

PRIVACY NOTICE “ONLINE SERVICES”

STEFFL Department Store Betriebs AG

1)	Processing Activities	Promotion and sale of retail goods to (registered and unregistered) customers ¹ as a retailer ²	
2)	Data Controller	Kaufhaus STEFFL Betriebs AG (“STEFFL”) Headquarters: Kärntner Straße 19 A-1010 Vienna Tel: +43-1-93056 Email: kundenservice@steffl-vienna.at	
3)	Purposes of data processing based on • Legal basis: <u>fulfillment or preparation of a contract</u>	a)	Distribution of online information about STEFFL’s products and services to customers and interested parties (consumers and businesses)
		b)	Making available and distributing our own and third-party advertising in the online information offerings and products
		c)	Distribution and operation of a customer loyalty program
		d)	Operation of an online store for the sale of gift vouchers
		e)	Organization of sweepstakes, events, and customer surveys to increase customer satisfaction and loyalty

¹ If terms referring to natural persons are used in the masculine form only in this privacy policy, they refer to both women and men equally. When applying these terms to specific natural persons, the gender-specific form should be used. The term “customers” refers to both consumers and business entities.

² Currently available at www.steffl-vienna.at.



		f)	Provision of STEFFL communication channels to support the contractual relationship
		g)	Collection of user statistics to document the website's reach
		h)	Order processing (shipping, accounting, billing)
	<ul style="list-style-type: none"> • Legal basis: the (predominant) <u>legitimate interests</u> of STEFFL Direct marketing 	a)	Retention and acquisition of customers
		b)	Distribution/display of advertising for (additional goods) and services of STEFFL and affiliated companies via direct marketing ("marketing purposes") to the extent permitted by law.
		c)	Analysis of customers' personal preferences for the targeted distribution of advertising with the aim of avoiding wastage (using profiling, see point 8) and optimizing the sales system
		d)	Collection of user statistics to document the website's reach and for market monitoring
4)	Changes in Purpose (Transfer)	Direct marketing: STEFFL informs you that customers' personal data is also processed for direct marketing purposes (including profiling). Through direct marketing, STEFFL aims to promote the sale of the advertised products (whether its own or those of third parties). <u>For this purpose, this data is not disclosed to any third parties (not affiliated with the group).</u> There is no incompatibility with the purpose of the original data collection.	
5)	Objection to processing for direct marketing purposes:	The customer may object to the use of their personal data for direct marketing (including profiling) at any time and without providing reasons by contacting the data controller. The objection results in STEFFL no longer processing the customer's personal data for these purposes in the future.	



6)	Legal basis for data processing	<p>1.) Online information: Contract performance. The use of the controller's online media is based on a contract within the meaning of Art. 6(1)(b) of the GDPR³ ; registration establishes a contractual relationship. The controller discloses that, in providing the contractual services, it incorporates third-party content (such as links, pixels, and plug-ins). Due to technical circumstances when accessing content or the internet, electronic identification data—in particular the user's IP address and browser settings—are automatically transmitted to third parties during page loading, who process this data under their own responsibility. When using the controller's social media channels, the primary contractual relationship exists with the respective service provider.</p> <p>2.) Use of the Online Store: The use of the controller's online store is based on a contract within the meaning of Article 6(1)(b) of the GDPR⁴ ; a purchase contract is formed upon completion of the ordering process. The controller discloses that, in providing the contractual services—e.g., processing payments, shipping, and third-party services (see point x.)—it utilizes third-party providers.</p> <p>3.) Additional Services: Consent. For certain services on the online platform (e.g., electronic newsletter distribution, online store, STEFFL The Club), the controller explicitly obtains consent from the customer. This consent may be revoked at any time with future effect.</p> <p>4.) Direct marketing (including profiling): Overriding legitimate interests (see point 7.)</p>
7)	Description of the (overriding) legitimate	STEFFL also processes customer data (but not data from children or special categories of personal data within the meaning of Article 9 of the GDPR ⁵ ("sensitive data")) in order to use it for the purposes

³ Kühling/Buchner GDPR 2017, Art. 6, para. 59

⁴ Kühling/Buchner GDPR 2017, Art. 6, para. 59

⁵ General Data Protection Regulation, available at <http://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32016R0679>



