Privacy Policy

of Marc O·Polo Einzelhandels GmbH

At MARC O'POLO, your satisfaction is our top priority, and an important part of our role is to protect your privacy. We therefore collect and process your personal data exclusively in accordance with the principles set out below and in compliance with the applicable data protection laws, in particular the General Data Protection Regulation (GDPR).

Data controller pursuant to Article 4 (7) of the GDPR for the website https://www.marc-o-polo.com and the online shop contained therein (hereinafter collectively referred to as the "website") and the Marc O'Polo app (hereinafter the "app") is MARC O'POLO Einzelhandels GmbH, Hofgartenstraße 1, 83071 Stephanskirchen, Germany,service@marc-o-polo.com (hereinafter 'MARC O'POLO' or 'we').

You can contact our Data Protection Officer can be contacted at (datenschutz@marc-o-polo.com) or at our postal address, marked 'Data Protection Officer'.

If you are under 16 years of age , please obtain permission from a parent or guardian before providing MARC O'POLO with any personal data.

In connection with the presentation and sale of our goods, we process personal data relating to various individuals. These include, in particular:

- visitors to our website http://www.marc-o-polo.com and users of our app
- Customers of our online shop (website and app)
- Subscribers to our newsletter via email and/or WhatsApp
- Participants in the MARC O'POLO COMMUNITY loyalty programme
- Users of our customer service
- Participants in our prize draws In **Section A** of this privacy notice, you will find information about the data **controllers responsible** for processing your personal data and the **data protection officers** of the data controllers.

In **sections B to G,** you will also find information about the **processing of your personal data**.

In **Section H, you** will find detailed information on the **use of cookies or similar technologies**.

In **Section I** you will also find information about **your rights regarding the processing of your personal data**.

The data protection terms used **in this data protection information**

have the meanings assigned to them in the General Data Protection Regulation.
You can find detailed information on this in **Section J**.

Table of Contents

A. Information about the data controller 6

I. Name and contact details of the data controller....6

II. Contact details of the data protection officers of the data controllers 6

B. Information on the processing of personal data of visitors to our website www.marc-o-polo.com or our app 7

I. Informational use of the website or app (using essential cookies or similar technologies) 7

1. Details of the personal data that is processed 7

2. Details regarding the processing of personal data....9

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....10

II. Use of third-party marketing tools (e.g. social media platforms, search engine operators and advertising networks) (using 'marketing' cookies and similar technologies (apps)) 11

1. Details regarding the personal data that is processed....14

2. Details regarding the processing of personal data 19

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....26

III. Use of web analytics technologies (using 'analytics' cookies and similar tracking technologies (app)) 30

1. Details regarding the personal data that is processed....31

2. Details regarding the processing of personal data 33

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....37

IV. Use of personalisation technologies (using personalisation cookies and similar tracking technologies (app))....38

1. Details regarding the personal data that is processed....39

2. Details regarding the processing of personal data....43

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....49

C. Information on the processing of personal data of customers of our online shop (website and app) 51

1. Details regarding the personal data that is processed....52

2. Details regarding the processing of personal data....59

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....66

D. Information on the processing of personal data of subscribers to our email and WhatsApp newsletters and our push notifications....68

1. Details regarding the personal data that is processed....69

2. Details regarding the processing of personal data....71
3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....74
E. Information on the processing of personal data of participants in the loyalty programme....77
1. Details regarding the personal data that is processed....78
2. Details regarding the processing of personal data....82
3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....89
F. Information on the processing of personal data of users of our customer service....92
1. Details regarding the personal data that is processed....92
2. Details regarding the processing of personal data....95
3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....97
G. Information on the processing of personal data of participants in our competitions....99
1. Details regarding the personal data that is processed....99
2. Details regarding the processing of personal data....103
3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations....105
H. Information on the use of cookies and similar technologies....107
1. General information on cookies and similar technologies (app)....107
1. First-party and third-party cookies/technologies....108
2. Transient and persistent cookies....108
3. Cookies requiring consent and those not requiring consent....108
2. Management of cookies and similar technologies used on this website (app)....109
1. Granting consent to the use of cookies and similar technologies (app) and managing cookies via the privacy and cookie settings....109
2. Managing cookies via browser settings....110
3. Cookies used on the website....110
1. Essential cookies for the informational use of the website.....110
2. Marketing cookies for the use of marketing technologies and advertising networks....111
3. Analytics cookies for the use of web analytics technologies....124
4. Personalisation cookies for the use of personalisation technologies....126
4. SDKs and similar technologies used in the app....127
1. Essential SDKs and technologies for the informational use of the app.....127
2. Marketing SDKs for the use of marketing technologies and advertising networks.....128
3. Analytics SDKs for the implementation of web analytics technologies....129
4. Personalisation SDKs for the use of personalisation technologies....129
I. App permissions....131
J. Information on the rights of data subjects....132
I. Right of access....132
II. Right to rectification....133
III. Right to erasure (‘right to be forgotten’)....133

IV. Right to restriction of processing 134
V. Right to data portability 134
VI. Right to object 135
1. Right to object on grounds relating to the data subject's particular situation 135
2. Right to object to direct marketing 135
VII. Right to withdraw consent 136
VIII. Right to lodge a complaint with a supervisory authority 136
K. Information on the technical terms from the General Data Protection Regulation used in this privacy notice 137
K. Status and amendments to this privacy notice 139

A. Information about the data controller

I. Name and contact details of the data controller

Marc O'Polo Einzelhandels GmbH

Hofgartenstraße 1, 83071
Stephanskirchen

Email:service@marc-o-polo.com

Telephone: 00 800 10221022
(freephone number)

II. Contact details of the Data Protection Officer of the data controller

MARC O'POLO Einzelhandels GmbH

Hofgartenstraße 1, 83071
Stephanskirchen

Data Protection Officer

datenschutz@marc-o-polo.com

B. Information on the processing of personal data of visitors to our website **www.marc-o-polo.com** or our app

I. Informational use of the website or app (using essential cookies or similar technologies)

When using the use of the website or app, certain information – such as your IP address – is sent to our website's server by the browser running on your device for technical reasons. We process this information to provide you with the website content you have accessed. To ensure the security of the IT infrastructure used to provide the website, this information is also temporarily stored in a so-called web server log file.

To provide the search functions on our website or app, data that you enter into our search functions is temporarily processed on our web server.

To provide the consent management functions for our website or app (e.g. for the use of certain cookie-based technologies), information regarding your consent to cookies (□ **Section H**)

stored on your device. The cookies and the information stored within them can be read whilst you are visiting our website to determine whether and which consents you have given. Furthermore, to provide the language selection feature, data is temporarily processed on our web server to present the content of the website or app that you have accessed in your chosen language.

You will find detailed information on this below:

1. Details of the personal data that is processed

Categories of personal data that are processed	**Personal data included in these categories**	**Sources of the data**	**Obligation to provide the data**	**Retention period**
HTTP data.	Log data generated automatically for technical reasons when accessing the website and using our native app via the Hypertext Transfer Protocol (Secure) (HTTP(S)). On the website: This includes your IP address, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), and the date and time of access.	Users of the website or app	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we may be unable to provide the requested content on the website .	Data is stored in server log files in a form that does not allow the identification of the data subject , for a maximum period of 6 weeks, unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are retained until the security-related incident has been resolved and fully investigated

Categories of personal data that are processed	**Personal data falling within the following categories**	**Sources of the data**	**Obligation to provide the data**	**Retention period**
	In the app: This includes the IP address, the type and version of the HTTP component , the operating system used and the operating system of the end device, the page accessed or the web address of a technical service (API endpoint) accessed by the app, via which data is received or provided, the previously visited page (referrer URL), and the date and time of the request.			Stored by event.
Search function data.	Data that you enter into the search functions on our website or app. This includes all the information you enter as search terms in the relevant search form on the website.	User of the website or app	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we may be unable to provide the website content you have accessed .	Data is stored in server log files in a form that does not allow the identification of the data subject , for a maximum period of 6 weeks, unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.
Opt-in data.	Data relating to the for our website or app. This includes your consent and, where applicable, your individual preferences regarding the use of cookie-based technologies. This data is stored in cookies or similar technologies on your device (□ **Section H**).	User of the website or app	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we cannot take cookie consents into account on this website.	We do not store this data permanently on our systems, but only temporarily at the time of the website is accessed. Permanent storage takes place locally in the browser or in the user's app. (□ **Section H.III.** for information on the the validity period of the cookies or similar technologies used.)
Language selection data	Data stored for the purpose of providing the language selection function. This includes the language you have selected. This data is stored in cookies on your device (□ **Section H**).	User of the website or app	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we may	We do not store this data permanently on our systems, but only temporarily whilst the website or app is in use. Permanent storage takes place locally in the user's browser for a maximum period of

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
			Content accessed on the website not available in the language you have selected.	4 weeks. In the case of the app, data is stored locally and permanently within the app.

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Provision of the website or app content accessed by the user: For this purpose, data is temporarily processed on our web server.	HTTP data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the content accessed by the user on the website.	Hosting provider.
Provision of the search functions on our website or app: To this end, data that you enter into our search functions is processed temporarily on our web server.	HTTP data: search function data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the on the website.	Hosting provider.
Provision of the consent management function for the website. Your consent is required for certain functions of our website and app (e.g. for the use of certain cookie-based or similar technologies). To grant and, where applicable, withdraw your consent, we provide a management function for consent management function for our website. For this purpose, information regarding your consents to cookies or similar technologies (□ **Section H**) is stored on your device. The information stored there may	HTTP data and opt-in data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the management of the consents given by the user for this website.	Consent provider.

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
are collected whilst you are visiting our website or app to determine whether and which consents you have given .				
Provision of the language selection function on the website or app: For this purpose, data is temporarily processed on our web server to provide you with the website content you have accessed in your chosen language.	HTTP data, language selection data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the content accessed by the user of the website in the language selected in each case.	Hosting provider.
Ensuring the security and stability of the provision of the website or app , in particular to identify, rectify and document in a manner that preserves evidence any disruptions (e.g. DDoS attacks), as well as to identify crashes (app) and rectify the associated faults. To this end, data is temporarily stored and analysed in log files on our web server.	HTTP data, search function data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to ensure the security of the IT infrastructure used to provide the website and app IT infrastructure used to provide the website and app, in particular to detect, rectify and documenting incidents (e.g. DDoS attacks) in a manner that preserves evidence.	Website and app: Hosting provider App only: Google Firebase Crashlytics
Implementation of the 'Refer a Friend' feature. With the 'Refer a Friend' feature, we aim to attract new customers through our existing customers. As a thank you, the referring member receives bonus points from us as a credit to their account as soon as the newly referred member has made a purchase .	Customer master data, login log data, identification data for new customer referrals	No automated decision-making takes place.	Article 6(1)(f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the operation of the 'Refer a Friend' feature.	CRM system, loyalty tool

3. Details of the recipients personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations

Recipient	Role of the recipient	Transfers to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Hosting provider (currently: commercetools GmbH, Adams-Lehmann-Str. 44, 80797 Munich, Germany)	Data processor.	EU and USA	*For the transfer With regard to the transfer of personal data to the USA and the UK, there is an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The Adequacy decision for the US is available here:* https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj *The Adequacy Decision for the United Kingdom (UK) is available here:* http://data.europa.eu/eli/dec_impl/2021/1772/oj *As regards transfers to Australia and Singapore, there is no adequacy decision by the within the meaning of Article 45(3) of the General Data Protection Regulation. Commerctools GmbH has standard contractual clauses (SCCs) in place which have been approved in accordance with Article 46 of the General Data Protection Regulation.*
Google Firebase Crashlytics	Data processor	EU and USA	An adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Google is self-certified under the Data Privacy Framework, this adequacy decision also applies to the transfers to this recipient. Details on self-certification can be found here: https://www.dataprivacyframework.gov/list
Consent Provider (currently: Usercentrics GmbH Sendlinger Str. 7, 80331 Munich, Germany)	Data processor.	EU.	-

II. Use of third-party marketing tools (e.g. from social networks, search engine operators and advertising networks) (using ‘marketing’ cookies and similar technologies (apps))

Provided you have given your consent to this in our privacy policy and cookie settings, we use certain third-party marketing tools (e.g. from social networks, search engine operators and advertising networks) on our website and in our app (i.e. if you have given your consent to the ‘Marketing’ or to individual marketing tools listed under this category in our privacy and cookie settings). The respective providers are listed in → **Section B.II.3** and in our Privacy and Cookie Settings, you can select specific providers.

These marketing tools are used for the following purposes:

- **Conversion tracking, including app attribution and deep linking**

  ‘Conversions’ are usage activities defined by us on our website or app. ‘Conversion tracking’ is a process that records what happens after our adverts have been displayed to you on the website of the provider of the relevant marketing tool (e.g. their search engine or social network) or on other websites that cooperate with that provider, or after you have interacted with these adverts. For example, we can see whether you subsequently carried out a specific action on our website or in our app (e.g. placing an order or signing up for our newsletter).

  As part of **app-based conversion tracking**, the events recorded in our app (such as purchases, adding items to the shopping basket (‘add-to-carts’) and similar interactions on the website or in the app) are processed via a so-called mobile measurement partner and sent back to the relevant marketing partners (such as Meta, Google Ads, etc.) (‘postbacks’). This enables the marketing partners to to measure the success of the advertising campaigns run there and to optimise them technically.

  App-based conversion tracking also includes **app attribution**. By ‘app attribution’ we mean a process by which we analyse and measure the specific marketing channels or advertising campaigns (e.g. an advert on a social media platform, in search engines or on partner websites) through which users became aware of our app and subsequently downloaded and installed it onto their device. When you click on one of our adverts, this click is recorded. If you install and open the app within a specific time frame, the attribution tool links this click – in pseudonymised form – to the app installation.

  In this way, we can see which keywords, adverts, ad groups and campaigns lead to the user actions we are targeting. We can also track how our return on investment (ROI) is generated and make informed decisions regarding our advertising spend. Furthermore, we can automatically optimise our advertising campaigns in line with our business objectives. This enables us to identify which marketing measures, adverts and campaigns are particularly successful, how to allocate our advertising budgets efficiently, and what the return on investment (ROI) of our mobile advertising activities is.

  Furthermore, ‘deep linking’ technology be used to redirect you directly to the advertised product, content or offer within our app after you click on an advert link. If the app is not yet installed, the redirection takes place after you have downloaded and opened the app for the first time. To do this, technical identifiers such as a click ID, your IP address, device information and session data are processed for a short period.

- **Remarketing** (including profile enrichment by the provider of the relevant marketing tool we use, personalisation of advertising and profile enrichment by us, as well as the determination of billing-related details for ad placement by the provider of the relevant marketing tool we use)

  ‘Remarketing’ (or ‘retargeting’) means that we users who have already interacted with our website or our app

can target them again, for example with adverts on the website of the provider of the relevant marketing tool (e.g. its search engine or social network) or on other websites that cooperate with that provider.

For these purposes, a unique ID may be assigned to your device which is linked to a profile. This ID may be stored in cookies (--> Section H.III.2) on your device, as well as in the profile maintained by the provider of the relevant marketing tool. When visit our website or app, as well as when visiting the website of the provider of the relevant marketing tool (e.g. their search engine or social network) or other websites that cooperate with that provider, the ID stored in cookies on your device may be read, thereby recognising your device on the basis of this ID. In this case, the profile may be enriched (e.g. with information about your orders with us, the items viewed on our website or in the app, or your interactions with our adverts on other websites). Conversion tracking and remarketing are carried out on the basis of this information. The provider of the relevant marketing tool we use only makes analyses or further information generated from the data collected available to us in an aggregated, anonymised form. As a rule, we are unable to link the information provided to us to any specific individual.

However, instead of using the ID, but also by matching hashed contact information or, where applicable, by linking it to your account with the relevant provider (e.g. your Google Account, if you have enabled personalised advertising there). In this way, actions you carry out using different devices may also be attributed to you as a unique user.

If, in addition to giving your consent to one or more of the ‘marketing’ tools, you have also given your consent to ‘personalisation’ in general, or at least to personalisation via ‘Bloomreach’ (you can check this via our privacy and cookie settings), we use the data on transactions, preferences and interests from your profile as criteria for creating segmented customer target groups.
The contact details of these target groups are transmitted in hashed form to the respective providers (e.g. social media platforms, search engine operators and advertising networks) and used to serve adverts, in order to tailor them even more closely to your preferences and interests. This may also include ‘guest orders’ that we have been able to link to your customer account, or orders placed in one of our high-street shops that have been linked to your customer account.

With regard to the use of these marketing tools on our website and in our app, we are in some cases jointly responsible with the respective provider of the marketing tools. Any further processing of the data by the respective provider for its own purposes or for the purposes of third parties (for example, to create target groups for other advertising clients) is the sole responsibility of the respective provider (which is not covered by this privacy policy).
Information on whether we are jointly responsible with the relevant provider, and a reference to the privacy policy of the relevant provider can be found below.

-
-

Detailed information on this is provided below:

1. Details of the personal data that is processed

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
HTTP and app connection data *(separately for each provider of the relevant marketing tool)*	Log data generated when using the respective marketing tool on our website or app via the Hypertext Transfer Protocol (Secure) (HTTP(S)) : This includes: • IP address • Type and version of your web browser • Operating system used • the page accessed or the app screen opened • the page you visited previously (referrer URL) • Date and time of the visit	Users of our website or app	The provision of the data is not required by law or contract, nor is it necessary for the conclusion of a contract. The data subject is under no obligation to provide the data. In the event of failure to provide the data, we are unable to carry out remarketing or conversion tracking.	We do not store this data. The storage of this data falls within the remit of the provider of the respective marketing tool for as long as it is necessary for the purpose.
Device data *(separately for each provider of the relevant marketing tool)*	Data that can be associated with your device when you • access our website or app, or • visit the website of the provider of the relevant marketing tool (e.g. its search engine or social network) (subject, where applicable, to your consent given to the relevant provider) or • visit a website that cooperates with this provider and displays our adverts (i.e. another website, such as an online newspaper that displays our adverts via the relevant provider), (subject, where applicable, to your consent given to the (the relevant website operator): • In the app: Temporary	Users of our website or app	The provision of the data is not required by law or contract, nor is it necessary for the conclusion of a contract. The data subject is under no obligation to provide the data. If the data is not provided, we will be unable to carry out remarketing or conversion tracking.	The cookies themselves do not store by either us or the relevant provider. However, the data contained in the cookies is, however, incorporated into the relevant profile data (see the data category 'Profile Data' below). (For information on the validity period of the cookies stored on your device, please see → **Section H.III.2**)

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
	Click IDs and session data • o Unique identifiers for the (re-) identification of your device (advertising IDs such as IDFA for iOS devices, GAID for Android devices, and the device-specific AppsFlyer ID). o Parameters which are passed to tracking pixels or app interfaces (SDKs) (e.g. partner ID, page type, product numbers, order number, order value, language settings, approximate location data from the IP address, screen size). • Partner identification number, e.g. of the advertising partner Google • Page type (e.g. thank-you page following an order, product detail page, shopping basket, category overview, search results) • Product numbers of the products viewed • Product numbers of the products ordered • Product numbers of the products searched for • Order number • Order value • URL of the page(s) visited • Names/prices of the products viewed • Number of products in the shopping basket • Currency • Language selected on the website			

Categories of personal data processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
	• Approximate location information • User agent data (browser type, device, screen size, email programmes, server) As part of the ID creation process, the IP address is collected and converted into an approximate geographical location. The last octet of this IP address is removed. This data may (depending on your consent to the relevant provider/operator, where applicable) stored in cookies (→ **Section H.III.2**) on your device. When you visit our website or any other websites that are part of the same advertising networks, the information stored in these cookies may be read.			
Installation and interaction data	Data collected specifically during the installation and active use of our app. This includes: • the time of the app download, installation and first time the app was opened. • App version and updates carried out. • Interactions with in-app content (e.g. buttons clicked, banners viewed, features used). • Transactions within the app (in-app purchases, time of purchase, products purchased, order value). • Information about advertising links and deep links used (which campaign led you to us).	Users of our app *(collected via the integrated AppsFlyer Software Development Kit [SDK])*	The provision of this data is not required by law or contractually required. There is no obligation to provide this data. However, without this data, we cannot offer performance measurement for app campaigns or deep linking.	We do not store this data permanently on our own systems. For the purpose of measuring the success of app campaigns and providing deep linking, we transmit it in pseudonymised form to AppsFlyer. AppsFlyer processes the data as part of a pseudonymised profile for as long as is necessary for these purposes . You may withdraw your consent at any time with future effect. In this case, processing for these purposes will cease.
Profile data *(separately for each provider of the relevant marketing*	Data collected by the respective marketing tool and stored in	By the marketing tool on search engines or	-	We do not store this data. The storage of this data takes place in

Categories of personal data that are processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
(tool)	may be stored in a profile when our adverts are displayed to you on the website of the provider of the relevant marketing tool (e.g. their search engine or social network) or on other websites participating in the same advertising network, or if you interact with such adverts (subject, where applicable, to your consent given to the relevant provider/operator): These include the unique ID assigned to your device (cookie ID, advertising ID or AppsFlyer ID) as well as information about our adverts displayed to you on the relevant websites that are part of the same advertising network, or with which you have interacted there. This also includes information about your use of the relevant website and the app. This may also include hashed contact details (e.g. an email address, name and address, or a telephone number) which has been provided to the provider of the relevant marketing tool , as well as technical information about your device that can be (e.g. the screen size).	collected on other websites		the scope of responsibility of the provider of the respective marketing tool for as long as is necessary for the purpose.
Data generated by the relevant marketing tool used on our website or app and added to the profile when you visit our website, or which we add to the profile. This includes your	By the marketing tool on our website	-	We do not store this data. The storage of this data falls within the remit of the provider of the respective marketing tool.	

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
Unique ID assigned to the device. This also includes, for example, the following information regarding the use of our website: • Page views Frequency of • visits • Time spent on pages visited • The 'conversions' (e.g. visiting a product page, adding an item to the 'shopping basket', placing an order, including the order value, registering a customer account or subscribing to our newsletter) • The user's origin (i.e. via which advertising partner or advertising campaign a visitor arrived at our website). This may also include hashed contact details (e.g. an email address, name and address, or a telephone number) which we add to the profile, provided you have a customer account with us and are logged in to it whilst visiting our website . This may also include technical information about your device that can be read from it (e.g. the screen size). This also includes the results of the analysis of this information, in particular the assignment of your profile to specific advertising segments or 'target groups' for the display of adverts, the bounce rate, and the				

categories of personal data that are processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
Turnover.				

