

LAHRER ZEITUNG

VERLAGSHAUS

Privacy Policy

01.04.2026

Wenn Sie das ePaper nutzen, verarbeitet die Schwarzwälder Bote Mediengesellschaft mbH 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.

Data protection at a glance

What data do we collect?

- Bestandsdaten (z.B. Namen, Adressen)
- Kontaktdaten (z.B. E-Mail, Telefonnummern)
- Inhaltsdaten (z.B. Eingaben in Onlineformularen)
- Zahlungsdaten (z.B. Bankverbindungen, Rechnungen, Zahlungshistorie)

- Vertragsdaten (z.B. Vertragsgegenstand, Laufzeit)
- Nutzungsdaten (z.B. besuchte Webseiten, Interesse an Inhalten, Zugriffszeiten)
- Meta-/Kommunikationsdaten (z.B. Geräte-Informationen, IP-Adressen, ID)

In der App erfassen und speichern wir die Informationen, die Sie eingeben oder uns in anderer Weise übermitteln.

Dabei handelt es sich vor allem um ihre

- E-Mail Adresse
- Telefonnummer

Ihr Endgerät übermittelt bei der Nutzung des Service aus technischen Gründen automatisch Daten an unseren Webserver, die wir zur Verbesserung unserer Angebote erfassen. Es handelt sich dabei unter anderem um

- Datum und Uhrzeit des letzten Zugriffs,
- Anzahl der abgegebenen Bewertungen, Marktplatzeinträge und App Starts,
- ausgewählter Standort,
- Geräte-Anmeldedaten (insbesondere Geräte-Typ und Betriebssystem, App-Version)
- eine eindeutige Nutzer ID pro Gerät und App Installation sowie
- Ihre zuletzt verwendete IP-Adresse.

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
- Anmeldung und Benutzerkonto
- Push-Nachrichten

Nutzungsanalyse und Produktoptimierung:

- Weiterentwicklung der Nutzerfreundlichkeit
- Nutzungsanalyse

Werbung durch Dritte

- Fremdvermarktung durch Dritte

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] (**

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.

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

How we make our content available to you

Systemberechtigungen

Die Hersteller von mobilen Betriebssystemen (Apple iOS, Google Android) haben die Systemberechtigungen oft so gestaltet, dass von einer Berechtigung mehrere Teil-Berechtigungen umfasst sind, die sich nicht einzeln erteilen oder abfragen lassen. Wir sind in solchen Fällen gezwungen, die gesamte Berechtigung einzuholen, auch wenn nur ein Teil davon benötigt wird. Im Folgenden erläutern wir, welche Berechtigungen die App benötigt und in welchem Umfang wir diese nutzen.

Systemberechtigung Android

Die App benötigt folgende Systemberechtigungen:

Berechtigung	Funktion
In-App-Käufe	ermöglicht den Erwerb von digitalen Inhalten im Play Store

Berechtigung	Funktion
Telefonstatus und Identität abrufen	ermöglicht die Abfrage der gerätespezifischen Device-ID
USB-Speicherinhalte lesen, ändern, löschen	ermöglicht die Speicherung der heruntergeladenen Ausgaben auf einer externen Speicherkarte
Abruf von Daten aus dem Internet	ermöglicht z.B. das Laden von Ausgaben, Zugriff auf Abonnentenverwaltung via Internet
Abruf der Netzwerkverbindungen	ermöglicht der App Verbindungen ins Internet für internetgestützte Funktionen zu prüfen

Systemberechtigung iOS

Die App benötigt folgende Systemberechtigungen:

Berechtigung	Funktion
Mitteilungen	ermöglicht die App Push-Meldungen etwa über neue Ausgaben an Sie zu schicken

Cookies and similar technologies

If cookies, device identifiers, or other personal data are stored or accessed on your device for processing purposes, this is done on one of the legal bases of Art. 6 GDPR.

In order to be able to provide the telemedia service you have expressly requested, we also take into account the provisions of Section 25 of the German Telecommunications Digital Services Data Protection Act (TDDDG), in particular the requirement under Section 25 (2) No. 2 TDDDG.

