



NETFIELD MEDIA S.L.

# Privacy Policy

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## CONTACT

[office@netfield-media.com](mailto:office@netfield-media.com)



We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the NETFIELD MEDIA SL. The use of the Internet pages of the NETFIELD MEDIA SL is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. However, if a person concerned wishes to make use of special services of our company via our website, it may be necessary to process personal data. If the processing of personal data is necessary and there is no legal basis for such processing, we generally obtain the consent of the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the NETFIELD MEDIA SL. By means of this data protection declaration, our company would like to inform the public about the type, scope and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed of their rights by means of this privacy policy.

As the controller, the NETFIELD MEDIA SL has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website. Nevertheless, Internet-based data transmissions can generally have security gaps, so absolute protection cannot be guaranteed. For this reason, every data subject is free to transmit personal data to us by alternative means, for example by telephone.

## 1. definitions

The data protection declaration of the NETFIELD MEDIA SL is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terms used in advance.

We use the following terms, among others, in this privacy policy:

- **a) personal data**

Personal data means any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject"). 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 to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **b) Data subject**

Data subject is any identified or identifiable natural person whose personal data is processed by the controller responsible for the processing.



- **c) Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **d) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of restricting its future processing.

- **e) Profiling**

Profiling is any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

- **f) Pseudonymisation**

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

- **g) Controller or controller responsible for the processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- **h) Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.



- **i) Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular enquiry in accordance with Union or Member State law shall not be regarded as recipients.

- **j) Third party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

- **k) Consent**

Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

## **2. name and address of the controller**

The controller within the meaning of the General Data Protection Regulation, other data protection laws applicable in the Member States of the European Union and other provisions of a data protection nature is the:

- NETFIELD MEDIA SL
- CALLE PANAMA 32
- 38009 SANTA CRUZ DE TENERIFE
- SPAIN
- Phone: +34922971748
- E-mail: [office@netfield-media.com](mailto:office@netfield-media.com)
- Website: [netfield-media.com](http://netfield-media.com)

## **3. Cookies**

The Internet pages of the NETFIELD MEDIA SL use cookies. Cookies are text files that are placed and stored on a computer system via an Internet browser.

Numerous websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier for the cookie. It consists of a character string that allows websites and servers to be assigned to the specific internet browser in which the cookie was stored. This enables the websites and servers visited to distinguish the individual browser of the data subject from other Internet browsers that contain other cookies. A specific internet browser can be recognised and identified via the unique cookie ID.

Through the use of cookies, the NETFIELD MEDIA SL can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

Cookies can be used to optimise the information and offers on our website for the benefit of the user. As already mentioned, cookies enable us to recognise the users of our website. The purpose of this recognition is to make it easier for users to use our website. For example, the user of a website that uses cookies does not have to re-enter their access data each time they visit the website because this is taken over by the website and the cookie stored on the user's computer system. Another example is the cookie for a shopping basket in an online shop. The online shop remembers the items that a customer has placed in the virtual shopping basket via a cookie.

The data subject can prevent the setting of cookies by our website at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programmes. This is possible in all common internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be fully usable.

#### **4. collection of general data and information**

The website of the NETFIELD MEDIA SL collects a series of general data and information when a data subject or automated system calls up the website. This general data and information is stored in the server log files. The (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system accesses our website (so-called referrer), (4) the sub-websites which are accessed via an accessing system on our website can be recorded, (5) the date and time of access to the website, (6) an internet protocol address (IP address), (7) the internet service provider of the accessing system and (8) other similar data and information used for security purposes in the event of attacks on our information technology systems.

When using these general data and information, the NETFIELD MEDIA SL does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimise the content of our website and the advertising for it, (3) ensure the long-term functionality of our information technology systems and the technology of our website, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber attack. Therefore, the NETFIELD MEDIA SL analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

#### **5. registration on our website**

The data subject has the option of registering on the controller's website by providing personal data. Which personal data is transmitted to the controller is determined by the respective input mask used for registration. The personal data entered by the data subject is collected and stored exclusively for

internal use by the controller and for the controller's own purposes. The controller may arrange for the data to be passed on to one or more processors, such as a parcel service provider, who will also use the personal data exclusively for internal use attributable to the controller.