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Conversion tracking: 'Conversions' are user activities on our website or in our app as defined by us. 'Conversion tracking' is a process that records what happens after our adverts have been displayed to you on the website of the provider of the relevant marketing tool (e.g. its search engine or social network) or on other websites that cooperate with that provider, or you have interacted with these adverts. For example, we can see whether you subsequently carried out a specific action on our website or in our app (e.g. placing an order or signing up for our newsletter). If our adverts are displayed to you on such websites or you interact with our adverts, information about this may be collected (subject, where applicable, to your consent given to the provider of the relevant marketing tool and the respective operator of other websites), information about this may be collected and stored in a profile	HTTP data, device data, profile data *(separately for each provider of the respective marketing tool)*	No automated decision-making takes place.	Art. 6(1)(a) GDPR (Consent)	*(respective)* marketing tool service provider

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
be stored. In order to associate this information with your device, a unique ID may be assigned to your device, which is linked to the profile. This ID may be stored in cookies (→ **Section H.III.2**) or similar storage formats on your device. When you subsequently visit our website or app, the information stored in these cookies can be retrieved. In this way, your device can be recognised by its ID, and using this ID, retrieve the information stored in the profile regarding your interactions with our adverts and store further data. This enables us to collect information about the use of our website or app, in particular the 'conversions'. Such an association may be carried out not only via the ID but also by matching hashed contact information or, where applicable, via a link to your account with the relevant provider (e.g. your Google account, if you have enabled personalised advertising there). In this way, actions you carry out using different devices can also be attributed to you as a unique user . This enables us to see which keywords, adverts, ad groups and campaigns lead to lead to the user actions we are seeking. We				

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
can also track how our return on investment (ROI) is generated and make informed decisions regarding our advertising expenditure. Furthermore, we can automatically optimise our advertising campaigns in line with our business objectives. The provider of the respective marketing tool we use makes analyses or further information, generated on the basis of the data collected, available to us solely in aggregated, anonymised form. We are generally unable to link the information made information provided to us cannot, as a rule, be linked to any specific individual.				
Remarketing: 'Remarketing' (or 'retargeting') means that we can specifically target users who have already , for example through adverts on the website of the provider of the relevant marketing (e.g. its search engine or social network) or on other websites that cooperate with the relevant provider. When you visit our website or app, information about your use of our website or app and stored in a profile. In order to associate this information with your device, a unique ID is , which is linked to the profile. This ID is stored in cookies (→ **Section H.III.2**) on your device. If you subsequently use	HTTP data, device data and profile data *(separately for each provider of the relevant marketing tool)*	No automated decision-making takes place.	Art. 6(1)(a) GDPR (Consent)	*(respective)* marketing tool service provider

Purpose of the processing of personal data	Categories of personal data being processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
on the same device, visit the website of the provider of the relevant marketing tool (e.g. its search engine or social network) or other websites that cooperate with the respective provider, may (subject, where applicable, to your consent given to the provider of the relevant marketing tool and the respective operator of other websites), your device may be recognised there on the basis of the ID assigned to it, and on the basis of this ID, the stored information regarding your use of our website or app, including the assignment of your profile to specific advertising segments, be retrieved. Such an association may be carried out not only via the ID but also by matching hashed contact information or, where applicable, via a link to your account with the relevant provider (e.g. your Google Account, if you have enabled personalised advertising there). In this way, actions you carry out using different devices may also be attributed to you as a unique user . In this way, the provider of the respective marketing tool we use can or suppress specific adverts (e.g. for products you have already purchased). In addition, the marketing tools use the data collected for predictive targeting.				

Purpose of processing personal data	**Categories of personal data that are processed**	**Automated decision-making**	**Legal basis and, where applicable, legitimate interests**	**Recipients**
In this context, the relevant provider calculates statistical twins of our users based on their usage profiles. The partners apply these insights to other individuals who have similar preferences to our users, in order to draw these individuals' attention to our website and to products.				
Profile enrichment by the provider of the relevant marketing tool we use: If you visit the website of the provider of the relevant marketing tool (e.g. its search engine or social network) or other websites that cooperate with the relevant provider, the provider of the relevant marketing tool we use Marketing tools may store information about your use of such websites and information about the adverts displayed to you there or with which you have interacted, to your profile in order to enable better personalisation Furthermore, profile enrichment enables the provider of the respective marketing tool we use to optimise the delivery of various adverts on our behalf and on behalf of other companies for which it serves adverts (e.g. control the frequency with which certain adverts are displayed).	Device data Profile data *(separately for each provider of the respective marketing tool)*	No automated decision-making takes place.	Art. 6(1)(a) GDPR (Consent)	*(respective)* marketing tool service provider
Personalisation of advertising and enrichment of	Bloomreach profile data (→ **Section B.IV.1**)	No automated decision-making takes place	Art. 6(1)(a) GDPR (Consent)	*(relevant)* marketing tool service provider Bloomreach (→

Purpose of the processing of personal data	Categories of personal data being processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Profiles created by us: We and the provider of the relevant marketing tool we use personalise our advertisements specifically for you based on your profile, in particular based on your use of our website or app. To this end, we analyse the information stored in your profile and, on this basis, assign your profile to specific advertising segments. Provided that, in addition to your consent to one or more of the 'marketing' tools , you have also given your consent to 'personalisation' as a whole, or at least to personalisation via 'Bloomreach' (you can check this via our privacy and cookie settings), we use the data on transactions, preferences and interests from your profile as criteria for creating segmented customer target groups. The contact information for these target groups is sent in hashed form to the respective providers (e.g. social media platforms, search engine operators and advertising networks) and used to serve adverts, to tailor them even more closely to your preferences and interests. This may also include 'guest orders' that we are able to link to your customer account or orders placed in one of our high-street shops that have been customer account.		.		**Section B.IV.3**)

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Determination of billing-related details regarding the placement of advertisements by the provider of the respective marketing tool we use: The information stored in your profile is used by the provider of the respective to analyse the adverts displayed on your device which, via that provider, lead to our website or app , so that they can invoice us for their services. For the purposes of invoicing us, they must determine the number of visits to our website or app via these adverts and other billing-related details (in particular, any purchases made through them).	Profile data *(separately for each provider of the respective marketing tool)*	No automated decision-making takes place and to determine the return on investment (ROI) of our mobile advertising activities.		
In the app only: App attribution: App attribution measures which marketing channel users install the app via. Clicks and installations are a limited period of time. This enables us to measure campaign success and optimise our advertising spend. We link ad clicks and app installations in a pseudonymised manner to measure the success of our campaigns. We only receive aggregated and anonymised reports that cannot be linked to any individual. We use device-specific advertising IDs (IDFA on iOS, GAID on Android) for advertising and campaign measurement. • With your consent	HTTP data, device data, installation and interaction data	No automated decision-making takes place.	Article 6(1)(a) of the GDPR (Consent)	AppsFlyer Ltd. and other marketing tool providers (such as Google Ads, Meta, Pinterest, Criteo)

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
We process these IDs in a pseudonymised form to measure the effectiveness of advertising.				
In the app only: Deep linking (optimised user navigation): After clicking on an advert link, deep linking redirects you directly to the advertised content within our app or – if the app is not installed – to that content after you have downloaded it. For this purpose, technical identifiers are processed temporarily and subsequently deleted.	HTTP data Device data	No automated decision-making takes place.	Art. 6(1)(a) GDPR (Consent)	AppsFlyer Ltd.

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Marketing tool service provider (1): Google Ireland Limited Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland The provider's privacy policy can be found here: https://policies.google.com/privacy?hl=de	(Joint) Controller We process data jointly with Google Ireland. Where applicable, Google Ireland may transfer data to within its area of responsibility to third countries such as the USA.	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Google is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details of the self-certification can be found here: https://www.dataprivacyframework.gov/list
Marketing tool service provider (2): Microsoft Ireland Operations Limited One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland The provider's privacy policy can be found here: https://privacy.microsoft.com/de-de/privacystatement	(Joint) Controller We process data jointly with Microsoft Ireland. Where applicable, Microsoft Ireland , within its area of responsibility, data to	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Microsoft, under the Data

Recipient	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
	Third countries such as the USA.		If the recipient is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to that recipient. Details regarding self-certification can be found here: https://www.dataprivacyframework.gov/list
Marketing tool service provider (3): Criteo SA 32 Rue Blanche, 75009 Paris, France The provider's privacy policy can be found here: https://www.criteo.com/de/privacy/	(Joint) Data Controller	EU	-
Marketing tool service provider (4): retailAds GmbH & Co. KG Kaiserstraße 23, 90403 Nuremberg, Germany The provider's privacy policy can be found here: LINK: https://www.retailads.net/de-de/ueberuns/datenschutz/	(Joint) Controller We process data jointly with retailAds.	EU	-
marketing tool provider (5): Tectumedia GmbH Eichhornstrasse 3 10785 Berlin, Germany The provider's privacy policy can be found here: https://www.tectumedia.com/privacy-policy/	(Joint) Data Controller	EU	-
Marketing tool provider (6): Outbrain UK Limited 5th Floor, The Place, 175 High Holborn, London, WC1V 7AA, UK The provider's privacy policy can be found here: https://www.outbrain.com/legal/privacy#privacy-policy	(Joint) Controller We process data jointly with Outbrain UK. Where applicable, Outbrain UK may transfer data its Scope of responsibility: Data transfers to other third countries such as the USA.	UK and the USA	The transfer personal data to the United Kingdom (UK) and the USA, there are adequacy decisions by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision for the USA is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/179 5/oj As Outbrain is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details of the self-certification can be found here: https://www.dataprivacyframework.gov/list The adequacy decision for the United Kingdom (UK) is available here: http://data.europa.eu/eli/dec_impl/2021/1772/oj

Recipient	Role of the recipient	Transfers to third countries and/or international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Marketing tool service providers (7): RTB House GmbH Kurfürstendamm 226 10719 Berlin, Germany The provider's privacy policy can be found here: https://blog.rtbhouse.com/privacy-policy/	(Joint) Data Controller	EU	-
Marketing tool provider (8): Taboola Germany GmbH Alt-Moabit 2, 10557 Berlin, Germany The provider's privacy policy can be found here: https://www.taboola.com/de/policies/datenschutzerklaerung	(Joint) Data Controller	EU	-
Marketing tool service provider (9): Axel Springer Teaser Ad GmbH ("Ad-up") Axel-Springer-Straße 65, 10969 Berlin, Germany The provider's privacy policy can be found here: https://www.adup-tech.com/rechtliches/datenschutz/	(Joint) Controller We process data jointly with Axel Springer Teaser Ad Deutschland. Where applicable, Axel Springer Teaser Ad Deutschland may, within its area of responsibility, transfer data to third countries such as the USA.	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/179 5/oj
Marketing tool service provider (10): Meta Platforms Ireland Limited Merrion Road, Dublin 4, D04 X2K5, Ireland The provider's privacy policy can be found here: https://de-de.facebook.com/about/privacy/	(Joint) Controller We process data jointly with Meta Ireland. Where applicable, Meta Ireland may transfer data within its area of responsibility to third countries such as the USA.	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/179 5/oj As Meta is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details of the self-certification can be found here: https://www.dataprivacyframework.gov/list
Marketing tool service provider (11): TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland The provider's privacy policy can be found here: https://www.tiktok.com/legal/page/eea/privacy-	(Joint) Data Controller	The provider to whom we transfer personal data to, or which collects such data via our website, is based in	For some of these third countries, there may be a so-called adequacy decision by the European Commission within the meaning of Article 45 of the GDPR, to which a transfer by the provider. Otherwise, such transfers are regularly carried out on the basis of of the European Commission's

Recipient	Role of the recipient	Transfers to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
policy/en		of the EU. This provider may, where applicable, carry out its own area of responsibility, in particular to the USA. We have no knowledge of this.	so-called 'Standard Contractual Clauses' adopted under Article 46(2)(c) of the GDPR to ensure an adequate level of protection for the data transferred. Further information on the respective adequacy decisions or standard contractual clauses may be obtained from the provider where applicable.
Marketing tool service provider (12): Pinterest Europe Limited 2nd Floor, Palmerston House, Fenian Street, Dublin 2, Ireland The provider's privacy policy can be found here: https://policy.pinterest.com/de/privacy-policy	(Joint) Data Controller	The provider to whom we transfer personal data to, or who collects such data via our website, is based in the EU. This provider may, where applicable, its own area of responsibility, data may be transferred to third countries, in particular the USA. We have no knowledge of this.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/179 5/oj As Pinterest is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details on self-certification can be found here: https://www.dataprivacyframework.gov/list
Marketing tool service providers (13): Reddit Inc. 303 2nd St, San Francisco, CA 94107, United States The provider's privacy policy provider can be found here: https://www.reddit.com/policies/privacy-policy	(Joint) Data Controller	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/179 5/oj As Microsoft is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details on self-certification can be found here: https://www.dataprivacyframework.gov/list
Marketing tool service provider (14): AppsFlyer Ltd. 14 Maskit St., Herzliya, Israel The provider's privacy policy can be found here: https://www.appsflyer.com/legal/services-privacy-policy/	Data processor	EU and Israel Where necessary, AppsFlyer may transfer data to other third countries, such as the USA, in the course of providing its services (e.g. via sub-processors) to other third countries such as the USA.	For the transfer of personal data to Israel , an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR (Decision 2011/61/EU). The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec/2011/61(1)/oj For any data transfers by AppsFlyer to third countries without an adequacy decision (such as the USA), AppsFlyer uses

Recipient	Role of the recipient	Transfers to third countries and/or international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
			suitable safeguards such as the EU Standard Contractual Clauses pursuant to Article 46(2) (c) of the GDPR, or relies on the EU U.S. Data Privacy Framework for recipients self-certified under that framework.

III. Use of web analytics technologies (using 'analytics' cookies and comparable tracking technologies (app))

Provided that you have given your consent to this in our privacy and cookie settings, we use certain web analytics technologies on our website or app (i.e. where you have given your consent to the 'Analytics' category or to specific web analytics technologies listed under this category in our privacy and cookie settings). The relevant providers are listed in → **Section B.III.3** and you can make individual selections regarding these technologies in our Privacy and Cookie Settings.

Web analytics enables the collection and analysis of information about the activities of users of our website or app. These web analytics technologies are used for the following purposes:

- to improve the website and app, including so-called "A/B tests" (comparing user behaviour across different layout variants of our website)
- To better achieve the objectives of the website and app (e.g. increasing page views)
- Calculating remuneration for advertising partners (affiliates)

A specific form of web analytics is the creation of video recordings of the content of our users' browser windows when they visit our website, using monitoring technology from Datadog and Mouseflow. The video recordings reveal the details of interactions with our website (for example, through the display of mouse movements), which is necessary in certain error scenarios where aggregated insights from regular web analytics are insufficient.

We use cookies for these purposes (□ **Section H.III.3**).

You can find more detailed information on this below:

1. Details of the personal data that is processed

Categories of personal data that are processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
Web analytics HTTP data / App analytics event data *(separately for each web analytics tool)*	Log data generated automatically for technical reasons when you visit the website and use our native app via the Hypertext Transfer Protocol (Secure) (HTTP(S)). This includes your IP address, the type and version of your internet browser or the HTTP component used in the app, the operating system or the operating system of the end device, the page accessed or the API endpoint accessed, the previously visited page (referrer URL), as well as the date and time of the request. In the app (in particular Firebase for Google Analytics): device ID (IMEI / advertising IDs such as IDFA/GAID), app instance ID, IP address, operating system used, device and system properties, installed app version, page/screen accessed, date and time of access, app updates, app launches. In addition, links from our advertising partners to our website may contain certain parameters that help us better identify the origin of our users (e.g. identification numbers of specific advertising media or campaigns)	of the website or app user.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to carry out web analytics using the relevant web analytics tool.	<u>For Google Analytics & Firebase for Google Analytics:</u> On this website and in the app, so-called IP anonymisation or IP masking . This means that the IP address, which is transmitted for technical reasons, is anonymised by truncated before being stored. With Firebase for Google Analytics, the IP address is, by default, used only to determine the approximate geographical location and is then discarded. We store the remaining data for 14 months (or a maximum of 38 months for certain Google Analytics historical data). <u>For AB Tasty and Mouseflow (only websites):</u> The IP address is transmitted to AB Tasty/Mouseflow and converted into an approximate location. The IP address is not stored by AB Tasty/Mouseflow and is used solely to identify the location. We store the remaining data for the duration of the session. With Mouseflow, for 12 months. <u>For Datadog (website only websites):</u> No IP addresses are stored. We store the remaining data for 30 days. <u>For Factfinder (website and app)</u>: The IP address is stored in log files.
Web/app analytics cookies and device identifier data	Data stored in cookies or similar technologies (such as app	of the website or app user.	Provision is not required by law or contract, nor is it necessary for	The cookies themselves do not store . The

categories of personal data that are processed	**Personal data included in the categories**	**Sources of the data**	**Obligation to provide the data**	**Retention period**
(specified separately for each web analytics tool)	IDs/SDK technologies) for the respective web analytics tool (e.g. Google Analytics / Firebase for Google Analytics) are stored on users' devices. These include a unique ID (such as a client ID, app instance ID or advertising ID) for the (re-) of returning visitors. This may also include test and variant IDs for mapping different display variants of our website, as well as timestamps . (□ **Section** **H.III.3** for detailed information on the contents of the cookies used.)		necessary for the conclusion of a contract. There is no obligation to provide the data. If the data is not provided, we will be unable to carry out web analytics using the relevant web analytics tool.	However, the data contained in cookies is incorporated into the relevant web analytics profile data (see the data category 'Web analytics profile data' below). (□ **Section** **H.III.3** for information on the validity period of the cookies.)
Web/App analytics profile data *(separately for each web analytics tool)*	Data generated by the respective web analytics tool (such as Google Analytics / Firebase for Google Analytics) and which is stored separately for the respective web analytics tool in pseudonymous usage profiles. This includes information about the use of the website or app, in particular page and screen views, frequency of visits, time spent on pages/screens visited, the order in which the content was accessed, in-app purchases, clicks, interactive actions such as adding to or emptying a shopping basket, as well as the origin of individual visitors (i.e. via which advertising partner or advertising campaign a visitor arrived at the website or app), linked to the unique ID of the respective web analytics cookie or device identifier data.	Generated automatically.	-	For Google Analytics & Firebase for Google Analytics: 14 months (or up to 38 months for certain Google Analytics historical data). For AB Tasty (website): 13 months For Datadog (website only website): 30 days For Mouseflow (website only): 12 months

Categories of personal data processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
Video data	Video recording of the browser content of a session (a visit) by our website users. The video recording displays the browser content exactly as the respective user saw it, including mouse movements. When text is entered into text fields, the text is is obscured; that is, text entered into text fields is displayed in the video recordings as, for example, “xxxxxxxxx” . Content from other browser windows outside our website or other screen content is not visible. Mouseflow: Website content containing personally identifiable information is not recorded (e.g. your name, if you are logged into your account).	Generated automatically	-	Data Dog: 30 days Mouseflow: 12 months
Factfinder search function data	These include search terms, a unique ID to identify the visitor during the session, and an session ID.	Generated automatically.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the the event that the data is not provided, we cannot carry out web analytics using the relevant web analytics tool.	Stored locally in the browser’s session storage or in the visitor’s app’s working memory until the end of the session.

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Web analytics to better achieve the objectives of the website or app (e.g. increasing page views): To this end, users’ behaviour on our website and app is recorded and, in pseudonymised form,	Web analytics HTTP data / App analytics event data Web/app analytics cookie and device identifier data Web/app analytics profile data	No automated decision-making takes place.	Article 6(1)(a) (a) of the General Data Protection Regulation (consent).	For Google Analytics & Firebase for Google Analytics: Google Ireland Limited For AB Tasty (website only the website): AB Tasty SAS For Datadog (website only website):

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
analysed. Users of the website or app are identified in pseudonymous form (e.g. by means of cookies or app instance IDs), so that they can be recognised on the website or app. Pseudonymous usage profiles are created from this information. The pseudonymous usage profiles are not merged with data relating to the person behind the pseudonym. The aim of the process is to investigate where (e.g. via which advertising partners and which advertising campaigns) users are coming from, which sections of the website or app are visited, and how often and for long which subpages and categories are viewed. This enables us to improve our website and app by tailoring them to the needs of our users, manage campaigns more effectively and calculate the remuneration paid to our advertising partners (affiliates). For these purposes, cookies or similar technologies (e.g. SDKs from web analytics tools) are used. (□ **Section H.III.3** for detailed information on the purposes for which the cookies are used.)				Datadog, Inc.
A/B testing based on web analytics: Web analytics also involves the carrying out of so-called 'A/B tests' (also known as 'split testing'), in which we test different versions of our website against one another. This testing method enables us to automatically present different users of our website to automatically and at random with different	web analytics HTTP data / app analytics event data, web analytics cookie data web analytics profile data	No automated decision-making takes place.	Article 6(1)(a) (a) of the General Data Protection Regulation (consent).	For Google Optimize: Google Ireland Limited For AB Tasty: AB Tasty SAS

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
To display different layouts of a specific page. In doing so, details of usage behaviour across different layout variants are collected, analysed and compared (e.g. analysing which layout variant of our newsletter sign-up form results in more frequent newsletter subscriptions). The aim is to optimise the website for a better user experience (e.g. optimising functions, layouts and transparency).				
Video recording during newsletter or member account registration and at checkout to improve the website and identify errors more quickly: From the usage profiles created using Datadog's web analytics technology, videos are which reproduce the content of the browser window exactly as the respective user saw it and interacted with it . To this end, the web analytics tool records, in particular, mouse movements. When text is entered into text fields, the text is obscured; that is, entries are displayed in the video recordings as, for example, "xxxxxxxxx". Consequently, no data entered by our users is recorded. The aim of the analysis is to identify sources of error on the website and to understand how they arise. We use the information obtained to improve our website and to better achieve our website's objectives (e.g. good navigation on the	Web analytics profile data Datadog video data	No automated decision-making takes place.	Art. 6(1)(a) GDPR (Consent).	Datadog

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Website). We only view such individual video recordings if the aggregated findings from our regular web analytics are insufficient (e.g. because error messages are highly specific, perhaps due to particular features of the browser used).				
Provision and optimisation of the search functions on our website or app: For this purpose, data that you enter into our search functions is sent to FactFinder's servers. The information collected enables the FactFinder search tool to learn from users' behaviour: . The data provided may be used to identify events such as visiting product detail pages, adding products to the shopping basket or completing a purchase . This information forms the basis for the automated optimisation of the search. Based on the recognised user behaviour, the search results are continuously improved.	Search function data.	No automated decision-making takes place.	Article 6(1)(a) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the website's search functions accessed by the user.	Omikron Data Quality GmbH
Web analytics to better achieve the website's objectives (e.g. improved user experience). To this end, user behaviour (click, mouse movement and scroll data at URL level) is visualised in various ways (e.g. heatmaps, screen recordings, form analyses). Entries in text fields are expressly not recorded and are deliberately obscured and displayed as "xxxx". Similarly, content that is expressly excluded from	web analytics HTTP data , app analytics event data, web analytics cookie data, web analytics profile data or video data (Mouseflow)	No automated decision-making takes place.	Article 6(1)(a) of the General Data Protection Regulation (consent).	Mouseflow

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
recorded. The user's of users' movements within the online shop across the various pages is recorded and analysed in the form of user journeys and funnel analyses in order to optimise the user experience and reduce errors. Data may be combined with user segments for analysis purposes, for personalisation using the Bloomreach software or for A/B testing using the AB Tasty software.				

