

# Occhio GmbH

## Data Privacy Policy

(Stand: 13.06.2018)

### 1. General information about the collection of personal data

Occhio GmbH (hereinafter "Occhio") takes the protection of your personal data extremely seriously. This Data Privacy Policy describes how Occhio (also referred to in the following by the words „we“, „us“ and „our“) uses and protects the data collected at [www.occhio.de/](http://www.occhio.de/) („Occhio website“).

Personal data are all data which refer to you personally, including for example your form of address, name, address, e-mail address, IP address, etc. We only collect and process your personal data in compliance with the provisions of the EU General Data Protection Regulation („GDPR“) and other provisions of European and applicable national data protection law.

Personal data are only collected and used on a regular basis with your consent or if the processing of such data is permitted by law. The following provisions provide information about the type, scope and purpose of the collection and processing of your personal data. In the event that we make use of the services of commissioned service providers (third parties) for the purpose of providing specific functions for our offer or of our services or if we use your data for advertising or analysis purposes, we will also inform you in detail in the following about the data processing. We also provide information about the stipulated criteria for and the period of storage. We also inform you about your rights with regard to each data processing activity.

This Data Privacy Policy relates exclusively to our Occhio website. If links on our website take you to third-party websites, please find out how your data are used at such websites.

### 2. Contact data

#### 2.1. Name and address of person responsible for data processing

Occhio („controller“) is responsible for data protection within the meaning of the GDPR and under all other applicable EU data protection law. If you have any questions, suggestions or criticisms relating to data protection and our website, please contact:

Occhio GmbH  
Wiener Platz 7  
81667 Munich  
Germany

E-Mail: [info@occhio.de](mailto:info@occhio.de)

#### 2.2. Name and address of the data protection officer

Any data subject (anyone affected of data processing activities) can contact our data protection officer directly with questions and suggestions at any time. Our Data Protection Officer can be contacted as follows:

Occhio GmbH  
Data Protection Officer  
Wiener Platz 7  
81667 Munich  
Germany

E-Mail: [dsgvo@occhio.de](mailto:dsgvo@occhio.de)

### 3. Notes on legitimacy and period of storage

#### 3.1. 3.1. Legitimacy of the processing of personal data

Our processing of your personal data is legitimate if you have given your consent as stipulated in Article 6 (1) sentence 1 a) GDPR.

Under Article 6 (1) sentence 1 b) GDPR, the processing of your personal data is legitimate if such processing is necessary for the performance of a contract with you or your company. This also applies to all processing operations which are relevant prior to entering into a contract.

Under Article 6 (1) sentence 1 c) GDPR, the processing of your personal data is legitimate if such processing is necessary for compliance with one of our legal obligations.

Under Article 6 (1) sentence 1 d) GDPR, the processing of your personal data is legitimate if such processing is necessary in order to protect your vital interests or those of another natural person.

Under Article 6 (1) sentence 1 f) GDPR, the processing of your personal data is legitimate if such processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms.

#### 3.2. Period of storage and erasure of data

Any personal data which we collect, process and store will only ever be kept by us for as long as there is a specific purpose for such storage. Your data will be erased or made unavailable as soon as the specific purpose for which they were stored no longer applies. It is possible, however, that European regulations, applicable national laws or other rules may require us to store data which we have processed for a longer period of time. We will erase or restrict the processing of your data when these statutory data retention periods have expired.

### 4. Your rights

For the purposes of the GDPR you are the data subject of any of your personal data which we process. As a data subject you have the following rights with regard to Occhio:

#### 4.1. Right to request access to processing information

You have the legal right to request information at any time about whether we are processing your personal data. If this is the case, you have the right to be informed about the extent to which your personal data is being processed.

#### 4.2. Right to rectification

You have the right to obtain from Occhio the rectification of inaccurate personal data concerning you and/or to have incomplete personal data completed.

#### 4.3. Right to restriction of processing

In certain circumstances you have the right to have the processing of your personal data restricted.