By registering on the controller's website, the IP address assigned by the data subject's Internet service provider (ISP), the date and time of registration are also stored.

This data is stored against the background that this is the only way to prevent the misuse of our services and, if necessary, to make it possible to investigate criminal offences that have been committed. In this respect, the storage of this data is necessary to safeguard the controller. This data is not passed on to third parties unless there is a legal obligation to pass it on or the passing on serves the purpose of criminal prosecution.

The registration of the data subject with voluntary provision of personal data serves the controller to offer the data subject content or services which, due to the nature of the matter, can only be offered to registered users. Registered persons are free to change the personal data provided during registration at any time or to have it completely deleted from the controller's database.

The controller shall provide any data subject at any time upon request with information about which personal data relating to the data subject is stored. Furthermore, the controller shall rectify or erase personal data at the request or indication of the data subject, insofar as this does not conflict with any statutory retention obligations. All of the controller's employees are available to the data subject as contact persons in this context.

## **6. subscription to our newsletter**

On the website of the NETFIELD MEDIA SL, users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted to the controller when the newsletter is ordered.

The NETFIELD MEDIA SL informs its customers and business partners regularly by means of a newsletter about enterprise offers. Our company's newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. For legal reasons, a confirmation e-mail is sent to the e-mail address entered by a data subject for the first time for the newsletter dispatch using the double opt-in procedure. This confirmation email is used to check whether the owner of the email address as the data subject has authorised the receipt of the newsletter.

When registering for the newsletter, we also store the IP address assigned by the Internet service provider (ISP) of the computer system used by the data subject at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of a data subject's e-mail address at a later date and therefore serves as legal protection for the controller.



The personal data collected when registering for the newsletter is used exclusively to send our newsletter. Furthermore, subscribers to the newsletter may be informed by e-mail if this is necessary for the operation of the newsletter service or a registration in this regard, as could be the case in the event of changes to the newsletter offer or changes to the technical circumstances. The personal data collected as part of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be cancelled by the data subject at any time. The consent to the storage of personal data, which the data subject has given us for the newsletter dispatch, can be revoked at any time. There is a corresponding link in every newsletter for the purpose of revoking consent. It is also possible to unsubscribe from the newsletter at any time directly on the controller's website or to inform the controller of this in another way.

## **7. Newsletter tracking**

The newsletters of NETFIELD MEDIA SL contain so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in e-mails sent in HTML format to enable log file recording and log file analysis. This allows the success or failure of online marketing campaigns to be statistically analysed. Based on the embedded tracking pixel, the NETFIELD MEDIA SL may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected via the tracking pixels contained in the newsletters are stored and evaluated by the controller in order to optimise the newsletter dispatch and to adapt the content of future newsletters even better to the interests of the data subject. This personal data is not passed on to third parties. Data subjects are entitled at any time to revoke the separate declaration of consent given in this regard via the double opt-in procedure. After cancellation, this personal data will be deleted by the controller. The NETFIELD MEDIA SL automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **8. Contact possibility via the website**

The website of the NETFIELD MEDIA SL contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the data controller by e-mail or via a contact form, the personal data transmitted by the data subject is automatically stored.

Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purposes of processing or contacting the data subject. This personal data is not passed on to third parties.

## **9. Comment function in the blog on the website**

The NETFIELD MEDIA SL offers users the possibility to leave individual comments on individual blog contributions on a blog, which is on the website of the controller. A blog is a portal on a website, usually open to the public, in which one or more people, called bloggers or web bloggers, can post articles or write down thoughts in so-called blog posts. The blog posts can usually be commented on by third parties.



