

Privacy Notice, as of March 2025

We appreciate your interest in our website. Protecting your privacy is very important to us. Below, we provide detailed information about how we handle your personal data.

Your personal data will only be collected, processed, and used by MBCY in accordance with the applicable data protection law. Our data protection practices therefore comply with the EU General Data Protection Regulation (GDPR) and the German Data Protection Adaptation and Implementation Act EU (BDSG-new).

Personal data includes all information relating to an identified or identifiable natural person; a natural person is considered identifiable if they can be identified directly or indirectly, particularly through the association with an identifier such as a name, an identification number, location data, an online identifier, or one or more characteristics that express the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person (Art. 4 No. 1 GDPR). This includes, for example, your name, your phone number, your address, and all inventory data you provide when registering and setting up your customer account. Statistical data or anonymized data that we collect when visiting our web shop, which cannot be directly associated with you as a person, are not included.

1. General Information {{a-general}} Within this privacy notice, we (Sole Brothers GmbH, hereinafter also referred to as "MBCY") inform you about the nature, scope, and purpose of processing your personal data ("data") when using our website and related functions, as well as our social media presences. MBCY only processes your data if it is legally permissible, for example, if you have given your consent for specific use when registering for a newsletter, participating in surveys or competitions, or if another legal basis permits us to use it (e.g., processing your orders or responding to your contact inquiries). Further details on the respective data processing are provided in this privacy notice.

2. Responsible Entity and Contact {{a-address}}

Sole Brothers GmbH Schanzenstraße 41 51063 Cologne

Phone: +49 800 - 411 00 00

Email: support@mbcy.com

3. Data Protection Officer {{a-securityofficer}}

MBCY has appointed a Data Protection Officer. You can reach the Data Protection Officer via email at: dsb@deichmann.com

4. Subject of Data Protection {{a-dataobject}}

The subject of data protection is personal data. According to Art. 4 No. 1 of the General Data Protection Regulation (GDPR), personal data includes all information related to an

identified or identifiable natural person; a natural person is considered identifiable if they can be identified directly or indirectly, particularly through the association with an identifier such as a name, an identification number, location data, an online identifier, or one or more characteristics that express the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person (Art. 4 No. 1 GDPR).

This includes, for example, your name, your phone number, your address, and all inventory data you provide when registering and setting up your customer account. Statistical data or anonymized data that we collect, for example, when visiting our web shop, which cannot be directly associated with you as a person, are not included.

5. Automated Data Collection {{a-datacollection}}

When accessing this website, the accessing device automatically transmits the following data for technical reasons:

- Browser type and version
- Operating system used
- Referrer URL
- Hostname of the accessing computer
- Time of server request
- IP address
- If JavaScript is enabled, the browser also transmits the resolution and color depth of the browser window

The data is stored for the following purposes:

- Ensuring the security of IT systems
- Defending against attacks on our online offering and IT systems
- Ensuring the proper operation of this online offering

The IP address is only stored for a period of 7 days. Processing takes place based on our overriding legitimate interests according to Art. 6 Para. 1 lit. f) GDPR.

6. Contact {{a-contact}}

If you contact us via our contact form or through other means (phone, email), we process your information related to the inquiry, including your contact details (especially your name, email address, and possibly your phone number), for the purpose of processing the inquiry and any follow-up questions. Processing is based on Art. 6 Para. 1 lit. f) GDPR. We have a legitimate interest in effectively handling your inquiry, and if it involves a contract, in enabling the initiation and execution of the respective contractual

relationship. If you are (or may become) a contractual partner, the processing of contract-related inquiries is based on Art. 6 Para. 1 lit. b) GDPR.

The data you provide when contacting us will be retained until the purpose for data storage/processing no longer applies (e.g., after completing your request). Mandatory legal provisions – especially retention periods – remain unaffected. We store contract-related or legally relevant inquiries during the general limitation period, i.e., three years from the end of the year in which we received your inquiry. Storage takes place due to our legitimate interest in properly documenting our business operations and securing our legal positions (Art. 6 Para. 1 lit. f) GDPR). In the case of contract-related inquiries, storage takes place for the purpose of initiating and executing the respective contractual relationship (Art. 6 Para. 1 lit. b) GDPR) or our corresponding legitimate interest (Art. 6 Para. 1 lit. f) GDPR).

7. Advertising and Market Research Purposes {{a-advertisement}}

We offer you, among others, the following services:

- Sending newsletters with current offers/product advertisements
- White mail (postal delivery)
- Participation in sweepstakes

In connection with these services, we may use your data to create and maintain a user profile to provide you with individualized advertising that we believe may be of special interest to you, provided the following conditions (see 7.1, 7.2) are met. To carry out the aforementioned services, we use service providers/processors (see 28.3).

7.1 Newsletter {{a-newsletter}}

Before subscribing to our solebox & MBCY newsletter, you agree that we may use the data you provide to send you information by e-mail about the content and products in our range. We use the so-called double opt-in procedure for sending the newsletter, i.e. we will only send you a newsletter by e-mail if you have expressly confirmed to us beforehand that we should activate the newsletter service. For statistical purposes, we anonymously evaluate which links in the newsletter are clicked on. It is not possible to identify the specific person who clicked on the link. Based on your consent, we also evaluate which links you click on in the newsletter in a personalized form to optimize our offer. We will then send you a notification email and ask you to confirm that you wish to receive our newsletter by clicking on a link contained in this email. If other companies are commissioned to process and send the newsletter, they will also be obliged to protect your data in accordance with data protection regulations and to use it only for the specified purpose.

In detail, the following data may be processed

- Data that you provide to us when you subscribe to the solebox & MBCY newsletter (e-mail address, title if applicable, first name, surname, address, zip code, shoe size, preferred brands, interests, date of birth);
- Data that we need to prove your consent to receive the solebox & MBCY newsletter and the processing of your data (IP address and time stamp of the newsletter order and the click on the link in the confirmation e-mail, declarations of consent given);
- Data that we receive when you read the solebox & MBCY newsletter (opening the newsletter, clicks on links contained in the newsletter, data on the end device used, data on the location based on the IP address, accessibility of the e-mail address, execution of a purchase on www.mbcy.com or an action on the website after clicking on an offer)
- Data that we receive when you participate in a competition organized by us (details of the competition, answers);
- Data that we receive when you register a user account on our website www.mbcy.com (title, first name, surname, email address, zip code, date of registration, date of last login);
- Data about your purchases made at MBCY online or in the store (goods/services, payment amount, currency, location, checkout or terminal ID and time and number of the transaction as well as store ID, discount amount);
- Data that we receive when redeeming vouchers or coupons and activating credit (redeemed vouchers and coupons from MBCY, date and place of redemption);
- Data collected when you use our website www.mbcy.com (pages viewed, services used, wish list, preferences);
- Data that we receive when using customer surveys (survey results);
- Data that we generate based on the evaluation of the aforementioned data (customer segments, presumed product preferences).

We only process the aforementioned data if we actually receive it, for example when you use our website features, place an order on www.mbcy.com or take part in one of our competitions. Your data is processed on the basis of your consent (Art. 6 para. 1 lit. a) GDPR).

If you no longer wish to receive newsletters from us, you can withdraw your consent at any time. A message via the contact form or e.g. e-mail, letter is sufficient for this.

Of course, you will also find an unsubscribe link in every newsletter. We also store information in order to be able to prove your consent. This information includes the time of consent.

This processing is based on Art. 6 para. 1 lit. c) in conjunction with Art. 7 para. 1 GDPR. If you withdraw your consent, we will delete your data immediately. We will delete information that we have stored to prove your consent after one month. Further storage to prove consent is based on our legitimate interest, the proper documentation of our business operations and the assertion, safeguarding or defense of claims (Art. 6 para. 1 lit. f) GDPR).

7.2 Sweepstakes {{a-win}} If you would like to participate in one of our sweepstakes, we will inform you in advance about the relevant information in separate privacy notices.

7.3 WhatsApp {{a-whatsapp}} You have the option to join our WhatsApp community and receive news, deals, and updates from MBCY via WhatsApp (“WhatsApp Conversations”). WhatsApp is operated by WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“WhatsApp Ireland”). WhatsApp Ireland acts as the data controller under data protection law when forwarding messages via WhatsApp and your responses. Further information on data processing by WhatsApp can be found here: [WhatsApp Ireland Privacy Notice](#). For sending messages via WhatsApp, we process your phone number and your WhatsApp profile name. The processing of your data is based on your consent, which you grant us in the WhatsApp chat by clicking the button “Sounds awesome.” or “Subscribe.” The legal basis for this processing is Art. 6 Para. 1 lit. a) GDPR. We are the data controller under data protection law. For offering and using WhatsApp Conversations, we use the software solution of Charles GmbH, Gartenstr. 86-87, 10115 Berlin (“Charles”). As a processor, Charles processes your data exclusively on our behalf and for no other purposes. The legal basis for this processing is Art. 6 Para. 1 lit. a) GDPR.

