



# Privacy Policy

01.04.2026

Wenn Sie unsere Angebote nutzen, verarbeitet die Direkt + Online GmbH Ihre personenbezogenen Daten. Mit diesen Datenschutzhinweisen informieren wir Sie, wie und warum wir Ihre Daten verarbeiten und wie wir gewährleisten, dass sie vertraulich bleiben und geschützt sind.

We take data protection seriously: as a matter of principle, we only process personal data if this is necessary for the provision of a service or offer or if it is provided voluntarily by the user. We also use technical and operational security measures to protect personal data against accidental or intentional manipulation, loss, destruction or access by unauthorised persons. We regularly review and modernise these precautions.

## **Privacy policy for applications**

If you have applied for a job with us, you will find the necessary data protection information [here](#).

# Data protection at a glance

## What data do we collect?

- Inventory data (e.g., names, addresses)
- Contact details (e.g., email, phone numbers)
- Content data (e.g., entries in online forms)
- Payment data (e.g., bank details, invoices, payment history)
- Contract data (e.g., subject matter of the contract, term)
- Usage data (e.g., websites visited, interest in content, access times)
- Meta/communication data (e.g., device information, IP addresses, ID)

## How do we collect the data?

We collect the data that is generated when you access our digital offers automatically. Otherwise, we collect data based on your entries or messages or through the use of cookies or similar technologies.

## What do we use the data for?

### Bereitstellung der Inhalte

- Cookies und ähnliche Technologien
- technische Bereitstellung und Sicherheit
- Unbedingt erforderliche Technologie

### Produktoptimierung

- Nutzungsanalyse

### Kommunikation

- Kontakt und Kommunikation

## Werbung für unsere eigenen Produkte

- Unternehmensauftritte in den Sozialen Medien

## Do we share data?

If you have given your consent or we are otherwise legally authorized to do so, we will pass on your personal data to service providers (e.g., hosting, marketing, sales partners, payment service providers) for the above-mentioned purposes. In such cases, we comply with the legal requirements and, in particular, conclude appropriate contracts or agreements with the recipients of your data to protect your data.

We transfer personal data to other companies within our group of companies or grant them access to this data for administrative purposes. This transfer of data is based on our legitimate business and economic interests or takes place if it is necessary to fulfill our contractual obligations or if the consent of the data subjects or legal permission has been obtained.

## Do we transfer data to third countries?

In order to use our digital services, it may be necessary to transfer certain personal data to third countries, i.e. countries where the GDPR does not apply. However, we only allow your data to be processed in a third country if the specific requirements of Art. 44 ff. GDPR are met and thus an adequate level of data protection is guaranteed in that country. This means that the third country must either have an adequacy decision by the European Commission or suitable safeguards in accordance with Art. 46 GDPR or one of the conditions of Art. 49 GDPR. **Unless otherwise stated below, we use the currently valid [standard contractual clauses] (<https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE> “current version of the standard contractual clauses”) for the transfer of personal data to processors in third countries.**

## **How do we secure the data?**

In order to protect your privacy and ensure a level of protection appropriate to the risk, we take technical and organizational measures in accordance with legal requirements, taking into account the state of the art, implementation costs, and the nature, scope, circumstances, and purposes of processing, as well as the varying likelihood and severity of threats to the rights and freedoms of natural persons. These measures ensure the confidentiality, integrity, availability, and resilience of your data. This includes, among other things, the use of recognized encryption methods (SSL or TLS) and pseudonymization.

However, we would like to point out that, due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions outside our area of responsibility. In particular, unencrypted data disclosed, e.g., by email, may be read by third parties. We have no technical influence on this.

## **When do we delete the data?**

We delete or anonymize your personal data as soon as it is no longer required for the purposes for which we collected or used it.

However, we may still need to store your data until the expiry of the retention obligations and periods imposed by the legislator or supervisory authorities, which may arise from the German Commercial Code, the German Fiscal Code, and the German Money Laundering Act (usually 6 to 10 years). In addition, we may retain your data until the expiry of the statutory limitation periods (i.e., usually 3 years, but in individual cases up to 30 years) if this is necessary for the assertion, exercise, or defense of legal claims. After that, the relevant data will be deleted.