If a data subject leaves a comment on the blog published on this website, information on the time of the comment entry and the username (pseudonym) chosen by the data subject are stored and published in addition to the comments left by the data subject. Furthermore, the IP address assigned by the data subject's Internet service provider (ISP) is also logged. The IP address is stored for security reasons and in the event that the data subject violates the rights of third parties or posts illegal content by posting a comment. This personal data is therefore stored in the controller's own interest so that the controller can exculpate itself in the event of an infringement. The personal data collected will not be passed on to third parties unless such a transfer is required by law or serves the legal defence of the controller.

#### **10. Subscription to comments in the blog on the website**

The comments made in the blog of the NETFIELD MEDIA SL may be subscribed to by third parties. In particular, it is possible for a commentator to subscribe to the comments following their comment on a particular blog post.

If a data subject decides in favour of the option to subscribe to comments, the controller sends an automatic confirmation email to check in the double opt-in procedure whether the owner of the specified email address has actually opted for this option. The option to subscribe to comments can be cancelled at any time.

#### **11 Routine erasure and blocking of personal data**

The controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose no longer applies or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data will be routinely blocked or erased in accordance with the statutory provisions.

#### **12. rights of the data subject**

- **a) Right to confirmation**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

- **b) Right to information**

Any person affected by the processing of personal data has the right, granted by the European legislator of directives and regulations, to obtain from the controller free information at any time about the personal data stored about him or her and a copy of this





information. Furthermore, the European legislator has granted the data subject access to the following information:

- the purposes of processing
- the categories of personal data that are processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- the existence of a right to lodge a complaint with a supervisory authority
- if the personal data is not collected from the data subject: All available information about the origin of the data
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject

Furthermore, the data subject has a right to information as to whether personal data has been transferred to a third country or to an international organisation. If this is the case, the data subject also has the right to obtain information about the appropriate safeguards in connection with the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

- **c) Right to rectification**

Any person affected by the processing of personal data has the right granted by the European legislator of directives and regulations to demand the immediate correction of incorrect personal data concerning them. Furthermore, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary declaration, taking into account the purposes of the processing.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

- **d) Right to erasure (right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary



- The personal data was collected or otherwise processed for purposes for which it is no longer necessary.
- The data subject withdraws consent on which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Art. 21 (2) GDPR.
- The personal data was processed unlawfully.
- The deletion of personal data is necessary to fulfil a legal obligation under Union law or the law of the Member States to which the controller is subject.
- The personal data was collected in relation to information society services offered in accordance with Art. 8 para. 1 GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by the NETFIELD MEDIA SL, he or she may, at any time, contact any employee of the controller. An employee of NETFIELD MEDIA SL shall promptly ensure that the erasure request is complied with immediately.

If the personal data has been made public by NETFIELD MEDIA SL and our company is obliged to erase the personal data in accordance with Article 17(1) of the GDPR, NETFIELD MEDIA SL shall take appropriate measures, including technical measures, taking into account the available technology and the implementation costs, to inform other data controllers who process the published personal data that the data subject has requested the erasure of all links to this personal data or of copies or replications of this personal data from these other data controllers, insofar as the processing is not necessary. An employees of the NETFIELD MEDIA SL will arrange the necessary measures in individual cases.

- **e) Right to restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the NETFIELD MEDIA SL, he or she may at any time contact any employee of the controller. The employee of the NETFIELD MEDIA SL will arrange the restriction of the processing.



- **f) Right to data portability**

Any person affected by the processing of personal data has the right, granted by the European legislator, to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format. He or she also has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR or on a contract pursuant to point (b) of Article 6(1) of the GDPR and the processing is carried out by automated means, provided that the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising their right to data portability pursuant to Art. 20 (1) GDPR, the data subject has the right to have the personal data transmitted directly from one controller to another, where technically feasible and provided that this does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the NETFIELD MEDIA SL.

