

## **1. Data Protection at a Glance**

### **General notes**

The following notes provide a simple overview of what happens to your personal data when you visit our website. Personal data are all data with which you can be personally identified. For detailed information on the subject of data protection, please refer to our data protection declaration listed below this text.

### **Data collection on our website**

#### **Who is responsible for data collection on this website?**

The data processing on this website is carried out by the website operator. His contact details can be found in the imprint of this website.

#### **How do we collect your data?**

On the one hand, your data is collected when you provide it to us. This can be data that you enter in a contact form, for example.

Other data is automatically collected by our IT systems when you visit the website. These are mainly technical data (e.g. internet browser, operating system or time of the page call). This data is collected automatically as soon as you enter our website.

#### **What do we use your data for?**

Part of the data is collected to ensure that the website is provided without errors. Other data can be used to analyze your user behavior.

#### **What rights do you have regarding your data?**

You have the right to receive information free of charge about the origin, recipient and purpose of your stored personal data at any time. You also have the right to demand the correction, blocking or deletion of this data. For this purpose, as well as for further questions regarding data protection, you can contact us at any time at the address given in the imprint. Furthermore, you have a right of appeal to the responsible supervisory authority.

#### **Analysis tools and third-party tools:**

When you visit our website, your surfing behavior can be statistically evaluated. This is mainly done with cookies and with so-called analysis programs. The analysis of your surfing behavior is usually anonymous; the surfing behavior cannot be traced back to you. You can object to this analysis or prevent it by not using certain tools. You will find detailed information on this in the following privacy policy.

You can contradict this analysis. We will inform you about the possibilities of objection in this privacy statement.

## **2. General Notes and Mandatory Information**

### **Privacy**

OU Xmetra is committed to protecting the privacy rights of everyone whose personal data is processed by OU Xmetra. Therefore, within this Data Protection Policy we will answer the important questions in relation to the processing of your data.

This Policy applies to the websites of OU Xmetra and to the websites of all companies affiliated with OU Xmetra who are referring to this Policy on their websites. It does not apply to OU Xmetra websites referring to their own Data Protection Policy.

Please refer to our Provider Identification for information on the data controller as defined under Data Protection law (for those users from the European Union: Article 4 of the General Data Protection Regulation).

Notwithstanding the above, the OU Xmetra company responsible for the provision of goods or services is the OU Xmetra company that is your contractual partner for the provision of the goods or services within the meaning of data protection law. Information on the relevant OU Xmetra company can be found in the conditions for the provision of the respective goods or services.

The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and according to the legal data protection regulations as well as this privacy policy.

When you use this website, various personal data is collected. Personal data is data with which you can be personally identified. This privacy policy explains what data we collect and what we use it for. It also explains how we do this and for what purpose.

We would like to point out that data transmission over the Internet (e.g. communication by e-mail) can have security gaps. It is not possible to completely protect data from access by third parties.

### **Note on the responsible authority**

The person responsible for data processing on this website is  
OU Xmetra

Address: Linda tänav 8-2, Narva-Jõesuu linn, 29022, Estonia

Phone: +372 53 0091114

e-mail: info{at}xmetra.com

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.).

### **Revocation of your consent to data processing**

Many data processing operations are only possible with your express consent. You can revoke a previously given consent at any time. For this purpose, an informal notification by e-mail to us is sufficient. The legality of the data processing that took place until the revocation remains unaffected by the revocation.

### **Right of complaint to the responsible supervisory authority**

In the event of violations of data protection laws, the person concerned has a right of appeal to the competent supervisory authority. The competent supervisory authority in data protection matters is the data protection commissioner of the state in which our company is located.

### **Right to data transferability**

You have the right to have data, which we process automatically on the basis of your consent or in fulfilment of a contract, handed over to you or to a third party in a common, machine-readable format. If you request the direct transfer of the data to another responsible party, this will only be done to the extent technically feasible.

### **SSL or TLS encryption**

This site uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content, such as orders or inquiries that you send to us as 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 the SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

### **Information, blocking, deletion**

Within the framework of the applicable legal provisions, you have the right to obtain information free of charge at any time about your stored personal data, its origin and recipients and the purpose of the data processing and, if applicable, a right to correct, block or delete this data. For this purpose, as well as for further questions regarding personal data, you can contact us at any time at the address given in the imprint.

