

## Privacy Policy

This privacy policy applies to the internet presence of PayExpert OÜ. The internet platform and services offered here are offered by PayExpert OÜ, Lasnamaelinnaosa Peterburitee 47, 11415 Tallinn, Estonia business address as stated, (hereafter: PAYEXPERT). Below you will be informed of which data are recorded during a visit to our website and how these are used, processed and provided to others.

Responsible party as per data protection law:

PayExpert OÜ

Lasnamaelinnaosa Peterburitee 47

11415 Tallinn

Estonia

Data protection officer and EU data protection representative:

SBS DATA PROTECT GmbH

Hans-Henny-Jahnn-Weg 49

22085 Hamburg

CEO: Thilo Noack

E-mail: [info@sbs-data.de](mailto:info@sbs-data.de)

The customer refers to the aforementioned data protection officer (and EU data protection representative) to assert the rights specified in this privacy policy or for questions pertaining to the usage, retrieval or processing of personal data.

As the responsible party as per the data protection conditions, PAYEXPERT is obligated to protect its customers' privacy and personal data, and to treat them as confidential. The retrieval, storage, alteration, transfer, blockage, deletion and usage of personal data occur on the basis of the applicable legal terms, in particular the General Data Protection Regulation.

PAYEXPERT uses technical and organizational security precautions to protect customers' data against access by unauthorized persons, random or deliberate manipulation, destruction, or loss.

## §1 Access data

In the event of informational usage of the website, PAYEXPERT only retrieves the personal data that the customers' browser provides to the PAYEXPERT server. If the customer would like to view PAYEXPERT' website, PAYEXPERT retrieves the following data, which are technically required to display the website to the customer and to ensure stability and security:

- IP address

- Date and time of the request

- Time zone difference based on Greenwich Mean Time (GMT)

- Contents of the request (specific page)

- Access status/HTTP status code

- Respectively transferred data quantity

- Website from which the command originates

- Browser

- Operating system and interface

- Language and version of browser software

However, the web server stores these data separately from other data, making allocation of these data to a certain individual by PAYEXPERT impossible.

This data processing is based on Art. 6 para. 1 s. 1 lit. f GDPR to protect the justified interests of PAYEXPERT, namely optimization of the web presence.

## §2 Usage of cookies

In addition to the data specified above, cookies are also stored on the customer's computer when using the website. Cookies are small text files that are allocated to the customer's browser and stored on the customer's hard drive, and through which certain information is provided to the location that installed the cookie. Cookies cannot operate programmes or transmit viruses to the computer. They serve to make the internet presence more user-friendly and effective overall.

The PAYEXPERT website uses the following types of cookies, the scope and functionality of which are explained below:

a) Transient cookies are automatically deleted when you close the browser. These mainly include session cookies. These store a so-called session ID, with which different requests from your browser can be allocated to the same session. This allows your computer to be recognized when you return to our website. The session cookies are deleted when you log out.

b) Persistent cookies are automatically deleted after a specific period of time, which may vary from one cookie to the next. You can delete these cookies at any time in your browser's security settings.

c) Flash cookies are not recorded by your browser, but rather by your Flash plug-in. These objects store the required data regardless of browser and have no automatic expiration date.

d) Third-party cookies are not installed by PAYEXPERT, but rather by a third-party provider. Cookies from third-party providers are created by, for example, the services of Google Analytics, which are integrated into the PAYEXPERT website. These third-party cookies are generated by integrated plug-ins or technology from the respective organizations. PAYEXPERT has no influence over the cookies and privacy settings of these services or organizations, and expressly notes that the services from third-party providers that are utilized are solely subject to their respective data protection guidelines.

You can find information on cookies from the following third-party services with the links below:

Google Analytics:

[www.google.com/intl/de/policies/technologies/cookies/](http://www.google.com/intl/de/policies/technologies/cookies/)

The customer may configure their browser settings as they please and decline the acceptance of cookies. If the customer does not wish for the processing of Flash cookies, they must install a corresponding add-on, e.g. "Better Privacy" for Mozilla Firefox (<https://addons.mozilla.org/de/firefox/addon/betterprivacy/>) or the Adobe Flash Killer cookie for Google Chrome. The customer may prevent the usage of HTML5 storage objects by using private mode in their browser. Furthermore, PAYEXPERT recommends regularly manually deleting the cookies and browser history. PAYEXPERT notes that the deactivation of cookies may prevent the usage of all functions on this website.