#### 4.4. Right to erasure

You have the right in certain circumstances to obtain from Occhio the erasure of personal data concerning you without undue delay. The right to erasure does not apply to the extent that processing is necessary.

#### 4.5. Right to be informed

If you have asserted your right to rectification, erasure or restriction to Occhio, Occhio must communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

#### 4.6. Right to data portability

You have the right to receive any personal data concerning you which you have provided to Occhio in a structured, commonly used and machine-readable format. In certain circumstances you also have the right to transmit those data to another company without hindrance from Occhio to which the personal data have been provided.

#### 4.7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you based on Article 6(1) sentence 1 f) GDPR. Occhio may then no longer process the personal data relating to you unless Occhio demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If the personal data relating to you are processed for the purposes of engaging in direct advertising, you have the right to object at any time to the processing of your personal data for such advertising purposes. You can inform us of such objection by contacting us as follows:

Occhio GmbH  
Wiener Platz 7  
81667 Munich  
Germany  
E-Mail: [dsgvo@occhio.de](mailto:dsgvo@occhio.de)

#### 4.8. Right to withdraw the data protection declaration of consent

If you have given you consent you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the legitimization of processing based on consent before its withdrawal. The data subject shall have the right to withdraw his or her consent at any time.

#### 4.9. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

#### 5. Visits to our website and creation of log files

Our system automatically retrieves data and information from your computer system each time you visit our Occhio website. The following data in particular are collected then:

- Information about the type of browser you are using
- Information about your operating system
- Information about your internet service provider
- Your IP address
- Date and time of your visit to our website
- Information about the website from which your system has reached our website
- Information about the website which you access from our website

The data which we collect on you are stored in our system's log files. As a rule, these data are not stored with other personal data. One exception to this rule is the information collected by us about your browser settings. We use the geoinformation to display an appropriate country website (e.g. for France [Occhio.de/fr](http://Occhio.de/fr)).

The temporary storage of data and log files is legitimate under Article 6 (1) sentence 1 f) GDPR. We have a legitimate interest in collecting and temporarily storing the data referred to as these data must be stored temporarily by the system in order to provide the website to your computer.

Data are stored in log files to ensure the functioning of the website. This information is also used to optimise our website and to guaran-

tee the security of our information technology systems. Your log files are not assessed for marketing purposes in this connection.

The data will be erased or altered in a way that prevents them being assigned to you as soon as they cease to be necessary for the purposes referred to here. Data which are stored in log files are erased after seven days.

#### 6. Orders for purchases placed on the Occhio website - Guest orders

You need to enter certain data if you wish to place guest orders for Occhio products on the Occhio website. These data include the following:

- Your form of address
- Your name
- Your date of birth
- Your company
- Your address or the address of your company
- Your country of origin or that of your company
- Your e-mail address
- Your telephone number
- Your payment details

We use, store and process these data in this step to enable you to order our Occhio products on our Occhio website. Processing of these data is necessary in order to establish, define the contents of or amend the contractual relationship between you and Occhio as well as for claiming and settling the relevant services.

Such processing of data by Occhio is legitimate under Article 6 (1) sentence 1 b) and f) GDPR. We erase your data if they are no longer needed for the purpose, i.e. performance of the contract, and if they are no longer subject to contractual or legal retention periods.

#### 7. Login for customers of the user databases

If you register as a user with Occhio, the following data are placed in your user account:

- Your form of address
- Your name
- Your date of birth
- Your company
- Your address or the address of your company
- Your country of origin or that of your company
- Your e-mail address
- Your telephone number
- Your payment details

We use, store and process these data in this step to enable you to order our Occhio products on our Occhio website. Processing of these data is necessary in order to establish, define the contents of or amend the contractual relationship between you and Occhio as well as for claiming and settling the relevant services.

Such processing of data by Occhio is legitimate under Article 6 (1) sentence 1 b) and f) GDPR.