Right of Withdrawal

You can withdraw your consent(s) at any time with future effect by sending the message “STOP” in our WhatsApp chat.

8. Cookies & Similar Technologies {{a-cookies}} To make visiting our website more attractive and to enable the use of certain functions, we use so-called cookies and similar technologies like browser storage objects on various pages. These help make our online presence more user-friendly, efficient, and secure, and speed up navigation on our platform. These are small text files stored on your device. Some of the cookies we use are deleted after the end of the browser session (i.e., after closing your browser) (“session cookies”). Other cookies remain on your device and enable us or our partner companies to recognize your browser on your next visit (“persistent cookies”).

Example: To use our shopping cart, both session cookies and persistent cookies must be enabled. You can configure your browser to inform you about the setting of cookies and decide individually whether to accept them or exclude cookies for specific cases or generally. If cookies are not accepted, the functionality of our website may be limited.

The following categories of cookies are used:

Technically necessary cookies for the operation of our website: These cookies are essential for the operation and functionality of the website. They help make the website technically accessible and usable and offer essential functionalities, such as navigation on the website, correct display in the internet browser, or consent management. Without these cookies, the website cannot function properly.

Functional/Analysis Cookies: These cookies are used to measure online traffic and analyze user behavior. This helps us better understand how our website is used and improve our services.

Marketing Cookies: These cookies allow us to make you aware of relevant MBCY advertising campaigns and show you personalized MBCY content on third-party websites based on your interests. Furthermore, targeting allows us to limit the frequency of an ad and reduce the display of advertisements for you.

The legal basis for using technically required cookies is § 15 Abs. 1 Telemediengesetz ("TMG") or based on Art. 6 Para. 1 S. 1 lit. f) GDPR to safeguard our legitimate interests. Our legitimate interests particularly lie in providing you with a technically optimized, user-friendly, and needs-based website and ensuring the security of our systems. Otherwise, we use cookies based on your consent according to Art. 6 Para. 1 lit. a) GDPR.

If we use cookies based on your consent, you can withdraw your consent at any time with future effect by adjusting your cookie settings here. Alternatively, you can change your settings at any time via the "Cookie Settings" link. You can find the link in the footer of the website. The legality of the processing carried out until the withdrawal remains unaffected.

9. Personal Product Recommendations - Tracking Pixel {{a-trackingpixel}} Tracking pixels perform similar functions to cookies but are not noticeable to the user. If you give your consent, we use tracking pixels within the shop functionality to measure your user behavior, in the newsletter, and for controlling offers in remarketing. These data are anonymous and are not linked to personal data on the user's computer or a database. For personal product recommendations on mbcy.com, your shopping history is used. This includes, in particular, items and product categories that you have viewed, searched for, or purchased. All information collected for this purpose is stored anonymously, and it is not possible to infer your identity. The legal basis for data processing is Art. 6 Para. 1 lit. a) GDPR. You can withdraw your consent as described in section 8. Please note that we will no longer be able to offer you personalized recommendations in this browser after withdrawal.

10. Google Tag Manager {{a-tagmanager}} This website uses the Google Tag Manager. This service allows website tags to be managed via an interface. The Google Tag

Manager only implements tags. This means: no cookies are set, and no personal data is collected. The Google Tag Manager triggers other tags that may collect data. However, the Google Tag Manager does not access this data. If a deactivation has been carried out at the domain or cookie level, it remains valid for all tracking tags as long as they are implemented with the Google Tag Manager.

11. Analytics Software, Marketing Pixels, and Retargeting {{a-analytics}}

11.1 Google Analytics {{a-googleanalytic}} If you give your consent, we use the Google Analytics service provided by Google Ireland Limited ("Google"). We comply with the currently applicable Google Analytics Terms of Service as well as the terms of the Google Data Processing Agreement. If your personal data is processed in an insecure third country, we have concluded the Standard Contractual Clauses approved by the EU Commission with Google LLC in accordance with Art. 46 Para. 2 lit. c) GDPR. More information can be found [here](#).

According to section 10.3 of the Google Data Processing Agreement, the transmitted data is stored in the following locations (so-called "data center locations"): [Google Data Center Locations](#). Therefore, we only use Google Analytics if you also consent to the transmission to the previously listed data center locations. In some cases, the third countries where the data centers are located or from which processing is carried out do not have an adequate level of data protection based on a decision by the European Commission (a list of so-called secure third countries can be found [here](#)).

For example, the USA is currently considered an insecure third country. Transmission to insecure third countries involves risks for your personal data, especially since access by US authorities cannot be ruled out when data is transmitted to the USA. These risks cannot be completely mitigated by merely concluding Standard Contractual Clauses between MBCY and the processor or controller in the third country.

However, the provisions of Google's data processing (see [Google Privacy and Terms](#) in the section "Appendix 2") include various technical and organizational measures designed to ensure the security of your personal data. Please take these circumstances into account when giving your consent. General information on how Google processes your personal data can be found [here](#).

If you have consented to the use of Google Analytics, we use the web analysis service Google Analytics. Google Analytics collects pseudonymous data about your use of our website, including your truncated IP address, and uses cookies. The information generated by the cookies about your use of the website (including your truncated IP address) is transmitted to a Google server at the aforementioned data center locations and stored there.

Google will use this information to evaluate your use of the website, compile reports on website activities for us, and generate further analyses and evaluations related to the

use of our website and internet usage. Google may also link this data with other data about you, such as your search history, your personal account, usage data from other devices, and other data stored by Google.

Google may also transfer this information to third parties if required by law (e.g., government authorities) or if third parties process this data on behalf of Google. The data stored by Google Analytics is retained for a period of 14 months. After this period, only aggregated statistics are kept at Google Analytics. The use of Google Analytics is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8. Further information on data usage by Google can be found [here](#).

11.2 Google Ads Remarketing {{a-googleads}} If you give your consent, we use the functions of Google Ads Remarketing from Google. This allows us to advertise our website in Google search results and on third-party websites. For this purpose, Google places a cookie in the browser of your device, which automatically enables interest-based advertising by means of a pseudonymous cookie ID and based on the pages you have visited. Additionally, your browsing history is linked to your Google account, and information from your Google account is used to personalize the ads you see on the web.

If you are logged in to Google during your visit to our website, Google uses your data together with Google Analytics data to create and define target group lists for cross-device remarketing. To do this, your personal data is temporarily linked with Google Analytics data by Google to form target groups.

As part of the use of Google Ads Remarketing, as described in section 11.1, there may be a transfer of personal data to third countries (particularly to the servers of Google LLC in the USA). Please take the aforementioned circumstances into account when giving your consent.

Details about the processing triggered by Google Ads Remarketing and how Google handles data from websites can be found [here](#). The data stored by Google is retained for a period of 14 months. After this period, only aggregated statistics are kept at Google Analytics. The use of Google Ads Remarketing is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8.

11.3 Microsoft Bing Ads {{a-bing}} If you give your consent, we use the conversion tracking of Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA, on our pages. In this process, a cookie is stored on your device by Microsoft Bing Ads if you have reached our website via a Microsoft Bing ad. This allows Microsoft Bing and us to recognize that someone clicked on an ad, was redirected to our website, and reached a previously determined target page (conversion page). We only receive the total number of users who clicked on a Bing ad and were then redirected to the conversion page.

If your personal data is processed in an insecure third country, we have concluded the Standard Contractual Clauses approved by the EU Commission with Microsoft in accordance with Art. 46 Para. 2 lit. c) GDPR. Additionally, we only use Microsoft Bing Ads if you also consent to the transmission to the data center locations listed under [Microsoft Privacy Statement](#).

In some cases, the third countries where the data centers are located or from which processing is carried out do not have an adequate level of data protection based on a decision by the European Commission (a list of so-called secure third countries can be found [here](#)). For example, the USA is currently considered an insecure third country.

Transmission to insecure third countries poses risks to your personal data, particularly as access by US authorities cannot be ruled out when data is transmitted to the USA. These risks cannot be fully eliminated solely by concluding Standard Contractual Clauses between MBCY and the processor or controller in the third country. However, the provisions of Microsoft's data processing (see [Licensing Documents](#)) include various technical and organizational measures to ensure the security of your personal data. Please consider the aforementioned circumstances when giving your consent.

