (e.g., via contact form or email), or when opening a customer account. Fields marked as mandatory are required because we need the data to process the contract, or to handle your contact or open your customer account, and you would not be able to complete the order or open the account without providing it. The data collected can be seen from the respective input forms. We use the data provided by you in accordance with Art. 6 para. 1 s. 1 lit. b GDPR for contract execution and processing your inquiries. After complete processing of the contract or deletion of your customer account, your data will be restricted for further processing and deleted after the 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 this, 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 sending a message to the contact option described below or via a function provided in the customer account.

5. Data Transfer

For fulfillment of the contract according to Art. 6 para. 1 s. 1 lit. b GDPR, we pass on your data to the shipping company commissioned with the delivery, insofar as this is necessary for the delivery of ordered goods. Depending on which payment service provider you select during the ordering process, we pass on the payment data collected for this purpose to the credit institution commissioned with the payment and, if applicable, payment service providers commissioned by us or to the selected payment service. In part, the selected payment service providers also collect this data themselves, insofar as you create an account there. In this case, you must log in to the ordering process with your access data with the payment service provider. The privacy policy of the respective payment service provider applies in this respect.

Data Transfer to Shipping Providers

If you have given us your express consent during or after your order, we will pass on your telephone number to the selected shipping service provider based on this consent according to Art. 6 para. 1 s. 1 lit. a GDPR, so that they can contact you before delivery for the purpose of delivery notification or coordination.

The consent can be revoked at any time by sending a message to the contact option described below or directly to the shipping service provider at the contact address listed below. After revocation, we delete your data provided for this purpose, 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 statement.

6. Email Newsletter and Postal Advertising

Email Advertising with Subscription to the Newsletter

If you subscribe to our newsletter, we use the necessary or separately provided data by you to regularly send our email newsletter based on your consent according to Art. 6 para. 1 s. 1 lit. a GDPR.

You can unsubscribe from the newsletter at any time, either by sending a message to the contact option described below or via a link provided in the newsletter. After unsubscribing, we delete your email 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 statement.

Email Advertising without Signing up for the Newsletter and Your Right to Object

If we receive your email address in connection with the sale of a product or service and you have not objected, we reserve the right to regularly offer you products similar to those already purchased from our range by email on the basis of § 7 para. 3 UWG. This serves to safeguard our predominantly legitimate interests in a promotional approach to our customers within the framework of a balancing of interests. You can object to this use of your email address at any time by sending a message to the contact option described below or via a link provided in the promotional email, 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 and your postal address for our own advertising purposes, e.g., to send you offers and information about our products by mail. This serves to safeguard our predominantly legitimate interests in an advertising approach to our customers according to Art. 6 para. 1 s. 1 lit. f GDPR.

7. Cookies and Web Analysis

To make visiting our website attractive and to enable the use of certain functions, to display suitable products or for market research, we use so-called cookies on various pages. This serves to safeguard our predominantly legitimate interests in an optimized presentation of our offer according to Art. 6 para. 1 s. 1 lit. f GDPR. Cookies are small text files that are automatically stored on your end device. Some of the cookies we use are deleted after the end of the browser session, i.e., after you close your browser (so-called session cookies). Other cookies remain on your end device and enable us to recognize your browser on your next visit (persistent cookies). The duration of storage can be found in the overview of the cookie settings of your web browser. You can set your browser so that you are informed about the setting of cookies and decide individually on their acceptance or exclude the acceptance of cookies for specific cases or in general. Each browser differs in the way it manages cookie settings. This is described in the help menu of each browser, which explains how you can change your cookie settings. You can find these for the respective browsers under the following links:

- Internet Explorer™: <http://windows.microsoft.com/de-DE/windows-vista/Block-or-allow-cookies>
- Safari™: https://support.apple.com/kb/ph21411?locale=de_DE
- Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=de&hlrm=en&answer=95647>
- Firefox™: <https://support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>
- Opera™: <http://help.opera.com/Windows/10.20/de/cookies.html>

If you do not accept cookies, the functionality of our website may be limited.

Use of Google (Universal) Analytics for Web Analysis

Provided that you have given your consent according to Art. 6 para. 1 s. 1 lit. a GDPR (cookie consent functionality activated on our website from 25.05.2018), this website uses Google (Universal) Analytics for website analysis, a web analytics service provided by Google LLC (www.google.de). Google (Universal) Analytics uses methods that enable an analysis of your use of the website, such as cookies. The information automatically collected about your use of this website is usually transferred to a Google server in the USA and stored there. By activating IP anonymization on this website, the IP address is shortened before transmission within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there. The anonymized IP address transmitted by your browser as part of Google Analytics is generally not merged with other Google data. After the purpose and end of the use of Google Analytics by us, the data collected in this context will be deleted.