### **Objection to advertising mails**

The use of contact data published within the scope of the imprint obligation for the transmission of not expressly requested advertisement and information materials is hereby contradicted. The operators of the site expressly reserve the right to take legal action in the event of unsolicited sending of advertising information, such as through spam e-mails.

### **3. Data Protection Officer**

Info{at}xmetra.com

### **4. Data Collection on our Website**

#### **Cookies**

The Internet pages partly use so-called cookies. Cookies do not damage your computer and do not contain viruses. Cookies serve to make our offer more user-friendly, effective and safer. Cookies are small text files that are stored on your computer and saved by your browser.

Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your end device until you delete them. These cookies enable us to recognize your browser on your next visit.

You can set your browser so that you are informed about the setting of cookies and allow cookies only in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If you deactivate cookies, the functionality of this website may be limited.

Cookies that are required to carry out the electronic communication process or to provide certain functions that you have requested (e.g. shopping basket function) are stored on the basis of Art. 6 para. 1 lit. f DSGVO. The website operator has a legitimate interest in the storage of cookies for the technically error-free and optimized provision of his services. Insofar as other cookies (e.g. cookies to analyze your surfing behavior) are stored, they are treated separately in this privacy policy.

#### **Server log files**

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

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

This data is not merged with other data sources.

The basis for data processing is Art. 6 para. 1 lit. f DSGVO, which permits the processing of data for the fulfilment of a contract or pre-contractual measures.

### **5. Analysis Tools and Advertising**

We may also partner with selected third-party vendors, such as [Google Analytics](#), , and others, to allow tracking technologies and remarketing services on the Site through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Site, determine the popularity of certain content and better understand online activity. By accessing the Site, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor to opt-out of analysis by Google Analytics on our website and other websites: <http://tools.google.com/dipage/gaoptout>.

## **6. Plugins and Tools**

In addition to its website, OU Xmeta also maintains online presences within social networks and platforms. This is how we communicate with our active customers, interested parties and online visitors (users). User data can also be processed outside the European Union. There may be risks for users due to the more difficult enforcement of their rights. User data is often processed for market research and advertising purposes and can be used to create user profiles based on user behaviour and the resulting interests. On the basis of these user profiles, advertisements can be placed inside and outside the platforms that are intended to correspond to the interests of the users. The user profiles also store data independent of the devices used by the users.

For users from the European Union: The legal basis for processing users' personal data is based on our legitimate interests in effective information for users and communication with users pursuant to Article 6 (1) (f) GDPR. If the users are requested by the respective providers of the platforms to consent to the aforementioned data processing, the legal basis for the processing is Article 6 (1) (a), Article 7 GDPR. Please inform yourself about the further presentation of the respective processing operations and the possibilities for objection (opt-out) and familiarise yourself with the information of the providers linked below.

### **Facebook**

We want our websites to be attractive and easy for you to use. Some of our websites may therefore contain social plug-ins from the social network facebook.com. We also use Facebook pages. This network is operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook").

Facebook's social plug-ins are identified by:

- the Facebook logo (white "f" on a blue background or a thumbs-up icon)
- the word "Like" or
- the words "Facebook Social Plug-In"

You can view the list of Facebook social plug-ins here:  
<https://developers.facebook.com/docs/plugins>.

When you visit a website that includes this social media plug-in, your browser establishes a direct connection with Facebook's servers. The content of the social plug-in is then transmitted directly to your browser and integrated into the website. In this case, Facebook obtains your IP address and other device-related information. The information that you have visited our website is also sent to Facebook. Facebook may then also save a cookie on your computer, which is deleted when the browser is closed (see the above section on cookies). OU Xmeta has no control over the scope of the data collected by Facebook using the social plug-in.

For information about the collection of data (purpose, extent, further processing and use) by Facebook, as well as your rights in this regard and the settings to protect your privacy, please see the privacy policy at <http://de-de.facebook.com/privacy/explanation.php>.

Facebook is certified under the Privacy Shield Agreement and thus offers a guarantee of compliance with European data protection law.