On request, we erase your data if they are no longer needed for the purpose, i.e. performance of the contract, and if they are no longer subject to contractual or legal retention periods.

#### 8. Contact form

You can make contact with Occhio by electronic means using the contact form on our website. If you wish to contact us in this way, the data which you enter will be sent to us and stored. This applies to the following data in particular:

- Your form of address
- Your name
- Your company
- Your address or the address of your company
- Your country of origin or that of your company
- Your e-mail address
- Your telephone number
- Your website or the website of your company
- Your customer identity
- Your language
- Where you found out about us

–Your query and any personal data you may have entered  
In this step we ask for your consent to receiving information material about new Occhio products or whether you wish to receive an Occhio newsletter. More about data processing in connection with the order of the Occhio newsletter, including in particular the double opt-in procedure, is available in section 9.

The processing of these data is legitimate under Article 6 (1) sentence 1 a), b) or f) GDPR. We only process any personal data which you enter in our contact form for the purposes referred to above or to deal with your request, which is in our interest. This may, for example, involve the initiation of a contract. The data are erased as soon as they are no longer required for the purpose for which they have been collected, provided that they are not subject to any legal archiving obligations. The conversation has come to an end when it is apparent from the circumstances that the matter being discussed has been finally clarified.

If we have obtained your consent and your data are processed by us for marketing purposes, the following applies: You can withdraw your consent to Occhio for the processing or any other use of your personal data at any time with effect for the future. In this case, all personal data which are stored when contact is made are then erased if they are not required to be retained by law and if there are no other legal grounds for processing the data.

The following data are also stored at the time you send your message:

- Your IP address
- The date and time at which you have made contact

These personal data processed during the transmission operation are used to prevent the contact form from being misused and to ensure the security of our information technology systems. Other personal data collected during transmission will be erased after a period of seven days at the latest. The data are used exclusively to process the conversation. The processing of this data is legitimate under Article 6 (1) sentence 1 b) or f) GDPR.

## 9. Newsletter

### 9.1 Sending of Newsletter

On the Occhio website you have the opportunity to subscribe to a free newsletter. With your consent we can send you information about Occhio's latest light solutions and systems as well as related news from our dealers and Occhio Stores. A link to all the partners relevant in this connection is available here: <https://www.occhio.de/de/company/store-locator>

The data which you enter when subscribing for the newsletter are transmitted to us. These data are usually:

- Your e-mail address
- Your name
- Your company
- Your address or the address of your company
- Your country of origin
- Your telephone number
- Your e-mail address
- Your industry
- Your nationality

Information about your interest in Occhio

- Your customer status

We need your e-mail address to be able to send you the newsletter and to identify and check that you have given your consent. Any other information you provide is given voluntarily.

You can cancel the newsletter subscription at any time by withdrawing your consent with effect for the future. There is a link in every newsletter sent to you which you can click to automatically unsubscribe. Alternatively, you can send an e-mail to [info@occhio.de](mailto:info@occhio.de) or a message to the controller referred to above in this Data Privacy Policy.

We use the double opt-in procedure to subscribe to our newsletter. This means that, after you have subscribed, we will send an e-mail to the e-mail address given by you asking you to confirm that you wish to receive the newsletter. If you do not confirm your subscription with-

in 48 hours, your information will be made unavailable and automatically erased after one month. We also store your IP addresses and the time of your subscription and confirmation. The purpose of this procedure is to demonstrate that you have subscribed and to clarify any possible misuse of your personal data.

After receiving your confirmation, we store your data for the purpose of sending the newsletter. This processing is legitimate under Article 6 (1) sentence 1 a) GDPR, since you have consented to receiving the newsletter. We erase your data as soon as you or we have ended the subscription for the newsletter. The subscription process is logged on the basis of our legitimate interests in accordance with Article 6 (1) sentence 1 f) GDPR. Our interests here are to have a user-friendly, secure newsletter system which promotes our business interests, meets users' expectations, and also allows us to document declarations of consent.