## **What rights do you have?**

- Information
- Deletion
- Correction

- **Objection**

You can contact the data protection officer with your request by mail or by email at [swmh-datenschutz@atarax.de](mailto:swmh-datenschutz@atarax.de).

This privacy policy is updated from time to time. The date of the last update can be found at the beginning of this information.

## **Privacy Manager**

You can obtain an overview of all the tools and cookies we use as well as an option to withdraw your consent by clicking on Privacy settings at the bottom of the website you are visiting.

You will find detailed data protection information below.

## **How we make our content available to you**

### **Cookies and similar technologies**

Wir verwenden Cookies und ähnliche Technologien, um das beste Erlebnis bei der Nutzung unserer digitalen Angebote zu bieten. Wir verwenden sie zur Sicherstellung der Funktionalität, zur IT-Sicherheit und Betrugsprävention.

Eine Übersicht über die verwendeten Technologien und Widerrufs- bzw. Widerspruchsmöglichkeiten gibt es unter Datenschutzeinstellungen in der Fußzeile der von Ihnen besuchten Website.

Werden zur Verarbeitung Cookies, Gerätekennungen oder andere personenbezogene Daten auf Ihrem Endgerät gespeichert oder abgerufen, erfolgt dies auf einer der Rechtsgrundlagen von Art. 6 DSGVO.

Um den von Ihnen ausdrücklich gewünschten Telemediendienst erbringen zu können, berücksichtigen wir darüber hinaus die Regelungen des § 25 Telekommunikation-Digitale-Dienste-Datenschutz-Gesetz (TDDDG), insbesondere die Erforderlichkeit nach § 25 Abs. 2 Nr. 2 TDDDG.

## Types and functions of cookies

Cookies are text files that contain data from visited websites or domains and are stored by a browser on users' devices. A cookie primarily serves to store information about a user during or after their visit to an online offering. The stored information may include, for example, language settings on a website, login status, a shopping cart, or video interactions. The term “cookies” also includes other technologies that perform the same functions as cookies (e.g., when user information is stored using pseudonymous online identifiers, also known as “user IDs”).

There are the following types of cookies and functions:

- **Temporary cookies (also known as session cookies):** Temporary cookies are deleted at the latest after a user leaves an online offering and closes their browser.
- **Permanent cookies:** Permanent cookies remain stored even after the browser is closed. This allows, for example, the login status to be saved or preferred content to be displayed directly when the user visits a website again. Similarly, the interests of users, which are used for reach measurement or marketing purposes, can be stored in such a cookie.
- **First-party cookies:** First-party cookies are set and used by us to process user information.
- **Third-party cookies:** Third-party cookies are mainly used by advertisers (so-called third parties) or other partners to process user information.

- **Strictly necessary (also: essential or necessary) cookies:** These cookies ensure functions without which these digital offerings could not be used as desired. They may be absolutely necessary for the operation of a website, for example to store logins or other user entries, or for security reasons.
- **Analysis and statistics cookies:** These cookies enable us to analyze the use of our digital offerings, in particular to measure reach—i.e., clicks, visits, and visitor numbers. The aim is to statistically determine the number of visits and visitors and their surfing behavior (duration, origin) and thus obtain market-wide comparable values. The information collected is evaluated in aggregate form in order to derive improvements and optimizations for our products.
- **Marketing and personalization cookies:** Cookies are also used to store a user's interests or behavior (e.g., viewing certain content, using functions, etc.) in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This process is also referred to as “tracking,” i.e., tracking the potential interests of users. If we use cookies or tracking technologies, we will provide separate information about this in our privacy policy or when obtaining consent.

## Technical provision and security

When our offer is used, we automatically employ essential technologies and process the following information:

- Information about the accessing device and the software used
- Date and time of access
- Websites from which the user accesses our website or which the user visits via our website
- IP address

The collection of these logs and their temporary storage and processing are necessary to ensure system security and integrity (in particular to ward off and defend against attempts at attack or damage) and are carried out in accordance with our legitimate interest (§ 25 (2) No. 2 TDDDG, Art. 6 (1) f GDPR).