This data processing is based on Art. 6 para. 1 s. 1 lit. f GDPR to protect the justified interests of PAYEXPERT, namely optimization of the web presence.

### §3 Retrieval and usage of personal data during a contact request

When contacting PAYEXPERT via e-mail or the contact form, the data provided (your e-mail address and name) are stored by PAYEXPERT to respond to the enquiry. PAYEXPERT deletes the data collected in this manner after storage thereof is no longer necessary, e.g. once the matter has been resolved. Otherwise the processing is limited in the event that there are legal retention obligations.

This data processing is based on Art. 6 para. 1 s. 1 lit. a GDPR in conjunction with the consent provided by the customer.

### §4 Retrieval of personal data during formation of a contract and payment

The following data are stored for purposes of an order:

1. Name,
2. Address,
3. Telephone number,
4. E-mail address,
5. Delivery address if different from address,
6. Payment information.

PAYEXPERT uses these data solely to execute the contract and for any necessary communication with the customers. These include the initiation, formation, execution, provision, and any reverse transaction of the contract. The data are stored until complete execution of the contract. If there are any commercial or fiscal retention periods, the duration period may last up to 10 years.

This data processing is based on Art. 6 para. 1 s. 1 lit. b GDPR for the execution of the contract. The legal basis for further storage for fiscal and commercial reasons is legal necessity as per Art. 6 para. 1 s. 1 lit. c GDPR.

### §5 Transmission of data

PAYEXPERT only provides customers' personal data to other parties to the extent required to execute the contract or to ensure PAYEXPERT' justified interests. PAYEXPERT utilises external service providers (data processors) to execute the contract. Separate data processing contracts were formed with these service providers in order to ensure the security of the customers' personal data.

To process payments, the customer's payment information, namely first name, surname, address, e-mail address, telephone number, date of birth and bank account, is sent to our payment processing provider Powercash21, Piliou 11-13, Quality Towers A 4th Floor, Office 401 Larnaca CY, 6037, Cyprus.

This data processing is based on Art. 6 para. 1 s. 1 lit. b GDPR for the execution of the contract.

#### §6 Usage of data for marketing purposes, newsletter

PAYEXPERT uses personal customer data to send a newsletter to the customer only if the customer has granted their prior consent to this usage.

For registration for the newsletter, PAYEXPERT uses the so-called double opt-in procedure. This means that after registration, the customer receives an e-mail at the address provided in which PAYEXPERT asks for confirmation that the customer would like to receive the newsletter. If the customer does not confirm their registration within 24 hours, their information will be blocked and automatically deleted after one month. Furthermore, PAYEXPERT stores the IP address and the times of registration and confirmation. The purpose of this procedure is to verify registration and to be able to resolve any potential misuse of personal data.

The e-mail address is the only information required to send the newsletter. The provision of other, specially designated information is voluntary and will be used to personally address the customer. After confirmation we save the customer's e-mail address for purposes of sending the newsletter.

The customer may revoke their consent to receive the newsletter and unsubscribe at any time. The customer may revoke their consent by clicking on the link provided in every newsletter e-mail, through the form on the PAYEXPERT website.

This data processing is based on the consent provided by the customer, the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR.

#### §7 Usage of Google Analytics

PAYEXPERT uses Google Analytics, a web analysis service of Google LLC ("Google"). Google Analytics uses so-called cookies, or text files that are stored on the customer's computer and which allow for an analysis of their usage of the website. The information about the usage of the website created by the cookie is generally sent to a Google server in the USA

and stored there. In the event that IP anonymization is activated on this website, Google will truncate the customer's IP address in advance within member states of the European Union or in other signatory states of the Agreement on the European Economic Area. Only in exceptional cases will the entire IP address be sent to a Google server in the USA and truncated there. As ordered by PAYEXPERT, Google will use this information to evaluate customer usage of the website, to compile reports about website activities, and to render other services associated with website usage and internet usage for PAYEXPERT.

Google will not consolidate the IP address provided by the customer's browser with other data.