### 9.2. Transmission of data to third parties

Our newsletter is sent by e-mail marketing provider CleverReach operated by CleverReach GmbH & Co. KG, Mühlenstr. 43, 26180 Rastede, Germany („CleverReach“). We use the order processing services of CleverReach.

The services provided by the Germany-based company CleverReach are subject to the GDPR and the stringent terms of the order processing agreement made with it. Your data are only sent to third parties by CleverReach in compliance with the legal requirements of the GDPR.

Under Article 6 (1) sentence 1 f) GDPR, we are permitted by law to pass on your data (name and e-mail address) to CleverReach as CleverReach sends the newsletter in its function as our service provider. CleverReach will erase your data as soon as we ask CleverReach to erase or return your data, e.g. as soon as you withdraw your consent to us. This is agreed as part of the order processing agreement.

CleverReach's privacy policy is available here:

<https://www.cleverreach.com/en/privacy-policy/>

## 10. Advertising by post

If you consent to receipt of the newsletter, in some circumstances we may also send Occhio advertising to the postal address you have given to us. With your agreement we will inform you about Occhio new developments as well as other news concerning our trading partners and our Occhio Stores. A link to all the partners relevant in this connection is available here: <https://www.occhio.de/de/company/store-locator>. The data which you enter when subscribing for the newsletter are transmitted to us. These data are usually:

- Your e-mail address
- Your name
- Your company
- Your address or the address of your company
- Your country of origin or that of your company
- Your telephone number
- Your e-mail address
- Your industry
- Your nationality
- Information about your interest in Occhio
- Your customer status

We require your name, your company and your address in order to send you advertising by post and to identify and check your consent. Any other information you provide is given voluntarily.

The processing of your data is legitimate under Article 6 (1) sentence 1 a) GDPR as you have consented to receiving post. You may withdraw your consent from Occhio with effect for the future at any time. We erase your data as soon as you or we have ended the subscription for advertising by post.

## 11. To what extent does Occhio perform website analyses?

### 11.1. Use of cookies

Whenever you use our Occhio website different types of cookies are used and stored on your computer in addition to the data referred to above. Cookies are small text files which are stored on your computer or mobile devices whenever you visit our Occhio website. These

cookies send us various types of information.

We use the following types of cookie:

- Cookies are sometimes necessary for the proper functioning of our website. By setting cookies we can determine, for example, that you have visited our website.
- Cookies enable us to provide you user-friendly services which it would simply be impossible to offer without setting cookies.
- Cookies allow the information and offers on our website to be optimised to meet the needs of the user. As already stated, cookies allow us to recognise you when you return to our website. This in turn enables us to make it easier for you to use our website.
- Cookies can also be used to analyse the way the website is used. It is then possible, for example, to determine how many users visit the website and what parts of the website could be improved. However, analyses of this kind do not establish any kind of connection between you and the statistics compiled on the basis of the data which is collected. We will inform you if cookies are used to analyse websites. We use the data collected by cookies for as long as required for the purpose for which they have been collected.

Cookies will be stored on your computer. You can decide whether you want to erase the cookies from your computer at any time. You can change the settings in your browser to determine yourself whether the transmission of cookies from your computer to us should be disabled, restricted or whether the cookies should be completely erased. If you disable all the cookies from our website, you may no longer be able to use all the website functions in full. The following list provides further information about disabling or managing your cookie settings in the browser which you are using:

- Safari: [help.apple.com/safari/](http://help.apple.com/safari/)
- Google Chrome: [support.google.com/chrome/](http://support.google.com/chrome/)
- Internet Explorer / Edge: [windows.microsoft.com/](http://windows.microsoft.com/)
- Firefox: [support.mozilla.org/](http://support.mozilla.org/)

You will find a list of the cookies we actually use here:

Cookie	Function	Storage time of cookies
REGION_CODE	z stores the region and language selected by the user	unlimited
COOKIECONSENT	z stores the setting for whether the user has agreed to the use of cookies or not.	unlimited
COUNTRY_CODE	Speic Stores 2-digit ISO code of the selected country	unlimited
LANGUAGE_CODE	Stores two-digit language code	unlimited
PARTNER_ID	Stores affiliate code from Occhio partners	unlimited
CUSTOMER_UUID	User ID for shopping cart	unlimited

## 11.2. Google Analytics

Our Occhio website uses Google Analytics, a web analytics service of Google. Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics uses „Cookies“. These are text files which are stored on your computer to analyse the way you use the Occhio website. The information about the way you use our Occhio website created by the cookie is usually sent to and stored on a Google server in the USA. IP address anonymisation is performed on the Occhio website so that your IP address is truncated beforehand by Google within Member States of the European Union or in other countries which are parties to the European Economic Area Agreement (“EEA”). Only in exceptional cases the full IP address is sent to and only then truncated on a Google server in the USA. Google uses this information on behalf of the operator of our Occhio website to evaluate the way you use the Occhio website, to collate reports on user activities on the Occhio website and to provide Occhio other services related to the Occhio website and Internet use. The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google.

In exceptional cases personal data are sent to the USA. Therefore, Google is subject to the EU-US Privacy Shield <https://www.privacyshield.gov/EU-US-Framework>

The use of Google Analytics is legitimate under Article 6 (1) sentence 1 a) GDPR where your consent is obtained in advance and by Article 6 (1) sentence 1 f) GDPR, as Occhio has a legitimate interest in processing data in this case. We use Google Analytics to analyse the use which is made of our Occhio website and to improve it on a regular basis.

You can change your browser settings to prevent cookies from being stored; however, you should realise that, in these circumstances, you may find that you are unable to make full use of functions on the Occhio website. You can also prevent the data (including your IP address) relating to your use of the Occhio website which is captured by the cookie being sent to or processed by Google by downloading and installing the browser plug-in from the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

You can prevent cookies being set by using an opt-out cookie. Click here if you wish to prevent cookies being set the next time you visit this Occhio website: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>

We will only process your data for as long as is necessary to fulfil the purpose for which they have been collected (in this case for creating and evaluating statistics). The data that we send and that are linked with cookies, user identifiers (e.g. a user ID) or advertising IDs are therefore automatically erased after 14 months. Data whose retention period has ended are erased automatically once a month. You can find more information on the usage conditions and data protection at: <https://www.google.de/analytics/terms/gb.html>.

## 11.3. Mouseflow

The Occhio website uses the analysis tool Mouseflow, a tool for the statistical evaluation of website visits which is operated by Mouseflow ApS, Flaeskatorvet 68, 1711 Copenhagen, Denmark. Mouseflow offers various heat maps which cover clicks, mouse movements, scroll depth, attention and geolocation. This makes it simple to follow users' activities, to analyse their behaviour and to use anonymised data to optimise the Occhio website. Mouseflow captures randomly selected single visits (with anonymised IP address only). This creates a log of mouse movements, mouse clicks and keyboard interactions, with the aim of reproducing sample individual visits to the Occhio website in the form of „session replays“ and of evaluating these as heat maps to create potential improvements to the Occhio website. The data captured by Mouseflow are not released to third parties. These data are stored and processed within the EEA. If you do not wish your activities to be recorded by Mouseflow, you can object on all websites which use Mouseflow at the following link: <https://mouseflow.com/opt-out/>

The use of Mouseflow is legitimate under Article 6 (1) sentence 1 a) GDPR where consent is obtained in advance and under Article 6 (1) sentence 1 f) GDPR as we have a legitimate interest in using such data in order to perform ongoing analyses and optimisation of our Occhio website and thereby of making the most efficient economic use of it as possible.

Your data are erased as soon as they are no longer needed for your purposes and if they are not subject to contractual or legal retention periods.