You can find an overview of the technologies used under Privacy settings.

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).

Wenn Sie die App benutzen, werden automatisch bestimmte technische Daten an uns übertragen („Nutzungsdaten“). Diese Daten sind für uns technisch erforderlich, um Ihnen die App-Inhalte anzuzeigen und die Stabilität und Sicherheit zu gewährleisten (Zweck der Verarbeitung). Rechtsgrundlage für diese Datenverarbeitung ist unser überwiegendes berechtigtes Interesse gemäß Art. 6 Abs.1 lit.f) DSGVO.

Die IP-Adresse wird nach sieben Tagen automatisch gelöscht. Da diese Daten zwingend für den Betrieb erforderlich sind, haben Sie keine Widerspruchsmöglichkeit, sondern müssen die App deinstallieren.

Um Missbrauch zu verhindern, erheben und verwenden wir zudem bei Zahlungsvorgängen, die innerhalb der App getätigt werden, die IP-Adresse, um den ungefähren Standort eines mobilen Endgeräts zu ermitteln. Auf diese Weise können wir verdächtige Bestellungen identifizieren und gegebenenfalls Sicherheitsmaßnahmen ergreifen. Soweit der Abruf von Inhalten aus rechtlichen Gründen auf bestimmte Länder begrenzt ist, wird der anhand der IP-Adresse ermittelte ungefähre Standort auch zur Ermittlung der Abrufberechtigung verwendet.

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.

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

Cookie	Purpose	Duration	Type
_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

Twipe

Für die Realisierung und den Betrieb dieser App nutzen wir die Plattform der **Twipe Mobile Solutions**, Gaston Geenslaan 8, Leuven, Belgien („Twipe“). Twipe setzt folgende Cookies, um Ihnen die gewünschten Inhalte anzeigen zu können:

Cookie	Zweck	Speicherdauer
TW_DESKTOP_DOUBLEPAGE	Speicherung der ausgewählten Ansicht	1 Jahr
TW_REGION	Festlegen der Region	1 Jahr
TW_USER_DATA	Berechtigung zur Anzeige des ePapers	1 Jahr
TW_SSO_STATE	Bestimmung des Nutzerstatus	1 Jahr
tw_preferred_viewer	Ansichtseinstellungen des Nutzers	1 Jahr

Registration

Sie können sich bei uns registrieren, um sich bei allen unseren jeweiligen digitalen Angeboten anmelden zu können.

Bei der Anmeldung nutzen wir Cookies in Ihrem Browser, um Sie zu identifizieren sowie Ihre E-Mail-Adresse.

The legal basis for the aforementioned data processing is Art. 6 para. 1 lit. b) GDPR.

Push notifications

Die Versendung von Push-Nachrichten erfolgt mit Hilfe eines von Ihrem genutzten Betriebssystem bzw. von dem entsprechenden Push-Dienst vergebenen pseudonymen Push-Token. Wir können über den Push-Token keinerlei personenbezogene Daten ableiten oder diesen einem Endgerät zuordnen.

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

How we optimize our products

Further development of user-friendliness

We use cookies and tracking tools to optimize our digital offerings based on your usage. To do this, we measure the development of reach and the use of content and functions, and use A/B testing to determine which variants users prefer.

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.

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

When you order offers

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 fulfilment of the contract (Art. 6 (1) (b) GDPR) and our legitimate interest in proper and functioning payment processing (Art. 6 (1) (f) GDPR).

Payment processing - Plenigo

If you choose a payment method offered by the payment service provider Frisbii, payment processing will be handled by Frisbii Germany GmbH (Mainzer Landstraße 51, 60329 Frankfurt am Main), to whom we will forward the information you provided during the ordering process along with information about your order (name, address, country/region, IBAN, BIC, account number, bank code, credit card number, invoice amount, currency, tax rate, transaction number, product name and description, device ID, order ID, customer ID, invoice ID, email address, IP address) in accordance with Art. 6 (1) (b) GDPR.