Google LLC is headquartered in the USA. To ensure compliance with the European data protection level also in the event of possible data transfers from the EU or the EEA to the USA and any further processing there, Google LLC relies on the so-called Standard Contractual Clauses of the European Commission, which we have contractually agreed with Google LLC.

You can revoke your consent at any time with effect for the future by downloading and installing the browser plugin available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>. This prevents the collection of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google.

Alternatively to the browser plugin, you can click this link to prevent Google Analytics from collecting data on this website in the future. An opt-out cookie will be placed on your device. If you delete your cookies, you will be asked to give your consent again.

Social Media

Facebook and Instagram

THE ANSWER CLUB uses the technical platform and services of "Facebook" and "Instagram" provided by Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin, Ireland ("Meta") for the information service offered here.

According to the opinion of the ECJ, there is a joint responsibility pursuant to Art. 26 GDPR between Meta and the operator of a Facebook fan page or Instagram page for the personal data processed via it. Meta and THE ANSWER CLUB have therefore concluded an agreement on joint responsibility, which you can access [here](#).

THE ANSWER CLUB provides you with the following information about data processing on our Facebook fan page or Instagram page:

(1) Responsible Persons

The processing of your personal data on the Facebook fan page or Instagram page of THE ANSWER CLUB is carried out in joint responsibility with:

Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin, Ireland

(2) Data Processing

When accessing a Facebook fan page or Instagram page, the IP address of your end device is transmitted to Meta. According to Meta, this IP address is

anonymized and deleted after 90 days, at least insofar as it is a German IP address. In addition, Meta stores further information about the end devices of its users, e.g., the used internet browser. Consequently, Meta may be able to assign IP addresses to individual users. If you are logged in to your Facebook account or Instagram account during a page visit, there is a cookie with your identifier on your device. Based on this cookie, Meta can trace that you have visited our Facebook fan page or Instagram page and how you have used it. Meta uses this information to present you with content or advertising tailored to you.

If you do not want this, you should log out of your Facebook account or Instagram account or disable the "stay logged in" function. We also recommend deleting cookies present on your device and restarting your browser. This process deletes information that Meta can use to link to you.

However, if you want to use the interactive functions of our Facebook fan page or Instagram page, you would need to log in again with your login details on Facebook or Instagram. This will again enable Meta to link to you.

The way Meta uses the data from the visit to our Facebook fan page or Instagram page for its own purposes, the extent to which activities on the page are assigned to individual users, how long Meta stores this data, and whether data from a visit to the Facebook fan page or Instagram page is passed on to third parties, is not definitively and clearly stated by Meta and is not known to us. As a user of our Facebook fan page or Instagram page, we can only refer you to Meta's statements on data protection.

The data collected in this context are processed by Meta and may be transferred to countries outside the European Union.

What information Meta receives and how it is used is described by Meta in general terms in its data usage guidelines. There you will also find information about contact options to Meta and settings options for advertisements.

The complete data policies of Meta can be found here:

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

<https://www.instagram.com/legal/privacy/>

Opt-out options can be set here:

<https://www.facebook.com/settings?tab=ads> and here

<http://www.youronlinechoices.com>

The transfer and further processing of users' personal data to third countries, such as the USA, and the associated possible risks for you as a user cannot be assessed by us as the operator of the Facebook fan page or Instagram page.

(3) Insight Function

Meta also provides a range of statistical data for THE ANSWER CLUB as the site operator within the framework of the so-called "Insights" function. These statistics are generated and provided by Meta. We, as the operator of the Facebook fan page or Instagram page, have no influence on the generation and cannot prevent this function. Within the "Insights" function, the following information is displayed to us for the categories "Fans", "Subscribers", "Reached People", and "Interacting People" for a selectable period:

Page activities such as page views, page previews, actions on the page; reach activities such as "likes", reached people and recommendations, post activities such as post interactions, video views, comments, shared content.

In addition, we are provided with statistical information about the Facebook groups that are linked to our fan page. According to the Facebook terms of use, which every user has agreed to as part of creating a Facebook profile, we can also identify the subscribers and fans of the page and view their profiles and other shared information from them.

Meta provides more information on this at the following link:

<https://www.facebook.com/help/pages/insights>

THE ANSWER CLUB uses these data available in aggregated form to make posts and activities on the fan page more attractive for users, such as for the content and timing planning of posts. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR, namely our legitimate interest in optimizing our offer.

(4) Duration of Storage

We store the information transmitted by Meta for as long as your interest in deletion or anonymization does not prevail.

If you no longer wish the data processing described here in the future, please disconnect your user profile from our fan page by using the functions "I no longer like this page" and/or "Unsubscribe from this page".

(5) Your Rights as Data Subject

We recommend that you direct requests for information or other questions regarding your rights listed at the end of this privacy statement directly to Meta, as only Meta has full access to user data. If you still direct your request to us, it will, of course, be processed and additionally forwarded to Meta.

