

## InternetQ

### Privacy statement

Thank you for your interest in using our services. The protection of your personal data is very important to us. In the following you will find all important information on the collection, processing and use of personal data, which we process only in accordance with the provisions of data protection law. Personal data is information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more specific characteristics that are an expression of the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

The legal basis for data protection can be found, among others, in the EU Basic Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

#### **Responsible body**

Responsible authority in the sense of the GDPR, the national data protection laws as well as other data protection-juridical regulations is:

InternetQ GmbH

Gutenbergring 67B

22848 Norderstedt

Germany

Managing Director: Marco Priewe (Chairman), Christoph Küppers

Phone: +49 40 413300-180

[help@kanzaroo.com](mailto:help@kanzaroo.com)

#### **Data protection officer**

MediaXS Ges. f. Medienrechte mbH

Datenschutzbeauftragte

Hohenstaufenring 55

50674 Köln

[datenschutzbeauftragte@datxs.de](mailto:datenschutzbeauftragte@datxs.de)

## **1. Data Sources and Categories of Data:**

We process personal data, which we receive from you in the context of the use of our services and/or in the context of the use of functions of our platform (in particular kanzaroo platform) and the services provided by us.

The relevant personal data can be - depending on the use - the following data categories:

- Name, first name
- Contact details (e.g. address, e-mail)
- Subscriber number, destination number
- Transaction data (on orders and use of services)
- System information (e.g. IP address)

## **2. Purposes of the Processing**

InternetQ is a provider of telecommunication-based services and web-based payment services. We process the personal data to provide and fulfill the services offered to you and to process the transactions you request.

## **3. Legal Basis:**

If you give us your consent for the processing of your personal data, this consent will be considered as legal basis as per Art.6 para.1 lit.a EU data protection basic regulation (GDPR).

In the processing of personal data, which is necessary for the fulfilment of a contract or usage relationship, the contract or usage relationship is considered as legal basis as per Art.6 para.1 lit.b GDPR. This also applies to processing operations that are necessary for the implementation of pre-contractual measures. If necessary, we process your data on the basis of Art. 6 para. 1 lit. f. GDPR beyond the actual performance of the contract to protect the legitimate interests of us or a third party.

As far as the processing of personal data is necessary for the fulfilment of a legal obligation (e.g. §§ 111ff. TKG), the legal or official obligation in as per Art.6 para.1 lit.c GDPR is considered as legal basis.

If data processing is carried out on the basis of requirements to safeguard vital interests, the legal basis is Art. 6 para. 1 lit. d GDPR.

In order to safeguard the legitimate interests of our company or a third party, data processing may also take place beyond the actual fulfilment of the contract on the basis of Art. 6 Para. 1 lit. f GDPR, insofar as it is necessary and does not outweigh the interests, fundamental rights and fundamental freedoms of the person concerned.

## **4. Data Transfer to Third Parties**

Personal data that is processed when using our services will be forwarded by us to the service provider selected by you for the purpose of fulfilling the contract, depending on the offer you have requested. Furthermore, your data will be passed on to the relevant subscriber network operator. In this case, the data will be forwarded for the purpose of providing the service and fulfilling the contract in accordance with Art.6 para.1 lit.b GDPR and on the basis of your consent.

In addition, in the event of illegal use of services for the purpose of legal prosecution, your personal data will be forwarded to law enforcement authorities (cf. §§ 111 ff. TKG) and/or, if applicable, to injured third parties in accordance with the statutory provisions. A passing on can also take place in the context of legal or official information duties, in particular towards the supervisory authorities. In

such cases, the disclosure shall be made on the basis of the protection of interests pursuant to Art. 6 Par. 1 lit.c GDPR.

In all other respects, your data will not be passed on to third parties unless you have expressly consented to this. In particular, the data will not be transmitted to locations outside the EU.

Within our company, those positions and employees who require your data for the purpose of fulfilling our service offers, technical tasks and legal obligations will be given access to your data. Service providers and contract processors employed by us may also receive data for these purposes if they observe our data protection instructions and undertake to respect data secrecy.

