# Data protection

Responsible for data processing is paybox Service GmbH, Lassallestraße 9, 1020 Vienna. You can reach us at info@onlineaufladen.at.

We are Austria's largest vendor of prepaid credits, calling cards and digital vouchers. You can use the products you purchased from us via a whole range of distribution partners as well as via our websites onlineaufladen.at or .de (our "Websites") or conveniently via app.

For you to be able to use our services, we have to process certain personal data. We are firmly committed to protect your data and provide transparency as to our data processing. This document will inform you about the data processing we carry out so that you will be able to use our services in high quality.

# We process the following data:

- Your first and last name as well as your IBAN and BIC in case you paid using EPS or Klarna. If you pay with PayPal secured by Alphacomm, we will use your first and last name, your address (street, house number, postcode, town) and your mobile phone number (payments data).
- Your mobile phone number
- Your e-mail address
- Your **order details** (which consist of type and quantity of the product ordered as well as date of order and payment method used)
- Your IP address
- The data you entered during the payment process (e.g. credit card or account details) will solely be used by our respective financial service provider, and we don't have any access to them.

# Data processing on behalf of third parties

Even if we commission a processor, we will still remain responsible for the protection of your data. Processors outside the European Union will only be commissioned if the European Commission has issued an adequacy decision for the respective third country or if we have arranged for adequate guarantees or binding internal privacy rules with the processor.

# **Processing your data**

Your mobile phone number, your e-mail address, payments data and order details will be used for providing our service [pursuant to point (b) of Article 6(1) GDPR], which is the distribution as well as the payment processing of the product commissioned via the channel of your choice. In the event of any problems during distribution, these data will enable us to get in contact with you. Pursuant to UGB (Austrian Corporate Code) and BAO (Austrian Federal Fiscal Code), these data will not be erased before expiry of seven years after we carried out your order or as long as limitation periods of potential legal claims are still in effect.

- If you have purchased products on our website onlineaufladen.at, we will also store the IP address you used during the transaction for the purpose of our legitimate interests [pursuant to point (f) of Article 6(1) (f) GDPR] for the purposes of preventing fraud or abuse of our services. We will erase your IP address three years after having processed your order or, in case of fraud or abuse, after successful access to justice or upon expiry of any limitation period. Instead of being erased, the data can be anonymised. In such case, all personal data will be irretrievably erased, thereby exempting us from our GDPR obligation to erase data.

  If you pay via our websites using PayPal secured by Alphacomm, we have a legitimate interest (pursuant to Art. 6 (1) lit. f) GDPR) in checking the transaction for potential misuse or fraud. For this purpose, our processor Alphacomm Solutions B.V. processes the payment data provided by you during the ordering process.
- The above-mentioned processing of your data is necessary for us to provide our services. In case you do not or only partially submit these data, we may be unable to fulfil all of our contractual obligations towards you or cannot conclude a contract with you.
- Your order details will be, in addition, internally processed due to our legitimate
  interest to obtain more information on how our customers are using our services,
  which enables us to constantly improve and extend them and to better tailor
  information and offers you receive from us (only if you accepted to receive such
  information) to your needs.

# In case you gave us your consent, we will process your data in the following a way:

• We will be entitled, until further notice, to send you information about our (value added) services and/or products and services of third parties. In the process, we will use the following communication channels, provided that you have indicated the relevant data: **telephone**, **e-mail**, **text messages**.

**Please note:** You may withdraw your consent any time by simply using the contact data you find on our websites. In case you withdraw your consent, this will not affect the fulfilment of our contractual obligations. In case you withdraw your consent, we will discontinue to use your personal data for the above-mentioned purposes.

### Information on our sales partners

We cooperate with various sales partners (such as LIBRO Handelsgesellschaft mbH, Österreichische Post AG, ElectronicPartner Austria GmbH, Euronics Austria reg.Gen.mbH, EXPERT Österreich e.Gen.) to deliver our products. Depending on the software we provide to our partner, the partner is entitled to enter your e-mail address or mobile phone number, if provided, to enable us to deliver the product you ordered to the respective address and/or phone number.

#### Additional information regarding our websites

**Use of cookies on our websites:** Our website uses cookies. Cookies are small text files stored on the computer, which help the website remember a user when returning to this website. Using cookies helps us to customise our offers to your needs, makes using our services easier for you and helps us to analyse how our services work and how they are used. You can go to your browser settings in order to manage the use of cookies. For instance, in your settings, you

can require us to obtain your consent before cookies may be used, or you can disable cookies completely. However, our services will only function correctly if you do not disable the use of cookies.

**Google Analytics:** This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses so-called "cookies", which are text files placed on your computer to help the website analyse how users use the site. As a rule, the information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers in the United States. In case IP anonymisation is activated on this website, your IP address will, however, previously be truncated within Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the full IP address will be transferred to a Google server in the USA and truncated there. Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing them with other services relating to website activity and internet usage. The IP address that your browser conveys within the scope of Google Analytics will not be merged with any other data held by Google. You may disable the use of cookies by selecting the appropriate settings of your browser; however, please note that, in doing, so you may not be able take advantage of all functionalities of this website. By using the following link to download and install a browser plugin, you may, in addition, prevent the collection by Google of the data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of this data by Google. Should no add-on be available for your browser, you can set a cookie to avoid tracking.

This website uses the functions of Analytics for the purposes of re-marketing, reports on impressions in the Google Display network, integration of DoubleClick Campaign Manager, Google Analytics performance reports by demographics and interests. You can opt out from Google Analytics for display advertising and you can customise Google Display Network ads by changing your ad settings.

