

# Data protection information plenigo GmbH

You can also download the following information as a pdf file.

## I. Who is plenigo GmbH and what does plenigo GmbH do?

plenigo GmbH is a German technical service provider that offers providers of fee-based Internet content the use of the SaaS platform "plenigo", which provides interfaces provided by plenigo as well as the associated services and functions. The software of plenigo GmbH is used for the technical processing of the contract between the provider and its customers. plenigo GmbH processes personal data for the client within the meaning of Art. 4 No. 2 and Art. 28 DSGVO on the basis of an order processing contract. The subject matter of the order results from the contract concluded between the Supplier and plenigo GmbH.

## II. What is the legal basis for data processing by plenigo GmbH?

plenigo GmbH is a German company and concludes its contracts on the basis of German law. This means that under data protection law the regulations

- the European Data Protection Regulation - DSGVO -
- of the Federal Data Protection Act - BDSG -
- as well as the supplementary legal regulations.

As a German company based in Bavaria, we are under the supervision of the data protection officers of the Federal Government and the State of Bavaria. If you would like more information on this, please visit the website of the data protection officer (<https://www.datenschutz-bayern.de/> and [https://www.bfdi.bund.de/DE/Home/home\\_node.html](https://www.bfdi.bund.de/DE/Home/home_node.html)). There you will be helped.

### **III. What data does plenigo GmbH process?**

Data is processed by plenigo GmbH in three different ways.

1. If a company uses plenigo GmbH as a contract processor, our software is used for technical order processing. We will then process the data of our client. In these cases, the person responsible for data processing within the meaning of Art. 24 DSGVO is our principal. This is your contractual partner, e.g. a publisher with whom you order paid content. This person responsible within the meaning of Art. 24 DSGVO concludes an order processing agreement with us, which ensures that the provisions of the DSGVO, the BDSG and the supplementary statutory provisions are complied with. In addition, we naturally take measures ourselves to ensure that the legal data protection regulations are complied with. For more information, please refer to our general data protection information under IV section 1 of the data protection information.
2. When you use our plenigo.com website, information is also collected.
  - a. If you visit the website for information purposes only, your personal data will only be recorded anonymously. For further details, please refer to the explanations below under IV. Section 2 of our data protection information.
  - b. Commercial customers who visit our website and want to try out our software must register. This includes the following:
    - Salutation
    - First name of contact person
    - Surname of the contact person
    - trade name
    - Country of company headquarters
    - Email address of the contact person

This data is used for the personal initial contact to decide whether the company is permitted to use the platform. In the event of non-approval, this data will be deleted. If the company is permitted to use the platform, our general data protection notice applies (see IV. Section 1 below).

### **IV. Data protection information of plenigo GmbH**

#### **1. General data protection notice**

The general data protection notice informs you about the regulations and procedures that generally apply to the processing of your data by plenigo GmbH.

Supplementary information on data protection when using our products, in particular on the purpose of use, processing, deletion, etc., is provided with the data processing contracts Art. 28 DSGVO concluded in each individual case.

### **We process your data in compliance with the regulations of the European and German data protection laws.**

Your data will only be processed to the extent and for as long as

- it is necessary for the performance of a contract with you or for the implementation of pre-contractual measures that are taken upon your request (Art. 6 para. 1 b Basic Data Protection Ordinance - DSGVO),
- or you have given your consent to the processing (Art. 6 para. 1 a DSGVO),
- or processing is necessary to protect the legitimate interests of us or third parties, e.g. in the following cases: Assertion of claims, defence in legal disputes; detection and elimination of abuse; prevention and investigation of criminal offences; guarantee of the secure IT operation of plenigo GmbH; Art. 6 Para. 1 f DSGVO,
- or due to legal requirements, e.g. storage of documents for commercial and tax purposes (Art. 6 Para. 1 c DSGVO),
- or in the public interest (Art. 6 para. 1 e DSGVO).