The use of Microsoft Bing Ads is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8. For more information on data protection and the cookies used by Microsoft and Bing Ads, please visit the [Microsoft Privacy Statement](#)

11.4 Facebook Custom Audiences {{a-facebook}} If you give us your consent, this website uses the functions of “Facebook Custom Audiences.” Using a Facebook Pixel (or similar functions to transmit event data or contact information via interfaces in apps), Facebook can identify visitors to our online offering as a target group for displaying ads (so-called “Facebook Ads”). This is intended to ensure that the Facebook ads we place are shown only to you on Facebook and within the services of Facebook’s cooperating partners (the so-called “Audience Network” – further information is available at www.facebook.com/audience network/), provided you have shown interest in our online offering or have specific characteristics (e.g., interest in certain topics or products apparent from visited websites) that we transmit to Facebook (this process results in your profile being assigned to certain groups, called “Custom Audiences”).

With the help of the Facebook Pixel, we also want to ensure that our Facebook ads correspond to your interest in targeted advertising and prevent annoying effects. Furthermore, the Facebook Pixel allows us to trace the effectiveness of Facebook ads for statistical and market research purposes by seeing if you were redirected to our website after clicking on a Facebook ad (so-called “conversion tracking”).

In this context, Facebook Ireland Ltd. processes the following data types:

- Usage data (e.g., visited websites, interest in content, access times);

- Meta-/communication data (e.g., device information, IP addresses);
- Event data (“event data” are data that can be transmitted from us to Facebook via the Facebook Pixel and relate to persons or their actions, such as visits to websites, interactions with content, functions, app installations, product purchases, etc.; event data are processed to form target groups for content and advertising information (Custom Audiences)).

As part of the so-called enhanced data matching, information for matching purposes is hashed, collected, and stored, which can identify individuals (e.g., names, email addresses, and phone numbers). Event data are deleted by Facebook after a maximum of two years, and the audiences formed from them are deleted when our Facebook account is deleted.

The following purposes are pursued: marketing, profiles with user-related information (creating user profiles), remarketing (targeted addressing of visitors or customers of one’s own website on other websites), conversion tracking (measuring the effectiveness of marketing measures), and audience building (determining marketing-relevant target groups or other content distribution).

We are jointly responsible with Facebook Ireland Ltd. for the collection or receipt, as part of a transfer (but not the further processing), of “event data” that Facebook collects via the Facebook Pixel – and similar functions (e.g., interfaces) executed on our online offering – or receives for the following purposes:

- Displaying content/advertising information corresponding to the presumed interests of users;
- Delivering commercial and transactional messages (e.g., addressing users via Facebook Messenger);
- Improving ad delivery and personalizing functions and content (e.g., improving detection of which content or advertising information likely corresponds to users’ interests).

For this purpose, we have concluded an agreement on joint responsibility for data processing with Facebook Ireland, which is available here: [de-facebook.com/legal/terms/page_controller_addendum](https://de.facebook.com/legal/terms/page_controller_addendum).

If Facebook provides us with metrics, analyses, and reports (which are aggregated, i.e., do not contain information about individual users and are anonymous to us), this processing does not take place within the framework of joint responsibility but is based on a data processing agreement (“Data Processing Terms”, “Data Security Terms” and with regard to processing in the USA based on Standard Contractual Clauses (“Facebook EU Data Transfer Addendum”)). According to the Facebook EU Data Transfer

Addendum, processing of your personal data may also take place in EU third countries such as the USA.

For this reason, we only use Facebook Custom Audiences if you also consent to the possible transfers resulting from this. Some third countries where data centers are located or from which processing is conducted do not have an adequate level of data protection based on a decision by the European Commission (a list of so-called safe third countries can be found at ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_de).

For example, the USA is currently considered an unsafe third country. Transfer to unsafe third countries involves risks for your personal data, especially since access by US authorities cannot be ruled out. These risks cannot be excluded solely by concluding Standard Contractual Clauses between MBCY and the processor or controller in the third country. Nevertheless, Facebook uses IP masking (pseudonymization of the IP address) as a security measure in this context as well as the additional measures listed here: www.facebook.com/legal/terms/data_security_terms.

Please consider the above circumstances when giving your consent. The use of Facebook Custom Audiences is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8.

Additional information on the data processing terms for Facebook Custom Audiences can be found here: www.facebook.com/legal/terms/customaudience.

11.5 TikTok Ads & Pixel {{a-tiktok}} If you give us your consent, we use the so-called "TikTok Pixel" from TikTok on this website (for users within the European Economic Area and Switzerland, TikTok is operated by TikTok Technology Limited, 10 Earlsfort Terrace, Dublin, D02 T380, Ireland ("TikTok Ireland")). The TikTok Pixel is a code we have implemented on our website. With this code, if you consent, a connection to TikTok servers is established when you visit our website to track your behavior on our website. For example, if you purchase a product on our website, the TikTok Pixel is triggered and stores your actions on our website in one or more cookies. This may include personal data such as your IP address and email address, as well as other information such as device ID, device type, and operating system transmitted to TikTok. TikTok uses email or other login or device information to identify the users of our website and associate their actions with a TikTok user account.

TikTok uses this data to show its users targeted and personalized advertising and to create interest-based user profiles. The collected data is anonymous to us and not visible, and is only used by us in the context of measuring the effectiveness of advertising campaigns.

If personal data is processed in an insecure third country, this is done according to the provisions under section 11.1. Please consider the aforementioned circumstances when giving your consent.

The use of TikTok Ads / Pixel is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8. TikTok's privacy notice can be found here: www.tiktok.com/legal/page/eea/privacy-policy/de-DE.

11.6 Snap Pixel and Website Custom Audiences {{a-snap}} We use the so-called "Snap Pixel" of the social network Snapchat, operated by Snap Inc., Market Street, Venice, CA 90291, USA ("Snapchat"), to analyze and optimize our website and services.

With the help of the Snap Pixel, Snapchat can identify visitors to our website as a target group for displaying ads (so-called "Snapchat Ads"). Accordingly, we use the Snapchat Pixel to show the Snapchat ads placed by us only to Snapchat users who have shown interest in our website or have certain characteristics (e.g., interests in certain topics or products that are determined based on visited websites) that we transmit to Snapchat (so-called "Custom Audiences").

With the help of the Snap Pixel, we also want to ensure that our Snapchat ads correspond to the potential interest of users and do not cause annoyance. Furthermore, the Snap Pixel allows us to trace the effectiveness of Snapchat advertising campaigns for statistical and market research purposes by seeing whether users were redirected to our website after clicking a Snapchat ad (so-called "conversion").

The processing of data by Snapchat is carried out in accordance with Snapchat's data use policy, which can be accessed here: [Privacy Center - You Control Your Info | Snapchat Privacy](#). The legal basis for data processing is Art. 6 Para. 1 lit. a) GDPR. The cookies required for this service (so-called marketing cookies) are used only with your consent. You can withdraw your consent at any time in our preference center.

11.7 Use of Pinterest Social Plugins

On our site, we use social plugins from the social network Pinterest, which is operated by Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA ("Pinterest"). When you visit a page containing such a plugin, your browser establishes a direct connection to Pinterest's servers. The plugin transmits log data to Pinterest's servers in the USA. All data collected is anonymous to us and does not allow conclusions about the identity of the respective user.

Data collected includes device information (e.g., type, brand), the operating system used, the IP address of the device, the time of access, the type and content of the campaign, the reaction to the respective campaign (e.g., purchase completion, newsletter subscription), as well as device identifiers based on individual device characteristics. This allows us to recognize your device on our website.

We use Pinterest to optimize our online offerings and to appropriately deploy our Pinterest campaigns. A so-called “Pinterest Tag” (an individual code snippet) is used in the advertising campaign. When a Pinterest user sees or clicks on an ad, further actions and target groups that have shown interest are tracked. This enables us to ensure that Pinterest ads are shown only to Pinterest users who have already shown interest in our offering and correspond to the user’s potential interest.

This data helps us measure the conversion of the respective campaign. The data is used for statistical and market research purposes and helps to optimize the campaigns. The legal basis is Art. 6 Para. 1 lit. f) GDPR.

Personal data such as your IP address and email address, as well as other information such as device ID, device type, and operating system, may be transmitted to Pinterest. Pinterest uses email or other login or device information to identify users of our website and associate their actions with a Pinterest user account.

The data is stored in accordance with statutory retention periods and then automatically deleted. If you log into your Pinterest account after visiting our website or visit our website while logged in, Pinterest may store and process this data. Pinterest may associate this data with your Pinterest account and use it for its own advertising purposes.