**Google Tag Manager:** For our website, we use Google Tag Manager from Google Inc. For the European region, Google Ireland Limited (Gordon House, Barrow Street Dublin 4, Ireland) is responsible for all Google services. Google Tag Manager allows us to centrally integrate and manage sections of code from various tracking tools that we use on our website. The use of Google Tag Manager requires your consent, which we have obtained with our cookie pop-up. According to Art. 6 para. 1 lit. a GDPR (consent), this consent constitutes the legal basis for the processing of personal data, as may occur when it is collected by web analytics tools.

In addition to consent, we have a legitimate interest in analyzing the behavior of website visitors in order to improve our offer technically and economically. We can improve our efficiency with the help of the Google Tag Manager. The legal basis for this is Art. 6 para. 1 lit. f GDPR (legitimate interests). Nevertheless, we only use Google Tag Manager if you have given your consent.

If you would like to find out more about Google Tag Manager, we recommend the FAQs at <a href="https://support.google.com/tagmanager/?hl=de#topic=3441530">https://support.google.com/tagmanager/?hl=de#topic=3441530</a>

**Microsoft Advertising:** For our online marketing measures, we also use the Microsoft Advertising program of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. For this purpose, we use a technology (conversion tracking tool) from Microsoft on our website, which also stores your data. Below we go into more detail about this service, show you which data is stored, managed and processed and how you can prevent this data storage.

We have integrated a conversion tracking tag (i.e. a small code snippet) from Microsoft Advertising into our website. This is the so-called Universal Event Tracking (UET) tag. If you come to our website via a Microsoft advertisement, we can use this tracking tool to find out more about your user behavior on our website. For example, we find out which keyword or ad you used to reach us, what you click on our website, how many people visit our website via Microsoft Ads and how long you stay on our website. All this data relates to user behavior and not to personal data. We therefore only receive data or evaluations of your web behavior, but no personal information. Microsoft uses the data to optimize its own advertising and other services. If you have a Microsoft account yourself, the data collected may be linked to your account. Microsoft may also recognize and store your IP address.

If you have consented to the use of Microsoft Advertising, the legal basis for the corresponding data processing is this consent. According to Art. 6 para. 1 lit. a GDPR (consent), this consent constitutes the legal basis for the processing of personal data, as may occur when it is collected by Microsoft Advertising.

We also have a legitimate interest in using Microsoft Advertising to optimize our online service and our marketing measures. The legal basis for this is Art. 6 para. 1 lit. f GDPR (legitimate interests). Nevertheless, we only use Microsoft Advertising if you have given your consent.

For more information, we also recommend that you read Microsoft's privacy policy at <a href="https://privacy.microsoft.com/de-de/privacystatement">https://privacy.microsoft.com/de-de/privacystatement</a>.

You may assert the following rights with regard to the processing of your data: Right of access: You can obtain from us a confirmation stating whether and to what extent we process your data. Feel free to contact us at paybox Service GmbH, Lassallestraße 9, 1020 Vienna, or via our other contact channels on the websites. Please submit your personal signature and include a legible copy of a valid photo ID.

**Right to rectification:** If we process your inaccurate or incomplete personal data, you have the right to obtain from us their rectification or completion any time. Simply use the contact data you find on the websites.

**Right to erasure:** If we unlawfully process your personal data or if the processing of your data disproportionately infringes upon your legitimate interests, you have the right to obtain from us the erasure of your personal data. Please note that there may be reasons withstanding an immediate erasure, e.g. in case of statutory retention requirements. Simply use the contact data you find on the websites.

**Right to restriction of processing:** You have the right to obtain from us restriction of processing your data if

• you contest the accuracy of the data, for a period of time enabling us to verify the accuracy of the data;

- the processing of data is unlawful but you oppose erasure and request a restriction of data usage instead;
- we no longer need the data for the purpose intended but you still need them for the establishment or defence of legal claims; or
- you have objected to the processing of data.

Simply use the contact data you find on the websites.

**Right to data portability:** You have the right to receive from us your data that you have made available to us for storage, in a structured, commonly used and machine-readable format, provided that

- we process such data upon having received your revocable consent or in order to fulfil a mutual contract; and
- the processing is carried out by automated means.

Simply use the contact data you find on the websites.

**Right to object:** Where we process your data in order to fulfil tasks in the public interest, to exercise public authority or where we invoke the necessity of safeguarding our legitimate interest when processing your data, you can object to such data processing if there is an overriding legitimate protective interest in your data. You can object to receiving any offers or marketing any time and without giving reasons. Simply use the contact data you find on the websites.

**Right to lodge a complaint:** If you are of the opinion that, in processing your data, we infringe upon national or European data protection legislation, please contact us to clarify potential questions. You are, of course, entitled to lodge a complaint with the national data protection authority of your country [for Austria: *Datenschutzbehörde* (Data Protection Authority)], as of 25 May 2018 also with any other supervisory authority within the EU.

**Assertion of rights:** If you wish to assert any of the above-mentioned rights vis-á-vis us, simply use the respective contact options.

**Confirmation of identity:** In case of doubt, we are entitled to request from you additional information to confirm your identity, e.g. a legible copy of a valid photo ID containing your signature. Thus, we protect your rights and privacy.

**Excessive claim of rights:** If you make use of one of the above-mentioned rights in a manifestly unfounded manner or with excessive frequency, we are entitled to charge a reasonable processing fee or refuse to act on your request.

**Extent of consent:** Please inform all those you share your contact details with (e.g. family members) as to which extent you consented to the processing and transfer of your data. Do not give your consent unless agreed upon with all co-users of your contact details.

<b>Period of validity:</b> This Privacy Policy of paybox Service GmbH shall enter into force on 23 May 2024.