3. Details regarding the recipients personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Google Analytics and Firebase for Google Analytics			
Google Ireland Limited, Google Building, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland	Data processor	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Google is self-certified under the Data Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details regarding self-certification can be found here: https://www.dataprivacyframework.gov/list
AB Tasty			
AB TASTY SAS 3 impasse de la Planchette F-75003 Paris	Data processor.	EU and USA	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As sub-processors of AB-Tasty, Google and Microsoft are self-certified under the Data Privacy Framework , this adequacy decision also applies to the

recipient's	Role of the recipient	Transfers to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
			Transfer to this recipient. Details regarding self-certification can be found here: https://www.dataprivacyframework.gov/list
Datadog			
Datadog, Inc. 620 8th Ave, 45th Floor, New York, NY 10018, United States of America	Data processor	EU and USA	The transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Datadog is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details regarding self-certification can be found here: https://www.dataprivacyframework.gov/list
FactFinder			
Omikron Data Quality GmbH Habermehlstr. 17 75172 Pforzheim	Data processor	EU	
Mouseflow			
Mouseflow ApS Flaesketorvet 68 1711 Copenhagen, Denmark	Data processor	EU and USA	For the transfer of personal data to the USA, an adequacy decision by the European Commission within the meaning Article 45 of the GDPR. The adequacy decision is available here: Implementing Decision 2023/1795 – EN – EUR-Lex As Mouseflow is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details on self-certification can be found here: Data Privacy Framework

IV. Use of personalisation technologies (using personalisation cookies and similar tracking technologies (app))

Provided you have given your consent to this in our privacy and cookie settings, we use our website and in our app to personalise content within our online shop and our newsletters, as well as for our direct mail (i.e. if you have given your consent to the 'Personalisation' category or to individual personalisation technologies listed under this category in our Privacy and Cookie Settings). The respective providers are listed in → **Section B.IV.3** and you can make individual selections regarding these technologies in our Privacy Policy and Cookie Settings.

The use of these
personalisation technologies serves the following purposes:

- Engaging users via
product recommendations at specific points in the online shop (website and app) based on the usage behaviour of users of our website and app
- Providing the size guide tool on the website
- Personalising content on our website or app
(in particular product recommendations) based on the usage behaviour of users of our website and app, and, where applicable, based on the data stored in our users' customer accounts
- Collection and analysis of the behaviour of
users of the website or app, in order to use this information to personalise our newsletters and direct mail, tailoring them to the respective subscriber

For this purpose, we use cookies or
similar technologies (□ **Section H.III.4**).

You will find detailed information on
this below:

1. Details of the personal data that is processed

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
epoq				
epoq **HTTP data.**	Log data generated automatically via the Hypertext Transfer Protocol (Secure) (HTTP(S)) when using the web tracking tool employed on the website. This includes your IP address, device, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), and the date and time of access.	Users of the website.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we cannot carry out web tracking using epoq.	The use of the web tracking tool epoq on this website, so-called IP is enabled. This means that the IP address transmitted by the browser for technical reasons is anonymised prior to storage by truncating the IP address (by deleting the last octet of the IP address) before it is stored. Deletion after 1 year.
epoq **Cookie data.**	Data stored in cookies for the web tracking tool on users' devices . This includes a unique ID for the (re)identification of returning visitors. It also includes information on the types of pages visited by the user (e.g. the thank-you page	on the website.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we cannot carry out web tracking using epoq.	(□ **Section H.III.4** for information on the retention period of the cookies.)

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide data	Retention period
	following an order, product detail page, shopping basket), product numbers of the products viewed, number of products in the shopping basket. (□ **Section H.III.4** for detailed information on the content of the cookies used.)			
epoq **Profile data**	Data that we generate via the web tracking tool and which is stored in pseudonymous usage profiles. This includes information about website usage, in particular page views, frequency of visits and time spent on the pages visited, linked to the unique visitor ID of the respective visitor contained in the epoq cookie data.	Generated automatically.	-	Deleted after 1 year.
Saiz				
Saiz HTTP data	Log data generated automatically via the Hypertext Transfer Protocol (Secure) (HTTP(S)) when using the Saiz size guide tool available on the website. This includes your IP address, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), and the date and time of the request.	Website user.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we will be unable to offer you sizing advice.	***90 days***
Saiz cookie data	Data stored in cookies for the Saiz size advice tool on users' devices. This includes a unique ID for (re)identifying users of the size advice tool. (□ **Section H.III.** for more detailed information on the contents of the cookies used.)	Website user.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to offer you size advice.	We do not store the cookies themselves or the information contained within them. (□ **Section H.III.4** for information on the validity period of the cookies.)
Size advice data	Data generated when using the size guide tool: This includes information that you provide when using the size guide tool	user of the size guide.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to	90 days.

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
	Specify: age, gender, height in cm, bust measurement (if applicable), hip circumference, if applicable, waist circumference, weight, information on physique and body shape, as well as IP address, linked to the respective Saiz cookie data . This also includes information on recommended sizes and the probabilities that these sizes will fit.		Provision of data. If you do not provide this data, we will be unable to offer you sizing advice	
Bloomreach				
Bloomreach HTTP data	Log data generated automatically via the Hypertext Transfer Protocol (Secure) (HTTP(S)) when using the Bloomreach personalisation tool on the website or app. This includes your IP address, device type, the type and version of your web browser or the HTTP component used in the app, the operating system you are using or the operating system of the end device, the number of pages viewed, the number of visits, the sequence of visits, and the duration of the visit.	Users of the website or app.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we cannot offer you an optimised or personalised user experience.	The IP address is transmitted to Bloomreach and converted into an approximate location. The IP address is not stored by Bloomreach and is used solely to identify the location. The remaining data is also stored in anonymised form so that it can be analysed for statistical purposes.
Bloomreach cookie data	Data stored in cookies for the Bloomreach personalisation tool on users' devices. This includes a unique ID for the (re)identification of returning visitors. It also includes usage and interaction data: pages visited and time spent on them, click behaviour, search queries on the website or app, interactions with banners or product recommendations. (□ **Section H.III.4** for detailed Information about the content of the cookies used.)	Users of the website or app.	Provision is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we cannot offer you an optimised or personalised user experience.	Cookie data is stored for 7 days to 3 years. (□ **Section H.III.4** for information on the validity period of the cookies.)
Bloomreach profile data	Data that we generate via the Bloomreach personalisation tool and which is stored in pseudonymous or customer-specific usage profiles	Users of the website or app.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to	We store this data for as long as you have subscribed to a newsletter or loyalty programme.

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
	include: This includes information about the use of the website or app, in particular page views, actions on the website or app (e.g. adding products to the shopping basket), frequency of visits and time spent on pages visited, linked to the the unique visit ID or app instance ID contained in the Bloomreach cookie data for the respective visitor's app. Where linked to a member account, this also includes the member ID and email address of the customer, as well as transaction data stored in the member account relating to orders placed in our online shop (website and app) and other purchases linked to the member account (e.g. in our high-street shops). This also includes information derived from this data regarding the preferences and interests of users or customers.		Provision of data. If you do not provide this data, we will be unable to offer you an optimised or personalised user experience.	We also store this data in anonymised form in order to analyse it for internal, statistical purposes.
Emarsys eMarketing Systems AG				
Emarsys HTTP data	Log data generated automatically for technical reasons when using the Emarsys web tracking tool via the Hypertext Transfer Protocol (Secure) (HTTP(S)). The data collected includes the following: • Browser and its version, • operating system, referring • URL • IP address (encrypted and truncated) • Session and cookie IDs • Country	Website user.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we cannot carry out web tracking using Emarsys .	1 year.
Emarsys cookie data	Data stored in the Emarsys cookies for the relevant web tracking tool on the end devices of users	Website user.	Provision is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to	The expiry dates are normally one year, with the exception of the session cookie, which expires at the end each session

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
	. In general, cookies collect the following two types of information: Information about the service IP address, browser Cookie identifiers Pseudonymised identifiers (newsletter or member) when visiting the website. Information on browsing behaviour Product numbers of the products viewed Product numbers of the products added to the shopping basket Product numbers of the products purchased		Provision of data. If the data is not provided, we will be unable to carry out web tracking or (insofar as this is the purpose of the relevant web tracking tool) send users personalised advertising offers.	will be deleted. (□ **Section H.III.4** for information on the retention period of the cookies.)
Emarsys profile data	The Emarsys database regularly updates data it has collected during visitor sessions. Here, , the identifiers for these sessions stored in cookies are mapped to the identification keys stored in the Emarsys contact database (e.g. encrypted email addresses). This also includes the interests in products/product categories.	Generated by Emarsys	-	We store this data for as long as you remain subscribed to our newsletter. We also store this data in anonymised form so that we can analyse it for internal statistical purposes.

2. Details regarding the processing of personal data

	Categories personal data being processed	Automated Decision-making	Legal basis and legitimate interests, where applicable	Recipients		
Purpose of processing the personal data						

Purpose of processing personal data	Categories of personal data being processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients		
epoq						
Engaging with users via product recommendations at specific points in the online shop based on the usage behaviour of users of our website: To this end, users' behaviour on our website is recorded and analysed in pseudonymised form. Website users are identified in pseudonymised form so that recognise them **on our website**. From this information, pseudonymous usage profiles are created. The pseudonymous usage profiles are not linked to data relating to the person behind the pseudonym. The aim of this process is to identify a user who has already shown an interest in a product on our website to our website to draw their attention to the product again, in order to increase the relevance of the advertising and thus the click-through and conversion rates (e.g. order rate). From the (truncated) IP address, we also determine the approximate geographical location of users in order to further personalise product recommendations based on location (e.g. based on the weather at the respective location). epoq offers various analytics tools for this purpose. (□ **Section H.III.4** for detailed information on the purposes for which the cookies are used.)	epoq HTTP data, epoq cookie data, epoq profile data	No automated decision-making takes place.	Article 6(1)(a) a of the General Data Protection Regulation (consent).	epoq		
Saiz						
Provision of the size guide tool on the website:	Saiz HTTP data, Saiz cookie data, size guide	No automated decision-making takes place	Article 6(1)(a) (a) of	Saiz GmbH		

Purpose of the processing of personal data	Categories of personal data being processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients		
The size advice tool recommends the size most likely to fit users best. Once users have entered their body measurements, the tool calculates, based on actual pattern data, the probability that a particular size of our product will fit the respective user. Data is pseudonymised and processed temporarily on our web server in order to provide you with the size advice tool and to ensure the security of the IT infrastructure of the size advice tool. To this end, information about your use of the size advice tool is stored in cookies (□ **Section H.III.4**) on your device. If you wish, you can delete the data stored in cookies on our servers and on your device via our cookie banner.	Data	in accordance with	General Data Protection Regulation (consent).			
Bloomreach						
Personalisation of content on our website or app (in particular product recommendations) based on the usage behaviour of users of our website and app and, where applicable, on the basis of the : When you visit our website or app , information about your use of our website or app is collected and stored in a profile that is initially pseudonymous. In order to associate this information with your device,	Bloomreach HTTP data, Bloomreach cookie data, Bloomreach profile data. All data categories from Sections C (Online Shop) and E (Member Account)	No automated decision-making takes place	Article 6(1)(a) (a) of the General Data Protection Regulation (consent).	Bloomreach		

Purpose of processing personal data	Categories of personal data being processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients		
, your device will be assigned a unique ID is assigned to your device, which is linked to your profile. This ID is stored in cookies (**--> Section H.III.4**) on your device. Your device can be recognised by the ID assigned to it so that subsequent visits made using the same device can also be attributed to the profile. Usage and interaction data, as well as transaction and e-commerce data relating to users are collected in pseudonymised form, assigned to the usage profile and analysed. If, after logging in, in your customer account as a registered Marc O'Polo customer, the pseudonymised usage information collected (including prior to logging in) is merged with the existing customer data. This creates a customer-specific usage profile, which, in particular, also consolidates usage across different devices. Any orders you may have placed as a guest ("guest checkout function without logging into a member account") are added to your customer account in the background using your email address, provided you have already created an account with this email address or you create a customer account after placing the order as a guest. (Note: The order will be added to your purchase history, but no bonus points will be credited.) We use the information collected to tailor the content,						

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients		
which we display to you on our website, the app and its push notifications, to better align with your personal interests. This includes, for example, personalised product and size suggestions based on the data you have entered, as well as content , which we believe may be relevant to you . We use cookies for these purposes. (□ **Section H.III.4** for detailed information on the purposes for which the cookies are used.) *Please note:* Provided that you have given your consent not only to 'personalisation' in general or at least to personalisation via 'Bloomreach', but also to one or more of the 'marketing' tools (you can check this via our privacy and cookie settings), we will further enrich the profiles created by the respective marketing tool providers with information from the profiles created by Bloomreach, in order to be able to display the content, which is better personalised in this way, to you on other marketing channels as well (e.g. Facebook) (**--> Section B.IV.2**).						
Emarsys eMarketing Systems AG						
Collection and analysis of the behaviour of website users in order to use this to personalise our newsletters and direct mail, tailoring them to the respective subscriber: The collection and	Emarsys HTTP data Emarsys cookie data Emarsys profile data	No automated decision-making takes place.	Article 6(1)(a) (a) of the General Data Protection Regulation (consent).	Emarsys eMarketing Systems AG		

Purpose of processing personal data	Categories of personal data being processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients		
Analysis of your usage behaviour via the Emarsys analytics tool only takes place • if you have given your consent to "personalisation" in our Privacy Policy and cookie settings and have also • have subscribed to our email newsletter (--> **Section D**) and/or • You are a member of our loyalty programme (--> **Section E**). In this case, a usage profile is created from your usage behaviour and click data to create a usage profile, from which deduce your interests in our products. In order to present you with personalised content (newsletters or direct mail), we store the interests identified in this way as category data (for example, the most recently clicked category or products that were added to the shopping basket but no unique click paths) in your customer profile, which we maintain for you as a a participant in the loyalty programme. We use cookies for these purposes. (□ **Section H.III.4** for detailed information on the purposes for which the cookies are used.)						

3. Details regarding the recipients personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
epoq			
epoq internet Services GmbH · Willy-Brandt-Straße 3 · 76275 Ettlingen	Data processor.	EU.	-.
Saiz			
SAIZ GmbH (Pappelallee 78/79, 10437 Berlin, Germany)	Data processor.	EU and USA.	The transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj The transfer of personal data to the USA is carried out via Saiz's subcontractors .
Bloomreach			
Bloomreach B.V. Fred. Roeskestraat 109, 1076 EE Amsterdam, Netherlands	Data processor	EU and USA.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Bloomreach is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details of the self-certification can be found here: https://www.dataprivacyframework.gov/list
Emarsys eMarketing Systems AG			
Emarsys eMarketing Systems AG Hans-Fischer-Str. 10, 80339 Munich, Germany	Data processor	EU and UK.	The transfer personal data to the United Kingdom (UK), there is an Adequacy Decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: http://data.europa.eu/eli/dec_impl/2021/1772/oj
Talon.One GmbH			
Talon.One GmbH Wiener Straße 10, 10999 Berlin, Germany	Data processor	EU and UK.	An adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here:

Recipient	Role of the recipient	Transfers to third countries and/or international organisations	Adequacy decision or suitable or appropriate safeguards for transfers to third countries and/or to international organisations
			http://data.europa.eu/eli/dec_impl/2021/1772/oj

C. Information on the processing of personal data of customers of our online shop (website and app)

On our website and in our app, you can use our MARC O'POLO online shops, which are available in different country-specific versions via country-specific URLs (e.g. for Germany at http://www.marc-o-polo.com/de-de/) (hereinafter referred to as 'country-specific shops'). An overview of the individual country-specific shops can be found in Part A, Section 1.1 of our Terms and Conditions. The country-specific shops on app and website are hereinafter collectively referred to as the 'online shop'.

When using our Online Shop, we process various categories of personal data that you provide to us, for example via the order form, for the following purposes:

- To provide various functions within our Online Shop,
- to conclude, execute and rescind sales contracts,
- to send emails advertising our own similar products in accordance with the provisions of Section 7(3) of the Unfair Commercial Practices Act (UWG),
- to ensure the security of the the IT infrastructure used to operate the online shop,
- for the administration and enforcement of our claims for the purchase price,
- for the provision of the review function,
- to provide address correction suggestions during the 'Checkout' stage of the ordering process,
- to carry out an order and risk check before the order is finalised,
- to carry out a fraud and credit checks during and after the order is completed,
- to carry out a sustainability check,
- to carry out customer surveys for market research purposes, as well as

- for evidential purposes and to fulfil statutory retention obligations

You can place orders in our online shop, you can place orders ‘as a guest’ (website only) or, alternatively, via a customer account. Use of our customer account is available in the country-specific shop is available exclusively to members of the MARC O’POLO COMMUNITY loyalty programme. The details of the processing of personal data of loyalty programme members, including the use of the member account, are described in Section E of this privacy notice.

Below you will find detailed information on this:

1. Details of the personal data that is processed

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
HTTP data.	Log data collected when accessing the website and using our native app via the Hypertext Transfer Protocol (Secure) (HTTP(S)) . On the website: This includes your IP address, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), and the date and time of access. In the app: This include the IP address, the type and version of the HTTP component used in the app, the operating system used or the operating system of the end device, the page accessed or the web address of a technical service (API endpoint) accessed by the app via which data is received or provided, the previously visited page (referrer URL), as well as the date and time of the request.	User of the online shop.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we may be unable to provide the requested content on the website .	Data is stored in server log files in a form that does not allow the identification of the data subject , for a maximum period of 7 days, unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.
Shopping basket data.	Data relating to products that you place in the online shop’s shopping basket. This includes product name, product number, quantity, size, colour, price and currency.	User of the online shop.	Provision of this information is required to conclude a contract of sale. There is no obligation to provide this information. If you do not provide this information, you will not be able to purchase items via our online shop.	Before completing an order: Without logging in: We do not store this data permanently on our systems, but process it only temporarily whilst the website or app is being used (e.g. to display the contents of your shopping basket). The following

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
				Temporarily locally in the user's browser or in the app for the duration of the user's session. During/after login: By logging into your customer account, the shopping basket data is . After completing an order: Data is stored until your order has been fully processed, i.e. until the goods have been dispatched. We also store this data for evidence purposes in order to assert, exercise or defend legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Contact details.	Data that you provide to us as part of the ordering process to enable us to contact you for the purpose of processing your order. This may include, in particular, the following details: title, surname, first name, postal address, telephone number and email address.	User of the online shop.	The provision of data marked as mandatory during the ordering process is required for the conclusion of the contract. There is no obligation to provide this data. If the data is not provided, it will not be possible to conclude a contract.	Data will be stored until your order has been fully processed, i.e. until the goods have been dispatched. We also store this data for evidential purposes in connection with the assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end the year in which you provided us with the data and, in the case of any

Categories of personal data processed	Personal data falling within the categories	Sources of the data	Obligation to provide the data	Retention period
				Legal disputes until their conclusion. We also retain this data insofar as statutory retention obligations exist, in particular under commercial and tax law. Depending on the nature of the documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Shipping data.	Data that you provide to us as part of the ordering process for the dispatch of the items you have ordered. This includes the delivery method you have selected and, where applicable, any delivery address you have provided that differs from the delivery address, which may differ from the billing address.	User of the online shop.	Provision of this data is necessary to conclude a contract of sale. There is no obligation to provide the data. If you do not provide the data, you will not be able to purchase items via our online shop.	We store the data until your order has been fully processed, i.e. until the goods have been dispatched. We also store this data for evidence for the purpose of asserting, exercising or defending legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB).
Payment details.	Data that you provide to us for the payment of the items you have ordered. This depends on the payment method you choose. Depending on the payment method, this may include, for example, your IBAN, BIC or billing address.	User of the online shop.	The provision of data marked as mandatory during the ordering process is required for the conclusion of the contract. There is no obligation to provide this data. If the mandatory details are not provided, it is not possible to conclude a contract.	Data is stored until your order has been fully processed, i.e. until the goods have been dispatched. We also store this data for evidential purposes in connection with the potential assertion, exercise or defence of legal claims, and furthermore for a

Categories of personal data that are processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
				A transitional period of three years from the end of the year in which you provided us with the data and, in the event of any legal disputes, until such disputes are resolved. We also retain this data for as long as statutory retention obligations – in particular those under commercial and tax law – apply. Depending on the type of documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Order details.	Information about your order. This includes details of the items purchased (item description, item number, price, currency, order number), the store version used, the date and time of the respective purchase, the device used and, if using the app, its operating system, the selected payment method and delivery method, and the status of your order.	Generated automatically.	-	Data is stored until your order has been fully processed, i.e. until the goods have been dispatched. We also store this data for evidential purposes in connection with the assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Customer data.	Data that we process for the administration of our purchase price receivables within our internal accounts receivable management system. This includes, in particular, information regarding the confirmation or cancellation	payment service providers, debt collection agencies, generated independently.	-	Data is stored until your order has been fully processed, i.e. until the goods have been dispatched. We store this data for evidence purposes in the event of any claims,

Categories of personal data processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
	payment, current outstanding items, payments received, reminder stages, ongoing debt collection processes, returns.			Exercising or defending legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the nature of the documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Transactional email data.	Information from transactional emails that we send to process or cancel your order (e.g. order confirmation). This includes the content and time of the transactional emails.	Generated automatically.	-	Data is stored until your order has been fully processed. This includes, in particular, any potential cancellation of the order. We also store this data for evidence purposes in order to assert, exercise or defend legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the nature of the documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Order and return values.	Any information provided by	user of the online shop.	Provision is not required by law or contract	Storing the reasons for returns

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
	Reasons for returns.		Mandatory or required for the conclusion of a contract. There is no obligation to provide the data. If the data is not provided, we cannot take the reasons for returns into account when calculate and assess the returns rate.	We do not store this on our systems. We store the returns rate calculated by us for 24 months.
The order total and the total price of the returned goods, as well as the contact details you provided, which we need to calculate your returns rate. To calculate your returns rate, we determine the percentage of your returns based on the total order value generated by orders placed via our online shop.	Generated independently.	-		
Creditworthiness data.	Information regarding our customers' creditworthiness. This includes, in particular, credit reports provided by credit reference agencies based on insolvency and debtor register data from local courts and notifications from creditors or creditors' representatives regarding payment behaviour in breach of contract.	Credit reference agencies.	-	We store the data until your order has been fully processed, i.e. until the goods have been dispatched. We also store this data for evidence for the purpose of asserting, exercising or defending legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB).
This also includes information information generated by us	Generated independently.			