You have the following rights:

- a) to request information on categories of data processed, processing purposes, possible recipients of the data, the planned storage period (Art. 15 DSGVO),
- b) to demand the correction or completion of incorrect or incomplete data (Art. 16 DSGVO),
- c) to revoke a given consent at any time with effect for the future (Art. 7 para. 3 DSGVO),
- d) to object to the processing of data on the basis of a legitimate interest for reasons arising from your particular situation (Art 21 Para. 1 DSGVO),
- e) in certain cases, within the framework of Art. 17 DSGVO, to request the deletion of data - in particular to the extent that the data are no longer required for the intended purpose or are processed unlawfully, or you have revoked

your consent pursuant to (c) above or declared an objection pursuant to (d) above,

- f) under certain conditions to demand the restriction of data if deletion is not possible or the obligation to delete is in dispute (Art. 18 DSGVO),
- g) to data transferability, i.e. you can receive the data you have provided to us in a common machine-readable format such as CSV and transmit it to others if necessary (Art. 20 DSGVO),
- h) to complain to the competent supervisory authority about data processing (Federal Commissioner for Data Protection and Freedom of Information; Bavarian State Commissioner for Data Protection).

**plenigo GmbH uses your e-mail address and telephone numbers only to send you information in connection with our products and the provision of our services.**

According to § 7 Abs. 3 UWG you can object to the use of your e-mail address and telephone numbers for advertising purposes at any time.

- by e-mail to [support@plenigo.com](mailto:support@plenigo.com)
- or by telephone on [+49 \(0\) 180 500 962 3](tel:+4901805009623)
- or by post to plenigo GmbH Königstraße 4, 87435 Kempten, Germany

#### **Protection of your data:**

plenigo GmbH is a service provider that processes data on behalf of other companies. We are commissioned by these companies to process data within the statutory framework of Art. 28 DSGVO (service providers, vicarious agents). We are also responsible for the protection of your data within the framework of legal regulations and the data processing contract concluded with the individual companies. Your data will only be processed within the contractually regulated and legally prescribed framework. A passing on to third parties for commercial, statistical or evaluation purposes does not take place. Due to legal regulations, however, we are obliged in individual cases to provide information to authorities (e.g.: tax office) or courts.

Your data will be processed in Germany and other European countries. If, in exceptional cases, your data is also processed in countries outside the European Union (i.e. in so-called third countries), this will be done insofar as you have

expressly consented to this or it is necessary for our service provision to you or it is provided for by law (Art. 49 DSGVO). In addition, your data will only be processed in third countries if certain measures ensure that an appropriate level of data protection exists (e.g. adequacy decision of the EU Commission or so-called suitable guarantees, Art. 44ff. DSGVO).

If you have any further questions about data protection at plenigo GmbH, please contact our data protection officer, Mr. Robert Holfeld, Königstraße 4, 87435 Kempten or send an e-mail to [datenschutz@plenigo.com](mailto:datenschutz@plenigo.com).

## **2. Privacy policy for the plenigo.com website.**

This Privacy Policy applies to your use of plenigo.com.

**The data controller is plenigo GmbH, Königstr. 4, 87435 Kempten, Germany.**

If you have any further questions about data protection at plenigo GmbH, please contact our data protection officer, Mr. Robert Holfeld, Königstraße 4, 87435 Kempten or send an e-mail to [datenschutz@plenigo.com](mailto:datenschutz@plenigo.com).

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- a) to request information on categories of data processed, processing purposes, possible recipients of the data, the planned storage period (Art. 15 Basic Data Protection Regulation - DSGVO),
- b) to demand the correction or completion of incorrect or incomplete data (Art. 16 DSGVO),
- c) to revoke a given consent at any time with effect for the future (Art. 7 para. 3 DSGVO),
- d) to object to the processing of data on the basis of a legitimate interest for reasons arising from your particular situation (Art 21 Para. 1 DSGVO),
- e) in certain cases, within the framework of Art. 17 DSGVO, to request the deletion of data - in particular to the extent that the data are no longer required for the intended purpose or are processed unlawfully, or you have revoked your consent pursuant to (c) above or declared an objection pursuant to (d) above,

- f) under certain conditions to demand the restriction of data if deletion is not possible or the obligation to delete is in dispute (Art. 18 DSGVO),
- g) to data transferability, i.e. you can receive the data you have provided to us in a common machine-readable format such as CSV and transmit it to others if necessary (Art. 20 DSGVO),
- h) to complain to the competent supervisory authority about data processing (Federal Commissioner for Data Protection and Freedom of Information; Bavarian State Commissioner for Data Protection).