The storage period for this log data is usually seven days; for reliable detection of AI bots, it is 30 days. From this point on, this specific server log

data is anonymized based on our legitimate interest in statistical evaluation to assess AI bots and their impact on our content (Art. 6 (1) f GDPR).

The legal basis for the aforementioned data processing is our legitimate interest pursuant to Art. 6 para. 1 sentence 1 lit. f) GDPR.

### Essential technology

The following tools and cookies are strictly necessary technologies, i.e., essential for providing our services as requested by the user.

The legal basis for the data processing described below is our legitimate interest pursuant to Art. 6 (1) (f) GDPR.

| Cookie                     | Zweck   | Laufzeit   | Art           |
|----------------------------|---------|------------|---------------|
| _icl_visitor_lang_js       | Hosting | 1 Tag      | Cookie        |
| elementor                  | Hosting | Session    | Cookie        |
| elementor                  | Hosting | unbegrenzt | Local storage |
| wp-wpml_current_language   | Cell    | Session    | Cookie        |
| wpml_browser_redirect_test | Hosting | Session    | Cookie        |

### Consent management

In order to obtain and store your consent under data protection law, we use the consent management platform from Sourcepoint (Sourcepoint Technologies, Inc., 228 Park Avenue South, #87903, New York, NY 10003-1502, United States). This platform uses strictly necessary cookies to query the consent status and thus display the corresponding content.

The data is stored for a maximum of 13 months.



| Cookie                    | Purpose                                                                                | Duration  | Type          |
|---------------------------|----------------------------------------------------------------------------------------|-----------|---------------|
| consentUUID               | UniqueUserID to store the user's consent status                                        | 12 months | Cookie        |
| _sp_su                    | Identification of users for sampling consent rates reporting                           | 12 months | Cookie        |
| _sp_user_consent          | UniqueUserID to retrieve the user's consent status stored in our database if necessary | Unlimited | Local storage |
| _sp_local_state           | Determines whether a user has seen the consent banner so that it is only shown once    | unlimited | local storage |
| _sp_non_keyed_local_state | Information about the metadata and the user's UniqueUserID                             | unlimited | local storage |

## How we optimize our products

### Usage analysis

We want to continuously develop and improve our products. To do this, we need to analyze usage. This serves to evaluate visitor traffic to our digital offerings and may include behavior, interests, or demographic information about visitors, such as age or gender, as pseudonymous values. With its help, we can see, for example, when our digital offerings are used most frequently or which functions are popular. This enables us to identify areas that need optimization.

In addition to usage analysis, we also use testing procedures to test different versions of our digital offerings or their components, for example, and to increase certain user actions or reactions if necessary.

For these purposes, profiles, i.e., data summarized for a usage process, are created and information is stored in a browser or on a terminal device and read from it. The information collected includes, in particular, websites visited and elements used there, as well as technical information such as the browser used, the computer system used, and information on usage times.

The IP addresses of users are also stored. We use an IP masking procedure (i.e., pseudonymization by shortening the IP address) for your protection. In general, no clear data of users (such as email addresses or names) is stored in the context of web analysis, A/B testing, and optimization, but rather pseudonyms, so that neither we nor the providers of the software used, who act as processors for us, know the actual identity of the users.

## **Matomo**

Wir setzen die Web-Analyse-Plattform Matomo ein, um Besucherdaten zu analysieren. Dies dient uns zur Produktoptimierung aufgrund unseres berechtigten Interesses, Art. 6 Abs.1 S. 1 lit. f) DSGVO. Zu diesem Zweck werden die folgende Nutzungsinformationen an unseren Server übertragen und zu Analyse Zwecken gespeichert:

- Benutzer-IP-Adresse (mit Anonymisierung von 2 Byte)
- Datum und Uhrzeit des Abrufs
- URL der aufgerufenen Seite (Page URL)
- URL der Seite, die vor der aktuellen Seite aufgerufen wurde (Referrer URL)
- Verwendete Bildschirmauflösung
- Zeit in der Zeitzone des lokalen Benutzers
- Standort des Nutzers: Land, Region, Stadt, ungefähre geografische Breite und Länge (Geolocation)

