

PRIVACY POLICY FOR “STEFFL THE CLUB”

STEFFL Betriebs AG

1)	Data Processing Activities	“STEFFL The Club” Loyalty Program ¹	
2)	Data Controller	Kaufhaus STEFFL Betriebs AG (“STEFFL”) Headquarters: Kärntner Straße 19 A-1010 Vienna Tel: +43-1-93056-0 Email: theclub@steffl-vienna.at	
1)	Contact information for the Data Protection Officer	Kaufhaus STEFFL Betriebs AG (“STEFFL”) c/o Data Protection Officer Kärntnerstraße 19, A-1010 Vienna Email: kundenservice@steffl-vienna.at	
2)	Access to and Updating of Data ²	Digital login (website, app) using the username and password specified by the data subject. STEFFL cannot view the password.	
3)	Purposes of data processing • Based on the legal basis of <u>contract performance or preparation</u>	a)	Operation of the customer loyalty program “STEFFL The Club”
		b)	Creation and management of the customer account (including integration into and linking with the POS system)
		c)	Increasing 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 the term to specific natural persons, the gender-specific form must be used. The term “customers” refers to both consumers and business entities.

² Access to data is limited to data provided by the customer.



		d)	Increasing customer loyalty by organizing contests, events, and customer surveys; providing opportunities to participate and fulfilling obligations toward participants
		e)	Provision of communication channels to STEFFL for the purpose of servicing the contractual and membership relationship (sending text messages, newsletters, emails, push notifications, phone calls, WhatsApp)
	<ul style="list-style-type: none"> • Based on the (overriding) <u>legitimate interests</u> of STEFFL: <u>Direct marketing</u>³ 	f)	Recapturing and acquiring new customers
		g)	Distribution/display of advertising for (additional) goods and services of STEFFL and affiliated group companies via direct marketing (“marketing purposes”), to the extent permitted by law. A list of current group companies can be found on the website: www.steffl-vienna.at/partnerbetriebe
		h)	Analysis of customers’ purchasing behavior and personal preferences for the targeted distribution of advertising with the aim of avoiding wasted coverage (using profiling, see point 10.)
4)	Changes in Purpose (Forwarding)	<p>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) (see Section 15).</u> There is no incompatibility with the purpose of the original data collection.</p>	

³ Direct marketing is the direct contact with the data subject for advertising purposes, such as sending letters or brochures, via telephone calls or electronic messages.



5)	Objection to processing for direct marketing purposes:	The data subject may object to the use of their personal data for direct marketing (including “profiling”) at any time and without providing reasons to the controller. The objection results in STEFFL no longer processing the data subject’s personal data for these purposes in the future.
6)	Legal basis for data processing	<p>1) Participation in STEFFL The Club, marketing activities, contests, and communication channels: fulfillment or preparation of a contract</p> <p>2) Direct marketing (including profiling): STEFFL’s overriding legitimate interests (see Section 9.)</p>
7)	Description of the (overriding) legitimate interests for the purposes of direct marketing:	<p>STEFFL also processes customer data (excluding data from children or special categories of personal data as defined in Article 9 of the GDPR⁴ (“sensitive data”)) to use it for the purposes of direct marketing for (additional) STEFFL products (see also Section 6.) STEFFL has a legitimate interest in the processing of personal data for the purpose of direct marketing (Recital 47, last sentence of the GDPR). It is noted that the customer can enable or disable contact requests in their profile settings at any time. Participation in the Club and the associated options for tracking purchases to receive discounts are intended to attract customers to paid products, and this personal data is used for promotional purposes to that end. Only those customer data points that STEFFL possesses from the contractual relationship and for which the retention period under the German Federal Data Protection Act () is still in effect are processed. This does not result in an extension of the retention period. The primary purpose of data processing is customer acquisition and 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</p>

⁴ General Data Protection Regulation, available at <http://eur-lex.europa.eu/legal-content/DE/TEXT/?uri=CELEX%3A32016R0679>