	<p>interests for the purposes</p> <ul style="list-style-type: none"> • direct marketing: 	<p>of direct marketing for (additional) STEFFL products (see also Section 3.). STEFFL has a legitimate interest in the processing of personal data for the purpose of direct marketing (Recital 47, last sentence of the GDPR). Participation in a customer loyalty program (e.g., a club) and the associated opportunity to earn loyalty points to receive price benefits is intended to attract customers to paid products, and personal data is used for promotional purposes to this end. Only those customer data points that STEFFL possesses from the contractual relationship and for which the retention period is still in effect are processed. This does not result in an extension of the retention period. The primary objective of data processing is customer acquisition and customer retention with the aim of re-establishing a (pre-)contractual relationship. In doing so, STEFFL relies on its freedom of enterprise (Art. 6 StGG) and freedom of communication (in particular Art. 10 ECHR, which also protects advertising measures), both of which are protected under convention and constitutional law, as well as on the rights</p> <ul style="list-style-type: none"> • to send postal advertising; • to make promotional calls with consent; • for the transmission of electronic mail following consent; • for the transmission of electronic mail in accordance with Section 107(3) of the Telecommunications Act (TKG); <p>When using this data, STEFFL complies with the provisions of communications law, in particular Section 107 of the Telecommunications Act (TKG).</p>
	<ul style="list-style-type: none"> • Data Processing within the Group: 	<p>STEFFL is part of a corporate group. To fulfill its extensive obligations, STEFFL also relies on affiliated companies within the group through a division of labor. STEFFL has a legitimate interest in this (Recital 48 of the GDPR). Within the corporate group, personal data is only provided to departments that require this data to fulfill</p>



		contractual and legal obligations and to safeguard legitimate interests. These departments are contractually obligated to comply with all data protection regulations.	
	<ul style="list-style-type: none"> IT Security 	The controller stores users' IP addresses for a period of 7 days in order to defend against targeted attacks in the form of server overload ("denial-of-service" attacks) and other damage to the systems. The controller has an overriding legitimate interest in this data processing for the purpose of maintaining the functionality of its online services (Recital 49 of the GDPR).	
8)	Assessment of personal aspects of the customer ("profiling") – to the extent disclosed	Type	Description
		Assessment of personal interests	To avoid wasted reach (and minimize data processing) in direct marketing, STEFFL stores the purchasing behavior collected during customer interactions (e.g., online purchases), such as sales figures, product categories, and responses to specific offers, and uses this to infer certain personal interests and preferences. STEFFL uses these assessed interests to provide customers with targeted, interest-specific offers and advertising at . In particular, to send advertising aimed at customer retention in order to avoid wasted reach in advertising.



9)	Objection to “Profiling”	The customer may object to the use of their personal data for profiling purposes at any time and without providing reasons by contacting the data controller. The objection results in STEFFL no longer processing the customer’s personal data for profiling purposes in the future.	
10)	Changes in Purpose (Transfer)	The controller does <u>not</u> change the purpose of processing personal data.	
11)	Obligation to Provide Data	The customer is under no obligation to provide data.	
12)	Automated decision-making	The customer is <u>not</u> subject to <u>any</u> automated decision that has legal effects on them.	
13)	Types of data processed	Disclosed by the registered customer	Collected additionally by STEFFL, including from non-registered users
		Name	IP addresses (log files)
		Username	Device data
		Email address	Browser used
		Password data	Communication log
		Data provided by the customer during the online purchase	Information regarding account usage (e.g., creation date, number of logins, date of last access)
		Title	Timestamp: Date and time Initial and recurring (update)
		First and last name	Session ID
		Address	Login details (email and encrypted password)



		Shipping address	Login Checks – successful and failed logins
		Billing address	Interface information attribute (APIToken)
		Different delivery address	Information from the app: device version, available device storage for issues to be downloaded, app version used, software version of the app and device, publication date, regional edition, PushToken, and device ID
		Phone number	Login via Facebook YES/NO, IP address, website title, browser-specific information, email, website usage)
		Date of birth	Collected by STEFFL in addition to the registered user
		Payment information	Purchase amounts per day/per year/product categories
			Use of offers
			Payment history
			Communication history
			Campaign behavior
			Loyalty program behavior
			Newsletter preferences
14)	External recipients of data via “social plug-ins” (“plug-ins”):	STEFFL itself does not collect any personal data via “social plug-ins” or through their use. However, it is possible that personal data about visitors to the STEFFL website may be collected via the plug-ins, transmitted to the respective service, and linked to the visitor’s	