The customer may prevent the storage of cookies through a corresponding setting in their browser software; however, PAYEXPERT notes that in this event the customer may not be able to fully utilize all functions of this website. Furthermore, the customer may prevent the recording of the information created by the cookie and concerning their usage of the website by Google (incl. their IP address), as well as the processing of this information by Google, by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

Alternatively, the customer may prevent recording by Google Analytics by clicking on the following link. This will install an opt-out cookie that prevents the future recording of your data when visiting this website:

Activate "opt-out cookie" for Google Analytics!

Please note that, should you delete the cookies in your browser settings, this may result in the deletion of the opt-out cookie and you may have to reactivate it.

The PAYEXPERT website uses Google Analytics with the extension "anonymize()". This truncates IP addresses for processing, ruling out the possibility of personal identification. If a customer's data that has been retrieved is allocated to them, it will instantly be eliminated, and the personal data are immediately deleted.

PAYEXPERT uses Google Analytics to analyze the usage of its website and to regularly improve it. PAYEXPERT can use the statistics it acquires to improve its internet presence and make it more interesting for the user. In the exceptional event in which personal data are transferred to the USA, Google has subjected itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

Information about the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. Terms of use:

<http://www.google.com/analytics/terms/de.html>, overview of data protection:  
<http://www.google.com/intl/de/analytics/learn/privacy.html>, as well as the privacy policy:  
<http://www.google.de/intl/de/policies/privacy>.

This website also uses Google Analytics for inter-device analysis of visitor flows, which is performed via user ID. The customer can deactivate this inter-device analysis of their use in their customer account under "My data", "Personal data".

This data processing aims to pursue the justified interests of PAYEXPERT, namely the optimization of its web presence. The legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

#### §8 Integration of social media links

This website contains links to the following social media channels: Facebook, YouTube, VK. You can recognize these links by the respective company logo of the social media provider. When you click on the link you will be redirected to PAYEXPERT' account on the respective social media channel.

Only at this point will data be processed by the respective provider of the social media channel. You can learn about this processing of your personal data when using the website from the data protection information:

Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA ;  
<http://www.facebook.com/policy.php>; further information on the retrieval of data:  
<http://www.facebook.com/help/186325668085084> as well as  
<http://www.facebook.com/about/privacy/your-info-on-other#applications>. Facebook has committed itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA, further information on the retrieval of data: [policies.google.com/privacy](https://policies.google.com/privacy). YouTube has committed to the EU-US Privacy Shield, [www.privacyshield.gov/EU-US-Framework](https://www.privacyshield.gov/EU-US-Framework).

LLC "V Kontakte", 1-N, bld. 12-14, Lit. A, Khersonskaya st., St. Petersburg, Russia;  
<https://vk.com/privacy>. VK has voluntarily committed to the European General Data Protection Regulation GDPR, <https://www.eugdpr.org/>.

If you follow the links while visiting our website and are logged into your personal account on the linked social media channel, the information that you have visited our website will be transmitted to the respective social media channel. The social media providers can also link your visit to the website with your account. This information is sent to the social media providers and stored there. In order to prevent this, you must first log out of your respective account before clicking on the social media link.

This data processing is based on Art. 6 para. 1 s. 1 lit. f GDPR to protect the justified interests of PAYEXPERT, namely the optimization of our web presence.

#### §9 Facebook fan page

For the informational service provided here, PAYEXPERT utilizes the technical platform and services of Facebook Ireland Ltd., 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland ("Facebook").

According to the ECJ, there is a shared responsibility as per Art. 26 GDPR between Facebook and the administrator of a Facebook fan page for the personal data processed through the Facebook fan page. For this reason, Facebook and PAYEXPERT have formed an agreement on their shared responsibility, which you may view [here](#).

PAYEXPERT provides you with the following information on data processing on our Facebook fan page:

##### (1) Responsible persons

Your personal data are processed on the Facebook fan page of PAYEXPERT in shared responsibility with:

Facebook Ireland Ltd., 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland

##### (2) Data processing

When accessing our Facebook page, your end device's IP address is sent to Facebook. According to Facebook this IP address is anonymized and deleted after 90 days, as long as the IP address in question is a German IP address. Furthermore, Facebook stores additional information about its users' end devices, such as the internet browser they use. It may thus be possible for Facebook to link IP addresses with certain users. If you are logged into your Facebook account when you visit our fan page, a cookie with your Facebook ID is installed on your end device. Through this cookie Facebook can learn that you have visited our fan page and how you used it. Facebook uses this information to present you with customized content or advertisements.