Payment processing PayPal

At your request, you can use the services of PayPal (PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg) for payment. For this purpose, we pass on your payment data (total amount of the order, reference on the PayPal account) to PayPal on the basis of Art. 6 para. 1

sentence 1 lit. b) GDPR. The processing of data for payment with PayPal is necessary for the fulfilment of the contract.

PayPal collects information about the transaction as well as other information associated with the transaction, such as the amount sent or requested, the amount paid for products or services, information about the merchant, including information about the means of payment used to carry out the transaction, device information, technical usage data and location data. In the case of a PayPal payment, we may see your data in our PayPal account.

With PayPal Express Checkout, you do not have to re-enter order information or credit card or address details, as these are transferred directly by PayPal.

PayPal reserves the right to carry out an identity and credit check via credit agencies under certain circumstances. Further information on PayPal's data protection can be found [here](#).

Wenn Dritte bei uns für ihre Produkte werben

Um unsere digitalen Angebote zu refinanzieren, vermarkten wir unsere Werbeflächen - über unsere Vermarktungsdienstleister aber auch über Dritte.

Eine Übersicht der Dritten und wie diese Ihre Daten zu welchem Zweck verarbeiten, finden Sie in den Datenschutz-Einstellungen.

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

External marketing by third parties

When you access our digital offerings, you will also be shown content from third parties who use our advertising space to place adverts. We refinance

our offering by displaying these adverts. If such content is loaded, this is done from the servers of the respective third-party providers. This always involves the transmission of certain data to the third-party providers, in many cases including personal data. In addition, cookies or similar technologies are used for most of the third-party services used to load the content.

In order to provide advertising that is relevant and tailored to current interests, an attempt is made to draw conclusions about current interests based on the website visit and surfing behaviour. This user data is used to communicate advertising in the form of banners and other marketing methods - possibly based on the user's interests. For the purpose of retargeting (remarketing) of website visitors, as well as for the purpose of measuring success, cookies from third-party providers (so-called third-party cookies) are used and, if necessary, user profiles are created under a pseudonym. These can be analysed for advertising and monitoring purposes. It is not possible to draw direct conclusions about a person.

An overview of the third parties and how they process your data and for what purpose can be found in the privacy settings.

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

In this context, data may also be transferred to third countries outside the EU with your consent in accordance with Art. 49 para. 1 lit. a) GDPR.

The publisher uses the Transparency and Consent Framework of IAB Europe 2.2 to manage this type of advertising in compliance with data protection regulations. This framework of the Interactive Advertising Bureau Europe ("IAB Europe"), an industry association for online marketing, defines and monitors the data protection-compliant display of advertising.

Advertising via the IAB TCF

IAB Europe has defined the following purposes for the processing of data, including the personal data of users, in order to manage advertising in compliance with data protection regulations:

Saving or accessing information on a terminal device (Purpose 1)

Cookies, terminal device or similar online identifiers (e.g. login-based identifiers, randomly generated identifiers, network-based identifiers) may

be stored on or read from your terminal device together with other information (e.g. browser type and browser information, language, screen size, supported technologies, etc.) in order to recognise it each time it accesses an app or a website. This is done for one or more of the processing purposes listed here.

Most of the processing purposes explained in this notice are based on the storage of or access to information on your device when you use an app or visit a website. For example, it may be necessary for a provider or website operator to store a cookie on your device when you first visit a website in order to recognise it on your next visits (by retrieving this cookie each time).

Use of reduced data to select adverts (Purpose 2)

Adverts presented to you on this service may be based on reduced data, such as the website or app you are currently using, your approximate location, your device type or the content you are interacting with (or have interacted with) (e.g. to limit the frequency of adverts displayed to you).

