

PRIVACY NOTICE: “NEWSLETTER”

Kaufhaus STEFFL Betriebs AG (“STEFFL”)

1)	1	Processing Activity	Distribution of online information via a newsletter to registered customers ¹	
2)		Data Controller	Kaufhaus STEFFL Betriebs AG (“STEFFL”) Headquarters: Kärntner Straße 19 A-1010 Vienna Phone: +43-1-93056 Email: kundenservice@steffl-vienna.at	
1)		Purposes of data processing • Based on the legal basis of <u>contract performance</u> or <u>preparation</u>	a)	Sending online information about STEFFL’s products and services to registered users/customers (consumers and business customers)
	b)		Maintaining communication with customers before, during, and after customer contact or the conclusion of a contract	
	c) b		Increasing customer satisfaction and loyalty by organizing contests, events, and customer surveys	
	d)		Providing communication channels to STEFFL to support the contractual relationship	
	e)		Processing of the newsletter service (subscriptions, unsubscriptions, address corrections, etc.), promotional offers, and satisfaction surveys	

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.



		f)	Distribution of our own and third-party advertising in online information offerings and products
	<ul style="list-style-type: none"> • based on the (predominant) <u>legitimate interests</u> of STEFFL: <u>direct marketing</u>² 	g)	Recapturing and acquiring new customers
		h)	Collection of user statistics for the products to document reach
		i)	Measuring and maintaining customer satisfaction and loyalty (using profiling, see point 9)
		j)	Distribution/display of advertising for STEFFL's offers and services via direct marketing ("marketing purposes"), to the extent permitted by law
			Improvement of STEFFL's services and offerings through the conduct of surveys and analysis of questionnaires, handling of claims/complaints, and offering of benefits from loyalty programs
2)	Changes in Purpose (Transfer)	<p><u>Direct marketing:</u> 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 (own or third-party) services and products. <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.</p>	
3)	Objection to processing for direct marketing purposes:	<p>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.</p>	

² Direct marketing is the direct addressing of the data subject for advertising purposes, such as sending letters or brochures, via telephone calls, or electronic messages.



4)	Legal basis for data processing	<p>1) Newsletter - Distribution: Contract performance or preparation: Use of the newsletter service is based on a contract within the meaning of Art. 6(1)(b) of the GDPR³. STEFFL discloses that, in providing its contractual services, it incorporates third-party content (such as links, pixels, and plug-ins). Due to the technical nature of accessing content on the internet, STEFFL automatically transmits electronic identification data—in particular the user's IP address and browser settings—to these third parties when the page is loaded; these third parties process this data under their own responsibility.</p> <p>2) Direct marketing (including profiling): STEFFL's overriding legitimate interests (see Section 8.)</p>
5)	Description of the (overriding) legitimate interests for the purposes direct marketing:	<p>STEFFL processes customer data (but not that of children or special categories of personal data within the meaning of Art. 9 GDPR (Link: http://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32016R0679 ("sensitive data")) also for the purpose of direct marketing for (additional) products, including those from companies affiliated with the STEFFL Group (see also Section 5). STEFFL has a legitimate interest in the processing of personal data for the purpose of direct marketing (Recital 47, last sentence of the GDPR). Only those customer data that STEFFL holds 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 with the aim of re-establishing a (pre-)contractual relationship and fostering customer loyalty. 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;

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



		<ul style="list-style-type: none"> • 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 § 107 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 (processing bookings through a central booking system, payment systems, marketing, accounting, etc.), STEFFL also relies on affiliated companies within the group through a division of labor. STEFFL has a legitimate interest in doing so (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. All of these departments are contractually obligated to comply with all data protection regulations.</p>	
	<ul style="list-style-type: none"> • IT Security: 	<p>STEFFL stores its customers' 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. STEFFL 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).</p>	
6)	Assessment of personal aspects of the customer ("profiling")	Type	Description
		Collection, storage	For the purpose of providing optimal customer service, STEFFL stores user behavior (e.g., browsing behavior, links opened, etc.) in a central database so that relevant and targeted measures can be taken to improve satisfaction and thus customer loyalty, as well as to customize the service.