If you do not wish for this to occur, you should log out of your Facebook account or deactivate the "stay logged in" function. We also recommend that you delete the cookies on your device, and close and restart your browser. This process deletes Facebook information that Facebook can connect to you.

However, should you wish to use the interactive functions of our fan page, you must log back into Facebook with your Facebook login information. This will make it possible for Facebook to connect information to you.



Facebook has not clearly specified, nor are we aware, of the manner in which Facebook uses data from visits to Facebook pages for its own purposes, the extent to which activities on the Facebook page are allocated to individual users, how long Facebook stores these data, and whether data from visits to Facebook pages are disclosed to third parties. As a user of our fan page, we are only able to refer you to Facebook's statements on data protection.

Facebook processes the data about you that are retrieved in this manner and may transmit them to countries outside of the European Union.

Facebook provides a general description of which information Facebook receives and how it is used in its data usage guidelines. There you will also find ways to contact Facebook, as well as the settings for advertisements. The data usage guidelines can be found at the following link: <http://de-de.facebook.com/about/privacy>

Facebook's complete data guidelines can be found here:

[https://de-de.facebook.com/full\\_data\\_use\\_policy](https://de-de.facebook.com/full_data_use_policy)

Facebook's privacy policy contains additional information on data processing:

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

Possibilities for opting out can be set here: <https://www.facebook.com/settings?tab=ads> and here <http://www.youronlinechoices.com>

Facebook Inc., the American parent corporation of Facebook Ireland Ltd., is certified under the EU-US Privacy Shield and is thus obligated to adhere to the requirements of European data protection law. You can find further information on Facebook's Privacy Shield status here: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>.

As the administrator of the Facebook fan page, we are unable to assess the transmission and further processing of personal user data in third countries, such as the USA, as well as the associated potential risks for you as a user.

### (3) Insight function

Furthermore, through the "Insights" function Facebook provides a range of statistical data for SBS-Legal as the fan page administrator. These statistics are created and prepared by Facebook. We, as the administrator of the fan page, have no influence over the creation of the statistics, and we are unable to prevent this function. As part of the "Insights" function, we are

shown the following information for the category's "fans", "followers", "people reached", and "people interacting" for a given period of time:

Page activities like page visits, page preview, actions on the page, scope activities such as "Likes", people reached and recommendations, post activities such as post interactions, video views, comments, shared content.

Furthermore, we are shown statistical information on the Facebook groups linked with our fan page. In accordance with the Facebook terms of use, which each user consents to when creating a Facebook profile, we are also able to identify the followers and fans of the page and can view their profiles and other information they have shared.

Facebook provides further information at the following link:

<http://de-de.facebook.com/help/pages/insights>.

PAYEXPERT uses these aggregated data to make posts and activities on the fan page more attractive for users, e.g. for planning the content and timing of posts. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR, namely our justified interest in optimizing our web presence.

#### (4) Storage period

We save the information provided by Facebook for as long as your interest in deletion or anonymization does not outweigh our own interest.

If you no longer wish for the data processing described here in the future, please use the "Unlike this page" and/or "Unfollow this page" functions to terminate the connection between your user profile and our fan page.

#### (5) Your rights as the affected person

For disclosure requests or other questions concerning your rights, which are listed at the end of this privacy policy, we recommend contacting Facebook directly, as only Facebook has complete access to the user data. However, should you direct your enquiry to us, we will of course process it and forward it to Facebook.

#### §10 Rights of the customer as the affected person

The customers have the right to:

- Information about the processing of their data
- Correction or deletion of their data
- Limitation of processing

-Objection against processing

-Data transferability

-Revocation of their granted consent with effect for the future

-File a complaint with the data protection supervisory authority

A list of all supervisory authorities in Germany can be found here:

[https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)

Austrian data protection authority:

<https://www.dsb.gv.at/>

We hope that this information has helped you understand your rights. If you would like more information on the data protection regulations, we are happy to assist you.