- **g) Right to object**

Any person affected by the processing of personal data has the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

The NETFIELD MEDIA SL shall no longer process the personal data in the event of the objection, 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.

If the NETFIELD MEDIA SL processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This also applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the NETFIELD MEDIA SL to the processing for direct marketing purposes, the NETFIELD MEDIA SL will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the NETFIELD MEDIA SL for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the NETFIELD MEDIA SL. The data subject is also free, in the context of the use of information



society services, and notwithstanding Directive 2002/58/EC, to exercise his or her right to object by automated means using technical specifications.

- **h) Automated decisions in individual cases including profiling**

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, provided that the decision (1) is not necessary for the conclusion or performance of a contract between the data subject and the controller, or (2) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the NETFIELD MEDIA SL shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of the controller.

- **i) Right to withdraw consent under data protection law**

Any person affected by the processing of personal data has the right granted by the European legislator to withdraw consent to the processing of personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of the controller.

### **13. data protection provisions about the application and use of Facebook**

On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a social meeting place operated on the Internet, an online community that generally enables users to communicate with each other and interact in virtual space. A social network can serve as a platform for the exchange of opinions and experiences or enable the Internet community to provide personal or company-related information. Facebook enables social network users to create private profiles, upload photos and network via friend requests, among other things.

The operating company of Facebook is Facebook, Inc, 1 Hacker Way, Menlo Park, CA 94025, USA. If a data subject lives outside the USA or Canada, the controller for the processing of personal data is Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Facebook component (Facebook plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Facebook component from Facebook through the Facebook component. A complete overview of all Facebook plug-ins can be accessed at [https://developers.facebook.com/docs/plugins/?locale=de\\_DE](https://developers.facebook.com/docs/plugins/?locale=de_DE). As part of this technical process, Facebook receives information about which specific subpage of our website is visited by the data subject.

If the data subject is logged in to Facebook at the same time, Facebook recognises which specific subpage of our website the data subject is visiting each time the data subject accesses our website and for the entire duration of their stay on our website. This information is collected by the Facebook component and assigned by Facebook to the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated on our website, for example the "Like" button, or if the data subject makes a comment, Facebook assigns this information to the personal Facebook user account of the data subject and stores this personal data.

Facebook always receives information via the Facebook component that the data subject has visited our website if the data subject is logged in to Facebook at the same time as accessing our website; this takes place regardless of whether the data subject clicks on the Facebook component or not. If the data subject does not want this information to be transmitted to Facebook, they can prevent the transmission by logging out of their Facebook account before accessing our website.

The data policy published by Facebook, which is available at <https://de-de.facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. It also explains the setting options Facebook offers to protect the privacy of the data subject. In addition, various applications are available that make it possible to suppress the transmission of data to Facebook. Such applications can be used by the data subject to suppress data transmission to Facebook.

#### **14. data protection provisions about the application and use of Google Analytics (with anonymisation function)**

The data controller has integrated the Google Analytics component (with anonymisation function) on this website. Google Analytics is a web analytics service. Web analysis is the collection, collation and evaluation of data about the behaviour of visitors to websites. Among other things, a web analysis service collects data about the website from which a data subject has come to a website (so-called referrer), which subpages of the website have been accessed or how often and for which time a subpage was viewed. 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.

The data controller uses the addition "\_gat.\_anonymiselp" for web analysis via Google Analytics. This addition is used by Google to shorten and anonymise the IP address of the data subject's Internet

connection if our website is 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. Among other things, Google uses the data and information obtained to analyse the use of our website, to compile online reports for us that show the activities on our website, and to provide other services in connection with the use of our website.

Google Analytics places a cookie on the data subject's IT system. What cookies are has already been explained above. By setting the cookie, Google is enabled to analyse the use of our website. Each time one of the individual pages of this website is accessed, 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 data subject is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. During the course of this technical procedure, Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which access was made and the frequency of visits to our website by the data subject. Each time our website is visited, this personal data, including the IP address of the internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may pass on this personal data collected via the technical process to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies.