Categories of personal data that are processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
regarding the timely settlement of our claims and insights we derive from past fraud and credit checks, such as spending limits on your purchases.				
Market research data.	Information that we collect as part of customer surveys for market research purposes, in order to analyse, in pseudonymised form, in particular our customers' satisfaction and to improve the content of our offering.	Users of the online shop.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data is not provided, we will be unable to carry out surveys and analyses for market research purposes.	We store this data in pseudonymised form for a maximum of 38 months. We also store this data in anonymised form beyond this period in order to analyse it for internal statistical purposes.
App review data	Information that we collect as part of customer surveys for market research purposes, in order to analyse, in pseudonymised form, in particular to analyse our customers' satisfaction with our app and to improve the content of our offering.	Users of the online shop (app only).	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to carry out surveys and analyses for market research purposes.	We store this data in pseudonymised form for a maximum of 38 months. We also store this data in anonymised form in order to analyse it for internal statistical purposes.
Advertising management data.	Information regarding any consent you have given for advertising, as well as any objections you may have raised to advertising. This includes the subject matter, date and time of the consent, the IP address of the device used to give consent, and the subject matter, date and time of any withdrawal of consent or an objection to the processing of personal data for advertising purposes.	Users of the online shop.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to take your consents or your objections to marketing into account.	We store this data for as long as consent remains in force or for as long as we carry out advertising activities without consent on the basis of the information provided to you in each instance this advertising. We also store this data for evidential purposes in connection with the potential assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you withdrew your consent or we ceased the relevant advertising campaign, and, in the event of any legal disputes, until such disputes have been resolved.
Virtual fitting data.	Information relating to the virtual fitting, which we collect on the basis of your consent amongst	Users of the online shop.	Provision is not required by law or contract, nor is it necessary for	We store this data for the duration of a session.

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
	collected during the session. This includes the subject matter, date and time of consent, the IP address of the device used to give consent, and the subject matter, date and time of any withdrawal of consent or an objection to the processing of personal data for marketing purposes.		This is required to conclude a contract. There is no obligation to provide the data. If you do not provide the data, we will be unable to offer you the virtual fitting service.	

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Provision of our online shop functions on the website or app. For this purpose, HTTP data is processed temporarily on our web server.	HTTP data, shopping basket data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the website content accessed by the user.	Hosting provider.
Conclusion and performance of sales contracts concluded via the online shop. This includes, in particular, processing the payment, dispatching the goods you have ordered, and the sending of transactional emails to keep you informed of the current status of your order. If you choose a payment service provider when making your payment, it is possible that this provider may carry out a credit check. Please refer to the information on data protection provided by our payment partners: **Adyen N.V.,** Simon Carmiggelstraat 6-50, 1011 DJ Amsterdam, Netherlands Credit card (Visa, MasterCard), P24, iDeal, Klarna: Adyen Privacy Policy	Shopping basket data, contact details, delivery details, payment details, order details, transaction email details. If you select payment service providers such as Klarna, PayPal, P24 and iDeal, we will pass on the following data: order data, contact details	No automated decision-making takes place.	Article 6(1)(b) (b) of the General Data Protection Regulation (fulfilment of a contract or the implementation of pre-contractual measures).	Hosting providers, Arvato Distributions, parcelLab, system and service email providers, delivery service providers, payment service providers.

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Klarna Bank AB (publ), Sveavägen 46, 111 34 Stockholm, Sweden: Paylater (purchase on account): Klarna Privacy Policy **PayPal (Europe)**, S.à.r.l. et Cie, S.C.A, 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg: PayPal: PayPal Privacy Policy **American Express Europe S.A.,** Theodor-Heuss-Allee 112, 60486 Frankfurt am Main, Germany: American Express credit card: American Express Privacy Policy				
Verification of your order based on general criteria such as, for example, order value, a delivery address different from the billing address, or whether you are a new or existing customer status. Based on automated checks, a shortlist of payment methods is generated, which we offer you, in order to minimise the risk of non-payment as far as possible. This check takes place before you select a payment method, to ensure the ordering process runs as smoothly as possible.	Contact details, shopping basket details, delivery details.	An automated decision-making process takes place, based on the following logic: The order check begins once you have entered your contact and delivery details, before we display specific payment methods for your order. In accordance with predefined rules, we check whether processing the order carries a risk of non-payment, so that only secure payment methods are offered , i.e. no purchase on account. To this end, we may check your contact and delivery details to ensure the address(es) provided match. We also analyse the value of the order. In particular, we check whether the maximum order limit has been reached or whether you are placing an order as a new customer or a guest.	Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to minimise the risk of non-payment as much as possible and to enhance the customer experience during the ordering process.	Hosting providers.
Prevention of incorrect billing and delivery addresses being entered, including suggestions for address corrections during the 'Checkout' stage.	Contact and delivery details	No automated decision-making takes place.	Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to minimise the risk of non-payment as much as possible and to enhance the customer experience during the ordering process.	Address validation providers

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Provision of the permitted payment methods, which are displayed to you as available. To this end, our service provider Arvato SE (Reinhard-Mohn-Straße 22 33333 Gütersloh) carries out a RiskCheck on our behalf.	Contact details, shopping basket details, delivery details, order details, customer account details, order and returns values	An automated decision-making process takes place, based on the following logic: The check to determine which payment methods are available begins when the order is finalised by clicking on 'Place order with payment due now'. Arvato uses the aforementioned data to carry out a risk assessment for payment default. In addition, Arvato checks the information we have generated regarding the timely settlement of our claims and insights we have gained from past fraud checks, such as spending limits set for your purchases. In particular, Arvato checks whether the maximum order limit configured has been reached. To calculate your returns rate, we determine the percentage of your returns based on the total order value you have generated through orders in our online shop. Arvato then sends us the result of the risk assessment in an automated format, which we interpret according to pre-set rules and use to determine whether the order can be processed using the selected payment method. If the assessment criteria are not met, you will be redirected to the payment methods page and can then only choose from other available secure payment methods.	Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to minimise the risk of non-payment as much as possible and to enhance the customer experience during the ordering process.	Risk Management Provider
Provision of the 'purchase on account' payment method. To this end, our service provider, Infoscore Consumer Data GmbH (Rheinstraße 99, 76532 Baden-Baden) carries out a credit check on our behalf (including	contact details, shopping basket details, delivery details, order details, customer account details, order and returns values, creditworthiness data.	An automated decision-making process takes place, based on the following logic: The credit check begins once consent to the credit check has been given and the order has been completed	Consent (Article 6(1)(a) of the General Data Protection Regulation).	Credit reference agency.

Purpose of the processing of personal data	Categories of personal data being processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
The following 'Infoscore', provided you have selected the 'purchase on account' payment method.		by clicking on 'Place order with payment due now'. To this end, we will pass **on your contact and delivery details to the credit reference agency.** The credit report contains a so-called 'score', which is calculated using a scientifically recognised mathematical and statistical method and is used to assess the credit risk. Based on the score value provided, the service provider assesses the risk of non-payment. The service provider then sends us the result of the fraud and creditworthiness check service provider then sends us the result in an automated format, which we interpret in accordance with pre-set rules and determine whether the order can be processed using the selected payment method. If the assessment criteria are not met to a sufficient standard, you will be redirected back to the payment methods page and can then only choose from secure payment methods (excluding purchase on account).		
We carry out a fraud check after you have completed your order to minimise the risk of non-payment as far as possible. Based on largely automated checks, we decide to what extent we can fulfil your order to the desired . The fraud check is carried out by Arvato SE (Reinhard-Mohn-Straße 22, 33333 Gütersloh) on our behalf (hereinafter "Arvato").	Contact details, shopping basket details, delivery details, order details, customer account details, order and returns values.	Automated decision-making takes place, based on the following logic: The fraud check begins when the order is completed by clicking on 'Place order with payment now'. In accordance with predefined rules, Arvato checks whether processing the order carries a risk of non-payment, so that only secure payment methods are offered , i.e. no purchase on account. To this end, Arvato first checks your contact and delivery details with regard to	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to minimise the risk of non-payment as much as possible.	Risk and Fraud Management Provider

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
		the accuracy of the address(es) provided. In addition, Arvato analyses the number and value of orders within a specific time period. In doing so, it checks in particular the extent to which your contact and delivery details have been used for past orders, for example, whether short period, different email addresses were provided for the same billing address. Arvato also checks the information generated by us information we have generated regarding the timely settlement of our claims and insights we have gained from past fraud checks, such as spending limits for your purchases. In particular, Arvato checks whether the maximum order limit configured has been reached, reviews your returns rate generated from order and returns data and uses our accounts receivable data to determine whether and to what extent there are any current outstanding items, reminder stages or ongoing debt collection processes. If the assessment criteria cannot be adequately assessed, the order will be rejected.		
Conducting a sustainability check. Based on largely automated checks, we decide to what extent we can fulfil your order to the desired scope.	Contact details, order and returns values.	An automated decision-making process takes place, based on the following logic: In accordance with predefined rules, we check whether fulfilling the order complies with our sustainability criteria in the online shop. In particular, we examine your return rate, which is generated from your order and return values. To calculate your return rate, we determine the percentage of your returns based on the total order value generated by orders in our	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to minimise returns and the associated CO_2 emissions as much as possible.	Arvato SE

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
		generated via the online shop. If your returns rate exceeds a certain threshold, your account will be blocked for online shopping and any other accounts linked to your contact details will be identified. You can redeem vouchers from the loyalty programme in-store at any time. You will be notified of this by email.		
Sending emails advertising our own similar products to customers who have provided us with their e-email address as part of an order in the online shop and who were clearly and explicitly informed at the time their email address was collected that they may object to this use of their email address at any time, without incurring any costs other than the transmission costs charged at standard rates. We also draw attention to this right to object each time the email address, i.e. in every product recommendation email. We use the information about your previous purchases, which are contained in the transactional email data, to ensure that you only receive advertising that matches your interests .	Contact details, transactional email data, advertising management data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the use of the email address for direct marketing of our own similar products, subject to the conditions set out in Section 7(3) of the Unfair Commercial Practices Act (UWG).	AWS (transactional emails)
Conducting customer surveys for market research purposes and pseudonymised analysis of the market research data to further develop and improve the content of our offering.	Market research data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the further development and improvement of our services.	Survey agency.
Ensuring the security of the IT infrastructure used to operate the online shop IT infrastructure,	HTTP data and shopping basket data.	No automated decision-making takes place.	Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests).	Hosting provider.

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
in particular for the detection, rectification and documenting incidents (e.g. DDoS attacks) in a manner that preserves evidence. To this end, data is temporarily stored in log files on our web server and analysed.			Our legitimate interest is to ensure the security of the IT infrastructure used to operate the online shop, in particular to identify, rectify and document malfunctions in a manner that preserves evidence (e.g. DDoS attacks).	
Management and enforcement of our claims for payment of the purchase price.	Contact details, customer account details.	No automated decision-making takes place.	Article 6(1)(b) (b) of the General Data Protection Regulation (performance of a contract).	Debt collection agencies.
Reversal of sales contracts in the event of withdrawal or other grounds for reversal.	Contact details, delivery details, payment details, order details, transaction email details, customer account details.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the reversal of sales contracts.	Delivery service providers.
Storage and processing for evidential purposes in connection with the potential assertion, exercise or defence of legal claims.	HTTP data, contact details, payment details, order details, shopping basket details, delivery details, transactional email data, customer account details, creditworthiness data, review data, advertising management data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the assertion, exercise or defence of legal claims.	Hosting provider.
Retention of data for the comply with statutory retention obligations, in particular those under commercial and tax law. Depending on the nature of the documents, retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).	Contact details, payment details, order details, shopping basket details, dispatch details, transaction email details, customer account details, review details.	No automated decision-making takes place.	Article 6(1)(c) c of the General Data Protection Regulation (compliance with a legal obligation).	Hosting provider.
Provision of a reminder regarding product availability.	Email address (contact details), marketing management data	No automated decision-making takes place.	Article 6(1)(a) (a) of the General Data Protection Regulation (consent).	Hosting provider.
Provision of a virtual fitting facility on the website. By clicking on “I agree’, you grant Fittingbox access to the	virtual fitting data.	No automated decision-making takes place.	Article 6(1)(a) a of the General Data Protection Regulation (consent).	Fittingbox.

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Use of your webcam.				

3. Details of the recipients of personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Hosting provider (currently: commercetools GmbH, Adams-Lehmann-Str. 44, 80797 Munich, Germany)	Data processor.	EU, UK, USA, Australia, Singapore	*For the transfer personal data to the USA and the UK, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The Adequacy Decision is available here:* https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj *For the transfer to Australia and Singapore, there is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation. Commerctools GmbH has standard contractual clauses (SCCs) in place which have been approved in accordance with Article 46 of the General Data Protection Regulation.*
Payment service providers	Data controller.	EU	-
Shipping service provider	Data controller.	EU	-
parcelLab GmbH, Schillerstr. 23a, 80336 Munich, Germany.	Data processor.	EU.	-
Arvato SE Reinhard-Mohn-Straße 22, 33333 Gütersloh, Germany.	Data processor.	EU.	-
Credit reference agency: Infoscore Consumer Data GmbH part of Experian GmbH, Rheinstraße 99, 76532 Baden-Baden	Data controller.	EU	-
Debt collection agency (currently: Germany: Riverty Services GmbH, Gütersloher Str. 123, 33415 Verl, Germany Netherlands: Riverty Services Netherlands B.V., K.R. Poststraat 66, 8441 Heerenveen, Netherlands Austria: Riverty Services Austria GmbH, Karl-Popper-Straße 2/Top 6, 1100 Vienna, Austria Switzerland: infoscore Debt Collection	Data processor. Data processor. Data processor. Data processor.	EU EU EU Switzerland.	- - - Adequacy Decision by the EU Commission on personal data in Switzerland: http://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32000D0518&from=DE

Recipient	Role of the recipient	Transfers to third countries and/or international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
AG, part of Arvato Financial Solutions, Ifangstrasse 8, 8952 Schlieren.			
Emarsys eMarketing Systems AG Hans-Fischer-Straße 10 80339 Munich	Data processor.	EU and UK.	For the transfer personal data to the UK, an adequacy decision has been issued by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj
Survey agency (currently: SurveyMonkey Europe UC, 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland)	Data processor.	EU	-
Fittingbox S.A. 209 Rue de l'Innovation, 31670 Labège France	Data controller.	EU	-
Mouseflow ApS Flaesketorvet 68 1711 Copenhagen Denmark	Data processor	EU and USA	For the transfer of personal data to the USA, an adequacy decision by the European Commission within the meaning Article 45 of the GDPR. The adequacy decision is available here: Implementing Decision 2023/1795 – EN – EUR-Lex As Mouseflow is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details on self-certification can be found here: Data Privacy Framework
Talon.One GmbH Wiener Straße 10, 10999 Berlin	Data processor.	EU and UK.	For the transfer of personal data to the UK , an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj

D. Information on the processing of subscribers' personal data in relation to our email and WhatsApp newsletters and our push notifications

We offer you the option to subscribe to our email and/or WhatsApp newsletter, including via our website or app, as well as for our push notifications via our app. The newsletter and push notifications keep you about new outfits and the latest product trends, as well as our special events, promotions or competitions. We also offer the option to sign up for our email and/or WhatsApp newsletter directly on social media platforms such as Meta and Instagram.

The content of the newsletter and the We can tailor push notifications (where we have such data) to your individual needs based on your orders in our online shop (☐ **Section C**)

or your membership of the MARC O'POLO COMMUNITY (☐ **Section E**) (e.g.

based on your purchase history, orders placed via your member account or your bonus points balance).
If, in addition to your email newsletter subscription, you have also given you have given your consent to "personalisation" (or at least consent to personalisation via Emarsys (newsletter) or Bloomreach (app)) (☐ **Section B.IV**), we will expand the email

newsletter to include further personalised content (e.g. relating to products you have added to your basket or which we recommend based on the product category you last clicked on).

When you subscribe to the email and WhatsApp newsletters, certain information is collected, such as your email address for the email newsletter or your telephone number for the WhatsApp newsletter. When you sign up for our push notifications, information such as your device type and operating system is collected.

We process this information

- to confirm your subscription
- to provide the relevant newsletter to ensure
- security
- for evidential purposes to assert, exercise or defend legal claims
- for market research purposes, if you take part in customer surveys.

When you sign up for the newsletter via WhatsApp, we will add your telephone number to your member account or email newsletter if you provide us with the email address you also use in your member account so that we can link the two. When using the form to subscribe to or unsubscribe from our email newsletter on the website, in the app or from our WhatsApp newsletter, certain information is sent for technical reasons by the browser or app used on your device to the

server of our website (for example, your IP address) or to our WhatsApp provider. We process this information to provide the form for subscribing to and unsubscribing from our newsletter on the website, in the app and on WhatsApp.

You will find detailed information on this below:

1. Details of the personal data that is processed

Categories of personal data processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
Newsletter form HTTP data.	Log data generated for technical reasons when accessing the form for subscribing to and unsubscribing from our newsletter on the website and when using our native app via the Hypertext Transfer Protocol (Secure) (HTTP(S)) . Email newsletter On the website: This include your IP address, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), as well as the date and time of the visit. In the app: This include the IP address, type and version of the HTTP component used in the app, the operating system used or the operating system of the end device, the page accessed or the web address accessed by the app of a technical service (API endpoint) via which data is received or provided, the previously visited page (referrer URL), and the date and time of the request. WhatsApp Newsletter These include the source of the request (e.g. QR code), as well as the date and time of the request.	Users of the website or app or WhatsApp.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we may not be able to provide the content of the website or WhatsApp.	Data is stored in server log files in a form that does not allow the identification of the data subject for a maximum period of 7 days, unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.
Newsletter subscription data.	Data that we collect when you sign up for the newsletter. Email newsletter	Newsletter subscriber.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract	We store this data for as long as you remain subscribed to our newsletter.

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
	This includes the following details: email address, first name and surname, and, where applicable, your indication of whether you would like to receive the newsletter with content for women or for men. WhatsApp newsletter This includes the following details: WhatsApp username, telephone number.		Required. There is no obligation to provide this data. If you do not provide this data, we will be unable to send you the newsletter.	We store this data for For the purposes of providing evidence in connection with the potential assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end the year in which you unsubscribed, and, in the event of any legal disputes, until such disputes are resolved.
Newsletter opt-in data.	Log data generated automatically for technical reasons when you subscribe to or unsubscribe from the newsletter. These include the date and time of newsletter subscription, the date and time the subscription notification was sent as part of the double opt-in process, the date and time of the confirmation of subscription in the double opt-in process, as well as the IP address (email newsletter) of the device used for confirmation or the telephone number (WhatsApp newsletter), and the date and time of any unsubscription from the newsletter.	Newsletter subscriber.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we will be unable to provide you with a newsletter.	We store this data for as long as you remain subscribed to our newsletter. We also store this data for evidential purposes in connection with the assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you unsubscribed, and, in the event of any legal disputes, until such disputes are resolved.
Market research data	Information that we collect as part of customer surveys for market research purposes, in order to analyse, in pseudonymised form, in particular our customers' satisfaction and to improve the content of our offering.	Newsletter subscriber.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we will be unable to carry out surveys and analyses for market research purposes.	We store this data in pseudonymised form for a maximum of 38 months. We also store this data in anonymised form beyond this period in order to analyse it for internal statistical purposes.
Push notification data	Data that is generated for technical reasons during the registration and activation of push notifications. This includes device type, operating system, the date and time of access, and the device-specific push token (a unique identifier for your mobile device for the delivery of push notifications via Bloomreach). Log data generated when	the recipient of push notifications.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If you do not provide the data, we will be unable to send you push notifications.	We store this data for as long as you have our push notifications enabled. We also store this data for evidential purposes in order to assert, exercise or defend legal claims, for a transitional period of three years from the end of the year in which you

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
	Technical requirements arising from the activation or deactivation of push notifications, such as the date and time of the activation or deactivation of push notifications in our app.			you have unsubscribed and, in the event of any legal disputes, until such disputes are resolved.