- User-Agent des verwendeten Browsers (User-Agent-Header): Anhand des User-Agent verwenden wir unsere Universal Device Detection Library, um den Browser, das Betriebssystem, das verwendete Gerät (Desktop, Tablet, Handy, Fernseher, Auto, Konsole usw.), die Marke und das Modell zu erkennen.
- Zufällige eindeutige Besucher-ID
- Zeitpunkt des ersten Besuchs dieses Nutzers
- Zeitpunkt des letzten Besuchs dieses Nutzers
- Anzahl der Besuche dieses Nutzers
- Site-Suche
- Ziele
- Ereignisse

Die Speicherdauer beträgt 14 Monate (betrifft Daten auf Nutzer- und Ereignisebene).

Im Rahmen unserer Webanalyse werden keine Cookies auf Ihrem Rechner gesetzt. Auch eine Weitergabe der Daten an Dritte erfolgt nicht.

Wenn Sie auch mit einer vollständig anonymen Speicherung und Auswertung dieser Daten aus Ihrem Besuch nicht einverstanden sind, dann können Sie der Speicherung und Nutzung in den Datenschutz-Einstellungen (erreichbar über den Footer der Website) widersprechen. In diesem Fall wird in Ihrem Browser ein Opt-Out-Cookie abgelegt, was zur Folge hat, dass Matomo keinerlei Sitzungsdaten mehr erhebt.

The legal basis for data processing is your consent in accordance with Art. 6 para. 1 lit. a) GDPR.

## When you request quotes

### Ordering products

If you order one of our offers or products, we need your address, contact and communication data as well as your bank and, if applicable, credit card data

when the contract is concluded.

The processing of this data is necessary for the initiation or fulfilment of the contract (Art. 6 para. 1 sentence 1 lit. b GDPR).

After termination of the contract, we delete your data or block it, unless we are legally obliged to retain this data. The deletion usually takes place after ten years at the latest.

## **Payment**

In order to offer you various payment functions, we use software from service providers who support us in processing the payment transaction. The software also manages transactions and controls access control, billing, the checkout process, invoice dispatch, and payment transactions. It also supports our user, product, and price management. In doing so, we process your personal master data (e.g., name, address data), your communication data (e.g., email), order data, contract billing and payment data, and our planning and control data.

The legal basis for this is the fulfillment of the contract (Art. 6 (1) (b) GDPR) and our legitimate interest in proper and functioning payment processing (Art. 6 (1) (f) GDPR).

## **When you contact us**

### **Contacting us**

When you contact us, we only collect personal data (e.g. name, e-mail address, telephone number) if you provide it to us voluntarily. This information is expressly provided on a voluntary basis. The purpose of processing your data is to process and respond to your enquiry. This is also our legitimate interest in data processing in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR.

In the case of a telephone enquiry, your data will also be processed by telephone applications and in some cases also via a voice dialogue system in order to support us in the distribution and processing of enquiries.

We will delete your data that we have received in the course of contacting you as soon as your request has been fully processed and no further communication with you is required or requested by you.

## When we advertise our products

### Direct marketing

We also use your contact data beyond contract-related use for advertising purposes. This is only done if you have expressly consented (Art. 6 para. 1 lit. a) GDPR) or on the basis of our legitimate interest in a personalised customer approach or direct advertising (Art. 6 para. 1 lit. f) GDPR), for example for information about the same and similar products of our company (Section 7 para. 3 UWG).

If you no longer wish to receive advertising, you can withdraw your consent or object to advertising at any time.

The data processed by us will be deleted as soon as they are no longer required for their intended purpose, you have objected to the advertising and the deletion does not conflict with any statutory retention requirements.

- per Mail an [data-privacy@direktundonline.de](mailto:data-privacy@direktundonline.de)
- schriftlich an Direkt + online GmbH, Martin-Kollar-Str. 5, 81829 München
- durch einen Klick auf den Abmelde-Link am Ende der Mail

### Company presence in the social media

We maintain a presence on social media. Insofar as we have control over the processing of your data, we ensure that the applicable data protection regulations are complied with. Below you will find the most important information on data protection law in relation to our company websites.