For users from the European Union: The use of Facebook pages and social plugins is in the interest of an appealing presentation of our online offers and an easy findability of the places indicated by us on the website as well as the use of the data for marketing and targeting purposes. This constitutes a legitimate interest within the meaning of Article 6 (1) (f) GDPR.

The joint processing of personal data takes place on the basis of an agreement on the joint processing of personal data.

If, as a Facebook account holder, you do not want Facebook to collect data about you via our websites and the platforms we use and to link this to your account information stored on Facebook, you must log out of Facebook and delete your cookies before using our websites and our social media presence. Further settings and objections to the use of data for advertising purposes are possible within the Facebook profile settings or via the US website [aboutads.info](http://aboutads.info) or the EU site [youronlinechoices.com](http://youronlinechoices.com).

## **LinkedIn**

In addition, plug-ins from the LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland (hereinafter referred to as "LinkedIn"), are embedded in our websites. These plug-ins are identified by the LinkedIn logo.

When you visit one of our websites, the plug-in creates a direct connection between your browser and the LinkedIn server, informing LinkedIn that you have visited our website with your IP address.

OU Xmetra also may use a "Recommend" button for LinkedIn. If you click this button, you will be asked to log in to LinkedIn. A cookie will be stored on your computer, only if you do this. This information will be transmitted to your profile if you are already logged in on LinkedIn when you click on the button. Depending on your settings, other users will then be able to see that you recommended our website. No cookie will be stored on your computer if you do not click on the button or are not logged in.

A shortened IP address will be transmitted when you visit a page with a "Recommend" button. This IP address is anonymized, making it impossible to draw any conclusions about your computer or you as a user.

For information about the collection of data (purpose, extent, further processing and use) by LinkedIn, as well as your rights in this regard and settings to protect your privacy, please see the privacy policy at <https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-guest-home-privacy-policy>.

LinkedIn is certified under the Privacy Shield Agreement and thus provides a guarantee of compliance with European data protection law.

For users from the European Union: The use of LinkedIn is in the interest of an appealing presentation of our social media sites and an easy retrievability of the places indicated by us on the website as well as the use of data for marketing and targeting purposes. This constitutes a legitimate interest within the meaning of Article 6 (1) (f) GDPR.

You can object to data collection by LinkedIn at [link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>].

## **Other Social Media Plugins**

The above statements apply to any other Social Media Plugin on this Website (Reddit, Tumblr, Pinterest, LinkedIn, Xing, etc.)

### **Google Web Fonts**

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

For this purpose, the browser you are using must connect to the servers of Google. This enables Google to know that our website has been accessed via your IP address. The use of Google Web Fonts is in the interest of a uniform and attractive presentation of our online offers. This represents a legitimate interest in the sense of Art. 6 para. 1 lit. f DSGVO.

If your browser does not support Web Fonts, a standard font from your computer will be used.

Further information about Google Web Fonts can be found at <https://developers.google.com/fonts/faq> and in the Google privacy policy: <https://www.google.com/policies/privacy/>.

### **Apple Store**

OU Xmetra also operates an App which is available through the apple store and may include functions and content of the apple store on the Xmetra websites. These functions are offered by Apple Inc., One Apple Park Way, Cupertino, CA 95014, United ed States.

If you'd like to know how Apple uses your information, please read the privacy policy at: <https://www.apple.com/legal/privacy/en-ww/>

You can change your Apple privacy settings in your account settings.

For users from the European Union: The use of Apple is in the interest of an appealing presentation of our app and an easy retrievability of the places indicated by us on the website as well as the use of data for marketing and targeting purposes. This constitutes a legitimate interest within the meaning of Article 6 (1) (f) GDPR.

### **Changes to our Data Protection Policy**

You are reading version 1.0 of our Data Protection Policy, last updated in 2021. Xmetra may change the Data Protection Policy at any time if...

- ... we introduce new products or services
- ... Internet procedures change
- ... Internet and IT security technology advances
- ... new legal requirements enter into force

We therefore reserve the right to change or supplement our Data Protection Policy as and when required. The revised version will be published here and will then apply to future use of our website. You should access the Data Protection Policy regularly to find out about its current status. This does not include a change of purpose in the use of data already stored.

All information contained on our websites has been checked with great care. However, we do not guarantee that the contents of our websites are always accurate, complete, and up-to-date.