More information can be found in Pinterest’s privacy policy:

<https://policy.pinterest.com/de/privacy-policy>. You can object to this specific data processing at any time by either disabling the relevant settings under “Personalization” in your Pinterest account at <https://help.pinterest.com/en/article/personalization-and-data> or by clicking on Opt-Out.

11.8 Criteo {{a-criteo}} If you give us your consent, our website uses cookies/advertising IDs for advertising purposes from Criteo, 32 Rue Blanche, 75009 Paris, France. This allows us to show our advertising to visitors interested in our products on partner websites, apps, and emails. Retargeting technologies use cookies or advertising IDs and display ads based on your previous browsing behavior.

We may share information such as technical identifiers from your registration information on our website or our CRM system with trusted advertising partners. This enables your devices and/or environments to be linked, offering you a seamless user experience across the devices and environments you use. The use of Criteo is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8.

Further information on data protection and details about linking capabilities in connection with Criteo can be found in the privacy notice at www.criteo.com/de/privacy.

11.9 ContentSquare {{a-contentsquare}} If you give us your consent, this website collects interaction data of the website visitor in pseudonymized form using

technologies from contentsquare S.A.S. for marketing purposes and to optimize the user-friendliness of the website through the use of cookies.

The information generated by the cookie about your use of the website is generally transmitted to a server of contentsquare and stored there. The IP address transmitted by your browser is not merged with other data from contentsquare. contentsquare shortens your IP address so that your data is processed anonymously.

The following cookies are used by contentsquare:

- `_cs_id`, to recognize returning website users (stored for up to 13 months)
- `_cs_s`, a session cookie that is set at the beginning of the website visit and deleted 30 minutes after the last page call

The use of contentsquare is based on your consent (Art. 6 Para. 1 lit. a) GDPR). You can withdraw your consent as described in section 8.

11.10 Emarsys {{a-emarsys}} If you give us your consent, we use the technologies of Emarsys eMarketing Systems AG, Märzstraße 1, 1150 Vienna, Austria, to personalize our website, the MBCY app, and newsletter content by creating user profiles with the help of the Emarsys Marketing Cloud. For this purpose, all data collected via the Emarsys Web Extend database is captured and stored both by JavaScript commands and cookies.

For visitors subscribed to the newsletter, our website uses JavaScript commands to collect browsing and purchase data. This data is used to enrich your customer profile and provide you with a personalized experience across all our contact points.

Additionally, we store the following personal data in our Emarsys CRM suite and use this data for targeting and profiling within the website, SCAYLE, possibly WhatsApp, newsletter, and possibly via push permissions for the app:

- Mobile phone number
- Email address
- Salutation
- First and last name
- Date of birth
- IP address
- Order data
- Shoe size
- Preferred brands
- Interests

In connection with the use of the Emarsys Marketing Cloud, your data may be matched by Google and Facebook. This circumstance may also result in your data being processed outside Europe. Considering the risks already mentioned (see the sections on Google and Facebook in these privacy notices), we only use Emarsys if you also consent to the possible transfers to insecure third countries. Some third countries where data centers are located or from which processing is carried out do not have an adequate level of data protection based on a decision by the European Commission (a list of so-called safe third countries can be found [here](#)). For example, the USA is currently not considered a safe third country. Transfer to insecure third countries involves risks for your personal data, especially since access by US authorities cannot be ruled out. These risks cannot be excluded solely by concluding Standard Contractual Clauses between us and the processor or controller in the third country. Nevertheless, Google and Facebook implement security measures to protect your personal data (see the sections on Google and Facebook in these privacy notices). Please consider the above circumstances when giving your consent.

We process your data only automatically for the purpose of evaluating certain personal aspects (profiling). We analyze your data using mathematical-statistical procedures to tailor advertising to your individual interests.

After unsubscribing from the newsletter, we will stop sending the newsletter and delete your data unless you also have a customer account on our website, in which case we store your data as long as the customer account exists. However, this only applies if we are not legally obligated to store the data for specific purposes, including the defense against legal claims.

The legal basis for data processing is Art. 6 Para. 1 lit. a) GDPR. You can withdraw your consent as described in section 8.

11.11 ChannelPilot {{a-channelpilot}} If you give us your consent, we use ChannelPilot – an online marketing tool from Channel Pilot Solutions GmbH, Lilienstraße 5-9, Semperhaus C, 20095 Hamburg. ChannelPilot uses cookies for performance analysis of connected online marketing channels such as Google. In addition, your IP address is processed as part of click fraud detection (bot detection), usually for a maximum of 24 hours. The legal basis for data processing is Art. 6 Para. 1 lit. a) GDPR. You can withdraw your consent as described in section 8. Further information on data protection related to ChannelPilot can be found at www.channelpilot.de/datenschutz.

11.12 Conversion Linker {{a-conversion}} If you give us your consent, we use the following Google technology: Google Ads Conversion Tracking within the Google Tag Manager and the Conversion Linker. We use the Conversion Linker to improve the reliability of measuring click data so that conversions can be effectively recorded. When you click on our ads, the URL of the conversion page on our website contains information about the click. If you perform an action that we have tagged as a

conversion (e.g., triggering a Google Ads Conversion Tracking tag), the conversion is linked to the click that brought you to our website based on this information. The Conversion Linker tag automatically captures the information about the ad click in the URLs of the conversion page and stores it in cookies on our website.

If personal data is processed in an insecure third country, this takes place according to the provisions under section 11.1. Please consider the aforementioned circumstances when giving your consent.

The following cookies are used by Google:

- **_gcl_au:** Contains a randomly generated user ID (stored for up to 90 days)
- **_gcl_aw:** This cookie is set when a user clicks on a Google ad and is redirected to the website. It contains information about which ad was clicked, so that successes such as orders or contact inquiries can be assigned to the ad (stored for up to 90 days).

The legal basis for data processing is Art. 6 Para. 1 lit. a) GDPR. You can withdraw your consent as described in section 8.

11.13 Google Enhanced Conversions {{a-enhanced}} If you give us your consent, we use the Enhanced Conversions feature from Google. This allows us to advertise more targeted and efficiently for our website thanks to higher quality data.

Enhanced Conversions is an extension of Google Ads Remarketing. Using the Google Tag Manager, customer-related data that has been previously encrypted as hash values is transmitted to a Google interface. The customer data includes input data in form fields on our website. Google links the data collected this way with any existing usage data from your Google account if you were logged in when interacting with an ad. We never see the information from your Google account. We only receive aggregated conversion reports from Google, which are improved in accuracy by using Enhanced Conversions.

Data collection only takes place after you explicitly consent and complete the input of customer data on our website. Then an automatic assignment to your Google account occurs if you are logged into your Google account when interacting with ads. If you want to prevent this, you can either log out of your Google account or not give consent to the service.

To our knowledge, Google uses the data confidentially and ensures its protection. The policies that apply when using Enhanced Conversions for customer data can be found [here](#). How Google uses your data is described [here](#).

As described under section 11.1, the use of Google Enhanced Conversions may result in the transfer of personal data to third countries (especially to servers of Google LLC in the USA).

The legal basis for processing your personal data is your consent, Art. 6 Para. 1 sentence 1 lit. a GDPR, and, if data stored on the device via tags is processed, also § 25 Para. 1 TDDDG (German Telemedia Data Protection Act).

You can withdraw your consent as described in section 8.

Further information on Google Enhanced Conversions is available here: [Erweiterte Conversions - Google Ads-Hilfe](#).

12. Use and Application of Livereach {{a-livereach}} Users of social media (“users”), especially Instagram, regularly interact with us through their own photo and video posts (“content”). This happens, for example, through a photo or comment tagging our Instagram profile @mbcystore.

Tagged content includes products distributed by us. To search for and make these relevant contents usable for us, we use the software solution of the third party “Livereach,” operated by Gorilla GmbH, Geisbergweg 8, 48143 Münster. When Livereach finds publicly accessible content relevant to us, we contact the user who posted the content. The user then has the opportunity to grant us usage rights by agreeing to the terms of participation.

Content for which usage rights have been granted to us can then be shared by us in accordance with the terms of use on the internet (e.g., in our own webshop) and in print. Along with the content, personal data connected with the original content, such as the username/alias, may also be shared.

The use of Livereach is in our interest to promote our brand and products. The legality of processing personal data arises from Art. 6 Para. 1 lit. b) or f) GDPR, provided you do not conclude or intend to conclude a contract with us.