***Examples**

- A car manufacturer wants to advertise its electric vehicles to environmentally conscious users who live in the city after hours. The advert is presented on a page with related content (e.g. an article about climate protection measures) after 6.30pm to users whose vague location suggests that they are in an urban area.
- A major manufacturer of watercolour paints wants to run an online advertising campaign for its latest watercolour range. The aim is to diversify the target audience to reach as many amateur and professional artists as possible and to avoid showing the advert alongside inappropriate content (e.g. articles about painting a house). The number of adverts you are presented with is determined and limited to avoid them being shown too often.

Creation of profiles for personalised advertising (Purpose 3)

Information about your activities on this service (such as completed forms, viewed content) may be stored and combined with other information about you (e.g. information from your previous activity on this service or other websites or apps) or similar users. This is then used to create or improve a profile about you (this may include, for example, possible interests and personal characteristics). Your profile may be used (including at a later date) to enable us to present you with adverts that are likely to be more relevant to you based on your potential interests.

*Examples

- For example, if you read several articles about the best bicycle accessories in the trade, this information can be used to create a profile about your interest in bicycle accessories. Such a profile can be used or improved at a later stage on the same or another website or app to show you adverts for a specific brand of bicycle accessories. If you are also looking at a configurator for a vehicle on a luxury car manufacturer's website, this information may be combined with your interest in bicycles to refine your profile and lead to the assumption that you are interested in luxury bicycle equipment.
- A clothing company wants to promote its new collection of high-quality baby clothes. It contacts an agency that has a network of high-income customers (e.g. high-end supermarkets) and asks the agency to create profiles of young parents or couples who can be assumed to be affluent and have recently had a baby, so that these can later be used to advertise in partner apps.

Use of profiles to select personalised advertising (Purpose 4)

Advertising displayed to you on this service may be based on your advertising profile. This advertising profile may include your activities (such as completed forms, viewed content) on this service or other websites or apps, possible interests and personal characteristics.

*Examples

- An online retailer wants to advertise a limited range of running shoes. They want to target adverts to users who have previously viewed running shoes in their mobile app. Tracking technologies could be used to recognise that you have previously used the mobile app to search for running shoes so that you are shown the relevant adverts in the app.
- A profile created for personalised advertising relating to a person who has searched for cycling accessories on a website may be used to present the relevant cycling accessories advertisement on another company's mobile app.

Creating profiles to personalise content (Purpose 5)

Information about your activities on this service (such as: completed forms, non-promotional content viewed) may be stored and combined with other information about you (such as your previous activity on this service or other websites or apps) or similar users.

This is then used to create or complete a profile about you (this may include, for example, possible interests and personal characteristics). Your profile may be used (including at a later date) to show you content that is likely to be more relevant to you based on your potential interests, for example by changing the order in which content is shown to you to make it even easier for you to find content that matches your interests.

*Examples

- You read several articles on a social media platform about how to build a tree house. This information can be added to a profile to record your interest in content about outdoor activities and do-it-yourself instructions (with the aim of enabling the personalisation of content so that you are presented with more blog posts and articles about treehouses and wooden cabins in the future, for example).
- You watched three videos about space exploration on different TV apps. An independent news platform that you have not previously used creates a profile based on this usage behaviour and identifies space exploration as a topic of potential interest for future videos.

Use of profiles to select personalised content (Purpose 6)

Content presented to you on this service may be based on your personalised content profiles, which include your activities on this or other services (such as forms you submit, content you view), possible interests and personal characteristics, such as the changed order in which content is displayed to you, to make it even easier for you to find (non-advertising) content that matches your interests.

*Examples

- You read articles about vegetarian food on a social media platform and then use the cooking app of a company that is independent of the platform. The profile created about you on the social media platform is used to present you with vegetarian recipes on the home page of the cookery app.
- You have watched three rowing videos on various websites. When you use your TV app, a video sharing platform that is independent of the websites recommends five more rowing videos that may be of interest to you, based on a profile that was created about you when you watched the online videos on these websites.

Measurement of advertising performance (Purpose 7)

Information about which adverts are presented to you and how you interact with them can be used to determine how much an advert has appealed to you or other users and whether the objectives of the advertising campaign have been achieved. The information includes, for example, whether you have viewed an advert, whether you have clicked on it, whether it has encouraged you to buy a product or visit a website, etc. This information is helpful in determining the relevance of advertising campaigns.