More information about data protection at Mouseflow is available in the Mouseflow data privacy policy: <https://mouseflow.com/privacy/>

## 12. Social Media Plugins

### 12.1. General information

We currently use the following social media plug-ins: Facebook and YouTube. Among other things, the plugins enable you to share content directly from our Occhio website in your social media profile. If you decide to share content in your social media profile, we will receive access to certain publicly available information in your social media profile (e.g. name, e-mail address, photographs, gender, date of birth, posts or „likes“).

If you publish data via social media sites, plug-ins or other applications when you interact with our Occhio website, these may be made public on the Internet in accordance with your data privacy settings. You can control which data you wish to release by altering the data privacy settings which are available on most social media platforms.



More information about how you can change your data privacy settings and how external social media sites handle your personal identifiable data is provided in the help texts on data privacy, the privacy policies and terms of service.

We process your data so that you can share our contents in social networks if you wish.

The processing of data with your consent via social media plug-ins is legitimate under Article 6 (1) sentence 1 a) GDPR. You may withdraw your consent at any time with effect for the future. In this case, data are also processed to enhance publicity for the Occhio website, which also constitutes an overriding interest, and such processing is thus legitimate under Article 6 (1) sentence 1 f) GDPR.

We erase your data as soon as they are no longer required for the stated purpose.

## 12.2. Facebook

We use the Facebook „share button“ („Facebook“). This plug-in is operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. The button is recognisable by the Facebook logo.

As soon as a user presses the „share button“ a connection is created between your web browser and Facebook's servers. Facebook receives and stores data (including the IP address). This enables Facebook to recognise the Occhio website subpage you have accessed. The corresponding information is then sent to Facebook in the USA where it is stored. If you are logged into Facebook at the same time, the transmitted data may be assigned to your Facebook account. Facebook may share information internally within its company group or with third parties. Information which is collected in the EEA may be transmitted to countries outside the EEA for the purposes described in this policy. Facebook states that it uses standard contractual clauses which have been approved by the European Commission, takes other measures in compliance with EU law and obtains your agreement to legitimate the transmission of data from the EEA to the USA and other countries.

An overview of all Facebook plug-ins is available at: <https://developers.facebook.com/docs/plugins>

The type, scope, purposes and processing of the data by Facebook and the rights and settings options for the protection of the user's privacy are detailed in Facebook's data privacy statement (<https://www.facebook.com/about/privacy>).

## 12.3. YouTube

We use integrated contents (videos) on our Occhio website provided by YouTube LLC, („YouTube“) 901 Cherry Ave., 94066 San Bruno, CA, USA, a company of Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA. When you visit our Occhio website that contains such content, a connection is made to YouTube's web servers which then instructs your browser to display the plugin on that web page. In this way information about which of our web pages you have visited is passed on to the YouTube server. If you are also logged in as a YouTube member, YouTube will associate this information with your personal YouTube account. You can prevent this association being made by logging out of your YouTube account before visiting our Occhio website.

You can opt out here: <https://adssettings.google.com/authenticated>  
YouTube also processes your personal data in the USA and is subject to the EU-US Privacy Shield for this purpose: <https://www.privacyshield.gov/EU-US-Framework>.

The use of YouTube is legitimate under Article 6 (1) sentence 1 f) GDPR as processing is necessary for the purposes of the legitimate interests pursued by Occhio. We use YouTube to be able to show you video contents. We will only process your data for as long as is necessary to fulfil the purpose for which they have been collected. YouTube's data privacy policy is available at <https://policies.google.com/privacy?hl=en>

## 13. Use of Google Maps

The Occhio website uses Google Maps API, a map service from Google Inc., („Google“). Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. This enables us to display interactive maps directly on the Occhio website

and makes it easy for you to use the map functions.