The privacy policy of the third-party Livereach can be viewed [here](#).

13. Digital Genius {{a-digitalgenius}} Customer service automation is carried out with the support of the third party DigitalGenius, 110 Clifton Street, London EC2A 4HT, United Kingdom. Messages from Salesforce are retrieved using DigitalGenius, transferred for processing to the DigitalGenius platform, and then automatically sent back to the customer via Salesforce. As part of this process, DigitalGenius processes personal data to handle the inquiry. All data is stored on the platform for only 30 days. This service is used to answer customer inquiries faster and more accurately.

The legal basis for processing is Art. 6 Para. 1 lit. b) or f) GDPR, provided you do not conclude or intend to conclude a contract with us. In this case, our overriding legitimate interest lies in providing suitable communication channels.

14. Reviews {{a-reviews}} You have the option to rate the products and services we offer on our website. After placing an order, you will receive an email requesting a review of the purchased product or service. If you do not wish to receive review emails, you can

object to their sending at any time. Details can be found in the section on the right of objection in this privacy notice. Each review email also contains a link allowing you to unsubscribe from future review emails with effect for the future.

The email contains a link to a review form where you can rate the purchased product or service. Reviews can also be submitted directly via a form on the website.

In the course of reviews, your email address, the content entered in the review form, and a so-called device fingerprint (IP address, device ID, and geolocation) are processed. The data is processed to collect and publish the review and to verify its authenticity. Cookies that are strictly necessary to provide the review system are also stored. The review system is provided by Bazaarvoice, Inc. in the USA. Bazaarvoice acts as a processor based on a data processing agreement pursuant to Art. 28 GDPR.

There may be a transfer of personal data to a third country without an adequate level of data protection. In such cases, we ensure that appropriate safeguards according to Art. 46 GDPR are in place for the transfer. Proof of appropriate safeguards (EU standard contractual clauses) will be provided to you upon request at any time.

The legal basis for this data processing is our legitimate interest pursuant to Art. 6 Para. 1 lit. f GDPR in supporting users in selecting products and services by providing authentic reviews from other users. If you have explicitly consented to certain data processing, the legal basis for these is your explicit consent pursuant to Art. 6 Para. 1 lit. a GDPR.

You have the option to have your review deleted at any time. Please contact us using the contact details provided above.

15. Use of Tracking Tools from trbo GmbH {{a-trbo}} Technologies from trbo GmbH, Leopoldstr. 41, 80802 Munich, Home | trbo (hereinafter “trbo”) are used on our website to optimize our online offering, measure the effectiveness of our online advertising, and deliver personalized offers.

If you have given us your consent pursuant to Art. 6 Para. 1 sentence 1 lit. a GDPR, we use tracking tools (especially so-called “cookies” and “web beacons”). The data collected and used in this context is always stored only under a pseudonym (e.g., a random identification number) and is not linked with other personal data about you (e.g., name, address, etc.).

The data is deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. Deletion of data at the user and event level takes place no later than 14 months after collection.

You can revoke your consent for the processing of personal data via trbo for the purposes mentioned above at any time with future effect or change your selected

preferences. To do this, please access the cookie settings again via this link: Cookie Settings.

We have concluded a data processing agreement with trbo, in which we oblige the provider to protect our customers' data and not to pass it on to third parties. Further information on data protection at trbo can be found here: www.trbo.com/datenschutz/.

16. Our Social Media Presences {{a-social}} If our websites contain icons of the following social media providers, we use these for passive linking to the pages of the respective providers.

16.1 Facebook Fanpage {{a-facebookfanpage}} You can find us on Facebook at <https://www.facebook.com/MBCYSTORE>.

For users outside the USA and Canada, Facebook is operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook Ireland"). For users in the USA and Canada, Facebook Inc., 1601 South California Avenue, Palo Alto, CA 94304, USA, operates Facebook.

Even if you are not registered on Facebook and visit our Facebook fan page, Facebook may collect pseudonymous usage data about you. Further information can be found in Facebook's Data Policy at <https://de-de.facebook.com/about/privacy/> and at [Facebook](#). The Data Policy also provides information about the settings options for your Facebook account.

Facebook Ireland may share your data within the Facebook corporate group and with other third parties. This may involve transferring personal data to the USA and other third countries for which no adequacy decision of the EU Commission exists. In such cases, Facebook Ireland will use the EU Commission-approved standard contractual clauses pursuant to Art. 46 Para. 2 lit. c) GDPR. Further information can also be found in Facebook's Data Policy.

We are jointly responsible with Facebook for processing so-called Insights Data when visiting our Facebook fan page. Using this Insights Data, Facebook Ireland analyzes behavior on our Facebook fan page and provides us with this data in anonymized form. For this purpose, we have concluded an agreement with Facebook Ireland on joint responsibility for data processing, which can be viewed here: [Facebook](#). Facebook Ireland undertakes, among other things, to assume primary responsibility under the GDPR for processing Insights Data and to fulfill all obligations under the GDPR concerning the processing of Insights Data. This processing serves our legitimate economic interests in optimizing and tailoring our Facebook fan page, Art. 6 Para. 1 lit. f) GDPR.

We also point out the following: If you visit or like our Facebook fan page as a logged-in Facebook user, Facebook Ireland collects personal data. If you are not registered on

Facebook and visit the Facebook fan page, Facebook Ireland may collect pseudonymous usage data.

Specifically, the following information is collected by Facebook Ireland:

- Visiting a page or a post or video from a page,
- Subscribing or unsubscribing from a page,
- Liking or unliking a page or a post,
- Recommending a page in a post or comment,
- Commenting on, sharing, or reacting to a page post (including the type of reaction),
- Hiding or reporting a page post as spam,
- Clicking on a link from another page on Facebook or from a website outside Facebook that leads to the page,
- Hovering over the name or profile picture of a page to preview page content,
- Clicking on the website, phone number, "Get Directions" button, or another button on a page,
- Information about whether you are logged in via a computer or mobile device while visiting or interacting with a page or its content.

Further information is available in Facebook's data policy at [de-facebook.com/legal/terms/information_about_page_insights_data](https://de.facebook.com/legal/terms/information_about_page_insights_data).

16.2 Instagram {{a-instagram}} Our Instagram presence is accessible under [Instagram \(@mbcystore\)](https://www.instagram.com/mbcystore).

For users outside the USA and Canada, Instagram is operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook Ireland"). For users in the USA and Canada, Facebook Inc., 1601 South California Avenue, Palo Alto, CA 94304, USA, operates Instagram.

Further information can be found in Instagram's privacy policy at help.instagram.com/155833707900388.

16.3 Community Features {{a-community}} When you visit our social media presences (e.g., Facebook fan page), we process certain data about you, e.g., when you interact with our page or account, like or comment on a post, reply, or provide other content. These data processing activities usually take place based on our legitimate interest to provide you with the corresponding functions on our social media presences (Art. 6 Para. 1 lit. f GDPR), as well as on your consent to the respective platform operators (e.g.,

Facebook Ireland, LinkedIn Ireland) (Art. 6 Para. 1 lit. a GDPR), or your contractual relationship with the operators of the respective platforms (Art. 6 Para. 1 lit. b GDPR).

We point out that these areas are publicly accessible and all personal information you enter there or provide when registering can be viewed by others. We cannot control how other users use this information. In particular, we cannot prevent unwanted messages from third parties being sent to you.

Content posted in community areas can be stored indefinitely. If you want us to remove content you have posted, please send us an appropriate email to the address specified above in section 2.

16.4 YouTube {{a-youtube}} Our YouTube presence can be accessed at www.youtube.com/user/solebox. For users within the EEA and Switzerland, Google is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Republic of Ireland, and outside this area by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. For more information, see Google's privacy policy at policies.google.com/privacy?hl=de.

16.5 Spotify {{a-spotify}} Our Spotify presence can be accessed at open.spotify.com/user/solebox. Spotify is operated by Spotify AB, Regeringsgatan 19, 111 53 Stockholm. For more information, see Spotify's privacy policy at www.spotify.com/de/legal/privacy-policy/.

17. Payment Methods {{a-payment}} We process your payment information for the purpose of payment processing, e.g., when you purchase a product through our online shop. Depending on the payment method, we forward your payment information to third parties (e.g., for credit card payments to your credit card provider).

The legal basis for this data processing is Art. 6 Para. 1 lit. b) GDPR, insofar as the processing is necessary for payment processing, as well as Art. 6 Para. 1 lit. f) GDPR, whereby our overriding legitimate interest lies in proper payment processing. In our online shop, we essentially offer the following payment methods:

17.1 Credit Cards {{a-creditcard}} We accept Visa and MasterCard. If you choose this payment method, you will be redirected to an external website (Saferpay) of Six Payment Services AG. There your card data is collected. Any necessary two-factor authentication is handled by Saferpay.