***Examples**

- You clicked on an advert on a website operator's website about a "Black Friday" discount from an online shop and bought a product. Your click is linked to this purchase. Your interaction and that of other users is measured to find out how many clicks on the advert led to a purchase.
- Sie gehören zu den wenigen, die in der App eines App-Betreibers auf eine Werbung, über einen Rabatt anlässlich eines besonderen Ereignisses (z.B. „internationaler Tag der Anerkennung“), eines Online-Geschenkshops geklickt haben. Der App-Betreiber möchte Statistiken darüber erhalten, wie oft eine bestimmte Anzeige innerhalb der App, insbesondere die Anzeige zu einem besonderen Ereignis (z.B. „internationaler Tag der Anerkennung“) von Ihnen und anderen Benutzern angesehen oder angeklickt wurde, um dem App-Betreiber und seinen Partnern (wie Agenturen) zu helfen, die Anzeigenschaltung zu optimieren.

Measuring the performance of content (Purpose 8)

Information about what advertising is presented to you and how you interact with it can be used to determine whether (non-advertising) content has reached the intended target group and matched your interests, for example. This includes, for example, information about whether you have read a particular article, watched a particular video, listened to a particular podcast or looked at a particular product description, how much time you have spent on that service and the websites you have visited, and so on. This information helps to determine the relevance of (non-advertising) content that is displayed to you.

***Examples**

- You have read a blog post about hiking in the mobile app of an app operator and tapped on a link to a recommended similar post. Your interactions are recorded to show that the first post about hiking was

useful to you and that it successfully encouraged you to read the similar post. This information is measured to determine whether more posts about hiking should be created in the future and where they should be placed on the home screen of the mobile app.

- You were presented with a video about fashion trends, but you and several other users cancelled it after 30 seconds. This information will be used to evaluate the appropriate length of future fashion trend videos.

Analysing target groups through statistics or combinations of data from different sources (Purpose 9)

Based on the combination of data sets (such as user profiles, statistics, market research, analytics data), reports can be created about your interactions and those of other users with advertising or (non-advertising) content in order to identify common characteristics (e.g. to determine which target groups are receptive to an advertising campaign or to certain content).

***Examples**

- The owner of an online bookstore wants to analyse how many visitors have visited his website without buying anything, or how many have visited the website to buy the latest celebrity biography of the month, as well as the average age of visitors and how many of them are male or female, broken down by category. Data about your navigation on the website and your personal characteristics is then used and combined with other such data to create these statistics.
- An advertiser wants to better understand the type of audience that interacts with their adverts. They commission a research organisation to compare the characteristics of users who have interacted with the ad with typical attributes of users of similar platforms across different devices. This comparison shows the advertiser that their target audience mainly accesses the advert via mobile devices and is likely to be between the ages of 45-60.

Development and improvement of offers (Purpose 10)

Information about your activities on this website, such as your interaction with adverts or content, can help to improve products and offers and to develop new products and offers based on user interactions, the type of target group, etc. This processing purpose does not include the development, supplementation or improvement of user profiles and

identifiers. This processing purpose does not include the development, enhancement or improvement of user profiles and identifiers.

*Examples

- Information about your activities on this offer, such as your interaction with adverts or content, can help to improve products and offers and to develop new products and offers based on user interactions, the type of target group, etc. This processing purpose does not include the development, enhancement or improvement of user profiles and identifiers.
- An advertiser is looking for a way to display adverts on a new type of device. It collects information about how users interact with this new type of device in order to determine whether it can develop a new mechanism for displaying adverts on this type of device.

Use of reduced data to select content (Purpose 11)

Content presented to you on this service may be based on reduced data, such as the website or app you are using, your approximate location, your device type or information about what content you interact (or have interacted) with (e.g. to limit how often you are shown a video or article).