Integration of YouTube Videos

We use the provider YouTube for the integration of videos. YouTube is operated by YouTube LLC with headquarters at 901 Cherry Avenue, San Bruno, CA 94066, USA. YouTube is represented by Google Inc. located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

When you access a page of our website that has such a plugin, a connection to the YouTube servers is established and the plugin is displayed. This sends to the YouTube server which of our web pages you have visited. If you are logged in as a member of YouTube, YouTube assigns this information to your personal user account. When using the plugin, such as clicking the start button of a video, this information is also assigned to your user account. You can prevent this association by logging out of your YouTube user account and other user accounts of the companies YouTube LLC and Google Inc. before using our website and deleting the corresponding cookies of the companies. Additionally, you have the option to disable cookies from third parties through the cookie banner integrated on our website. However, you will then not be able to access the corresponding content via our website.

Purpose and scope of data collection and further processing and use of data by YouTube, as well as your related rights and setting options for protecting your privacy, can be found in YouTube's privacy policy: <https://policies.google.com/privacy?hl=en&gl=de>.

9. **Duration of Data Storage**

We initially process and store your personal data for the duration for which the respective purpose of use requires corresponding storage (see above for the individual processing purposes). This may also include the periods for the initiation of a contract (pre-contractual legal relationship) and the fulfilment of a contract. On this basis, personal data is regularly deleted as part of the fulfilment of our contractual and/or legal obligations, unless its temporary further processing is necessary for the following purposes:

- Fulfilment of statutory retention obligations
- Preservation of evidence in compliance with the statute of limitations

10. **Contact**

If you contact us via a contact option specified within this privacy policy or in the imprint, or via our contact form, your details and the contact data provided by you (e.g., name, email address) will be stored by us for the purpose of processing the request and in case of follow-up questions. We do not pass on this data to third parties.

We delete your request(s) and your contact data if your request has been finally answered. Your data is generally stored for 6 months and deleted after this period expires unless you send us follow-up inquiries or we need to further process the data for other purposes.

This data processing is based on Art. 6 para. 1 s. 1 lit. a GDPR in conjunction with the consent you have given.

11. Data Security

Personal data is protected by us using appropriate technical and organizational measures to ensure an appropriate level of protection and to safeguard the personal rights of the data subjects. The measures taken serve, among other things, to prevent unauthorized access to the technical equipment used by us and to protect personal data from unauthorized knowledge by third parties. In particular, this website uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content, such as your contact requests, which you send to us as the site operator. 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. However, we would like to point out that data transmission over the Internet (e.g., when communicating by email) can have security gaps. Complete protection of data from access by third parties is not possible in this regard.

12. Contact Options and Your Rights

As a data subject, you have the following rights:

- In accordance with Art. 15 GDPR, you have 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 request the erasure of your personal data stored by us, unless further processing is necessary – for exercising the right of freedom of expression and information; – for compliance with 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 if - the accuracy of the data is disputed by you; - the processing is unlawful, but you refuse to delete it; - we no longer need the data, but you need it for the assertion, exercise or defence of legal claims or - you have lodged an objection to the processing in accordance with Art. 21 GDPR;
- You are entitled to object to the processing of your personal data under the conditions of Art. 21 GDPR, so that we must stop processing your personal data. The right to object exists only within the limits provided for in Art. 21 GDPR. In addition, our interests may conflict with the termination of processing, so that we are authorised to process your personal data despite your objection. We will consider an objection to any direct marketing measures immediately and without weighing up the existing interests again.

Information about Your Right to Object according to Art. 21 GDPR

You have the right, at any time, to object to the processing of your data, which is based on Art. 6 para. 1 s. 1 lit. f GDPR (data processing on the basis of a balance of interests) or Art. 6 para. 1 s. 1 lit. e GDPR (data processing in the public interest), if there are reasons for this arising from your particular situation.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing serves to assert, exercise or defend legal claims.

The objection can be made informally and should preferably be addressed to:

THE ANSWER Club s.r.o., Kopcianska 14, 85101 Bratislava, Slovakia

E-Mail: office@theanswerclub.com

- 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. In particular, you can lodge a complaint with a supervisory authority.

A list of German data protection supervisory authorities and their contact details can be found at the following link:

https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

If you have questions about the collection, processing, or use of your personal data, for information, correction, blocking, or deletion of data, as well as the revocation of consent granted or objection to a particular use of data, please contact our company data protection officer.

13. Obligation to Provide Data

Generally, you are not obligated to provide us with your personal data. However, if you do not, we will not be able to provide our website to you without restriction or respond to your inquiries to us. Personal data that we do not necessarily require for the above-mentioned processing purposes is accordingly marked as voluntary information.

Date of the Privacy Policy: 16.03.2024