		<p>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; • to send electronic mail with consent; • to send electronic mail in accordance with § 107(3) 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 <u>corporate group</u> (for companies, see Section 15). To fulfill its extensive obligations, STEFFL also engages affiliated companies in 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 contractual and legal obligations and to safeguard legitimate interests. These departments are contractually obligated to comply with all data protection regulations.</p>	
8)	Assessments of personal aspects of the customer (“profiling”)	Type	Description
		Assessment of personal interests	For the purpose of providing optimal customer service and to avoid wasted reach (and minimize data processing) in direct marketing, STEFFL stores purchasing behavior (purchases, complaints), such as reactions to specific offers, response data from club and marketing newsletters, participation in contests, click behavior, results from customer



			satisfaction surveys, and online orders of gift certificates, and uses this information to infer specific personal interests. STEFFL uses these assessed interests to implement targeted, interest-specific measures for the customer and to present offers and advertisements. In particular, to send advertisements aimed at customer retention, thereby avoiding wasted reach in advertising.
9)	Objection to "Profiling":	The data subject 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 data subject's personal data for profiling purposes in the future.	
10)	Obligation to Provide Data	There is no obligation to provide data.	
11)	Automated decision-making	The data subject is <u>not</u> subject to <u>any</u> automated decision that has legal effects on them.	
12)	Types of data processed	Data provided by the customer	Additional data collected by STEFFL
		Data provided during club registration:	
		Title	Registration channel
		First and last name	Total sales and total purchase amount for the last 12 months



		Title	Daily sales and sales by department
		Date of birth	Customer status by sales volume
		Address(es)	Sales by product category
		Phone	Current offers for customers
		Email address(es)	Brand-based purchasing behavior
		Registration data (login)	Nature and content of the contractual relationship
			Online: Logins by registered users and behavior
			Communication history, campaign behavior (analysis of club-relevant coupon usage)
			Shipping behavior (use of standard shipping, express shipping)
			Analysis of welcome bonus coupons
			App Downloaded & App Download Date
			Push Notifications Enabled & Push Device ID
			DOI Date & DOI Status
			Newsletter preferences
	External Recipients of Data		



13)	Group companies (a list is also available on the website: www.steffl-vienna.at/partnerbetriebe):	<ul style="list-style-type: none"> • Steffl Handels GmbH, Kärntner Straße 6, A-1010 Vienna, FN 339387z • Skybox Gastronomiebetriebs GmbH, Kärntner Straße 19, A-1010, FN 176631b • Mythos Mozart Betriebs GmbH, Rauhensteingasse 6-8, A-1010, FN 373060v 	
Categories of external economic service providers:		<ul style="list-style-type: none"> • Tax Advisors/Certified Public Accountants • Attorneys • Banks and payment service providers • Postal service providers • Printing companies • Event agencies 	
Categories of external tracking and analytics services:		Providers:	Types of data processed:
		Google Analytics 4, services provided by Google Inc., Amphitheatre Parkway, Mountain View, CA 94043 ("Google")	IP address (truncated), device information, browser information, operating system, language settings, page views, interactions, referrer information, approximate location data, usage data
		Microsoft Clarity	Mouse movements, clicks, scrolling behavior, session recordings, device and browser information, IP address (truncated/pseudonymized), screen resolution, usage data
		Plausible Analytics	Pages visited, referrer, browser used, operating system, device type, country/region (derived from IP address), usage



			statistics; no cookies and no persistent personal identifiers
		Google Ads	Cookie IDs, advertising IDs, device information, browser information, IP address, conversion data, interactions with ads, search queries, website usage data
		Meta Ads	Device identifiers, cookie IDs, IP address, browser information, interactions with the website and ads, conversion data, user interests, and audience information
		Google Maps	IP address, location data (if shared), device and browser information, usage data, search queries, and interactions with maps
		Typeform	Form data entered by the user, IP address, device and browser information, timestamps, usage data
		Google reCAPTCHA	IP address, mouse and keyboard interactions, browser and device settings, operating system, referrer URL, installed browser plugins, cookies, security and verification information