		Assessment of personal interests	To avoid wasted coverage (and minimize data processing) when displaying advertising content and in direct marketing, STEFFL stores user behavior and infers specific personal interests from it. STEFFL uses these assessed interests to send customers targeted, interest-specific offers and advertising, thereby avoiding wasted coverage in advertising.
7)	Objection to "Profiling":	The customer may object to the use of their personal data for profiling purposes at any time and without providing reasons to the data controller. The objection results in STEFFL no longer processing the customer's personal data for profiling purposes in the future. This information is stored for as long as you are subscribed to the newsletter. After unsubscribing, we store the data purely for statistical and anonymous purposes.	
8)	Obligation to Provide Data	The customer is under no obligation to provide data.	
9)	Automated decision-making	The customer is <u>not</u> subject to <u>any</u> automated decision-making that produces legal effects concerning them.	
10)	Types of data processed	Disclosed by the customer	Additionally collected by STEFFL
		Email address	Registration channel
		Name	Campaign behavior
		Voluntarily disclosed by the customer:	Interests
		Title	IP addresses (log files)



			Device data (Device ID)
			Browser used
			Device used
			Type of transmission, e.g., encryption
			Timestamp: Date and time Initial and recurring (update)
			Session ID
			Login data (email and encrypted password)
			Login checks – successful and failed logins
11)	External recipients of data	Transmission of electronic identification data to controllers:	
		Google Analytics 4 , services provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”)	IP address (truncated), device information, browser information, operating system, language settings, page views, interactions, referrer information, approximate location data, usage data
		Facebook Inc. , 1 Hacker Way, 94025 Menlo Park, USA; Instagram Inc. , 1601 Willow Road, Menlo Park, CA 94025, USA; Tiktok Technology Ltd , 10 Earlsfort Terrace, Co. Dublin, Ireland	IP address, URLs, cookies, and browser settings data



		<p>LinkedIn Ireland Unlimited Company Wilton Plaza, Gardner House 4, 5, 6 2, Dublin, Ireland</p>	
		For more details on the above data processing activities, please refer to the “Cookie Information” section on our website	
12)	External recipients of data – Group companies and processors:	A list of current group companies can also be found on the website: www.steffl-vienna.at	Data processors
		STEFFL Handels GmbH	Tax Advisor/Auditor
		Skybox Gastronomiebetriebs GmbH	Mail delivery services
		Mythos Mozart Betriebs GmbH	Printing companies
			Collection agency
			Telecommunications providers (newsletter distribution)
			IT service providers
			Communication service providers
			Logistics companies
		All group companies and data processors can be contacted uniformly via STEFFL regarding data protection issues.	
	Transfers to third countries	The following data is transferred to countries outside the EU in the course of data processing:	
		Country	Purpose
			Data types



		USA (EU-US Privacy Shield)	Google Analytics 4	<u>Anonymized</u> IP address, website title, browser-specific information, information about website usage
		USA (EU-US Privacy Shield)	Facebook, Instagram, TikTok, LinkedIn	<u>Social plugins and pixels:</u> IP address, website title, browser-specific information, information about website usage with opt-in
13)	Retention period	Registered customers (newsletter subscribers): The data of registered customers is processed by the controller on the basis of the legal grounds mentioned above for the duration of the contractual relationship. The data may be modified or deleted by the controller at any time. The user agreement ends in any case upon cancellation of the newsletter subscription; this results in immediate deletion.		
14)	Data Subject's rights	Legal 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 of the GDPR "Erasure"	The data subject has the right to request that personal data be erased without undue delay, provided that the grounds set forth in Article 17(1) of the GDPR are met.	
		Art. 18 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 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 purpose 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.
15)	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.
16)	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.