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Provision of the form for subscribing to and unsubscribing from our newsletter on the website or app: For this purpose, newsletter form HTTP data is temporarily processed on our web server or by our WhatsApp provider.	Newsletter form HTTP data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the website content accessed by the user.	Hosting providers, email newsletter providers, WhatsApp providers, system and service email providers.
Provision of the form for subscribing to our newsletter via social media.	Newsletter form HTTP data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the content accessed by the user on social networks.	Transmission service providers, email newsletter providers, system and service email providers.
Ensuring the security of the IT infrastructure used to provide the form, in particular for the detection, rectification and documenting malfunctions in a manner that preserves evidence (e.g. DDoS attacks): To this end, data is temporarily stored in log files on our web server or with our WhatsApp provider and analysed.	Newsletter form HTTP data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to ensure the security of the IT infrastructure used to provide the form, in particular to detect, rectify and document malfunctions in a manner that preserves evidence (e.g. DDoS attacks).	Hosting providers, email newsletter providers, WhatsApp providers, system and service email providers.
'Double opt-in' procedure to confirm subscription to the email newsletter:	Newsletter subscription data, newsletter opt-in data.	No automated decision-making takes place.	Article 6(1)(f) f of the General Data Protection Regulation	System and service email providers

Purpose of the processing of personal data	**Categories of personal data processed**	**Automated decision-making**	**Legal basis and, where applicable, legitimate interests**	**Recipients**
To this end, we send an email requesting confirmation to the email address provided during registration. A subscription only becomes effective once the subscriber confirms the email address by clicking on the confirmation link contained in the email.			(Balancing of interests). Our legitimate interest is the legally compliant documentation of your consent to receive the newsletter.	
Sending the newsletter to the email address (email newsletter) or telephone number (WhatsApp newsletter), or sending push notifications to the app user's mobile device (push notifications). The newsletter and the push notifications contain information about products and services offered by Marc O'Polo Einzelhandels GmbH (e.g. clothing, shoes & accessories, bags, Junior, Living or the MARC O'POLO COMMUNITY programme, including cross-channel services), including information on current product trends, special events, invitations to take part in customer surveys, special offers or prize draws. We use your name to address you personally and to tailor gender-specific content in our email newsletter and push notifications. We can tailor the content of the newsletter and push notifications (where such data are available to us) based on your orders in our online shop (□ **Section C**) or your membership of the MARC O'POLO COMMUNITY (□ **Section E**)	Newsletter subscription data, newsletter opt-in data, push notification data. We use Emarsys profile data for personalisation. (□ **Section** B.IV) **Order data (--> C.1)** This data is stored in your member account (□ **Section E.1**).	No automated decision-making takes place.	Article 6(1)(a) a of the General Data Protection Regulation (consent). If you did not consent to the personalisation of newsletter content when you subscribed to the newsletter, personalisation takes place on the basis of Article 6(1)(f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to tailor the newsletter to your interests. (However, personalisation based on your browsing behaviour on our website, as described here, only takes place if you have our privacy and cookie settings, in addition to your newsletter subscription, you have also given your consent to 'personalisation' (or at least consent to personalisation via 'Emarsys') (□ **Section B.IV**).)	Email newsletter providers, WhatsApp providers, lettershop, loyalty tool

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
tailored to you (e.g. based on your orders via your member account, your purchase history or your bonus points balance). If, in addition to your newsletter subscription, you have also given your 'personalisation' consent (or at least cookie settings, you have also given "personalisation" consent (or at least have given your consent to personalisation via "Emarsys" (□ **Section** B.IV): • we will expand the newsletter (email and WhatsApp) to include further personalised content (e.g. regarding products you have have added to your basket or which we recommend based on the product category you most recently clicked on). • we will send you a newsletter (via email and WhatsApp) about products that you have added to your shopping basket but subsequently did not order (a so-called 'abandoned basket' email). WhatsApp newsletter: When you subscribe to the newsletter via WhatsApp, we will add your telephone number to the on file for your member account, provided you have also provided us with the email address you also use in your member account. The assignment of the telephone number is carried out via the optional entry of this email address, which we request in the chat. If the link to your member account is successful, we will inform you of this both in the WhatsApp chat and by email, and subsequently, the information from your MARC O'POLO COMMUNITY membership (□ **Section E**) will be used to personalise the WhatsApp newsletter.				

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Conducting customer surveys for market research purposes and pseudonymised analysis of market research data to further develop and improve the content of our offering.	Market research data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the further development and improvement of our services.	Survey agency.
Storage and processing for evidential purposes in connection with the potential assertion, exercise or defence of legal claims.	Newsletter subscription data, newsletter opt-in data.	No automated decision-making takes place.	Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the assertion, exercise or defence of legal claims.	Email newsletter providers, WhatsApp providers, system and service email providers.

3. Details of the recipients personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Hosting provider Current CRM hosting provider: Microsoft Ireland Operations Ltd (South County Business Park, Dublin, D18, Ireland) E-shop hosting currently: (currently: commercetools GmbH, Adams-Lehmann-Str. 44, 80797 Munich, Germany).	Data processors.	EU and USA. EU and USA.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Microsoft is self-certified under the Data Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details regarding self-certification can be found here: https://www.dataprivacyframework.gov/list In addition, the parties have concluded EU Standard Contractual Clauses in accordance with Article 46(5) of the General Data Protection Regulation. *For the transfer personal data to the US and the UK, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR.* *The Adequacy Decision is available here:* https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj *As regards transfers to Australia and Singapore, there is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation.* *Commerctools GmbH*

Recipients	Role of the recipient	Transfer to third countries and/or international organisations	Adequacy decision or suitable or appropriate safeguards for transfers to third countries and/or to international organisations
			has standard contractual clauses (SCCs) that have been approved in accordance with Article 46 of the General Data Protection Regulation.
Email newsletter provider Emarsys eMarketing Systems AG Hans-Fischer-Straße 10 80339 Munich	Data processor.	EU and UK.	The transfer personal data to the UK, an adequacy decision has been issued by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj
WhatsApp newsletter provider chatarmin.com GmbH Kaiserstraße 89/2/3 1070 Vienna, Austria	Data processor.	EU and USA.	The transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The Adequacy Decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj The transfer of personal data to the USA is carried out via subcontractors of Chatarmin Ad. In addition to the Adequacy Decision, the parties have EU Standard Contractual Clauses in accordance with Article 46(5) of the General Data Protection Regulation.
System and service email providers (currently: Amazon SES, Amazon Web Services EMEA SARL, 5 rue Plaetis, Luxembourg, L-2338, Luxembourg).	Data processors	EU and USA.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Amazon is self-certified under the Data Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details of the self-certification can be found here: https://www.dataprivacyframework.gov/list In addition, the parties have concluded EU Standard Contractual Clauses in accordance with Article 46(5) of the General Data Protection Regulation.
Survey agency (currently: SurveyMonkey Europe UC, 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland)	Data processor.	EU and USA.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As SurveyMonkey is self-certified under the Data Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details regarding the

recipient's	role of the recipient	Transfers to third countries and/or international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
			Self-certification documents can be accessed here: https://www.dataprivacyframework.gov/list
Communications agency (currently: Defacto relations GmbH, Am Pestalozziring 1-2, 91058 Erlangen, Germany).	Data processor.	Germany (EU)	-
Data transmission service provider for social networks: Zapier Inc., 548 Market St #62411, San Francisco, California 94104, USA	Data processor.	USA.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Zapier is self-certified under the Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details regarding self-certification can be found here: https://www.dataprivacyframework.gov/list In addition, the parties have concluded EU Standard Contractual Clauses in accordance with Article 46(5) of the General Data Protection Regulation.
Talon.One GmbH Wiener Straße 10, 10999 Berlin	Data processor.	EU and UK.	For the transfer of personal data to the UK , an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj
App push notification provider Bloomreach B.V. Fred. Roeskestraat 109, 1076 EE Amsterdam, Netherlands	Data processor	EU and USA.	For the transfer of personal data to the USA , an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj As Bloomreach is self-certified under the Data Privacy Framework, this adequacy decision also applies to transfers to this recipient. Details on self-certification can be found here :

E. Information on the processing of personal data of participants in the loyalty programme

We operate the
MARC O'POLO COMMUNITY loyalty programme). In connection with the operation of the loyalty programme, we process the personal data of
participants, in particular for

- providing the web applications in the online
shop, where participants can provide their details to register for the loyalty programme,
- to carry out the double opt-
in process,
- to operate a customer database,
- to provide the services of the loyalty programme described in Part C of the Terms and Conditions and on the website,
- to carry out customer surveys,
- to send promotional material by post,
for programme communications by post, WhatsApp, push notifications, email or telephone,
- to ensure IT security in the online shop, and
- for evidential purposes or to comply with statutory retention obligations.

Provided you have given your consent
, we also process your data to send personalised promotional content via the communication channels you have selected, to carry out a personalised analysis of your affinity with MARC O'POLO products, and to display personalised banner adverts.

Participate in the loyalty programme
brick-and-mortar shops operated by us or by our retail partners (participating brick-and-mortar shops hereinafter collectively referred to as
'brick-and-mortar shops'). An up-to-date list of participating brick-and-mortar shops is available in our Store Finder at http://www.marc-o-polo.com/stores
. There, you can view the nearest shops based on a specified location or postcode. We mark the physical shops participating in the loyalty programme with graphic icons in the overview of your search results in the Store Finder. Furthermore,
the country-specific shops we operate are part of the loyalty programme; these can be accessed via the website (for Germany, e.g. http://www.marc-o-polo.com/de-de/
) or via the terminals in the physical shops (the version of the country-specific shop accessible via the terminals in the physical shops is referred to below as the 'shop version'). An overview of the individual country-specific shops can be found in Part A, Section 1.1 of our Terms and Conditions. Hereinafter

, the physical shops and the respective country shop, including the shop version, are collectively referred to as ‘participating shops’.

Below you will find detailed information on this:

1. Details of the personal data that is processed

Categories of personal data that are processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
Customer master data	Mandatory data that you must provide when registering for the loyalty programme : title, first name, surname, date of birth, postal address, email address, password. When registering in a high-street shop: the shop which you registered.	Participant in the loyalty programme.	Providing your customer details is required to take part in the loyalty programme. Failure to provide this mandatory information means that you will not be able to take part in the loyalty programme.	We store this data for as long as you remain registered for the loyalty programme. We also store this data for evidence purposes in connection with the assertion, exercise or defence of legal claims, and for a transitional period of one year from the end the year in which you opted out, and in the event of any legal disputes, until such disputes are resolved.
We will record the high-street shop where you registered for the loyalty programme as ‘favourite store’ in your customer account. Based on your postal address , we also identify the physical store closest to your place of residence as well as the nearest factory outlet and store these in our member database. In addition, we assign each participant in the loyalty programme a personal membership number and a referrer ID for referring friends.	Generated automatically.	-		
Registration log data	Log data that we collect when you register for the loyalty programme. This includes: country, language used and date of your registration, as well as the participating store where you registered.	Generated automatically.	-	We store this data for as long as you remain registered with the loyalty programme. We also store this data for evidence purposes in connection with the assertion, exercise or defence of legal claims, and for a transitional period of four years from the end the year in which you

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
				have unsubscribed and, in the event of any legal disputes, until such disputes are resolved.
Participation details	Information provided by participants in their customer account or when placing orders in the country-specific shop. This includes your contact details (first name and surname), your telephone number, your date of birth, your email address, the delivery and billing addresses you have provided, as well as your payment methods, your preferred communication channels and promotional content, your favourite store, whether you wish to collect points as part of the loyalty programme, as well as your wish list and your boards you have created (in the app only), which you have added to the country-specific shop . Information on points collected, the start of the membership, the member level achieved, and the start date of the level.	Participant in the loyalty programme.	The provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to provide certain functions of the customer account and will be unable to personalise our promotional content based on your participant details.	We store this data for as long as you remain registered with the loyalty programme. We also store this data for evidence for the purpose of asserting, exercising or defending legal claims, and furthermore for a transitional period of three years from the end the year in which you opted out, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of document, retention obligations under commercial and tax law may six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
Identification data for new customer acquisition	When you take part in the Refer-a-Friend scheme, an identification ID is automatically generated. This ID tracks which friends were referred by a particular customer. The following are also recorded: time of registration, referrer ID	Generated automatically	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we may be unable to display the website content you have accessed in the language you have selected.	We store this data for as long as you remain registered with the loyalty programme.
Purchase history	Information about your purchases, provided that you identify yourself as a participant in the loyalty programme when making a purchase in a high-street shop, or that you identify yourself as a participant in the country-specific shop by entering your login details. This includes details about the items purchased (item description, item number, quantity,	Participating shops	-	We store this data for as long as you remain registered with the loyalty programme. We also store this data in anonymised form in order to analyse it for internal statistical purposes.

Categories of personal data processed	Personal data included in these categories	Sources of the data	Obligation to provide the data	Retention period
	Size, colour, price, currency, payment method and number of points collected), as well as the location (online shop or country, town and branch for high-street shops), the time of the respective purchase and the delivery status.			
Product data	Information about your choice of products, which we require to process the extended ordering and reservation options described in the Terms and Conditions. This includes information about the item you have selected (item number, colour, size, price) and the transaction number.	Generated automatically.	-	We store this data as part of your purchase history for as long as you remain registered with the loyalty programme. We also store this data in anonymised form so that we can analyse it for internal statistical purposes.
Customer service enquiry data	Information that you provide to us in your enquiries to customer service by telephone or via the online contact form, e.g. the subject and background of your enquiry.	Participant in the loyalty programme.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to personalise our promotional content and shopping advice based on this data.	We store this data for a maximum of 12 months. Your data may be stored outside your customer account for longer than 12 months. (Section F) We store this data for evidential purposes to enable us to assert, exercise or defend legal claims, and furthermore for a transitional period of four years from the end of the year in which you cancelled your account and, in the event of any legal disputes, until such disputes are resolved.
HTTP data	Log data generated when accessing the online shop via the Hypertext Transfer Protocol (HTTP) : IP address, type and version of your internet browser, operating system used, the page accessed, the previously visited page (referrer URL), date and time of access.	Participant in the loyalty programme.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we may be unable to provide the requested website content .	Data is stored in server log files in a form that does not allow the identification of the data subject , for a maximum period of 7 days, unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
Service usage data	Information on the nature and scope of the services you have used as part of the loyalty programme, in particular the extended ordering and booking options you have used and the vouchers you have redeemed.	Generated automatically	-	We store this data for as long as you remain registered with the loyalty programme.
Segment profile data	Assignment to participation segments, which we determine by analysing customer master data, participation details, purchase history, customer service enquiry , and data that we with your consent via the personalisation tools Emarsys and (→ B.IV), as well as service usage data.	Generated automatically	-	We store this data for as long as you remain registered with the loyalty programme.
Market research data	Information that we collect as part of customer surveys for market research purposes, in order to analyse, in pseudonymised form, in particular the satisfaction of our participants and to improve the content of our programme.	Participant in the loyalty programme.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we will be unable to carry out surveys and analyses for market research purposes.	We store this data in pseudonymised form for a maximum of 38 months. We also store this data in anonymised form beyond this period in order to analyse it for internal statistical purposes.
Advertising management data	Information regarding any consent you have given for advertising, as well as any objections you may have raised to advertising. This includes the subject matter, date and time of the consent, the IP address of the device used to give consent, and the subject matter, date and time of any withdrawal of consent or an objection to the processing of personal data for advertising purposes.	Participant in the loyalty programme.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to take your consents or your objections to marketing into account.	We store this data for as long as consent remains in force or for as long as we carry out marketing activities without consent on the basis of the information provided to you in each instance this advertising. We also store this data for evidential purposes in connection with the potential assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you withdrew your consent or we ceased the relevant advertising campaign, and, in the event of any legal disputes, until such disputes have been resolved.

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
Event booking details	Information regarding registration for an event organised by Marc O'Polo. This includes first name, surname, customer number, email address for further notifications and consent to the booking and participation terms and conditions.	Participant in the loyalty programme.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, you will not be able to register for an event.	We store this data until the event follow-up is completed, 3 months after the event.

2. Details regarding the processing of personal data

a) Processing of personal data on a legal basis

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients
Provision of the web applications in the online shop, where you can provide us with your data for registration for the loyalty programme.	HTTP data, customer master data, login log data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is to provide the website content requested by the participant.	Hosting service providers, online shop developers
Operation of a customer database in which we and keep them up to date.	Customer master data, participant details.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the operation of a well-organised customer database as the basis for optimal management of customer data.	Hosting service providers, lettershop.
Provision of extended ordering and reservation options. Within the scope of the reservation and collection options for items described in Part C clauses 2.4.1 and 2.4.2 of the General Terms and Conditions, for items you have selected in one of our country shops , we will forward the item details required for storage (item number, colour, size, transaction number, item price) as well as the customer master data needed for your identification and notification to the high-street shop, which will hold your desired item(s) for you . We will inform	item details, customer master data, subscriber details.	No automated decision-making takes place.	Performance of a contract (Article 6(1)(b) of the General Data Protection Regulation).	Brick-and-mortar shops.

Purpose of processing personal data	Categories of personal data that are processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients
We will then notify you by email that your deposit has been successfully processed. If you make use of the option described in Part C, Section 2.4.4 of the Terms and Conditions to place online orders in one our country-specific shops via a device in our high-street stores, staff in the high-street stores may view your customer master data and subscriber details stored in your customer account in order to assist you with the ordering process and/or log into your customer account.				
Provision of the customer account functions and a convenient ordering process in the country-specific shop. We use the email address and password you provided during registration as your login details for your customer account. In your customer account, you can easily manage the customer details, subscriber information, marketing preferences and your wish list. If you are logged into your customer account whilst placing an order in the Länder-Shop, the information requested during the ordering process (e.g. the billing address) will be automatically pre-filled with the details stored in the customer database, to make the ordering process even more convenient for you. Based on your purchase history, we provide an overview in your customer account of your previous purchases in the participating stores and show you the processing and delivery status of orders placed in the the Länder-Shop.	Customer master data, participant details, purchase history, HTTP data, payment data.	No automated decision-making takes place.	Performance of a contract (Article 6(1)(b) of the General Data Protection Regulation).	Hosting service providers, online shop developers.
Recording of purchase history in the participating shops, in order to use this as a basis for	Purchase history, customer master data.	No automated decision-making takes place	Performance of a contract (Article 6(1)(b) of the General Data Protection Regulation).	Participating stores.

Purpose of processing personal data	**Categories of personal data processed**	**Automated decision-making**	**Legal basis and legitimate interests, where applicable**	**Recipients**
Your respective points total for the issuing vouchers and to display them in your customer account.		takes place.		
Calculation of your current points balance. Sending reminders regarding the redemption of points, level upgrades, level downgrades and the possible expiry of points via post, WhatsApp, push notifications or email.	Customer master data, purchase history.	No automated decision-making takes place.	Performance of a contract (Article 6(1)(b) of the General Data Protection Regulation).	Postal service providers, lettershop.
Participation in the 'Refer a Friend' scheme. Members can invite friends to join the Marc O'Polo COMMUNITY via a personalised registration link. If they register and make a purchase, the referring member receives a bonus.	Identification data for new customer acquisition	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is in recruiting new customers.	Loyalty tool, CRM
Provision of a customer helpline where you can enquire about your current points balance and other information, such as details regarding your membership, special events and promotions or new collections. To provide you with the best possible personalised advice, customer helpline staff may access your access the data stored in the customer database.	All data mentioned in Section E.1 .	No automated decision-making takes place.	Performance of a contract (Article 6(1)(b) of the General Data Protection Regulation).	Customer service providers.
Sending of information material on the components of the loyalty programme, as well as relevant, personalised advertising for our own offers (e.g. information about MARC O'POLO, product information, newsletters, invitations to take part in customer surveys, as well as exclusive offers or invitations to prize draws, events and promotions organised by participating stores) by post. For this purpose, we use the postal address you provided when registering for the loyalty programme or as held in your	customer master data, segment profile data and advertising management data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the use of the postal address for direct marketing.	Postal service providers, lettershop, communications agency.

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipient
have provided a customer account as their billing address. We use the title and name you provided during registration to address you personally and to tailor gender-specific content in our marketing materials. We use the date of birth you have provided to send you personalised birthday greetings and to send you . The store where you registered, as well as stores located nearby at the address you may have provided or the details of your favourite store in your customer account to send you invitations to store-related events and promotions . We use your participant details, purchase history, service usage data and segment profile data to provide you with content tailored to your personal preferences.				
To provide information by post, email, WhatsApp, push notifications, in-app messages or by telephone, insofar as this is necessary for the operation of the loyalty programme or the services provided in this context (hereinafter collectively referred to as 'programme communications'). Programme communications include, in particular, emails, telephone calls or postal correspondence confirming your registration, notifications regarding your points balance, expiry of points, level upgrades, level downgrades or information regarding the administrative processing of your purchases or the services you have ,	customer master data, participant details and product data.	No automated decision-making takes place.	Performance of a contract (Article 6(1)(b) of the General Data Protection Regulation).	Brick-and-mortar shops, system and service email providers, lettershop, postal service providers, communications agency.

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients
such as notification of the arrival of an order or reservation at a high street shop, the resolution of complaints or till errors, information regarding the tailoring service or arranging exclusive shopping appointments.				
Conducting customer surveys for market research purposes and pseudonymised analysis of market research data to further develop and improve the content and features of the loyalty programme.	Market research data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the further development and improvement of the loyalty programme.	Survey agency, hosting service provider, online shop developer.
Ensuring the security of the IT infrastructure used to operate the online shop IT infrastructure used to provide the online shop, in particular to detect, rectify and document malfunctions in a manner that preserves evidence (e.g. DDoS attacks). To this end, data is temporarily stored in log files on our web server and analysed.	HTTP data.	No automated decision-making takes place.	Article 6(1)(f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to ensure the security of the IT infrastructure used to operate the online shop, in particular to identify, resolving and documenting malfunctions in a manner that preserves evidence (e.g. DDoS attacks).	Hosting service providers, online shop developers.
Retention for evidential purposes in connection with the potential assertion, exercise or defence of legal claims.	Customer master data, email opt-in data, login log data, subscriber details, customer service enquiry data, advertising management data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of legal claims.	Customer service providers
Proper bookkeeping and retention to fulfil contractual and statutory retention obligations, in particular those under commercial and tax law.	Customer master data, subscriber details.	No automated decision-making takes place.	Fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation), in particular the fulfilment of statutory requirements for proper bookkeeping and statutory, in particular professional, commercial and tax law. The legal basis is also the performance of a contract to which the data subject is a party (Article 6(1)(b) of the General Data Protection	Customer service providers

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and legitimate interests, where applicable	Recipients
			General Data Protection Regulation).	
Participant management for events; sending event-related information by email.	Customer master data, participant details.	No automated decision-making takes place.	Consent	Hosting provider, event management tool

b) Processing of personal data on the basis of your consent

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Sending of information material on the components of the loyalty programme, as well as relevant, personalised advertising for our own offers (e.g. information about MARC O'POLO, product information, newsletters, invitations to take part in customer surveys, as well as exclusive offers or invitations to prize draws, events and promotions organised by the participating stores) via the communication channels selected by the participant (post, email, SMS, WhatsApp, push notifications, in-app messages or via a telephone call). For this purpose, we use the most up-to-date details stored in our customer database. You can select or change the communication channels at any time in your customer account. We use the title and name you provided during registration to address you personally and to tailor gender-specific content in our promotional materials. We use the date of birth you provided to send you personalised birthday greetings and . The store where you registered, other stores,	customer master data, participant details, purchase history, service usage data, and segment profile data.	No automated decision-making takes place.	Consent (Article 6(1)(a) of the General Data Protection Regulation).	Email service providers, survey agencies, lettershop providers, postal service providers, communications agencies.

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
located near the address provided, if any, or your details regarding your favourite store in your customer account to send you invitations to store-related events and promotions . We use your participation details, purchase history, service usage data and segment profile data to provide you with content tailored to your personal preferences . We also send reminder emails if you have not completed orders in the online shop or if there are still items on your wish list in your customer account are listed				
Personalised analysis of loyalty to MARC O'POLO products amongst loyalty programme members for the purposes of personalising and tailoring advertising content to individual needs. To this end, we use various analytical methods that enable us to to personalise the advertising content as effectively as possible and tailor it to your specific personal interests, which we derive from all the information stored in our customer database. To this end, we also analyse insights gained through the marketing and personalisation technologies from Emarsys and Bloomreach used on our website (**--> Section B.IV**) . As part of this process, we also assign our customers to specific target groups towards which we direct our advertising campaigns. These include: the following segments	All data from Section E.1 , order and returns data (**--> Section C.1**). Emarsys and Bloomreach profile data (--> Section B.IV)	No automated decision-making takes place.	Consent (Article 6(1)(a) of the General Data Protection Regulation).	Survey agency.