In addition to us, we are responsible for the company websites within the meaning of the EU General Data Protection Regulation (GDPR) and other data protection regulations:

- **X** (Twitter International Unlimited Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland); further information on data protection can be found here.

We process the data for statistical purposes in order to further develop and optimise the content and to make our offer more attractive. This data includes the total number of page views, page activities and data and interactions provided by visitors. This data is processed and made available by the social networks. We have no influence on the generation and presentation of this data.

Your personal data is also processed for market research and advertising purposes. For example, it is possible that user profiles are created based on your usage behaviour and the resulting interests. This allows, among other things, adverts to be placed within and outside the platforms that presumably correspond to your interests. Cookies are usually stored on your computer for this purpose. Irrespective of this, data that is not collected directly from your end devices may also be stored in your user profiles. Data is also stored and analysed across devices; this applies in particular, but not exclusively, if you are registered as a member and logged in to the respective platforms.

We do not collect or process any other personal data.

The processing of your personal data by us is based on your consent in accordance with Art. 6 para. 1 sentence 1 lit. a) GDPR.

As we do not have full access to your personal data, you should contact the social media providers directly when asserting your rights as a data subject, as they have access to the personal data of their users and can take appropriate measures and provide information.

Should you nevertheless require assistance, we will of course endeavour to support you. You can find our contact details here.

For a detailed description of the respective processing and the cancellation options, please refer to the information linked below.

- **X** Optout

## What else you should know

### Controller

Verantwortlicher im Sinne der DSGVO ist die

#### **Direkt + online GmbH**

Martin-Kollar-Str. 5  
81829 München

### Data Protection Officer

#### **atarax group of companies**

Luitpold-Maier-Str. 7  
D-91074 Herzogenaurach  
Phone: 09132 79800  
Email: [swmh-datenschutz@atarax.de](mailto:swmh-datenschutz@atarax.de).

## Kontakt für Ihre Datenschutzanfrage

Hier können Sie Ihre Fragen zum Datenschutz stellen.

[data-privacy@direktundonline.de](mailto:data-privacy@direktundonline.de)

## Your rights

- In accordance with Art. 15 GDPR, you have the right to request **information** about your personal data processed by us. In this context, you also have the right to receive a copy of your personal data processed by us in accordance with Art. 15 para. 3-4 GDPR.
- In accordance with Art. 16 GDPR, you can immediately request the **correction** of incorrect or the completion of your personal data stored by us.
- In accordance with Art. 17 GDPR, you can request the erasure of your personal data stored by us.
- In accordance with Art. 18 GDPR, you can request the **restriction of the processing** of your personal data.
- In accordance with Art. 20 GDPR, you can request to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format and you can request the **transfer** to another controller.
- In accordance with Art. 7 para. 3 GDPR, you can **revoke** your consent once given to us at any time. This means that the processing carried out on the basis of the consent prior to the revocation was lawful and has the consequence that we may no longer continue the data processing based on this consent in the future.

### Right to object

**If your personal data is processed on the basis of legitimate interests in accordance with Art. 6 para. 1 sentence 1 lit. f) GDPR or Art. 6 para. 1 sentence 1 lit. e) GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR. In the event of such an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.**

**In the case of direct marketing, you have the right to object at any time to the processing of personal data concerning you. If you object to processing for direct marketing purposes, the personal data will no longer be processed for these purposes.**

### Right to lodge a complaint with the supervisory authority



You have the right to lodge a complaint with a data protection supervisory authority against the processing of your personal data if you feel that your rights under the GDPR have been violated. As a rule, you can contact the supervisory authority of your usual place of residence, your workplace or our company headquarters.

## **Data protection information in the GTC**

With this privacy policy, we fulfil the information obligations under the GDPR. Our General Terms and Conditions also contain data protection information. These explain in detail how your personal data, which we require to fulfil contracts and for the purpose of identity and credit checks, is processed.

## **Links to other websites**

We link to websites of other providers or have integrated elements from them into our website. This data protection information does not apply to them - we have no influence on these sites and cannot check that others comply with the applicable data protection regulations.

## **Changes to the privacy policy**

We reserve the right to change or adapt this privacy policy at any time in compliance with the applicable data protection regulations.