		Google Tag Manager	No independent storage of personal data; processes technically necessary information for the delivery and management of tags
		Resend	Email address, delivery status, technical delivery data, log data, timestamps, device information (to the extent necessary for delivery)
		<p>"Facebook SDK" (Software Development Kit)</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>App Events: App installations, app launches), other (automatic or manual) standard logging for 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>
<p>All external recipients can be contacted uniformly regarding data protection issues through Kaufhaus STEFFL Betriebs AG</p>			
	<p>External recipients of data via “social plugins” (“plugins”):</p>	<p>STEFFL itself does not collect any personal data via “social plugins” 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 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 ensures that the plugins are initially embedded only as graphics. The graphic contains a link to the respective provider’s website; only upon clicking 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 upon clicking 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</p>	



		<p>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:</p> <p>IP address, URLs, cookies, and browser settings</p>													
		<table border="1"> <thead> <tr> <th>Country</th> <th>Application</th> <th></th> </tr> </thead> <tbody> <tr> <td rowspan="2">USA</td> <td> Facebook Inc., 1 Hacker Way, 94025 Menlo Park, USA; </td> <td> https://www.facebook.com/help/186325668085084 </td> </tr> <tr> <td> Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA; </td> <td> https://help.instagram.com/155833707900388 https://policy.pinterest.com/de/privacy-policy </td> </tr> <tr> <td rowspan="2">Ireland</td> <td> LinkedIn Ireland Unlimited Company Wilton Plaza, Gardner House 4,5,6 2, Dublin, Ireland </td> <td> https://de.linkedin.com/legal/privacy-policy </td> </tr> <tr> <td> Tiktok Technology Ltd, 10 Earlsfort Terrace, Co. Dublin, Ireland </td> <td> https://www.tiktok.com/legal/page/eea/privacy-policy/de-DE </td> </tr> </tbody> </table>	Country	Application		USA	Facebook Inc. , 1 Hacker Way, 94025 Menlo Park, USA;	https://www.facebook.com/help/186325668085084	Instagram Inc. , 1601 Willow Road, Menlo Park, CA 94025, USA;	https://help.instagram.com/155833707900388 https://policy.pinterest.com/de/privacy-policy	Ireland	LinkedIn Ireland Unlimited Company Wilton Plaza, Gardner House 4,5,6 2, Dublin, Ireland	https://de.linkedin.com/legal/privacy-policy	Tiktok Technology Ltd , 10 Earlsfort Terrace, Co. Dublin, Ireland	https://www.tiktok.com/legal/page/eea/privacy-policy/de-DE
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Ireland	LinkedIn Ireland Unlimited Company Wilton Plaza, Gardner House 4,5,6 2, Dublin, Ireland	https://de.linkedin.com/legal/privacy-policy													
	Tiktok Technology Ltd , 10 Earlsfort Terrace, Co. Dublin, Ireland	https://www.tiktok.com/legal/page/eea/privacy-policy/de-DE													



14)	Retention Period	Data pursuant to Section 14 may be processed by STEFFL on the basis of the aforementioned legal grounds until the end of the contract, and thereafter for a maximum 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). The contract is deemed terminated if a customer has not generated any revenue within a period of 18 months. Thereafter, personal data processing of billing data continues until the end of the statutory retention obligations (e.g., Federal Tax Code currently generally 7 years).		
15)	Data subject's Rights	Basis	Content	
		Art. 15 GDPR "Right of Access"	The data subject has the right to request information regarding whether their personal data 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	The data subject has the right to request that the processing of personal data be restricted,	



		“Restriction”	provided that the grounds specified in Article 18(1) of the GDPR are met.
		Article 21 of the GDPR “Objection”	Objection to profiling: The data subject has the right to object at any time to the processing of their personal data for the purpose of profiling. Objection to Direct Marketing: The data subject has the right to object at any time to the processing of their personal data for the purposes of direct marketing.
		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.
16)	Right to lodge a complaint	Art. 77 GDPR Section 24 DSG	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.
17)	Supervisory authority	Austrian Data Protection Authority (Datenschutzbehörde) 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.