*Examples

- A travel magazine has published an article on its website about the new online courses offered by a language school to improve the travelling experience abroad. The travel school's blog posts are inserted directly at the bottom of the page and selected based on your approximate location (e.g. blog posts with the syllabus for the course of a language that is not the language of your country).
- A mobile app for sports news has introduced a new section with articles about the latest football matches. Each article contains videos with highlights of the game hosted by an external streaming platform. If you fast-forward a video, this information can be used to play a shorter video afterwards.

Special processing purposes

The user has no choice for the following two special processing purposes, as these are absolutely necessary to provide the service.

- **Ensuring security, preventing and detecting fraud and troubleshooting:** Your data may be used to monitor and prevent

unusual and potentially fraudulent activities (for example, regarding advertising, advertising clicks by bots) and to ensure that systems and processes function properly and securely. The data may also be used to resolve problems that you, the website or app operator or the advertiser may have in delivering content and adverts and in your interaction with them.

Example

An advertising intermediary delivers adverts from different advertisers to its network of partner websites and apps. The advertising intermediary notices a sharp increase in clicks on adverts from a particular advertiser. He analyses the data regarding the source of the clicks and finds that 80% of the clicks are from bots and not humans.

- **Provision and display of advertising and content:** Certain information (such as IP address or device features) is used to ensure the technical compatibility of the content or advertising and to enable the transfer of the content or advertising to your device.

Example

When you click on a link in an article, you are usually redirected to another page or another part of the article. To this end, 1°) your browser sends a request to a server linked to the website, 2°) the server responds to the request ("here is the article you requested") using technical information contained by default in the request sent by your terminal in order to properly display the information/images that are part of the article you requested. Technically, such an exchange of information is necessary to provide the content that is displayed on your screen.

- **Store and transmit your data protection choices:** The choices you make in relation to the purposes and companies listed in this notice will be stored and made available to the companies concerned in the form of digital signals (e.g. a character string). Only in this way can both this service and the companies concerned respect the respective decisions.

Example:

If you visit a website and are given the choice of whether or not to consent to the use of profiles for personalised advertising, the decision you make will be stored and transmitted to the advertising providers concerned so that your decision is taken into account in the advertising presented to you.

Functions

For the following functions, personal data will be used for one or more of the above purposes if you consent to these purposes.

- **Matching and combining data from different data sources:--**
Information about your activities on this service may be matched and combined with other information about you from different sources (e.g. your activities on another online service, your use of an in-store loyalty card or your responses to a survey) to support the purposes explained in this framework.
- **Linking of different devices:--** To support the purposes set out in this framework, it may be determined whether it is likely that your device is connected to other devices belonging to you or your household (e.g. because you are logged into the same service on both your mobile phone and your computer or because you use the same internet connection on both devices).
- **Identification of end devices based on automatically transmitted information:** Your end device can be distinguished to support the purposes explained in this framework using information that it automatically transmits when accessing the Internet (e.g. the IP address of your Internet connection or the type of browser you use).

Special functions

For the following special functions, personal data will be used for one or more of the above-mentioned purposes, provided that you consent to these purposes.

- **Use of precise geographical data:** With your consent, your precise location (within a radius of less than 500 metres) may be used to support the above purposes.
- **Active scanning of device characteristics for identification:** With your consent, certain characteristics of your device may be queried and used to distinguish it from other devices (e.g. the fonts or plugins installed, the resolution of your screen) to support the above purposes.

What else you should know

Controller

Controller

Schwarzwälder Bote Mediengesellschaft mbH

Kirchtorstrasse 14
78727 Oberndorf a. Neckar

Data Protection Officer

You can contact our Data Protection Officer at:

NPG Digital GmbH The Data Protection Officer
121 Olga Street
89073 Ulm, Germany
Phone: 0731 156 - 0
datenschutz@swp.de

Kontakt für Ihre Datenschutzanfrage

Hier können Sie Ihre Fragen zum Datenschutz stellen.

datenschutz@schwarzwaelder-bote.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.

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.