Such a setting of the Internet browser used would also prevent Google from placing a cookie on the information technology system of the data subject. In addition, a cookie already set by Google Analytics can be deleted at any time via the internet browser or other software programmes.

Furthermore, the data subject has the option of objecting to and preventing the collection of data generated by Google Analytics relating to the use of this website and the processing of this data by Google. To do this, the data subject must download and install a browser add-on from the link <https://tools.google.com/dlpage/gaoptout>. This browser add-on informs Google Analytics via JavaScript that no data and information about visits to websites may be transmitted to Google Analytics. The installation of the browser add-on is recognised by Google as an objection. If the data subject's IT system is deleted, formatted or reinstalled at a later date, 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 data subject or another person who is attributable to their sphere of control, it is possible to reinstall or reactivate the browser add-on.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.de/intl/de/policies/privacy/> and under <http://www.google.com/analytics/terms/de.html>. Google Analytics is explained in more detail at this link [https://www.google.com/intl/de\\_de/analytics/](https://www.google.com/intl/de_de/analytics/).



## **15. Data protection provisions about the application and use of Instagram**

The data controller has integrated components of the Instagram service on this website. Instagram is a service that qualifies as an audiovisual platform and allows users to share photos and videos and also to redistribute such data in other social networks.

The operating company of the Instagram services is Instagram LLC, 1 Hacker Way, Building 14 First Floor, Menlo Park, CA, USA.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram is made aware of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in to Instagram at the same time, Instagram recognises which specific sub-page the data subject is visiting each time the data subject accesses our website and for the entire duration of their stay on our website. This information is collected by the Instagram component and assigned by Instagram to the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, the data and information transmitted with it is assigned to the personal Instagram user account of the data subject and stored and processed by Instagram.

Instagram always receives information via the Instagram component that the data subject has visited our website if the data subject is logged in to Instagram at the same time as accessing our website; this takes place regardless of whether the data subject clicks on the Instagram component or not. If the data subject does not want this information to be transmitted to Instagram in this way, they can prevent the transmission by logging out of their Instagram account before accessing our website.

Further information and the applicable data protection provisions of Instagram can be found at <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

## **16. Data protection provisions about the application and use of Twitter**

The data controller has integrated Twitter components on this website. Twitter is a multilingual, publicly accessible microblogging service on which users can publish and disseminate so-called tweets, i.e. short messages limited to 280 characters. These short messages can be accessed by anyone, including people who are not registered with Twitter. However, the tweets are also displayed to the so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Twitter also makes it possible to address a broad audience via hashtags, links or retweets.

The operating company of Twitter is Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.



Each time one of the individual pages of this website is accessed, which is operated by the controller and on which a Twitter component (Twitter button) has been integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Twitter component to download a representation of the corresponding Twitter component from Twitter. Further information about the Twitter buttons is available at <https://about.twitter.com/de/resources/buttons>. As part of this technical process, Twitter receives information about which specific subpage of our website is visited by the data subject.

The purpose of integrating the Twitter component is to enable our users to disseminate the content of this website, to publicise this website in the digital world and to increase our visitor numbers.

If the data subject is logged in to Twitter at the same time, Twitter recognises which specific sub-page of our website the data subject is visiting each time the data subject accesses our website and for the entire duration of their stay on our website. This information is collected by the Twitter component and assigned by Twitter to the respective Twitter account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on our website, the data and information transmitted with it is assigned to the personal Twitter user account of the data subject and stored and processed by Twitter.

Twitter always receives information via the Twitter component that the data subject has visited our website if the data subject is logged in to Twitter at the same time as accessing our website; this takes place regardless of whether the data subject clicks on the Twitter component or not. If such a transmission of this information to Twitter is not desirable for the data subject, the delivery may be prevented if the data subject logs off from their Twitter account before a call-up to our website is made.

The applicable data protection provisions of Twitter may be retrieved under <https://twitter.com/privacy?lang=de>.