## **5. Duration of Storage**

The data are deleted as soon as they are no longer required for the purpose of their collection and there are no legal storage periods (e.g. §§ 111ff., 113b TKG) to the contrary. If the processing purpose no longer applies or if a statutory storage period expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

If the data is stored in log files, this is the case after seven days at the latest. A storage going beyond this is possible. In this case, the user's identification data (e.g. IP addresses) are deleted or altered so that it is no longer possible to assign the calling client. In the case of the collection of data for the provision of services, this is the case when the respective session has ended.

## **6. Your rights as Data Subject**

As the data subject, you have the right to request information or correction of the stored personal data at any time or to revoke your consent. In addition, you have the right to delete or restrict the processing or to object to the processing. We also draw your attention to the right of data transfer and to the fact that it is possible to lodge a complaint with a supervisory authority.

Please send corresponding requests by e-mail to us or to our data protection officer under the aforementioned contact data.

Below we explain your rights in detail:

### **a) Right of revocation, right of objection**

You have the right to revoke your declaration of consent at any time. The revocation can take place by e-mail to [help@kanzaroo.com](mailto:help@kanzaroo.com). The revocation of the consent does not affect the legality of the processing carried out on the basis of the consent up to the revocation.

You also have the right, for reasons arising from your particular situation, to object at any time to the processing of your personal data on the basis of Art.6 para.1 lit.e, f GDPR; this also applies to profiling based on these provisions.

### **b) Right to information**

You may request a statement as to whether personal data concerning you will be processed by us. If your personal data is processed, you can in particular request information on the data categories, origin of the data, purposes of the processing, recipient, any third country transfer (including guarantees in accordance with Art. 46 GDPR), planned duration or criteria for the duration of the processing as well as the existence of an automated decision-making process. The same applies to profiling pursuant to Art. 22 (1), (4) GDPR (if applicable with information on the logic involved as well as its scope and effects).

### **c) Right to rectification**

You have the right to have your personal data corrected and/or completed if it is inaccurate or incomplete.

#### d) Right of cancellation

You have the right to delete the personal data concerning you, in particular if these data are no longer necessary for the processing purposes or you have withdrawn your consent or there is no other legal basis or you have lodged an objection against the processing and there are no overriding legitimate reasons for the processing in accordance with Art. 21 para. 2 GDPR or the data have been processed unlawfully or the deletion of the data is necessary for the fulfilment of a legal obligation in accordance with EU law or national law or the data have been collected in relation to services offered by the information society in accordance with Art. 8 para. 1 GDPR.

Rights to cancellation cannot exist if and to the extent that the processing is necessary to fulfil a legal obligation, to perform tasks in the public interest or to assert, exercise or defend legal claims.

#### e) Right to limitation of processing

You may ask for the processing of your personal data to be restricted if, for example, the processing is unlawful, if you dispute its accuracy, if you have lodged an objection, if the controller no longer needs the data for processing purposes but you need it to enforce your rights, or if, in the case of unlawful processing, you ask for a restriction instead of deletion.

#### f) Right to transfer data

Among other things, you have the right to obtain personal data concerning you in a structured, common and machine-readable format and to communicate them to another controller, provided that the processing is based on consent or a contract and the processing is carried out by means of automated procedures. You have the right to have the data transferred directly from one controller to another controller, provided this is technically feasible and does not affect the rights of third parties. The right to data transfer does not apply to processing carried out in the exercise of official authority for the performance of a task carried out in the public interest.

#### g) Right of complaint to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the Member State where you are staying, at your place of work or at the place where the alleged infringement is alleged, if you consider that the processing of your personal data is contrary to the GDPR.

## **7. Cookies**

So-called cookies are used on our platform to recognize multiple use of our offer by the same user/connection owner. Cookies are small text files that your browser stores on your computer. They serve to simplify the use of websites for users and to optimize our internet presence and our offers. Some functions of our website cannot be offered without the use of cookies. For these it is necessary that the browser is recognized also after a page change. The recognition takes place on the basis of the IP address stored in the cookies.