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Categories: Purchase activity (lead, new, active, inactive, lost), willingness to pay (zero, basic, full return, good, top, unknown), purchase frequency (zero order, single order, slow shopper, medium shopper, heavy shopper), discount affinity, channel preference, product preference, last purchase category. By personalising of advertising content, we aim to ensure that you primarily receive information that we consider to be of particular interest to you.				

3. Details regarding the recipients personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or suitable or appropriate safeguards for transfers to third countries and/or to international organisations
Hosting service providers Current CRM hosting provider: Microsoft Ireland Operations Ltd (South County Business Park, Dublin, D18, Ireland) Current e-shop hosting provider: (currently: commercetools GmbH, Adams-Lehmann-Str. 44, 80797 Munich, Germany).	Data processors	EU and USA. EU, UK, USA, Australia, Singapore.	There is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation. Microsoft has Standard Contractual Clauses (SCCs) which have been approved in accordance with Article 46 of the General Data Protection Regulation. *For the transfer personal data to the US and the UK, there is an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR.* *The adequacy decision is available here:* https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj *As regards transfers to Australia and Singapore, there is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation.* *Commerctools GmbH has standard contractual clauses (STCs) which have been approved in accordance with Article 46 of the General Data Protection Regulation.*
Email service provider (currently: Emarsys eMarketing Systems AG, Hans-Fischer-Str. 10, 80339 Munich,	Data processor.	EU and UK.	For the transfer personal data to the UK, an adequacy decision has been issued by the European Commission within the meaning of Article 45 of the GDPR.

Recipient	Role of the recipient	Transfers to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Germany).			The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj
System and service email providers (currently: Amazon SES, Amazon Web Services EMEA SARL, 5 rue Plaetis, Luxembourg, L-2338, Luxembourg)	Data processors	EU and USA.	There is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation. Amazon has standard contractual clauses (SCCs) which have been approved in accordance with Article 46 of the General Data Protection Regulation.
Brick-and-mortar shops / participating shops (insofar as these are operated by distribution partners) An overview of the currently participating brick-and-mortar shops can be found in our Store Finder at http://www.marc-o-polo.com/stores . There, you can view the nearest shops based on a specified location or postcode. We Brick-and-mortar shops taking part in the loyalty programme are marked in the overview of your search results in the Store Finder.	Data processors, insofar as they are involved in the provision of the services of the loyalty programme described in Part C of the Terms and Conditions and on the website , in particular the extended ordering and reservation options in accordance with Part C, clauses 2.4.1, 2.4.2 or 2.4.4 of the Terms and Conditions, or in programme communications. When recording and transmitting purchase history to us, the high-street shops act as data controllers.	Germany (EU)	-
Survey agency (currently: SurveyMonkey Europe UC, 2nd Floor, 2 Shelbourne Buildings, Shelbourne Road, Dublin, Ireland).	Data processor.	Dublin (Ireland) – European Union (EU)	-
Customer service provider (currently: Ströer X GmbH, Ströer Allee 1, 50999 Cologne).	Data processor.	Germany (EU)	-
Postal service provider (currently: Deutsche Post AG (Charles-de-Gaulle-Str. 20, 53113 Bonn, Germany) and UPS, United Parcel Service (Deutschland S.à r.l. & Co. OHG, Görlitzer Str. 1, 41456 Neuss, Germany).	Data controller	Germany (EU)	-
Lettershops (currently: optilyz GmbH, Neue Schönhauser Str. 19, 10178 Berlin)	Data processor.	Germany (EU)	-
Online shop developer: MOBIZCORP EUROPE LTD. Viernheim branch August-Bebel-Straße 26	Data processor.	Germany (EU)	-

Recipient	Role of the recipient	Transfers to third countries and/or international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
68519 Viernheim, Germany			
Email sender: Emarsys eMarketing Systems AG, Hans-Fischer-Str. 10, 80339 Munich, Germany	Data processor.	EU and UK.	The transfer personal data to the UK, an adequacy decision has been adopted by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj
Hosting service provider: Event management tool eveeno, Andreas Bothe, Ellenbogen 8, 91056 Erlangen	Data processor	European Union (EU)	-
Loyalty tool: Talon.One GmbH Wiener Straße 10, 10999 Berlin	Data processor.	EU and UK.	For the transfer of personal data to the UK , an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj

F. Information on the processing of personal data of users of our customer service

On the website and in the app we offer you the option to get in touch with our customer service team via a contact form or chat. We also offer you the option to speak to a member of our customer service team via our helpline or to contact our customer service team by email.

We process the information you provide to our customer service team to deal with your enquiry, such as questions regarding an order. Where necessary, we also store the information for evidential purposes in connection with the potential assertion, exercise or defend legal claims, or to comply with statutory retention obligations, in particular those under commercial and tax law. If you have verified your status as a participant in our loyalty programme, we also store this data for a period of 12 months from the resolution of the enquiry, so that we can take it into account in the event of any further enquiries.

Insofar as this is necessary to process your enquiry, we may also access further information which may already be available to us in connection with your orders in our online shop (see Section C) or your participation in our loyalty programme (see Section E).

When using the contact forms or the chat function on the website or in the app, certain information is automatically sent to our website's server by the browser or app running on your device , certain information is sent to our website's server, such as your IP address. We process this information to provide the contact forms/chats on the website and to ensure the security of the IT infrastructure used for this purpose.

To measure the quality of our customer service, we compile aggregated analyses of the nature of enquiries and the time taken to process each one. With your consent, we also record your telephone calls with our customer service team and analyse these recordings to improve our customer service.

You will find detailed information on this below:

1. Details of the personal data that is processed

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
HTTP data.	Log data generated for technical reasons when accessing contact forms or chat functions on the website and when using our native app via the Hypertext Transfer Protocol (Secure) (HTTP(S)) are generated for technical reasons. On the website:	Users of the website or app.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we may not be able to display the requested content on the website	Data is stored in server log files in a form that does not allow the identification of the for a maximum period of 7 days, unless a security-related incident occurs (e.g. a

Categories of personal data processed	Personal data fall within the categories	Sources of the data	Obligation to provide the data	Retention period
	This include your IP address, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), and the date and time of the request. In the app: This include the IP address, type and version of the HTTP component used in the app, the operating system used or the operating system of the end device, the page accessed or the web address accessed by the app of a technical service (API endpoint) via which data is received or provided, the previously visited page (referrer URL), and the date and time of the request.		not to provide.	DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.
Email data	Log data generated automatically for technical reasons when emails are received. This includes the date and time the email was sent, the email address, IP addresses and information regarding the servers involved in the email communication servers involved in the email communication.	Users contacting us via email	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If you do not provide the data, you will not be able to contact us by email.	Data is stored in server log files in a form that does not allow the identification of the data subjects , for a maximum period of 7 days, unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.
Enquiry data.	Data that you provide to us via contact forms on the website or app, via chat, by telephone or by email inquiries to our customer service. This includes the information you provide to us via the respective communication channel. In particular, this may include the following data: name,	customer service user.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event of failure to provide the data, we will be unable to process your enquiry.	Data will be stored until your enquiry has been resolved. If you have verified your status as a participant in our loyalty programme, we will the data for a maximum of 12 months as 'customer service enquiry data' (see Section E). We store this data

Categories of personal data processed	Personal data that are included in the categories	Sources of the data	Obligation to provide the data	Retention period
	Date of birth, address, telephone number, email address and the content of your enquiry.			For evidential purposes in connection with the potential assertion, exercise or defence of legal claims, and furthermore for a transitional period of 12 months from the resolution of your matter and, in the event of any legal disputes, until their conclusion. We also retain this data to the extent that statutory, in particular those under commercial and tax law. Depending on the nature of the documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).
This also includes documentation we have compiled relating to your enquiry, such as summaries of the correspondence between you and us, telephone records and, in the case of written enquiries (contact form, email), our assessment of the nature and urgency of the enquiry.	Generated automatically.	-		
Telephone data	These include log data such as the telephone number and duration of the call.	Users of the customer helpline.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If you do not provide the data, you will not be able to contact us by telephone.	We store the data for as long as is necessary to fulfil the purposes described below.
Telephone call recording data	This includes recordings of telephone calls between you and our customer service team, as well as documentation of your consent and the transcript of the conversation generated automatically from the recordings.	Users of the customer helpline.	The provision of data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If the data, we will be unable to use it to improve our customer service.	We store the data for as long as is necessary to fulfil the purposes described below.

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Provision of our contact and chat forms on the website or app and receipt of enquiries via these channels. For this purpose, HTTP data is processed temporarily on our web server.	HTTP data, enquiry data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the website content accessed by the user.	CRM service provider For the contact form, in addition: Hosting provider.
Ensuring the security of the IT infrastructure used to provide the form, in particular for the detection, rectification and documenting malfunctions (e.g. DDoS attacks) in a manner that preserves evidence. To this end, data is temporarily stored in log files on our web server and analysed.	HTTP data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to ensure the security of the IT infrastructure used to provide the form, in particular to identify, rectify and document malfunctions in a manner that preserves evidence (e.g. DDoS attacks).	Hosting provider.
Provision of a customer helpline and handling of enquiries by telephone. For this purpose, log data is processed temporarily on our systems.	Telephone data, enquiry data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide a customer helpline for personalised advice.	Customer service provider.
Provision of an email system for contacting our customer service team and receiving enquiries via this channel. For this purpose, log data is processed temporarily on our systems.	Email data, enquiry data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide an email system for contacting our customer service team.	Email service provider
Measuring the quality of customer service: To this end, we compile aggregated analyses of the nature of enquiries and the time taken to process each one, in order to determine which types of enquiries result in which average processing times by our customer service team	Telephone data, enquiry data.	No automated decision-making takes place.	Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to measure the quality of customer service. .	CRM service providers, customer service providers

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
required. These aggregated analyses do not contain any personal data relating to our customers.				
Processing your enquiry. Once you have , we can access the data we hold about you in order to process your enquiry. This may include, for example, your purchase history when processing a return. In the case of written enquiries (contact form, email), we carry out an automated analysis of the process various enquiries, we carry out an automated analysis of the nature and urgency of the enquiries. To this end, our system identifies certain keywords in the text of the enquiries that indicate the nature of the enquiry (e.g. a question about an order, product advice, etc.) and which, based on the 'tone' of the enquiry text.	Enquiry data Depending on the specific We may also request the following data relating to your orders, even if you are a guest customer: contact details, delivery details, order details, customer account details, transactional email data, order and returns values, marketing management data (for details, see Section C.1) Depending on the specific enquiry, the following data relating to your participation in our loyalty programme may also be required: customer master data, participant details, purchase history, product data, customer service enquiry data, service usage data, segment profile data, advertising management data (for details, see Section E.1 in each case)	No automated decision-making takes place.	Insofar as your enquiry relates to a contract to which you are a party, or to the implementation of pre-contractual measures: Article 6(1)(b) b of the General Data Protection Regulation (performance of a contract or the implementation of pre-contractual measures). Otherwise: Article 6(1)(f) f of the General Data Protection Regulation (balancing of interests). In this case, our legitimate interest is the efficient handling of your enquiry.	Customer service providers, CRM service providers
Recording and analysis of telephone calls to improve customer service: With your consent, we record your telephone calls with our customer service team and automatically transcribe the audio recordings into text. We analyse these transcripts automatically and, in some cases, manually, and use the results to train our customer service staff. As part of such training, we do not process any personal data of our customers.	Telephone recording data	No automated decision-making takes place.	Article 6(1)(a) (a) of the General Data Protection Regulation (consent).	Customer service provider

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Storage and processing for evidential purposes in connection with the potential assertion, exercise or defence of legal claims.	Enquiry data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the assertion, exercise or defence of legal claims.	Customer service providers.
Retention of data for the comply with statutory retention obligations, in particular those under commercial and tax law. Depending on the type of documents, retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB)).	Enquiry data.	No automated decision-making takes place.	Article 6(1)(c) (c) of the General Data Protection Regulation (compliance with a legal obligation).	Customer service providers.

3. Details of the recipients personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Recipient's registered office	Adequacy decision or suitable or adequate safeguards for transfers to third countries and/or to international organisations
Hosting provider (currently: commercetools GmbH, Adams-Lehmann-Str. 44, 80797 Munich, Germany)	Data processors.	EU, UK, USA, Australia, Singapore	*For the transfer personal data to the USA and the UK, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here:* https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj *As regards transfers to Australia and Singapore, there is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation. Commerctools GmbH has standard contractual clauses (STCs) which have been approved in accordance with Article 46 of the General Data Protection Regulation.*
CRM service provider (currently: Microsoft Ireland Operations Ltd, South County Business Park, Dublin, D18, Ireland)	Data processors.	EU.	-
Customer service provider (currently: Ströer X GmbH,	Data processors.	EU.	-

Recipient	Role of the recipient	Registered office of the recipient	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Ströer Allee 1, 50999 Cologne).			
Email service provider (currently: Emarsys eMarketing Systems AG, Hans-Fischer-Straße 10, 80339 Munich)	Data processors.	EU and UK.	The transfer of personal data to the UK, an adequacy decision has been issued by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj
Loyalty Tool (currently: Talon.One GmbH, Wiener Straße 10, 10999 Berlin)	Data processors.	EU and UK.	For the transfer of personal data to the UK , an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR is in place. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj

G. Information on the processing of personal data of participants in our competitions

On our website, our app and, where applicable, via other channels (e.g. entry postcards), we occasionally offer the opportunity to take part in various prize draws. We process the information you provide in the relevant entry forms (which may be pre-filled for our subscribers to reminder emails) for the purpose of running the relevant prize draw and award the respective prizes in accordance with the relevant terms and conditions of entry, which you have accepted.

In addition, for some competitions, we offer you the opportunity to sign up for reminder emails, through which we will inform you about our competitions, as explained in more detail in the relevant registration form. We process the information collected in this context to confirm your subscription and to provide the reminder emails.

We also store the information collected in connection with participation in competitions or the subscription to reminder emails for evidential purposes, to assert, exercise or defend legal claims and, where applicable, to fulfil statutory retention obligations, in particular those under commercial and tax law.

When taking part in competitions or subscribing to reminder emails via our website or app (e.g. competition or registration forms), the browser or app used on your device, for technical reasons, certain information is sent to our website's server, such as your IP address. We process this information to make the forms available on the website or app. To ensure the security of the IT infrastructure used to provide the website, this information is also temporarily stored in a so-called web server log file. When using such forms on our website, you often also have the option to subscribe to our newsletter. More detailed information on the processing of personal data in connection with the newsletter can be found in **Section D** of this privacy notice.

Below you will find more detailed information on the processing of personal data in connection with taking part in competitions and signing up for reminder emails on our website or app:

1. Details of the personal data that is processed

Categories of personal data that are processed	**Personal data included in these categories**	**Sources of the data**	**Obligation to provide the data**	**Retention period**
Form HTTP data.	Log data collected when forms are accessed on the website to enter a prize draw or to sign up for prize draw reminder emails, and when using our	competition entrants (only when entering via an online form on our website, e.g. competition or registration forms).	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. In the event that the	data, it is stored in server log files in a form that does not allow the identification of the data subjects , for a maximum period of 6 weeks; it

Categories of personal data processed	Personal data falling within the following categories	Sources of the data	Obligation to provide the data	Retention period
	native app via the Hypertext Transfer Protocol (Secure) (HTTP(S)) generated for technical reasons. On the website: This includes your IP address, the type and version of your web browser, the operating system used, the page accessed, the previously visited page (referrer URL), as well as the date and time of the request. In the app: This include the IP address, type and version of the HTTP component used in the app, the operating system used or the operating system of the end device, the page accessed or the web address accessed by the app of a technical service (API endpoint) via which data is received or provided, the previously visited page (referrer URL), and the date and time of the request.		We may collect data on the content accessed on the website will not be provided.	unless a security-related incident occurs (e.g. a DDoS attack). In the event of a security-related incident, server log files are stored until the security-related incident has been resolved and fully investigated.
Entry form data.	Data that you provide to us in the entry form for the relevant competition. This includes the information you provide to us in the relevant entry form and which we require to run the competition in accordance with the terms and conditions of entry. The specific data requested depends on the particular competition in which you wish to take part in. Typically, we collect at least your name, your email address and telephone number (WhatsApp). Depending on the nature of the competition, and we will inform you of this	competition participants.	Providing this data is a prerequisite for taking part in the relevant competition. There is no obligation to provide the data. If you do not provide this data, you will not be able to take part in the prize draw.	Data will be stored until the end of the relevant competition. We store this data for evidential purposes in connection with the assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of documents , retention obligations under commercial and tax law may range from six to

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
	as set out in the relevant registration form.			ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB).
Winners' data.	Data that you provide to us in addition as a winner of a prize draw. This includes information that we require for the deliver the prize, such as your full name, your address, telephone number (WhatsApp), your clothing or shoe size, and confirmation of whether you have accepted the prize in question.	Winners of a prize draw.	Providing this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If you do not provide the data, we will be unable to deliver your prize to you.	Data will be stored until the end of the relevant competition. We store this data for evidential purposes in connection with the assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the type of documents , retention obligations under commercial and tax law may be for six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB).
Prize data.	Data relating to the prizes won by the respective winners. This includes information which winner has won which prize.	Generated automatically.	-	Data is stored until the end of the relevant competition. We store this data for evidence purposes in connection with the assertion, exercise or defence of legal claims, and furthermore for a transitional period of three years from the end of the year in which you provided us with the data, and, in the event of any legal disputes, until such disputes are resolved. We also retain this data to the extent that statutory retention obligations exist, in particular under commercial and tax law. Depending on the nature of the documents, , retention obligations under commercial and tax law

Categories of personal data processed	Personal data included in the categories	Sources of the data	Obligation to provide the data	Retention period
				of six or ten years (Section 147 of the German Fiscal Code (AO), Section 257 Commercial Code (HGB)).
Reminder email subscription details.	Data that we collect when you sign up for any competition reminder emails relating to our competitions. This includes the following details: Email address, title, first name, surname.	Reminder email subscribers.	Provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide this data. If the mandatory details, we will be unable to send you reminder emails.	We store this data for the period specified in the registration form for the relevant reminder email period, which generally corresponds to the period specified in the respective terms and conditions of the relevant prize draw campaign. We also store this data for evidence for the purpose of asserting, exercising or defending legal claims, and furthermore for a transitional period of three years from the end of the year in which you unsubscribed or in which the period for reminder emails ended, and, in the event of any legal disputes, until such disputes are resolved.
Reminder email opt-in data.	Log data generated automatically when you subscribe to or unsubscribe from reminder emails. These include the date and time of subscription to the reminder email, the date and time of dispatch of the registration notification in the double opt-in process, and the date and time of confirmation of registration in the double opt-in process, and the IP address of the device used for confirmation, and the date and time of any unsubscription from the reminder emails.	Reminder email subscribers.	The provision of this data is not required by law or contract, nor is it necessary for the conclusion of a contract. There is no obligation to provide the data. If you do not provide the data, we will be unable to send you reminder emails.	We store this data for the period specified in the registration form for the relevant reminder email period, which generally corresponds to the period specified in the respective terms and conditions of the relevant prize draw campaign. We also store this data for evidence for the purpose of asserting, exercising or defending legal claims, and furthermore for a transitional period of three years from the end of the year in which you unsubscribed or in which the period for reminder emails ended, and, in the event of any legal disputes, until such disputes are resolved.

2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Only in the case of participation in a competition via an online form on our website or app, e.g. competition or registration forms: provision of the (where applicable, pre-filled) forms for entering a competition and the form for signing up for reminder emails on the website or app: for this purpose, data is temporarily processed on our web server. If you have signed up for a reminder email and accessed the entry form via the participation link in your reminder email, we will pre-fill the entry form with the details you provided when signing up for the reminder email. To do this, we append a randomly generated (hash) value, which allows us to link this to your consent-based email subscription data. You can change this data at any time before submitting the registration form.	Form HTTP data, and, where applicable, reminder email subscription data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to provide the website content accessed by the user.	Hosting provider.
Only when participation in a competition via an online form on our website or app, e.g. competition or registration forms: ensuring the security of the data used to provide the forms for taking part in a competition and for signing up for reminder emails IT infrastructure used to provide the forms for taking part in acompetition and for signing up for reminder emails, in particular to detect, rectify and documenting malfunctions in a manner that preserves evidence (e.g. DDoS attacks):	Form HTTP data,	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is to ensure the security of the IT infrastructure used to provide the forms IT infrastructure used to provide the forms, in particular to detect, rectify and document malfunctions (e.g. DDoS attacks) in a manner that preserves evidence.	Hosting provider.

Purpose of the processing of personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
For this purpose, data is temporarily stored in log files on our web server and analysed.				
Entry to the relevant competition and the selection of winners in accordance with the relevant terms and conditions of entry terms and conditions of entry that you have accepted for that specific competition.	Entry form data, prize data.	The winner is selected at random by a draw. This draw is conducted automatically without human intervention.	Article 6(1)(b) b of the General Data Protection Regulation (fulfilment of a contract or the implementation of pre-contractual measures).	Hosting provider, WhatsApp provider.
Notification of the prize and the provision of the prizes in accordance with the respective for the specific competition.	Entry form data, winner data, prize data.	No automated decision-making takes place.	Article 6(1)(b) b of the General Data Protection Regulation (performance of a contract or implementation of pre-contractual measures).	Where applicable, delivery service providers.
'Double opt-in' procedure to confirm a subscription to any reminder emails: To this end, we send an email requesting confirmation to the email address provided during registration. A subscription only becomes effective once the subscriber confirms the email address by clicking on the confirmation link contained in the email.	Reminder email subscription data, reminder email opt-in data.	No automated decision-making takes place.	Article 6(1)(f) (f) of the General Data Protection Regulation (balancing of interests). Our legitimate interest is the legally compliant documentation of your consent to receive reminder emails.	Hosting provider.
Sending reminder emails to reminder email subscribers. We use the optional details provided during registration to address you by name in the reminder emails.	Reminder email subscription data, reminder email opt-in data.	No automated decision-making takes place.	Article 6(1)(a) a of the General Data Protection Regulation (consent).	Hosting provider.
Storage and processing for evidential purposes in connection with the potential assertion, exercise or defence of legal claims.	Entry form data, winner data, prize data, reminder email subscription data, reminder email opt-in data.	No automated decision-making takes place.	Balancing of interests (Article 6(1)(f) of the General Data Protection Regulation). Our legitimate interest is the assertion, exercise or defence of legal claims.	-
Retention of data for the comply with statutory retention obligations, in particular those under commercial and tax law.	Entry form data, winner data, prize data.	No automated decision-making takes place.	Fulfilment of a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).	-

Purpose of processing personal data	Categories of personal data processed	Automated decision-making	Legal basis and, where applicable, legitimate interests	Recipients
Depending on the type of documents, retention obligations under commercial and tax law may apply for a period of six or ten years may apply (Section 147 of the German Fiscal Code (AO), Section 257 of the German Commercial Code (HGB).				