		<p>respective account. To prevent data from being transferred to service providers in the U.S. without the user's knowledge, STEFFL uses the so-called "Shariff solution" on its website. This means that the plugins are initially embedded only as graphics. The graphic contains a link to the respective provider's website; only when clicked is the user redirected to the provider's service. This prevents personal data from being automatically transmitted to the plugin providers when the STEFFL website is visited. Data can only be transmitted by clicking on the graphic. By clicking, the respective service provider receives the information that the user has visited the relevant page of STEFFL's online offering. The user does not need to be logged in to the respective provider's site or have a user account to do so. If the user has an account with the provider, the data collected by the plugin provider can be directly assigned to that account. STEFFL has no influence over whether or to what extent the service provider collects personal data. We are not aware of the scope, purpose, and retention periods, nor of the further processing and use of the data there. Please refer to the privacy policy directly on the website of the respective service for this information and details regarding your data protection rights and settings options.</p>
		<p>Data types: IP address, URLs, cookies, and browser settings</p>
		<p>Application</p>
		<p>Facebook Inc., 1 Hacker Way, 94025 Menlo Park, USA; Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; LinkedIn Ireland UC; Wilton Place, Dublin 2, Ireland TikTok Technology Ltd, 10 Earlsfort Terrace, Co. Dublin, Ireland</p>
15)	External recipients of data	



	Data processing within the group – A list of current group companies can also be found on the website: www.steffl-vienna.at	<p>Steffl Handels GmbH, Kärntner Straße 6, A-1010 Vienna, FN 339387z</p> <p>Skybox Gastronomiebetriebs GmbH, Kärntner Straße 19, A-1010, FN 176631b</p> <p>Mythos Mozart Betriebs GmbH, Rauhensteingasse 6-8, A-1010, FN 373060v</p>	
	Categories of external economic service providers:	<ul style="list-style-type: none"> • Tax Advisors/Auditors • Attorneys • Banks and payment service providers • IT services • Postal service providers • Printing companies • Event agencies • Logistics companies 	
	All external recipients of data can be contacted uniformly via STEFFL regarding data protection issues.		
16)	Transfers to third countries		
	The following data is transferred to countries outside the EU in the course of data processing:	Application	Data types
		<p>Google Analytics, services provided by Google Inc., Amphitheatre Parkway, Mountain View, CA 94043 (“Google”), USA (EU-US Privacy Shield)</p>	IP address (truncated), device information, browser information, operating system, language settings, page views, interactions, referrer information, approximate location data, usage data
		<p>Microsoft Clarity, services provided by Microsoft Corporation, One Microsoft Way, Redmond, WA 98052,</p>	Mouse movements, clicks, scrolling behavior, session recordings, device and browser information, IP address



		USA ("Microsoft"), USA (EU-US Data Privacy Framework)	(truncated/pseudonymized), screen resolution, usage data
		Google Ads Google Ads, services provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 ("Google"), USA (EU-US Data Privacy Framework)	Cookie IDs, advertising IDs, device information, browser information, IP address, conversion data, interactions with ads, search queries, website usage data
		Meta Ads , services provided by Meta Platforms, Inc., 1 Meta Way, Menlo Park, CA 94025, USA ("Meta"), USA (EU-US Data Privacy Framework)	Device identifiers, cookie IDs, IP address, browser information, interactions with the website and ads, conversion data, user interests, and audience information
		Google Maps , a service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 ("Google"), USA (EU-US Data Privacy Framework)	IP address, location data (if shared), device and browser information, usage data, search queries, and interactions with maps
		Typeform , services provided by TYPEFORM S.L., Carrer Bac de Roda 163, 08018 Barcelona, Spain ("Typeform"). As part of the provision of services, personal data may be transferred to the U.S. (Standard Contractual Clauses – SCCs).	Form data entered by the user, IP address, device and browser information, timestamps, usage data