Further information about the Saferpay service can be found here: www.six-payment-services.com/de/site/e-commerce/solutions/paymentsolution.html.

Important security information: In case of misuse of your credit card by unauthorized persons, you have the option to object via your credit card institution. Maximum security: We ensure optimal protection of your personal data in the checkout area of our online shop with the latest SSL encryption. Additionally, for credit card payments, your

entire transaction is secured by the mandatory entry of the card verification number (CVC2 or CVV2). Good to know: These numbers are not stored on the magnetic stripe of your credit card and thus do not appear on payment receipts.

17.2 PayPal {{a-paypal}} For payments via PayPal, your payment data is forwarded to PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg ("PayPal") as part of the payment processing. You are identified by logging into your PayPal account.

Further data protection information can be found in PayPal's privacy policy:

www.paypal.com/de/webapps/mpp/ua/privacy-full.

17.3 Klarna {{a-klarna}} To offer you payment options from Klarna Bank AB (publ) Sweden, we will transmit personal data, such as contact and order data, to Klarna. This allows Klarna to assess whether you can use the payment options offered via Klarna and to tailor the payment options to your needs. General information about Klarna can be found [here](#). Your personal data will be handled by Klarna in accordance with applicable data protection regulations and according to Klarna's privacy policy.

18. Order Process {{a-order}} The following personal data is collected from you during the order process: First name, last name, address, email address, telephone number (optional), as well as data collected through the above-mentioned applications and by processors/service providers.

The associated processing is carried out for the purpose of handling your purchase. The legal basis for processing is Art. 6 Para. 1 lit. b) GDPR. In the case of a purchase in our online shop (contract conclusion), the provision of your personal data is necessary. If you do not provide the aforementioned data, a purchase in our online shop cannot take place. The data is made available to employees responsible for sales and logistics as well as commissioned service providers/processors in this context (see section 28.3). Your data will be stored until the respective purchase contract has been completed and thereafter in anonymized and blocked form as long as statutory retention periods apply regarding the transactions made.

19. Customer Account {{a-account}} On our website, we offer you the possibility to register with personal data ("My Account"). Registration is necessary so that we can set up your customer account. MBCY uses your personal data to manage your MBCY account ("My Account"), including obtaining consents, verifying and confirming the identity of the account user, preventing unauthorized access and use, restricting use by minors, sending messages and notifications, taking measures against misuse of the account, tracking violations of terms of use, and processing the withdrawal of consents.

We also use your personal data to provide you with a personalized online experience and to immediately provide you with information about your purchase. The processing of your personal data for your account is based on your consent when you create a

customer account. The legal basis for processing is Art. 6 Para. 1 lit. a) GDPR. We store your personal data as long as it is necessary to provide the account. Personal data collected and used exclusively for the purpose of providing you with a customer account will be deleted after the account is closed. You can withdraw your consent as described in section 8.

20. Use of Data When you register in our online shop, we use your login credentials (email address and password) to grant you access to your user account and to manage it ("mandatory information"). Mandatory fields required for registration are marked with an asterisk and are necessary to conclude the user agreement. If you do not provide this information, you will not be able to create a user account. The mandatory information also includes: title, first name and last name, and country. You may also voluntarily provide the following information during registration: mobile phone number and date of birth.

We use the mandatory information to authenticate you when logging in and to process any password reset requests. The data you provide during registration or login is processed and used by us in order to (1) verify your authorization to manage the user account; (2) enforce the Online Shop Terms & Conditions and any associated rights and obligations; and (3) contact you with technical or legal notices, updates, security alerts, or other messages related to the administration of your user account. Voluntary information is used to send you personalized communication.

This data processing is justified by the fact that (1) it is necessary for the performance of the contract between you as the data subject and us pursuant to Art. 6 (1) lit. b) GDPR, or (2) we have a legitimate interest in ensuring the functionality and error-free operation of our services, which outweighs your rights and interests in the protection of your personal data in accordance with Art. 6 (1) lit. f) GDPR.

We use the information available to us (mobile phone number, date of birth, transaction data) to personalize features and content and to make suggestions to you. To create personalized products that are individually tailored and relevant to you, we use your connections, preferences, interests, and activities. This is based on the data we collect from and about you, how you use and interact with our products, and the people, places, or things you are connected to or interested in—both on and off our platforms.

We also use the information available to us to develop, test, and improve our products, including conducting surveys and studies as well as testing and troubleshooting new products and features. We use the information we have about you—including your interests, actions, and connections—to select and personalize the advertisements, offers, and other sponsored content we show you.

21. Data Security {{a-datasecurity}} We have implemented technical and organizational security measures to protect your personal data from loss, destruction, manipulation, and unauthorized access. All of our employees are committed to data

secrecy, i.e., the confidential handling of personal data. Our security measures are continuously revised in accordance with technological developments.

22. Automated Individual Decisions or Profiling Measures {{a-profiling}} We do not use automated processing procedures to make decisions or conduct profiling.

23. Data Disclosure {{a-data}} As a rule, your personal data will only be disclosed without your explicit prior consent in the following cases:

If it is necessary to clarify unlawful use of our services or for law enforcement purposes, personal data will be forwarded to law enforcement authorities and, if applicable, to injured third parties. However, this only happens if there are concrete indications of illegal or abusive behavior. Disclosure may also take place if it serves to enforce contracts or other agreements. We are also legally obligated to provide information upon request to certain public authorities. These include law enforcement agencies, authorities enforcing administrative offenses subject to fines, and tax authorities. The disclosure of these data is based on our legitimate interest in combating abuse, prosecuting crimes, and securing, asserting, and enforcing claims (Art. 6 Para. 1 lit. f GDPR) or on the basis of a legal obligation (Art. 6 Para. 1 lit. c GDPR).

Your data will be disclosed to the shipping company commissioned with delivery, insofar as this is necessary to deliver the goods. The shipping company uses your personal data exclusively for the purpose of processing the delivery. For payment processing, we forward your payment data to the credit institution, PayPal, or other payment service providers responsible for the payment. Your data will not be disclosed to other third parties or used for advertising purposes. The legal basis for data processing is Art. 6 Para. 1 lit. b GDPR. Upon full completion of the contract and full payment of the purchase price, your data will be blocked for further use and deleted after expiry of statutory retention periods under tax and commercial law.

We rely on contractually affiliated third-party companies and external service providers ("processors") to provide services. In such cases, personal data will be disclosed to these processors to enable further processing. These processors are carefully selected and regularly reviewed by us to ensure your rights and freedoms are protected. Processors are only permitted to use the data for the purposes specified by us and are contractually obligated to handle your data exclusively in accordance with these privacy notices and applicable data protection laws.

Disclosure of data to processors is based on Art. 28 Para. 1 GDPR. In addition to the processors already mentioned in these privacy notices, we also use the following categories of processors:

- IT service providers
- Cloud service providers

- Software service providers

In the context of administrative processes and the organization of our operations, financial accounting, and compliance with legal obligations such as archiving, we disclose or transmit the same data received in the context of providing our contractual services to tax authorities, advisors such as tax consultants or auditors, as well as other fee offices and payment service providers. The disclosure of these data is based on our legitimate interest in maintaining our business operations, fulfilling our tasks, and providing our services (Art. 6 Para. 1 lit. f GDPR) or on the basis of a legal obligation (Art. 6 Para. 1 lit. c GDPR).

In the course of further developing our business, the structure of Sole Brothers GmbH may change by changing the legal form, founding, acquiring, or selling subsidiaries, business units, or components. In such transactions, customer data and contact persons' data will be disclosed together with the part of the company being transferred. For any disclosure of personal data to third parties to the extent described above, we ensure that this is done in accordance with these privacy notices and applicable data protection laws. Such disclosure of personal data is justified by our legitimate interest in adapting our corporate structure to economic and legal conditions as necessary (Art. 6 Para. 1 lit. f GDPR).

24. Provision of Your Data {{a-yourdata}} You are neither legally nor contractually obligated to provide your data.

However, providing your data is necessary to a certain extent so that we can offer you the functions on our website and our services. In particular, providing your data is required so that we can receive and process your inquiries, enable contract initiation or execution, and so that you can use the community functions related to our social media presences. Additionally, providing your data is necessary to receive and process your application.