The legal basis for the processing of personal data using technically necessary cookies is our legitimate interest pursuant to Art.6 para.1 lit.f GDPR. The legal basis for the processing of personal data using cookies for analysis purposes is the required consent of the user in conjunction with the use of cookies. Art.6 para.1 lit. a GDPR

## **8. Server Data**

For technical operation, data transmitted via your Internet browser is collected (so-called server log files). This includes browser type and version, operating system used, website from which you visit us (referrer URL), platform you visit, date and time of your access, your Internet protocol (IP) address.

The data is stored in log files to ensure the functionality of the website. In addition, the data is used to assign your transactions and to ensure the security of our information technology systems.

This also results in our legitimate interest in data processing as a legal basis pursuant to Art.6 para.1 lit.f GDPR.

## **9. Information within the Scope of the Use of our Services**

When using our services, data may be processed which you enter on our platform or which is generated by the applications. The data categories result from the offer windows called up. These are in particular the products/services to which your transaction relates and the billing amounts.

## **10. Contact Possibility**

On our website we offer you the possibility to get in touch with us by e-mail.

In this case, the personal data of the user transmitted with the e-mail will be stored.

The legal basis for the processing is Art.6 para.1 lit.f GDPR. If the e-mail contact is aimed at the conclusion of a contract, the legal basis results from Art.6 para.1 lit.b GDPR.

The data will not be passed on to third parties in this context. The data will be used exclusively for the processing of the conversation.

The data will be deleted as soon as they are no longer required to achieve the purpose for which they were collected. For the personal data from the input mask of the contact form and those sent by e-mail, this is the case when the respective communication with the user has ended.

## **11. Use of Google Analytics with Anonymization Function**

On our platform we use the component Google Analytics (with anonymization function). Google Analytics is a web analysis service. Web analysis is the collection and evaluation of data about the behaviour of visitors to internet pages. A web analysis service collects data on, among other things, from which website a person concerned came to a website (so-called referrers), which subpages of the website were accessed or how often and for how long a subpage was viewed. A web analysis is mainly used to optimise a website and to analyse the costs and benefits of internet advertising.

The operating company of the Google Analytics component is Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

We use the addition "\_gat.\_anonymizeIp" for the web analysis via Google Analytics. This addition is used by Google to shorten and anonymise the IP address of the internet connection of the person concerned if our internet pages are accessed from a member state of the European Union or from another state party to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the flow of visitors to our website. Google uses the data and information obtained, among other things, to evaluate the use of our website, to compile online reports for us showing the activities on our website and to provide other services in connection with the use of our website.

The legal basis for data processing is our legitimate interest pursuant to Art. 6 Para. 1 lit. f GDPR.

Google Analytics places a cookie on the information technology system of the person concerned. for the meaning of cookies please refer to aforesaid explanation. When the cookie is set, Google is able to analyse the use of our website. Each time you access one of the individual pages of this website, which is operated by the data controller and on which a Google Analytics component has been integrated, the internet browser on the information technology system of the person concerned is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. As part of this technical process, Google obtains knowledge of personal data, such as the IP address of the person concerned, which Google uses, among other things, to track the origin of visitors and clicks and subsequently to enable commission statements.

The cookies are used to store personal information such as the access time, the location from which an access originated and the frequency of visits to our website. Each time you visit our website, this personal data, including the IP address of the internet connection used, is transferred to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may disclose personal data collected through this technical process to third parties.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. Such a setting of the internet browser used would also prevent Google from setting a cookie on the information technology system of the person concerned. In addition, a cookie already set by Google Analytics can be deleted at any time via the internet browser or other software programs.

Furthermore, it is possible for the person concerned to object to and prevent the collection of data generated by Google Analytics and relating to the use of this website and the processing of this data by Google. For this purpose, the person concerned must download and install a browser add-on under the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data and information on visits to Internet pages may be transmitted to Google Analytics. The installation of the browser add-on is considered a contradiction by Google. If the data subject's information technology system is later deleted, formatted or reinstalled, the data subject must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated by the person concerned or by another person within his/her sphere of control, the browser add-on may be reinstalled or reactivated.

For more information and to review Google's current privacy policies, please visit <https://www.google.de/intl/de/policies/privacy/> and <http://www.google.com/analytics/terms/de.html>.

Google Analytics is explained in more detail at [https://www.google.com/intl/de\\_en/analytics/](https://www.google.com/intl/de_en/analytics/).