		<p>Google reCAPTCHA, services provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 (“Google”), USA (EU-US Data Privacy Framework)</p>	IP address, mouse and keyboard interactions, browser and device settings, operating system, referrer URL, installed browser plugins, cookies, security and verification information
		<p>Google Tag Manager, services provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 (“Google”), USA (EU-US Data Privacy Framework)</p>	No independent storage of personal data; processes technically necessary information for the delivery and management of tags
		<p>Resend, services provided by Resend, Inc., 2261 Market Street #5039, San Francisco, CA 94114, USA (“Resend”). As part of the provision of services, personal data may be transferred to the U.S. (Standard Contractual Clauses – SCCs).</p>	Email address, delivery status, technical shipping data, log data, timestamps, device information (to the extent necessary for delivery)
		<p>Facebook, Instagram, TikTok, LinkedIn (see Section 14) USA (EU-US Privacy Shield)</p>	<u>Social plugins and pixels:</u> IP address, website title, browser-specific information, information about website usage with opt-in
		<p>“Facebook SDK” (Software Development Kit) Facebook Inc., 1 Hacker Way, 94025 Menlo Park, USA; or</p>	App Events: App installations, app launches), other (automatic or manual) standard logging for



		<p>Facebook Ireland Ltd., Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland</p> <p>https://de-de.facebook.com/policy.php</p>	<p>product metrics (e.g., SDK loading, SDK performance).</p> <p>Configuration data: After logging in, requests are made in the background to manage the access token's lifetime.</p> <p>Error information: Collection of error information, including during SDK initialization. This may also include the user ID of individuals logged into Facebook.</p> <p>Short-term data: Measurement of user activities to detect fraud and abuse.</p>
		<p>"Meta Pixel" of the social network "Facebook"</p> <p>Facebook Inc., 1 Hacker Way, 94025 Menlo Park, USA; or Facebook Ireland Ltd., Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.</p> <p>https://de-de.facebook.com/policy.php</p>	<p>Used for remarketing to display targeted advertising and to evaluate the effectiveness of ads for statistical and marketing purposes.</p>
17)	Retention period	<p><u>Non-registered users:</u> The personal data (in particular IP address) of (non-registered) website visitors is stored for 7 days for the purpose of IT security.</p>	



		<p><u>Registered users, online store customers:</u> The data of registered customers is generally processed by STEFFL on the basis of the legal grounds mentioned above for a period of 30 months following the termination of the contract (= 24 months for potential contractual claims for damages + a maximum of 6 months for the service of a lawsuit) and is subsequently deleted (in any case, the personal reference). Thereafter, personal data processing of billing data continues until the end of the statutory retention period (currently generally 7 years). The contract ends in any case after a period of 7 years of inactivity and results in immediate deletion in this case.</p>	
18)	Customer Rights	Basis	Content
		Art. 15 GDPR "Right of Access"	The data subject has the right to request information regarding whether personal data concerning him or her is being processed.
		Art. 16 GDPR "Rectification"	The data subject has the right to request the immediate rectification of inaccurate personal data or its completion.
		Article 17 GDPR "Erasure"	The data subject has the right to request that personal data be erased without delay, provided that the grounds set forth in Article 17(1) of the GDPR are met.
		Article 18 of the GDPR "Restriction"	The data subject has the right to request that the processing of personal data be restricted, provided that the grounds



			specified in Article 18(1) of the GDPR are met.
		Article 21 of the GDPR "Objection"	The data subject has the right to object at any time to the processing of their personal data based on legitimate interests.
		Article 20 GDPR "Data Portability"	The data subject has the right to receive their personal data in a structured, commonly used, and machine-readable format.
19)	Right to lodge a complaint	Article 77 of the GDPR	Every data subject has the right to lodge a complaint with the supervisory authority if they believe that the processing of their personal data violates this Regulation.
20)	Supervisory Authority	Austrian Data Protection Authority Barichgasse 40-42, 1030 Vienna Phone: +43 1 52 152-0 Email: dsb@dsb.gv.at	

Notice: This text is a translation of the original German version. In the event of any discrepancy, inconsistency, or ambiguity between the German version and this English translation, the German version shall prevail.