If the provision of your data is required, we will indicate this by marking the respective fields as mandatory during entry. Providing further data is voluntary. If mandatory data is not provided, we will not be able to provide the corresponding functions and services; in particular, we will not be able to receive or process your inquiries or enable contract initiation or execution. Furthermore, you will not be able to use the community functions of our social media presences. If you do not provide the required data in connection with your application, we cannot consider your application. If voluntary data is not provided, we may not or may not fully provide the corresponding functions and services.

25. Transfer to Third Countries {{a-transmissionpurp}} We also process data in countries outside the European Economic Area ("EEA"), so-called third countries, or transfer data to recipients in these third countries. This includes the USA. Please note that for some of these third countries, there is currently no adequacy decision by the EU Commission confirming that these countries generally provide an adequate level of data

protection. Therefore, in designing contractual relationships with recipients in third countries, we rely on the EU Commission-approved standard contractual clauses pursuant to Art. 46 Para. 2 lit. c) GDPR or on your consent pursuant to Art. 49 Para. 1 lit. a) GDPR.

For our service providers who process your data on our behalf (“processors”), we conclude standard contractual clauses for the transfer to processors in third countries. For transfers to third parties in third countries, we use the standard contractual clauses for transfers to third parties as controllers. You can request a copy of these standard contractual clauses from the contact details provided in section 2.

26. Change of Purpose {{a-purpose}} Processing your data for purposes other than those described only occurs if permitted by law or if you have consented to the changed purpose of data processing. In the case of further processing for purposes other than those for which the data was originally collected, we will inform you of these other purposes before the further processing and provide you with all other relevant information.

27. Deletion of Your Data {{a-deletion}} Unless otherwise stated in these privacy notices, we delete or anonymize your data as soon as it is no longer necessary for the purposes for which we collected or used it according to the above sections. Further storage only takes place if required for legal reasons, especially for asserting, securing, or defending claims. Storage is based on our legitimate interest in the proper documentation of our business operations and securing our legal positions (Art. 6 Para. 1 lit. f GDPR).

If your data is relevant for contract initiation or execution, storage takes place for the purpose of initiating and executing the respective contractual relationship (Art. 6 Para. 1 lit. b GDPR). If we are legally obligated to retain data, we also store your data beyond the statutory period (Art. 6 Para. 1 lit. c GDPR). Legal retention requirements may result from retention periods under the Commercial Code (HGB) or the Fiscal Code (AO). The retention period according to these regulations generally ranges between 6 and 10 years from the end of the year in which the relevant transaction was completed, e.g., when your inquiry was finally processed or the contract ended.

28. Your Rights as a Data Subject {{a-rights}} You have the following rights regarding the processing of your personal data. To exercise your rights, you may submit a request by post or email to the address provided above in section 2.

28.1 Right of Access {{a-disclosureright}} You have the right to obtain from us, at any time upon request, information about the personal data concerning you that we process, in accordance with Art. 15 GDPR and § 34 BDSG.

28.2 Right to Rectification of Incorrect Data {{a-correctionright}} You have the right to request from us the immediate correction of inaccurate personal data concerning you, pursuant to Art. 16 GDPR.

28.3 Right to Erasure {{a-deletionright}} You have the right to request from us the deletion of your personal data under the conditions described in Art. 17 GDPR and § 35 BDSG. These conditions include, in particular, a right to erasure when the personal data are no longer necessary for the purposes for which they were collected or otherwise processed, in cases of unlawful processing, if you object, or if there is a legal obligation to delete under Union or member state law applicable to us.

28.4 Right to Restriction of Processing {{a-limitationright}} You have the right to request restriction of processing pursuant to Art. 18 GDPR. This right exists, in particular, if the accuracy of the personal data is disputed between you and us during the period required for verification; if you have requested restriction instead of deletion under a right to erasure; if the data is no longer needed for our purposes but you require it to assert, exercise, or defend legal claims; or if the success of an objection you have made is still contested between you and us.

28.5 Right to Data Portability {{a-datatransfer}} You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format pursuant to Art. 20 GDPR.

28.6 Right to Object {{a-objection}} You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you which is carried out based on Art. 6 Para. 1 lit. e) or f) GDPR, pursuant to Art. 21 GDPR. We will then cease processing your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing serves to assert, exercise, or defend legal claims. If we process your personal data for direct marketing purposes, including profiling, you have the right to object to this processing. Upon your objection, we will stop processing.

28.7 Right to Lodge a Complaint {{a-complaint}} You have the right to lodge a complaint with a supervisory authority of your choice. The supervisory authority responsible for North Rhine-Westphalia is:

- Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
- Kavalleriestr 2-4 40213 Düsseldorf
- Phone: 0211/38424-0
- Fax: 0211/38424-10
- Email: poststelle@ldi.nrw.de

29. Data Processing When Exercising Your Rights {{a-dataprocessing}} We would like to point out that if you exercise your rights pursuant to Art. 15 to 22 GDPR, we will process the personal data you provide in this context for the purpose of implementing these rights and to be able to provide proof thereof. These processing activities are based on the legal basis of Art. 6 Para. 1 lit. c) GDPR in conjunction with Art. 15 to 22 GDPR and § 34 Para. 2 BDSG.

30. Updates and Changes {{a-change}} We reserve the right to change and update the privacy notice in accordance with current legal requirements or adaptations in data processing. Please review the privacy notice each time before using our services to stay informed of any changes or updates.

31. Scayle {{a-scayle}} Scayle is a headless eCommerce system of About You SE & Co. KG (Domstraße 10, 20095 Hamburg). MBCY uses the Scayle system to provide the online shop. Information on the data protection provisions can be found at this link: [Data Protection | SCAYLE](#).

31.1 Akamai Technologies, Inc. {{a-akamai}} MBCY uses the service “Akamai” to optimize the delivery of the website and secure our web servers with a Web Application Firewall. The data controller responsible for processing your personal data is: Akamai Technologies GmbH, Parkring 20-22, 85748 Garching, Germany.

The following list contains all (personal) data collected through or when using this service:

- Browser information
- Visited pages
- Date and time of the visit
- Operating system
- IP address

The legal basis for processing your personal data is Article 6(1)(f) GDPR, balancing of interests, based on our legitimate interest in ensuring the constant availability of our website. The place of processing is the European Union and the United States of America (Currently, there is no adequacy decision by the European Commission stating that the USA generally provides an adequate level of protection. If the protection level for personal data is not guaranteed at a level equivalent to the European standard, the transfer of personal data is carried out by appropriate safeguards and on the basis of EU standard contractual clauses to protect personal data; as an additional guarantee, personal data processed in connection with Akamai is pseudonymized and therefore particularly protected).

The lifespan of the cookies used lasts until the end of the respective session. The personal data collected with their help will be deleted when it is no longer needed for processing.

To read the data processor's privacy policy, click [here](#).

31.2 Amazon Web Services Inc. {{a-amazon}} Amazon Web Services (AWS) is a cloud computing service offered by [Amazon.com](#). This service enables companies and organizations to operate IT infrastructure and applications in the cloud. The provider is Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg (hereinafter referred to as "AWS").

More detailed information can be found here: [AWS GDPR Data Processing Addendum – now part of the Service Terms | Amazon Web Services](#). Further information on the processing of personal data can be found in the AWS privacy notice: ([Data Protection](#)).

The use of the AWS service is subject to your consent (Article 6(1)(a) GDPR). The legal basis for the use of the AWS service is Article 6(1)(f) GDPR. We have a legitimate interest in the reliable presentation of our website. If we have obtained your consent to process personal data, the processing takes place exclusively based on Article 6(1)(a) GDPR and § 25 Para. 1 TDDDG (Telecommunications and Telemedia Data Protection Act) if the consent includes the storage of cookies or access to information on the user's device (e.g., scanning device fingerprints). This consent can be revoked at any time.

31.3 Datadog Inc. {{a-datadog}} Datadog is a service focused on monitoring real users and performance. The data processing serves to analyze these websites and their visitors. On behalf of the operator of this website, Datadog uses the collected information to evaluate website usage, monitor the performance of this website, application screens, user actions, network requests, and the performance of our front-end code, monitor ongoing errors and issues, and generate reports on website activities. The data controller is Datadog, Inc (620 8th Avenue, Floor 45, New York, NY 10018, USA).

Among other things, the following information may be collected:

- IP address
- Date and time of page visit
- User navigation (click path)
- Information about the browser and device you use
- Visited pages
- Link URL (website from which you accessed our website)
- Location data
- Shopping activities

Datadog uses technologies such as cookies, browser web storage, and tracking pixels to analyze your use of the website. The processing of personal data, particularly setting cookies, only takes place with your consent. More information about terms of use and personal data protection can be found here: [Privacy Policy | Datadog](#).