When you visit the Occhio website Google receives the information that you have accessed the corresponding subpage of our website. The following data are also sent to Google:

- Your IP address
- The date and time of your enquiry
- The difference in time between your time zone and Greenwich Mean Time (GMT)
- The content of the request (specific page)
- Access status/HTTP status code
- The amount of data transmitted
- Website from which the request originates
- The type of browser you are using
- The operating system you are using and its user interface
- The language and version of your browser software

This is done regardless of whether you have a Google user account to log in with or whether you don't have a user account. If you have logged in through Google, your data are assigned directly to your account. If you do not wish Google to identify you with your profile you must log out before activating the button. Google stores your data as user profiles and uses them for advertising, market research and/or web design purposes. Any such use is made in particular (including for users who are not logged in) to provide tailored advertising and to inform other users of the social network about your activities on our Occhio website. You are entitled to object to the creation of this user profile: this right must be asserted against Google directly.

It is simple to disable the Google maps service and this then prevents data being transferred to Google: Simply disable JavaScript in your browser. However, we do point out that you will then no longer be able to use the map display function.

Google also processes your personal data in the USA and is subject to the EU-US Privacy Shield for this purpose: <https://www.privacyshield.gov/EU-US-Framework>.

The use of Google Maps API is legitimate under Article 6 (1) sentence 1 f) GDPR as processing is necessary for the purposes of the legitimate interests pursued by Occhio. We use Google Maps API to be able to offer you a map function. We will only process your data for as long as is necessary to fulfil the purpose for which they have been collected.

More information about the purpose and scope of data collection and the processing of such data by Google is provided in Google's privacy policy. This policy also provides more information about your rights and the settings which enable you to protect your privacy: <https://policies.google.com/privacy?hl=en>.

## 14. Disclosure of data to third parties

### 14.1. Principles

Essentially, we will pass on your personal data to service providers, business partners, affiliated companies and other third parties only within the framework of the applicable data protection legislation. We may disclose personal data to service providers working on our behalf and require them to perform services in our name (order processing). These service providers may be affiliated undertakings of Occhio or external service providers. In this context we comply with stringent national and European data protection regulations. These service providers are bound by our instructions and are subject to stringent contractual limitations on the processing of personal data. Accordingly, data may only be processed if this is necessary for the performance of services in our name or in order to comply with legal requirements. We stipulate precisely and in advance the rights and obligations of our service providers in relation to personal data. We may disclose personal data to a third party if we are required to do so by law or in legal proceedings or in order to supply and manage our products and services. We may also be required to provide information to law enforcement agencies or other public authorities. We are also authorised to release data if the disclosure of information is necessary for the purposes of collaboration and thus of providing Occhio's services to you or if you declare your consent to such disclosure. Disclosure can also rarely be avoided in the course of tax audits.

## **14.2. Web hosting**

Our Occhio website, and thus your data, is hosted by Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany („Hetzner“). Hetzner only uses the data in accordance with our instructions (order processing). Hetzner also adopts stringent technical measures to protect your personal data. Hetzner does not pass on your personal data to third parties unless this is necessary in order to perform the agreed services or if Hetzner is required to do so by law or to comply with a valid and mandatory instruction issued by a government or regulatory authority. The data provided for this purpose are restricted to the necessary minimum.

Hetzner operates its server only in Germany. Your data are not transmitted outside the EEA.

The processing of your data is legitimate under Article 6 (1) sentence 1 f) GDPR. The purpose of processing data is that Hetzner enables us to use Hetzner's servers. We only store the data for as long as it is necessary to achieve this purpose.

More information from Hetzner about data protection is available at: <https://www.hetzner.de/rechtliches/datenschutz>.

## **15. Security standards**

Occhio has implemented appropriate physical, technical and administrative security standards to protect personal data against loss, misuse, modification or destruction. Our service providers and associated undertakings are contractually committed to safeguarding the confidentiality of personal data. They are also prohibited from using data for purposes not approved by us.

## **16. Changes to this policy**

We may update this Data Privacy Policy from time to time. We therefore recommend that you read through this Data Privacy Policy on a regular basis so that you are familiar with our data protection practices. This Data Privacy Policy was last updated on June 5th 2018.