The data arising from the use of our website will only be used by plenigo GmbH. However, plenigo GmbH processes data on behalf of third parties. If a customer of the third party contacts plenigo GmbH with an inquiry or complaint within the framework of his contractual relationship with the third party, we will forward the inquiry to the relevant competent third party.

plenigo GmbH is responsible for the protection of your data collected when using our website. As a matter of principle, your data will only be processed within the legally prescribed framework. A passing on to third parties for commercial, statistical or evaluation purposes does not take place. Due to legal regulations, however, we may be obliged to provide information to authorities or courts in individual cases.

Your data will be processed in Germany and other European countries. If, in exceptional cases, your data is also processed in countries outside the European Union (i.e. in so-called third countries), this will be done insofar as you have expressly consented to this or it is necessary for our service provision to you or it is provided for by law (Art. 49 DSGVO). In addition, your data will only be processed in third countries if certain measures ensure that an appropriate level of data protection exists (e.g. adequacy decision of the EU Commission or so-called suitable guarantees, Art. 44ff. DSGVO).

**When using the plenigo GmbH website, we collect your data as follows:**

When you visit our websites, the web server temporarily registers the domain name or IP address of your computer, the client's file request (file name and URL), the http response code and the website from which you are visiting us. The logged data is used exclusively for data security purposes, in particular to prevent attempts to attack our web server (Art. 6 Par. 1 f DSGVO). They are neither used for the creation of individual user profiles nor passed on to third parties. We reserve the right to statistically evaluate anonymous data records.

Your usage behavior is evaluated anonymously for error analysis and to improve our website. Our website uses cookies and tracking technologies for these purposes. If IP addresses are collected, they are immediately made anonymous. The evaluation results are stored anonymously in a database. This data is not assigned to any person at any time.

In order for them to find the products they are interested in and for us to make our websites user-friendly, we analyse their usage behaviour in anonymised or pseudonymised form. Within the framework of the legal regulations, we, or companies commissioned by us within the scope of an order data processing, create usage profiles. It is not possible to draw any direct conclusions about you.

In the following we inform you generally about the different purposes and techniques. You then have the opportunity to object. Please note, however, that in this case you may not be able to use all functions of our websites.

#### **a) Uses (Art. 6 para. 1 f DSGVO)**

- tag management

Tag management is used to manage tracking tools in websites. For this purpose, a tag is defined for each page. The marker can then be used to determine which tracking tools are to be used for this page. Tag management can therefore be used to control tracking so that the tools are only used where they make sense.

- Market research / range measurement

The aim of the range measurement is to statistically determine the intensity of

use and the number of users of a website and to obtain comparable values for all connected offers. Individual users are never identified at any time. Your identity is always protected.

- **Profiles for the demand-oriented design of the web portal**

In order to continuously improve our websites, we create so-called clickstream analyses. The clickstream corresponds to your movement path on the web pages. The analysis of the movement paths gives us information about the usage behaviour on our websites. This allows us to identify possible structural errors in the web pages and thus improve the web pages so that the web pages can be optimized to your needs. Individual users are never identified at any time.

## **b) Techniques**

- **Cookies**

We use cookies for certain offers. These are small text files that are stored on your computer. This allows you to be recognized if you visit web pages repeatedly from the same computer. Session cookies are cookies that are only stored on your computer for the duration of an Internet session. You have the option of setting your browser so that these cookies are not stored in the first place, or so that the cookies are deleted at the end of your Internet session. Please note, however, that in this case you may not be able to use all functions of our websites. Information about the browser settings can be found at:

<https://www.sicherdigital.de/sicher-surfen#sicher-surfen-browsereinstellungen>

You can read more information about cookies and the individual providers on the websites [www.meine-cookies.org](http://www.meine-cookies.org) or [www.youronlinechoices.com](http://www.youronlinechoices.com)

- **Services of other companies providing their services as persons in charge**

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of this website is usually

transferred to a Google server in the USA and stored there. However, if IP anonymisation is activated on this website, Google will reduce your IP address within Member States of the European Union or in other countries party to the Agreement on the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide the website operator with other services relating to website and Internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.