31.4 New Relic Inc. {{a-newrelic}} NewRelic (New Relic, Inc., 188 Spear St. Suite 1200, 94105 San Francisco, USA) is a web service for analyzing website usage. The cookie transmits information, including your IP address, to a New Relic server in the USA. The processing of personal data takes place according to Art. 6 Para. 1 lit. f) GDPR for the purpose of optimal presentation of our online offering. NewRelic uses the stored information to evaluate website usage, compile reports for website operators, and provide other services related to website and internet usage. More information on data protection can be found here: [Terms & Conditions](#).

31.5 Functional Software, Inc. {{a-functional}} Functional Software, Inc. (132 Hawthorne Street, San Francisco, California 94107) provides a platform for reporting software errors and outages, allowing us to retrospectively analyze and improve our website. Please note that this involves the transfer of personal data to the USA, which is considered a transfer of personal data to a third country. The processing of personal data is carried out in accordance with the provisions of Article 6(1)(f) GDPR.

Information about the protection of personal data can be found at the following link: [Privacy Policy 3.3.1 \(31 May 2024\)](#).

31.6 Cloudflare, Inc. {{a-cloudflare}} This website uses a so-called Content Delivery Network (“CDN”) of the technology service provider Cloudflare Inc., 101 Townsend St. San Francisco, CA 94107, USA (“Cloudflare”). A Content Delivery Network is an online service that helps deliver large media files (such as graphics, page content, or scripts) through a network of regionally distributed and internet-connected servers. The use of Cloudflare’s CDN helps optimize the loading speeds of this website and contributes to improving performance and stability.

For this purpose, personal data may be processed in server log files by Cloudflare. Cloudflare also collects statistical data about visits to this website. The data collected include:

- Name of the accessed website, accessed file and URL
- Date and time of access
- Transferred data volume
- HTTP status code (e.g., 200, 404)
- Browser type, version, and language settings
- Operating system and its version

- Referrer URL
- IP address of the requesting device
- Requesting provider
- Geographical location data
- Information on security risks (e.g., suspicious activity or bot detection)
- TLS/SSL information for secure connection

The data agreement is based on standard contractual clauses, which can be found here: <https://www.cloudflare.com/cloudflare-customer-scc/> Further information about Cloudflare's privacy policies can be found here: [Privacy Policy Cloudflare | Cloudflare.](#)

The company holds a certification under the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the USA that aims to ensure compliance with European data protection standards for data processing in the USA. Every company certified under the DPF commits to adhering to these data protection standards. More information can be obtained from the provider at the following link: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?contact=true&id=a2zt0000000GnZKAA0&status=Active>

Additional information applies when using Cloudflare Turnstile: Cloudflare Turnstile is used to verify whether data input on this website is performed by a human or an automated program. To do so, Turnstile analyzes the behavior of the website visitor based on various characteristics. This analysis begins automatically as soon as a visitor accesses a website with Turnstile enabled. Turnstile evaluates various information for the analysis (e.g., IP address, visitor's dwell time on the website, or mouse movements made by the user). The data collected during the analysis is forwarded to Cloudflare. Data transfer between your browser and our servers is analyzed on Cloudflare's servers to defend against attacks. Cloudflare uses cookies to enable your access to our website. The use of Cloudflare Turnstile is in the interest of secure use of our internet presence and defense against harmful external attacks. The storage and analysis of the data is based on Art. 6 Para. 1 lit. f) GDPR and § 25 Para. 2 No. 2 TDDDG.

32. Google Maps {{a-googlemaps}} This site uses the map service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. To use the functions of Google Maps, it is necessary to store your IP address. This information is usually transmitted to a Google server in the USA and stored there. The provider of this site has no influence on this data transmission. When Google Maps is activated, Google may use Google Web Fonts for uniform font display purposes. When calling up Google Maps, your browser loads the necessary web fonts into your browser cache to correctly display texts and fonts. The use of Google Maps is in the interest of appealing presentation of our physical stores and easy findability of the locations we list

on the website. This constitutes a legitimate interest within the meaning of Art. 6 Para. 1 lit. f GDPR. If appropriate consent has been obtained, processing is carried out exclusively on the basis of Art. 6 Para. 1 lit. a GDPR; the consent can be revoked at any time. The data transmission to the USA is based on the EU Commission's standard contractual clauses. Details can be found here: [Google Maps/Earth Additional Terms of Service – Google](#) More information on handling user data can be found in Google's privacy policy: [Privacy Policy – Privacy & Terms – Google](#)

33. RTB House

1. Below you will find a notice published in the customer's privacy policy regarding the processing of personal data by RTB House for the purpose of conducting online advertising campaigns on your behalf. "For the execution of personalized advertising campaigns, MBCY processes certain data about users' online activities on this website. These data may include online identifiers (e.g., cookie ID / mobile advertising ID), information about specific pages visited, products viewed or added to the shopping cart along with timestamps, and purchased products, as well as technical device and browser details. MBCY commissions RTB House GmbH, an advertising technology company, as a third-party subcontractor to conduct advertising campaigns based on these data and to display personalized ads to users. If these data constitute 'personal data' under the GDPR, MBCY acts as controller and RTB House GmbH as processor. Further information about RTB House retargeting technology can be found at: <https://www.rtbhouse.com/privacy-center/>."
2. Please note that, besides including the above information in your privacy policy, you must also comply with all obligations arising from applicable laws to ensure the lawfulness of collecting, processing, and sharing user data. These obligations particularly include:
 1. Obtaining valid user consent for storing and accessing information on the user's device using cookie-based or other tracking technologies (according to the ePrivacy Directive);
 2. Obtaining a valid legal basis for processing the personal data collected on the website through such tracking technologies for the purpose of later ad personalization, including the creation of a personalized advertising profile, as well as for transferring these data to RTB House as processor for the purposes described above (pursuant to Article 6 GDPR);
 3. Properly informing your website users about the specific aspects of processing their data (in accordance with Article 13 GDPR).
3. Considering these obligations, we strongly recommend consulting a professional law firm to create or review your website notices and privacy policies and to

closely monitor the application of data protection laws on online advertising in your jurisdiction, especially through your local supervisory authorities.

4. Please also note that your company can integrate a registered Consent Management Platform (CMP) into the IAB Transparency & Consent Framework (TCF) to facilitate obtaining a valid legal basis for processing personal data for ad personalization purposes. More information about the IAB TCF initiative and its benefits for website operators can be found at:
<https://advertisingconsent.eu/publishers/>

The legal basis for this data processing is your consent pursuant to Art. 6 Para. 1 Sentence 1 lit. a GDPR and § 25 Para. 1 Sentence 1 TDDDG, which you may revoke at any time.

34. Use of AWIN Sole Brothers GmbH processes your personal data in order to run affiliate marketing campaigns. This allows us to track which third-party operators of websites, apps, and other technologies have referred potential customers to our websites and apps, and to pay them a commission for these referrals. We do this based on our legitimate interest in conducting a performance-based online advertising campaign.

We work with Awin, who supports us in running these affiliate marketing campaigns. You can find Awin's privacy policy [here](#), which includes information about your rights regarding data processing by Awin.

In some cases, Awin may create a limited profile that relates to you, but which does not allow any conclusions to be drawn about your identity, online behavior, or other personal characteristics. This profile is used solely to understand whether a referral was initiated on one device and completed on another.

In some instances, Awin and intermediaries referring potential customers may receive and process your personal data in the context of affiliate marketing campaigns with us. We also receive personal data from Awin and the referrers of potential customers, which can be categorized as follows: cookie data, data related to the website, app, or other technology from which a potential customer was referred, and technical information about your device or a uniquely assigned ID for your transaction, which Awin can link to the aforementioned data in its system.

You may revoke your consent in accordance with section 8.

35. Use of Clarity This website uses the Clarity tool to gain insights into user behavior and to optimize the user experience. Clarity is an analytics and diagnostics tool from Microsoft that provides detailed information on user behavior by collecting data about interactions on the website. This includes clicks, scrolling behavior, and time spent on the site.

Clarity does not collect any personal data, as this is anonymized before processing. The information collected is used exclusively for analysis and optimization purposes. Data is processed on the basis of our legitimate interest under Art. 6 (1) lit. f GDPR in improving the functionality and user-friendliness of our website.

For more information on how Clarity uses data and to view Microsoft Clarity's privacy policy, please visit the official Microsoft Clarity website. You also have the option to disable Clarity's data processing via your browser settings or by revoking your consent.