3. Details regarding the recipients of personal data and the transfer of personal data to third countries and/or to international organisations

Recipients	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Hosting provider (currently: commercetools GmbH, Adams-Lehmann-Str. 44, 80797 Munich, Germany)	Data processors.	EU, UK, USA, Australia, Singapore	*For the transfer personal data to the USA and the UK, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here:* https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj *As regards transfers to Australia and Singapore, there is no adequacy decision by the European Commission within the meaning of Article 45(3) of the General Data Protection Regulation. Commerctools GmbH has standard contractual clauses (STCs) which, in accordance with Article 46 of the General Data Protection Regulation.*
WhatsApp provider chatarmin.com GmbH, Kaiserstrasse 89/2/3 1070 Vienna, Austria	Data processors.	EU and USA.	For the transfer personal data to the USA, an adequacy decision by the European Commission within the meaning of Article 45 of the GDPR. The adequacy decision is available here: https://eur-lex.europa.eu/eli/dec_impl/2023/1795/oj The transfer of personal data to the USA is carried out via subcontractors of chatarmin. In addition to the adequacy decision, the parties have concluded EU Standard Contractual Clauses in accordance with Article 46(5) of the General Data Protection Regulation.
Parcel delivery service provider Arvato Distribution GmbH, Carl-Bertelsmann-Str. 32, 33330 Gütersloh, Germany	Data processors.	EU	-
System and email service provider (currently: Amazon SES,	Data processor	EU and USA.	There is no adequacy decision by the European Commission within the meaning of Article 45(3)

Recipient	Role of the recipient	Transfer to third countries and/or to international organisations	Adequacy decision or appropriate or adequate safeguards for transfers to third countries and/or to international organisations
Amazon Web Services EMEA SARL, 5 rue Plaetis, Luxembourg, L-2338, Luxembourg).			of the General Data Protection Regulation. Amazon has Standard Contractual Clauses (SCCs) in place, which have been approved in accordance with Article 46 of the General Data Protection Regulation.

H. Information on the use of cookies and similar technologies

In connection with our website or app, as well as the offers , we use cookies and similar tracking technologies. In doing so, we utilise processing and storage functions of your device's browser or the app and collect information from the storage of your device's browser or the app. You will find detailed information on this below.

1. General information on cookies and similar technologies (app)

Cookies on our website: Cookies are small text files containing information that may be placed on the user's device via the browser when they visit a website. When the website is visited again using the same device, the cookie and the information stored within it can be retrieved.

Similar technologies in our app (SDKs and local storage):

For our mobile app, for technical reasons, we do not use traditional web cookies. Instead, we use comparable technologies to fulfil the same purposes (e.g. statistical measurements, error analysis, optimised user guidance and marketing):

- **Local app storage** (Shared Preferences / NSUserDefaults): These are local, protected storage areas within your smartphone's operating system (Android/iOS) where the app stores small fragments of data (e.g. your login status, language settings or a pseudonymous ID) locally. Similar to cookies, this data remains stored on your device temporarily or permanently until the app is uninstalled or the app's storage is manually cleared.

- **Software Development Kits** (SDKs): An SDK is a programming interface provided by the relevant third-party provider (e.g. Google, Bloomreach, AppsFlyer) that is integrated directly into our app's code. It enables the app to read pseudonymised interaction data and device-specific identifiers (such as the advertising IDs 'IDFA' for iOS or 'GAID' for Android) and to transmit them to the relevant provider for analysis or marketing purposes.

Legally, these app technologies are subject to the same data protection requirements as web cookies (in particular Section 25 of the TDDDG). Unless they are technically absolutely necessary for the app to function , we use them exclusively with your express consent (opt-in).

When using the app, log data is collected via the Hypertext Transfer Protocol (Secure) (HTTP(S)). The following data is processed: your device (model and IMEI), operating system, the (sub-)page accessed, date and time of access, country (based on IP address), and technical usage data (e.g. which products were viewed, shopping basket information, completion of a purchase). So-called IP anonymisation is enabled in the app. This

means that the IP address, which is transmitted for technical reasons, is anonymised before being stored by truncating the IP address (by removing the last octet of the IP address)
.

1. First-party and third-party cookies/technologies

Depending on where a cookie comes from, a distinction can be made between so-called first-party cookies and third-party cookies:

First-party cookies or first-party technologies	**Cookies set by the website operator, as the data controller, or by a data processor commissioned by the website operator . Cookies and similar technologies set by us ourselves or by a data processor commissioned by us in our on our behalf. In the app, this may include, in particular, locally stored information and SDKs, provided that these are used exclusively on our behalf.**
Third-party cookies or third-party technologies	Cookies set by other data controllers other than the website operator and retrieved, which do not act as data processors on behalf of the website operator . Cookies and similar technologies provided or operated by external providers, through which information may be transmitted to these providers or read by them. In our app, such technologies are used in particular in the form of SDKs .

2. Transient and persistent cookies

Depending on the duration of validity, a distinction can also be made between so-called transient and persistent cookies:

Transient cookies (session cookies)	**Cookies that are automatically deleted when you close your browser.**
Persistent cookies	Cookies that remain on you close your browser remain stored on your device .

3. Cookies requiring consent and those not requiring consent

Depending on their function and their intended purpose, the use of certain cookies may require the user's consent. In this respect, cookies can be categorised according to whether the user's consent is required for their use:

Cookies not requiring consent cookies	**Cookies whose sole purpose is to carry out the transmission of a message via an electronic communications network.**

Cookies not requiring consent **Cookies**	**Cookies whose sole purpose is to carry out the transmission of a message via an electronic communications network.**
Cookies that are strictly necessary to enable the provider of an information society service, which has been expressly requested by the subscriber or user, to provide that service ('Strictly necessary cookies').	
Cookies requiring consent	Cookies for all other purposes other than those mentioned above.

2. Management of the website (app)

1. Granting consent to the use of cookies and similar technologies (app) and managing cookies via the privacy and cookie settings

Where the use of certain cookies, we will only set these cookies when you use the website and the app if you have given your prior consent. Information on whether consent is required for the use of a cookie can be found in the information on the cookies used on this website in **section H.III** of this privacy policy.

Consent on the website (cookie banner): When you visit our website, we display a so-called 'cookie banner' in which you can, by clicking a button, give your consent to the use of cookies on this website. By clicking the button provided for this purpose, you can consent to the use of all cookies described individually in **section H.III** of this privacy policy . Alternatively, you can click on the 'Cookie Settings' button (LINK TO https://www.marc-o-polo.com/on/demandware.store/Sites-MOP-Site/de_DE/Home-CookieSettings) to make a personalised selection of cookies and to adjust your selection at a later date. We also store your consent and, where applicable, your personalised selection of cookies on your device in the form of a cookie ('opt-in cookie') so that, the next time you visit the website, we can determine whether you have already given your consent. The opt-in cookie has a limited validity period of a maximum of 6 months.

Consent in the app (in-app consent banner): When you launch our app for the first time, we display a so-called 'consent banner' (consent banner). Here, you can specify whether you wish to consent to the use of analytics, marketing and personalisation technologies within the app.

You can withdraw or amend this consent at any time, with effect for the future directly in the app's settings under the menu item 'Privacy and Cookie Settings'. As soon as you withdraw your consent, the relevant SDK will be deactivated and no further data will be collected, stored locally or transmitted.

Strictly necessary
Cookies cannot be disabled via this website's cookie management function. However, you can disable these cookies generally in your browser at any time.

2. Managing cookies via browser settings

You can also manage the use of cookies via your browser settings. Different browsers offer different ways of configuring cookie settings. You can find further detailed information on this, for example, at http://www.allaboutcookies.org/ge/cookies-verwalten

However, we would like to point out that some functions of the website may not work, or may no longer work properly, if you disable cookies in your browser generally.

3. The Cookies used on this website

This website may the following cookies may be used:

1. Essential cookies for the basic functioning of the website.

No consent is required for these cookies.

Name	First-party / Third-party	Purpose and content	Duration
Commerce Tools			
ai_session	**First-party**	**This cookie is linked to the Microsoft Application Insights software, which collects statistical usage and telemetry data for applications developed on the Azure cloud platform. This is a unique, anonymous cookie used to identify sessions**	**1 day**
ai_user	First-party	This cookie is linked to the Microsoft Application Insights software, which collects statistical usage and telemetry data for applications developed on the Azure cloud platform. This is a unique, anonymous cookie used to identify sessions	1 day
country	First-party	This cookie records the country from which the page is accessed, in order to select the correct language /country variant of the shop.	1 day
csmopb	First-party	This cookie stores the shopping basket. Required for shop functions	4 weeks
csmcg	First-party	This cookie stores the	4 weeks

ai_session	**First-party**	**This cookie is linked to the Microsoft Application Insights software, which collects statistical usage and telemetry data for applications developed on the Azure cloud platform. This is a unique, anonymous cookie used to identify sessions**	**1 day**
		MARC O'POLO customer segment.	
csmopat	First-party	Cookie storage Checkout authentication token to retrieve customer data	4 weeks
csmopr	First-party	Cookie that stores the Reco (Dynamic Yield or Amazon Web Services)	6 months
csmoprs	First-party	Cookie that stores the Reco session (DY or AWS)	Session
csmopw	First-party	Cookie that stores information about the wishlist	4 weeks
csmtc	First-party	Cookie that stores the selected main categories (Women & Men)	4 weeks
csmabs	First-party	Cookie for A/B testing allocation	4 weeks
long	First-party	Cookie to identify the user's language	4 weeks
customerStub	First-party	A cookie that recognises customers at the checkout so that the login form is pre-filled for returning customers. This only appears at the checkout and not on the shop page	6 weeks
MopSessionType	First-party	Cookie that sets the user type	60 days
MopSession	First-party	Cookie that ensures long-term user authentication.	60 days
MopSessionHeader		Cookie that ensures short-term authentication of the user	60 days

2. Marketing cookies for the use of marketing technologies and advertising networks

Your consent is required for these cookies.

Google Ads remarketing
cookies
These cookies are used by the Google Ads Remarketing web tracking tool to deliver targeted advertising to website users (re-)targeting (☐ Section B.II). At the time this privacy notice was drawn up , the following cookies were in use for this purpose. Our advertising partner may since have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

NID **SID** **DIE** **IDE** **ANID** **DSID** **FLC** **AID** **TAID** **exchange_uid** **_gads gac**	**First-party**	**These cookies are set by the Google Ads Remarketing Pixel web tracking tool for targeted advertising to users of the website ((re-)targeting) (see Section B). We have implemented the Google AdWords Remarketing Pixel; when a user visits our shop, the pixel is loaded and sets a cookie (tag) in the user's browser to identify them. Depending on which pages the customer has visited in the shop, this information is stored in the cookie; for example, if they have viewed various products, this is recorded and this allows product adverts to be displayed to the customer on other websites . In this case, the product IDs are stored in the cookie. Generally, we the product ID, the price, the page type and the number of products in the cookies for this purpose. In addition to the cookie settings on our website, users can also disable personalised advertising from Google in general: https://adssettings.google.com/authenticated?hl=de**	**Persistent: 60 days**

Microsoft Advertising
These cookies are used by the Microsoft Advertising web tracking tool for the targeted advertising of website users (re-)targeting (☐ Section B.II). At the time this privacy notice was drawn up , the following cookies were in use for this purpose. Our advertising partner may since have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

MUID **MUIDB** **_uetsid** **_uetvid**	**Third Party**	**These cookies are set by the Microsoft Advertising Remarketing Pixel web tracking tool for the targeted advertising to website users ((re-)targeting) (see Section B). In our shop, we have implemented the Google AdWords Remarketing Pixel; when a user visits our shop, the pixel is loaded and sets a cookie (tag) in the user's their browser to identify them. Depending on which pages the customer has visited in the shop, the information is cookie; if they have viewed various products, for example, this is recorded and this allows product adverts to be displayed to the customer on other websites . In this case, the product IDs are stored in the cookie. Generally, we provide pass the product ID, price, page type and number of products in the cookies. In addition to the cookie settings on our website, the user can also generally disable personalised advertising from Microsoft Ads: https://support.microsoft.com/de-de/microsoft-edge/using-microsoft-edge-browsing-history-for-personalised-advertising-and-experiences-37aa831e-6372-238e-f33f-7cd3f0e53679**	**1 year**

Criteo cookies
These cookies are used by the web tracking tool Criteo for the targeted advertising of website users (re-)targeting (□ Section B.II). As the time this privacy notice was drawn up, the following cookies were in use. Since then, our advertising partner may have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

ASP.NET_Sessionid	**Third Party**	**The session ID is used to uniquely identify a browser on the server.**	**Session**
r.ack	Third Party	A cookie used primarily for Safari.	1 hour
uid	Third Party	Identifies users for remarketing purposes (displaying dynamic banners with the most relevant product-specific recommendations based on statistical data and browsing behaviour)	1 year
opt-out	Third Party	Opt-out cookie. Allows the user to opt out of the Criteo service.	5 years
uic	Third Party	Identifies the user's context, e.g. at which stage of the purchase process	6 months

ASP.NET_Sessionid	**Third Party**	**The session ID is used to uniquely identify a browser on the server.**	**Session**
		the user is whether they have viewed one or more products, or perhaps added a product to the shopping basket. It allows us to evaluate the user's behaviour on the website based on their browser history and their actions on the website, for example, to assess their likelihood of making a purchase.	
possibly	Third Party	event cookie. It contains information about the last page visited on our website. It is used for product recommendations during the banner display process.	6 months
udc	Third Party	Dynamic inventory selection. It contains the list of advertisers for whom the user is profitable and supports the tagging and untagging functionality. Criteo operates with a very large number of publishers in Germany. A publisher usually has one or more websites on which Criteo advertising content. Demarking a user means that a user who has, for example, purchased a product, is de-targeted for that product.	6 months
acdc	Third Party	Advanced Criteo Data Collection. It contains (optional) additional data relating to the user, e.g. whether the user accessed the website. It is used to continuously improve campaign performance.	6 months
zdi	Third Party	Passback loop detection. Tracks how often a user triggers a passback . Publishers comprise a large number of advertisers within our network, on whose sites we display our clients' ad creatives.	6 months
eid	Third Party	External ID. It contains the user ID of our Publisher/marketer. It is used for the resale of our mid-market inventory. We have a large number of marketers in our network. Any inventory we purchase is resold resold programmematically.	6 months

ASP.NET_Sessionid	**Third Party**	**The session ID is used to uniquely identify a browser on the server.**	**Session**
opt	Third Party	The opt cookie contains information indicating whether a user has logged out of our service or one of the marketers within our network and therefore no longer wishes to receive personalised advertising.	1 year
cto_bundle	Third Party	The cto_bundle cookie helps to improve tracking results and records visitor behaviour, in order to provide more relevant adverts.	1 year

Meta Pixel cookies
These cookies are used for the Meta Pixel tool on our website (□ Section B.II). At the time this privacy notice was drawn up , the following cookies were in use. Our advertising partner may since have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

c_user	**First-party**	**Used in conjunction with the xs cookie to authenticate your identity to Meta (User ID).**	**90 days**
datr	First-party	Browser ID and timestamp Identifies the browser for security and website integrity, including account recovery and the identification of potentially compromised accounts.	Persistent: 2 years
sb	First-party	Browser ID and timestamp Identifies the browser for the purposes of login authentication	Persistent: 2 years
wd	First-party	Screen or window dimensions Enables the delivery of an optimal experience on the user's screen	Persistent: 7 days
xs	First-party	Session ID, creation time, authentication value, secure session status, caching group ID. Used in conjunction with the C_user cookie to authenticate the user's identity to Meta.	Persistent: 90 days

TikTok Pixel cookies

These cookies are used for the TikTok Pixel tool on our website (□ Section B.II). At the time this privacy notice was drawn up , the following cookies were in use. Our advertising partner may since have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

_tt_enable_cookie	**First-party**	**To measure and improve the performance of your advertising campaigns and to personalise the user experience (including adverts) on TikTok.**	**390 days (13 months)**
_ttp	Third Party	To measure and improve the performance of your advertising campaigns and to personalise the user experience (including adverts) on TikTok.	390 days (13 months)

retailAds

These cookies are used by the advertising network operated by retailAds to promote our products as effectively as possible, including the display of personalised, interest-based adverts and settling accounts for advertising campaigns with our advertising partners (□ Section B.II). At the time this privacy notice was drawn up , the following cookies were in use for this purpose. Our advertising partner may since have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

bId	**Third Party**	**Defines a browser-specific ID to identify a new click from the same browser .**	**1 year**
aw***** (The cookie name varies for each advertiser , but consists of the letters 'aw', followed by an ID representing the advertiser, e.g. aw1001.)	Third Party	Set when you click on one of our links. Stores IDs for referring websites, advertisement, which you have clicked, the group of adverts to which the advert belongs, the time you clicked on it, the ID for the type of advert, the ID for the product, and any parameters the referring website adds to the click.	30 days
AWSESS	Third Party	Stored when you view an advert, also to ensure that we do not keep showing you the same advert. An ID for the advert you have seen. Expires at the end the session when you close your browser	Session
awpv***** (The cookie name is unique to each advertiser	Third Party	Set when you view an advertisement. Stores an ID for the website on which the	24 hours

bId	**Third Party**	**Defines a browser-specific ID to identify a new click on the same browser .**	**1 year**
Varies, but consists of the letters 'aw', followed by an ID representing the advertiser, e.g. awpv1001.)		Ad is displayed, and the time at which you viewed the advert.	
_aw_m_***** (The cookie name varies for each advertiser, but consists of the letters 'aw', followed by an ID representing the advertiser, e.g. _aw_m_1001.) Tracking cookies set by the advertiser on the advertiser's domain for AWIN	Third Party	Triggered when you click on one of our links. Stores IDs for referring websites, advertisement, which you clicked, the advertising group to which the advert belongs, the time at which you clicked on it, the ID for the type of advert, the ID for the product and any parameters that the referring website adds to the click .	30 days

Google Ads Conversion Pixel cookies These cookies are set by the Google Ads Conversion Pixel web tracking tool for analysing visitor actions (conversion tracking) (□ Section B.II). At the time this privacy notice was drawn up , the following cookies were in use for this purpose. Our advertising partner may since have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

Conversion AID **DSID** **TAID** **_gcl_au**	**First-party**	**These cookies are used by the Google Ads Conversion Pixel web tracking tool for visit action analysis (conversion tracking) (□ Section B.II). They contain placeholders for the following information:** • **Unique ID for (re-) identifying returning visitors** • **Page type (e.g. thank-you page after an order, product detail page, shopping basket),** • **Order number** • **Net shopping basket value (excluding delivery charges, VAT, payment fees and vouchers)** • **Product numbers and prices** **The conversion pixel tracks users' purchasing and usage behaviour. This includes the following information:** • **which product the customer purchased and at what price purchased** • **which pages did they browse** • **what was the value of the shopping basket** **This information is used to measure the success of the advertising materials employed (e.g. whether the use of banners and videos has led to sales). Furthermore, customers are placed on retargeting lists on a pseudonymised basis using this data, in order to show them relevant adverts or exclude them from campaigns (e.g. excluding men from a campaign aimed at women). (See also Google Ads remarketing cookies above)**	**Persistent: 60 days**
DoubleClick/Floodlight These cookies are used by the web tracking tool DoubleClick/Floodlight for targeted advertising to users of the website (re-)targeting and for analysing visitor actions (conversion tracking) (□ **Section B.II**). At the time this privacy policy was drawn up, the following cookies were in use for this purpose. Our advertising partner may new cookies may have been added or			

Conversion AID **DSID** **TAID** **_gcl_au**	**First-party**	**These cookies are used by the Google Ads Conversion Pixel web tracking tool for visit action analysis (conversion tracking) (☐ Section B.II). They contain placeholders for the following information:** • **Unique ID for (re-)** • **Page type (e.g. thank-you page after an order, product detail page, shopping basket),** • **Order number** • **Net shopping basket value (excluding delivery charges, VAT, payment fees and vouchers)** • **Product numbers and prices** **The conversion pixel tracks users' purchasing and usage behaviour. This includes the following information:** • **which product the customer purchased and at what price purchased** • **which pages did they browse** • **what was the value of the shopping basket** **This information is used to measure the success of the advertising materials employed (e.g. whether the use of banners and videos has led to sales). Furthermore, customers are placed on retargeting lists on a pseudonymised basis using this data, in order to show them relevant adverts or exclude them from campaigns (e.g. excluding men from a campaign aimed at women). (See also Google Ads remarketing cookies above)**	**Persistent: 60 days**
The purposes, content and retention periods of the cookies have been modified . For further information, we would therefore also like to refer you to the privacy policy provided by our advertising partner, which are linked in **section B.II**.			
DSID	Third-party	campaign optimisation.	14 days
IDE	Third-party	Contains a randomly generated user ID. Using this ID, Google can track the user across across different websites, spanning multiple domains,	1 year

Conversion AID **DSID** **TAID** **_gcl_au**	**First-party**	**These cookies are used by the Google Ads Conversion Pixel web tracking tool for visit action analysis (conversion tracking) (□ Section B.II). They contain placeholders for the following information:** • **Unique ID for (re-)** • **Page type (e.g. thank-you page after an order, product detail page, shopping basket),** • **Order number** • **Net shopping basket value (excluding delivery charges, VAT, payment fees and vouchers)** • **Product numbers and prices** **The conversion pixel tracks users' purchasing and usage behaviour. This includes the following information:** • **which product the customer purchased and at what price purchased** • **which pages did they browse** • **what was the value of the shopping basket** **This information is used to measure the success of the advertising materials employed (e.g. whether the use of banners and videos has led to sales). Furthermore, customers are placed on retargeting lists on a pseudonymised basis using this data, in order to show them relevant adverts or exclude them from campaigns (e.g. excluding men from a campaign aimed at women). (See also Google Ads remarketing cookies above)**	**Persistent: 60 days**
		recognise users and display personalised adverts.	
vscr_vid	Third-party	Campaign optimisation.	1 year
_fbp	Third-party	Campaign optimisation.	30 days