## **17 Data protection provisions about the application and use of YouTube**

The data controller has integrated YouTube components on this website. YouTube is an Internet video portal that allows video publishers to post video clips free of charge and other users to view, rate and comment on them free of charge. YouTube allows the publication of all types of videos, which is why complete film and television programmes as well as music videos, trailers or videos made by users themselves can be accessed via the Internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. YouTube, LLC is a subsidiary of Google Inc, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Each time one of the individual pages of this website is accessed, which is operated by the data controller and on which a YouTube component (YouTube video) has been integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective YouTube component to download a representation of the corresponding YouTube component from YouTube. Further information about YouTube can be found at <https://www.youtube.com/yt/about/de/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject.



If the data subject is logged in to YouTube at the same time, YouTube recognises which specific sub-page of our website the data subject is visiting when a sub-page containing a YouTube video is accessed. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject.

YouTube and Google always receive information via the YouTube component that the data subject has visited our website if the data subject is logged in to YouTube at the same time as accessing our website; this takes place regardless of whether the data subject clicks on a YouTube video or not. If the data subject does not want this information to be transmitted to YouTube and Google in this way, they can prevent the transmission by logging out of their YouTube account before accessing our website.

The data protection provisions published by YouTube, which can be accessed at <https://www.google.de/intl/de/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

## **18. Legal basis of the processing**

Art. 6 I lit. a GDPR serves our company as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, with processing operations necessary for the supply of goods or the provision of any other service or consideration, the processing is based on Art. 6 I lit. b GDPR. The same applies to such processing operations that are necessary for the performance of pre-contractual measures, for example in cases of enquiries about our products or services. If our company is subject to a legal obligation which requires the processing of personal data, such as for the fulfilment of tax obligations, the processing is based on Art. 6 I lit. c GDPR. In rare cases, the processing of personal data may become necessary in order to protect the vital interests of the data subject or another natural person. This would be the case, for example, if a visitor were injured in our company and their name, age, health insurance details or other vital information would have to be passed on to a doctor, hospital or other third party. The processing would then be based on Art. 6 I lit. d GDPR.

Ultimately, processing operations could be based on Art. 6 I lit. f GDPR. Processing operations that are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to safeguard a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of the data subject do not prevail. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed if the data subject is a customer of the controller (Recital 47 Sentence 2 GDPR).

## **19. Legitimate interests in the processing pursued by the controller or a third party**

Where the processing of personal data is based on Article 6 I lit. f GDPR, our legitimate interest is the performance of our business activities for the benefit of the well-being of all our employees and our shareholders.



## **20. Duration for which the personal data is stored**

The criterion for the duration of the storage of personal data is the respective statutory retention period. After this period has expired, the corresponding data is routinely deleted, provided it is no longer required for the fulfilment or initiation of a contract.

## **21. legal or contractual provisions for the provision of personal data; necessity for the conclusion of the contract; obligation of the data subject to provide the personal data; possible consequences of non-provision**

We would like to inform you that the provision of personal data is partly required by law (e.g. tax regulations) or may also result from contractual regulations (e.g. information on the contractual partner). Sometimes it may be necessary for a contract to be concluded for a data subject to provide us with personal data that must subsequently be processed by us. For example, the data subject is obliged to provide us with personal data if our company concludes a contract with them. Failure to provide the personal data would mean that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact one of our employees. Our employee will inform the data subject on a case-by-case basis whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and what the consequences would be if the personal data were not provided.

## **22. Existence of automated decision-making**

As a responsible company, we do not use automated decision-making or profiling.

This Privacy Policy has been generated by the Privacy Policy Generator of the DGD - Your [External DPO](#) that was developed in cooperation with German [Lawyers from WILDE BEUGER SOLMECKE, Cologne](#).

Questions or complaints can also be directed to the data protection authority responsible for this website, [aepd.es](http://aepd.es).



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