Tectumedia
These cookies are used by the web tracking tools Google and DoubleClick, which are implemented on the website via the Tectumedia Container (□ Section B.II). At the time this privacy policy was drawn up, the following cookies were in use. our advertising partner's area of responsibility, new cookies may have been added in the meantime, or the purposes, content and retention periods of the cookies may have been modified. For further information, we therefore refer you to our advertising partner's privacy policy, which is linked in Section B.II.

dsply_nth_3749	**Third-party**	**Campaign optimisation.**	**1 year**
dsply_nin_3793	Third-party	Campaign optimisation.	1 year
dsply_dlkl_3793	Third-party	Campaign optimisation.	6 months

dsply_ost_3749	**Third Party**	**Campaign optimisation.**	**1 year**
dsply_ost_3793	Third Party	Campaign optimisation.	6 months
dsply_kc_3749	Third Party	Campaign optimisation.	1 year
dsply_kc_3793	Third Party	Campaign optimisation.	1 year
dsply_dlkl_3749	Third Party	Campaign optimisation.	1 year
dsply_vid	Third Party	Campaign optimisation.	1 year
ata	Third Party	Campaign optimisation.	1 year
Outbrain These cookies are used by the advertising network operated by Outbrain to promote our products in the best possible way, including the delivery of personalised, interest-based advertising and the billing of advertising campaigns to our advertising partners (□ **Section B.II**). At the time this privacy notice was drawn up, the following cookies were in use. Since then, our advertising partner may have added new cookies or modified the purposes, content and retention periods of the cookies may have been modified. For further information, , we would therefore also like to refer you to our advertising partner's privacy policy , which is linked in **Section B.II**.			
OBUID	Third Party	Stores the user's pseudonymous user ID and is read to track user actions – for example, when clicking on an advert, for conversion tracking or for running retargeting campaigns.	3 months

dsply_ost_3749	**Third Party**	**Campaign optimisation.**	**1 year**
AUID	Third Party	Stores the user's pseudonymous user ID and is read on mobile devices – for example, when a user clicks on an advert, for conversion tracking or to run retargeting campaigns	90 days
Pinterest These cookies are used for the Pinterest Pixel tool on our website (□ **Section B.II**). At the time this privacy notice was drawn up, the following cookies were in use for this purpose. Our advertising partner may new cookies may now have been added, or the purposes, content and retention periods of the cookies may have been modified . For further information, we would therefore also like to refer you to the privacy policy provided by our advertising partner, which are linked in **section B.II**.			
_pin_unauth	First-party	Used by Pinterest to track usage of the services.	1 year
_pinterest_sess	Third-party. http://www.pinterest.com	The Pinterest login cookie is used to store a user's login status in a web browser . It is updated when a user logs in to Pinterest (or logs out of Pinterest). This cookie contains the user's Pinterest ID (a pseudo-random integer) and the user's authentication token (if the user is).	Session
_pinterest_ct, _pinterest_ct_mw, _pinterest_ct_rt	Third-party. http://www.pinterest.com	These are identical in content ; they contain only a user ID and the timestamp for the cookie was created.	1 year

Emarsys eMarketing Systems AG			
scarab.visitor	First-party	Browser ID – Identifies the browser for the purposes of login authentication	1 year
cdv	Third Party	Browser ID – Identifies the browser for the purposes of login authentication	1 year
scarab.profile	First-party	Information on user profile, products, by	1 year

Emarsys eMarketing Systems AG			
		that were searched for, etc., as well as additional performance metrics for the scripts (such as how quickly they were loaded/executed, etc.) – these cookies are encrypted	
xp	Third Party	Information on the user profile, products searched for, etc., as well as performance metrics for the scripts (such as how quickly they were loaded/executed, etc.) – These cookies are encrypted	1 year
scarab.mayAdd & scarab.mayViewed	First-party	Session cookies that we use to track click behaviour and items in the shopping basket.	Duration of the web session
s	Third Party	Session cookies that we use to track click behaviour and items in the shopping basket.	Duration of the web session

RTB House **These cookies are set by the web tracking tool RTB House to deliver targeted advertising to website users (re-) (☐ Section B.II).** **At the time this privacy notice was drawn up, the following cookies were in use. Since then, our advertising partner may have added new cookies or modified the purposes, content and retention periods of the cookies. For further information , we would therefore also like to refer you to our advertising partner's privacy policy, which is linked in Section B.II.**			
u	Third-party	Data relating to user activity on the customer's website, in particular whether the user has clicked the 'Order' button; IDs or categories of products that the user has viewed; IDs of products that were added to the shopping basket and/or ; total value of the order and order reference These are not shared with other	1 year

RTB House **These cookies are used by the web tracking tool RTB House to deliver targeted advertising to website users (re-** **) (□ Section B.II).** **At the time this privacy notice was drawn up, the following cookies were in use. Since then, our advertising partner may have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we would therefore also like to refer you to our advertising partner's privacy policy, which is linked in Section B.II.**			
		sources of PII.	
ts	Third-party	Time of user activity	1 year

Reddit Inc. **These cookies are used by the web tracking tool Reddit to deliver targeted advertising to users of the website (□ Section B.II). At the** **At the time this privacy notice was drawn up, the following cookies were in use. Since then, our advertising partner may have added new cookies or modified the purposes, content and retention periods of the cookies. For further information, we would therefore also like to refer you to our advertising partner's privacy policy, which is linked in Section B.II.**			
_rdt_uuid	First-party	Contains an anonymous ID used for accurate allocation.	90 days
_rdt_cid	First-party	Stores the click ID when someone visits the online shop via a Reddit advert.	90 days

3. Analytics cookies for the use of web analytics technologies

Your consent is required for these cookies.

Artefact Triple-A cookies

Google Analytics cookies These cookies are used by the web analytics tool Google Analytics to collect and analyse user behaviour on our website in order to improve the website (see Section B).			
_ga	First-party	This cookie contains a unique visitor ID and is used to distinguish one user from another .	Persistent: 2 years.
_gid	First-party	This cookie contains a unique visitor ID and is used to distinguish users from one another .	Persistent: 24 hours.
_gat	First-party	This cookie is used to throttle the request rate.	Transient.
_utma	First-party	This cookie stores the number of visits made by each visitor and the time of their first visit, previous visits and the current visit.	Persistent: 2 years.
_utmt	First-party	This cookie is used to throttle the request rate.	Transient.
_utmb	First-party	This cookie is used to track how long the visitor spends on a website, i.e. when the visit begins and when it ends. This cookie records the time at which a visitor enters a page.	Transient.
_utmc	First-party	This cookie is used to track how long a visitor spends on a website, i.e. when the visit begins and when it ends. This cookie records the time at which a visitor leaves a page.	Persistent: 30 minutes.
_utmv	First-party	This cookie stores the visitor category to which a user belongs.	Persistent: 2 years.
_utmz	First-party	This cookie stores the source or campaign that explains how a user arrived at the website .	Persistent: 6 months.
AB Tasty			
ABTasty	First-party	AB Tasty uses this cookie to transmit test data (visitor ID, test and variant IDs, timestamps).	13 months

Google Analytics cookies These cookies are used by the web analytics tool Google Analytics to collect and analyse user behaviour on our website in order to improve the website (see Section B).			
ABTastySession	First-party	In the case of AB Tasty Session, the cookie is used to transmit the start, duration and end of the session .	Session-based
Factfinder (Session Storage)			
ssmopffcmi	First-party	Campaign Storage – Identifies the Factfinder campaign via which the user reached the product	In session storage for the duration of the session
ssmopffsi	First-party	Session ID – Randomly ID that aggregates all events generated within a session .	In session storage for the duration of the session
ssmopffui	First-party	User ID – Randomly ID that aggregates all events generated by a user.	In session storage for the duration of the session

Google Optimize Sizmek

4. Personalisation cookies for the use of personalisation technologies

Your consent is required for these cookies.

adnymics GmbH			
AWSALB	Third Party	Users' click and purchase behaviour is analysed to enable the inclusion, in the event of an order, an insert containing personalised product recommendations for the user .	13 months
AWSALBCORS	Third Party	13 months	
Epoq cookies			
eqe	First-party	The Epoq recommendation tool is used to optimise our website, transforming your visit into a personalised experience through tailored recommendations and content. In doing so, we use the page content accessed by the user to suggest similar or thematically related products or other	Persistence: 30 days

adnymics GmbH			
		for them relevant content.	
eqsid_	First-party	Session	
_cfduid	First-party	Persistent: 365 days	
Saiz			
ARRAffinitySameSite	First-party	The ARRAffinitySameSite cookie is used to distribute requests to the widget evenly so that the SAIZ widget always loads quickly.	20 minutes
Fittingbox			
LastSessionUuid	First-party	This ID is used to track whether the user had previously .	Session-based
fitstate	First-party	This cookie identifies whether the user is using a photo or the camera mode for the Virtual Try On.	Session-based
dataPrivacyTermsAccepted	First-party	The user has accepted the privacy notice.	30 minutes
dataPrivacyTermsAnswerExpiration_date	First-party	The period during which you can use Virtual Try On without restriction, without the privacy notice reappearing.	30 minutes

4. SDKs and similar technologies used in the app

The following SDKs may be used in the app:

1. Essential SDKs and technologies for the basic functioning of the app.

No consent is required for these SDKs and technologies.

Name	**First-party / Third-party**	**Purpose and content**	**Validity period**
Firebase for Crashlytics			
Firebase Crashlytics SDK	Third Party	App stability analysis and error reporting: This SDK is used to system crashes and technical errors within our app in	Session-based / Until uninstallation The error reports and temporary IDs are temporarily stored for the duration of the

Term	First Party / Third Party	Purpose and content	Validity period
		To be recorded in real time. If an an error or a crash occurs, technical reports (crash Reports) are automatically sent to Google's servers. In the process, anonymised device details (e.g. device model, installed version of the app, free storage space, operating system version) as well as temporary, device-specific installation IDs for error tracking. This is technically essential to ensure the secure, error-free and stable delivery of the app's content.	These are retained in the system for troubleshooting purposes and, following the session is closed or the reported system error has been resolved .
Usercentrics SDK	First Party	We use the Usercentrics Apps SDK.	The SDK permanently stores the consent status locally, together with a controller ID, until the consent decision is updated .
Language selection data (stored in the device's device)	First Party	Delivery of the app in the selected language. The This is technically essential in order to display text within the app in the selected language.	Language selection data is permanently .
Consent data (stored in the device's local storage)	First Party	Storage of the specified permissions for the app.	Consent data is stored permanently in the app. Storage is device-specific.
Shopping basket data (stored in the device's local storage)	First Party	Storage of the items you add to your shopping basket.	Shopping basket data is stored without the need to log in for the duration of the session. Upon or after logging in, this data is stored permanently in your profile.

2. Marketing SDKs for the use of marketing technologies and advertising networks.

Your consent is required for these SDKs and technologies.

Name	First-party / Third-party	Purpose and content	Validity period
AppsFlyer			
AppsFlyer SDK	Third Party	App attribution, campaign measurement and deep linking (OneLink): The integrated SDK uses the	Local identifiers are stored on the device on a temporary basis for the duration of the session (deep linking) or remain until the app is uninstalled or the

Designation	First-party / Third-party	Purpose and content	Validity period
		local storage on your device, as well as your operating system's advertising IDs (IDFA/GAID) for measuring the effectiveness of mobile adverts. It stores temporary IDs locally on your device in order to determine which advertising campaign led to the app's installation, as well as click IDs to facilitate deep-linking redirects. The data is processed in a pseudonymised form and transmitted to advertising networks (such as Google Ads, Meta) for campaign management.	Withdrawal of consent is active.

3. Analytics SDKs for the use of web analytics technologies

Your consent is required for these SDKs and technologies.

Designation	First-party / Third-party	Purpose and content	Validity period
Firebase for Google Analytics			
Firebase SDK	Third Party	In-app behaviour analysis and performance metrics: This analytics SDK is used in our mobile app to record and statistically analyse user behaviour within the app in a pseudonymised manner and to evaluate it statistically. To this end, interactions (e.g. accessing specific screens, clicks on buttons, in-app purchases) and app crash reports are collected. In doing so, the SDK reads your device's advertising IDs (IDFA/GAID) as well as a unique app instance ID generated by Firebase and stores small data packets in the app's local storage for session management. The data helps us to identify technical issues, improve the app's user experience and understand how active our app is used.	The pseudonymous identifiers remain stored in the app's local storage until the app is uninstalled, the app cache is cleared manually, or consent is withdrawn in the app settings.

4. Personalisation SDKs for the use of personalisation technologies

Your consent is required for these SDKs and technologies.

Name	First-party / Third-party	Purpose and content	Validity period
Bloomreach			

Name	First-party / Third-party	Purpose and content	Validity period
Bloomreach SDK	Third Party	The SDK automatically tracks app events (e.g. installation, session start) as well as user-defined interactions in order to analyse usage behaviour and segment users based on their behaviour . Each event is assigned a device ID; logged-in are recognised across devices by means of a unique identifier (e.g. email address) across devices and assigned to a single user profile . Furthermore, the SDK registers the device to receive push notifications and manages the push tokens required for this. It also enables the display of personalised in-app messages, dynamic content areas and an in-app message box. All recorded events and profile information are transmitted in real time to the Bloomreach Engagement Platform.	? Push tokens: 120 days; reset when the app is used.

I. App permissions

- **Push notifications:** By giving your consent, the app may send push notifications to your device. This permission can be changed at any time in your device settings. The various push options and their respective purposes are explained in **Section D**.
- **Tracking permission:** Depending on the operating system, you can allow or deny the app access to tracking technologies via a system prompt and subsequently change the permission in your device settings – on iOS, in particular via **App Tracking Transparency (ATT)**. (Irrespective of this, you can select separately in the consent banner whether your data may be used for analytics and/or marketing purposes.)

J. Information on the rights of data subjects

As a data subject,
the following rights in relation to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (‘right to be forgotten’) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data portability (Article 20 of the General Data Protection Regulation)
- Right to object (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7(3) of the General Data Protection Regulation)
- Right to lodge a complaint with the supervisory authority (Article 77 of the General Data Protection Regulation)

To exercise your rights
, you may contact us using the contact details set out in **Section A**.

Information on any
specific procedures and mechanisms designed to facilitate the exercise of your rights, in particular regarding the exercise of your rights to data portability and to object, may be found, where applicable, in the information on the processing of personal data in **Sections B to F** of this privacy notice.

Below you will find
more detailed information on your rights regarding the processing of your personal data:

I. Right to access ( )

As a data subject,
you have a right of access under the conditions set out in Article 15 of the General Data Protection Regulation.

In particular, this means
that you have the right to request confirmation from us as to whether we are processing personal data relating to you. If this is the case,
you also have the right to access this personal data and to the information set out in Article 15(1) of the General Data Protection Regulation. This includes, for example, information on the purposes of processing, the categories of personal data

processed, and the recipients or categories of recipients to whom the personal data have been or will be disclosed (Article 15(1)(a), (b) and (c) of the General Data Protection Regulation).

You can find out the full extent of your right to access your data can be found in Article 15 of the General Data Protection Regulation, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679

.

II. Right to rectification

As a data subject, you have a right to rectification subject to the conditions set out in Article 16 of the General Data Protection Regulation.

This means, in particular, that you have the right to request that we rectify any inaccurate personal data concerning you without delay, and to have any incomplete personal data completed.

You can find the full scope of your right to rectification can be found in Article 16 of the General Data Protection Regulation , which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679

.

III. Right to erasure ("right to be forgotten")

As a data subject, you have a right to erasure ('right to be forgotten') subject to the conditions set out in Article 17 of the General Data Protection Regulation.

This means that you in principle have the right to request that we erase personal data relating to you without delay, and we are obliged to erase personal data without delay provided that one of the grounds listed in Article 17(1) of the General Data Protection Regulation applies. This may be the case, for example, if personal data is no longer (Article 17(1)(a) of the General Data Protection Regulation).

Where we have have made the personal data public and are obliged to erase it, we are also obliged to take appropriate measures, including technical measures, taking into account the available technology and the costs of implementation, to ensure that other data controllers who are processing the personal data that a data subject has requested them to erase all links to that personal data or copies or replicas of that personal data (Article 17(2) of the General Data Protection Regulation).

The right to erasure ('right to be forgotten") does not apply in exceptional cases where processing is necessary for the reasons set out in Article 17(3) of the General Data Protection Regulation. This may be the case, for example, where processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (Article 17(3)(a) and (e) of the General Data Protection Regulation).

You can find the full scope of your right
to erasure can be found in Article 17 of the General Data Protection Regulation, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679
.

IV. Right to restriction of processing

As a data subject,
you have the right to restriction of processing under the conditions set out in Article 18 of the General Data Protection Regulation.

This means that you
have the right to request that we restrict processing if one of the conditions set out in Article 18(1) of the General Data Protection Regulation is met. This may be the case, for example, if you
contest the accuracy of the personal data. In this case, the restriction on processing shall apply for a period enabling us to verify the accuracy of the personal data (Article 18(1)(a) of the General Data Protection Regulation).

Restriction means the
marking of stored personal data with the aim of restricting its future processing (Article 4(3) of the
General Data Protection Regulation).

You can find the full scope of your right
to restriction of processing can be found in Article 18 of the
General Data Protection Regulation, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679
.

V. Right to data portability

As a data subject,
you have a right to data portability subject to the conditions set out in Article 20 of the General Data Protection Regulation.

This means that you
in principle have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, and you have the right to transmit this data to another controller without hindrance from us, provided that the processing is based on consent pursuant to Article 6(1)
(a) or Article 9(2)(a) of the General Data Protection Regulation, or on a contract pursuant to Article 6(1)(b) of the
General Data Protection Regulation, and the processing is carried out
by automated means (Article 20(1) of the General Data Protection Regulation).

Information on whether
processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation or on a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation can be found in the information on the legal bases for processing in **Sections B to F** of this
Privacy Notice.

When exercising your right
to data portability, you also generally have the right to request that the personal data be transferred directly by us to another

controller, insofar as this is technically feasible (Article 20(2) of the General Data Protection Regulation).

You can find the full scope of your right
to restriction of processing can be found in Article 20 of the
General Data Protection Regulation, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679
.

VI. Right to object

As a data subject,
you have the right to object under the conditions set out in Article 21 of the General Data Protection Regulation.

We will
as a data subject, we will expressly draw your attention to this no later than at the time of our first communication with you.

You will find more detailed
information on this below:

1. Right to object on reasons arising from the data subject's particular situation

As a data subject,
the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which
on the basis of Article 6(1)(e) or (f) of the General Data Protection Regulation; this also applies to profiling based on these provisions.

Information on whether
processing is carried out on the basis of Article 6(1)(e) or (f) of the General Data Protection Regulation can be found in the information on the legal bases for processing in **Sections B to F**
of this privacy notice.

In the event of an objection
on grounds relating to your particular situation, we will no longer process the personal data concerned, unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to establish, exercise or defend legal claims.

You can find the full scope of your right
to object can be found in Article 21 of the General Data Protection Regulation
, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679
.

2. Right to object to direct marketing

If personal data
processed for the purposes of direct marketing, you have the right to object at any time to the processing of your personal data for the purposes of such marketing; this also applies to profiling, insofar as
it is related to such direct marketing.

Information on whether and to
what extent personal data is processed for the purposes of direct marketing can be found in the information on the purposes of processing in
sections B to F of this privacy notice.

In the event of an objection
to processing for the purposes of direct marketing, we will no longer process
the personal data in question for these purposes.

You can find the full scope of your right
to object can be found in Article 21 of the General Data Protection Regulation
, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679
.

VII. Right to withdraw consent

If the processing is based on
consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation, you, as the data subject, have the right under Article 7(3) of the General Data Protection Regulation to withdraw your consent at any time. Withdrawal of consent does does not affect the lawfulness of processing carried out on the basis of that
consent prior to its withdrawal. We will inform you of this before you give your
consent.

Information on whether a
processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of the General Data Protection Regulation,
in the information on the legal bases for processing in **sections B to F** of this privacy notice.

VIII. Right to lodge a complaint with a supervisory authority

As a data subject,
you have the right to lodge a complaint with a supervisory authority, subject to the conditions set out in Article 77 of the General Data Protection Regulation.

The supervisory authority responsible
for us is:

Bavarian State Office for Data Protection
Supervision

Promenade 18, 91522 Ansbach

poststelle@lda.bayern.de

+49 (0) 981 180093-0

K. Information on the technical terms from the General Data Protection Regulation used in this privacy notice

The technical terms used in this
privacy notice have the meanings assigned to them in the General Data
Protection Regulation.

The full scope of the
definitions in the General Data Protection Regulation can be found in Article 4 of the General Data Protection Regulation, which you can access via the following link: http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679
.

More detailed information
on the key technical terms from the General Data Protection Regulation used in this privacy notice is provided below:

- **‘Personal data’**
means any information relating to an identified or identifiable natural person
(‘data subject’); a natural person is considered identifiable if they can be
identified, directly or
indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity
of that natural person;

- **‘Data subject’** means
any identified or identifiable natural person to whom personal data relates;

- **‘processing’** means any
operation or set of operations performed on personal data, whether or not by
automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, distribution or any other form of disclosure, the comparison or linking, the restriction, erasure or destruction;

- **‘profiling’** means any form
of automated processing of personal data which consists of
using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s work performance, economic situation, health,
personal preferences, interests, reliability, behaviour, location or movements of that natural person;

- **‘controller’** means
the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the
processing of personal data; where the purposes and means of such processing are determined by Union law or the law of the Member States, the controller or the specific criteria for its designation may be provided for by Union law or the law of the Member States;

- **‘processor’**

means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

- **‘recipient’** means a natural or legal person, public authority, agency or other body, to whom personal data are disclosed, whether or not they are a third party. Public authorities which, in the course of a specific investigative mandate under Union law or the law of the Member States; the processing of such data by those authorities shall be carried out in accordance with the applicable data protection rules and in line with the purposes of the processing;

- **‘third party’** means a natural or legal person, public authority, agency or other body, other than the data subject, the controller, the processor and the persons authorised to process the personal data under the direct responsibility of the controller or the processor;

- **‘international organisation’** means an organisation established under international law and its subordinate bodies, or any other body established by or on the basis of an agreement concluded between two or more countries;

- **‘third country’** means a country which is not a Member State of the European Union (**‘EU’**) or the European Economic Area (**‘EEA’**);

- **‘Special categories of personal data’** means data from which a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the unique identification of a natural person, health data, or data relating to a natural person’s sex life or sexual orientation.

K. Status and amendments to this privacy notice

This privacy notice is current as
at 7 August 2026

Due to technical
developments and/or changes to statutory and/or regulatory requirements, it may become necessary to amend this privacy notice.

The current
Privacy Policy can be accessed at any time at http://www.marc-o-polo.com.