Privacy Policy

Scope of Application

This privacy policy applies to all personal data processed by our company and to all personal data processed by companies we commission (processors). By personal data, we mean information within the meaning of Article 4 No. 1 of the GDPR, such as a person's name, email address, and postal address.

The processing of personal data enables us to offer and invoice our services and products, whether online or offline. This privacy policy applies to:

- All online presences (websites, online shops) operated by us
- Social media presences and email communication
- Mobile apps for smartphones and other devices

In short: This privacy policy applies to all areas where personal data is systematically processed within our company through the mentioned channels. If we engage in legal relationships with you outside of these channels, we will inform you separately where necessary.

Legal Bases

In this privacy policy, we provide transparent information about the legal principles and regulations that allow us to process personal data under the General Data Protection Regulation (GDPR).

Regarding EU law, we refer to **Regulation (EU) 2016/679 of the European Parliament** and of the Council of April 27, 2016. You can access this regulation online at EUR-Lex, the gateway to EU law, at https://eur-lex.europa.eu.

We only process your data if at least one of the following conditions applies:

- 1. **Consent (Article 6(1)(a) GDPR):** You have given us your consent to process your data for a specific purpose. An example would be storing the data you entered in a contact form.
- 2. **Contract (Article 6(1)(b) GDPR):** We process your data to fulfill a contract or precontractual obligations. For example, if we enter into a purchase contract with you, we require certain personal information.
- 3. **Legal Obligation (Article 6(1)(c) GDPR):** If we are subject to a legal obligation, we process your data. For instance, we are legally required to keep invoices for accounting purposes, which usually contain personal data.

4. **Legitimate Interests (Article 6(1)(f) GDPR):** If there are legitimate interests that do not restrict your fundamental rights, we reserve the right to process personal data. For example, we must process certain data to operate our website securely and efficiently.

Other legal bases, such as the performance of tasks in the public interest or the protection of vital interests, generally do not apply to us. If such a legal basis should become relevant, it will be indicated at the appropriate point.

In addition to the EU regulation, national laws also apply:

- In Austria, this is the Data Protection Act (DSG).
- In Germany, this is the Federal Data Protection Act (BDSG).

If additional regional or national laws apply, we will inform you in the following sections.

Contact Information of the Responsible Party

If you have any questions about data protection or the processing of personal data, you can find the contact details of the responsible party below, in accordance with Article 4(7) GDPR:

MS Ventures GmbH

Marco Seitner

Inselstr. 11, 6900 Bregenz, Austria

Email: info@ms-ventures.at Phone: +43 5574 231260

Imprint: https://ms-ventures.at/impressum/

Data Retention Period

As a general rule, we only store personal data for as long as it is absolutely necessary to provide our services and products. This means that we delete personal data as soon as the reason for processing it no longer exists.

In some cases, we are legally required to retain certain data even after the original purpose has ceased to exist—for example, for accounting purposes.

If you request the deletion of your data or revoke your consent to data processing, we will delete the data as soon as possible, provided there is no legal obligation to retain it.

If we have additional information on specific retention periods, we will inform you in the respective sections below.

Your Rights Under the GDPR

According to Articles 13 and 14 of the GDPR, you have the following rights to ensure fair and transparent data processing:

- Right to Information (Article 15 GDPR): You have the right to know whether we
 process your data. If so, you are entitled to a copy of the data and the following
 information:
 - The purpose of processing
 - The categories of data being processed
 - The recipients of the data and, if transferred to third countries, how security is ensured
 - o The retention period of the data
 - The right to rectification, deletion, restriction of processing, and the right to object
 - The right to lodge a complaint with a supervisory authority
 - o The source of the data, if we did not collect it from you
 - Whether automated decision-making (profiling) takes place
- **Right to Rectification (Article 16 GDPR):** If your data is incorrect, you have the right to request corrections.
- Right to Erasure (Article 17 GDPR): You can request the deletion of your data.
- Right to Restriction of Processing (Article 18 GDPR): You may request that we
 only store your data but not use it further.
- **Right to Data Portability (Article 20 GDPR):** We will provide your data in a commonly used format upon request.
- Right to Object (Article 21 GDPR):
 - If data processing is based on Article 6(1)(e) GDPR (public interest) or Article 6(1)(f) GDPR (legitimate interest), you can object to the processing. We will then assess whether we can legally comply with your objection.
 - If data is used for direct marketing, you can object at any time. We will then stop using your data for marketing purposes.
 - If data is used for profiling, you can object at any time, and we will stop using your data for this purpose.
- Right Not to Be Subject to Automated Decision-Making (Article 22 GDPR):
 Under certain conditions, you have the right not to be subjected to decisions based solely on automated processing, including profiling.

• **Right to Lodge a Complaint (Article 77 GDPR):** If you believe your data is being processed unlawfully, you can lodge a complaint with a supervisory authority.

In short: You have rights—don't hesitate to contact us if needed!

For Austria, the relevant supervisory authority is:

Austrian Data Protection Authority

Head: Dr. Matthias Schmidl

Address: Barichgasse 40-42, 1030 Vienna

Phone: **+43 1 52 152-0** Email: **dsb@dsb.gv.at**

Website: https://www.dsb.gv.at/

Cookies

What Are Cookies?

Our website uses **HTTP cookies** to store user-specific data. Below, we explain what cookies are and why they are used to help you better understand this privacy policy.

Whenever you browse the internet, you use a browser such as Chrome, Safari, Firefox, Internet Explorer, or Microsoft Edge. Most websites store small text files in your browser—these are called **cookies**.

Cookies store user data such as language preferences or personal site settings. The next time you visit, your browser sends these "user-specific" details back to the website, allowing it to recognize you and apply your preferred settings.

Cookies can be classified into four types:

- 1. **Essential Cookies:** Necessary for basic website functionality (e.g., keeping items in a shopping cart).
- 2. **Performance Cookies:** Collect data on user behavior and potential errors.
- 3. Functional Cookies: Improve user experience (e.g., saving form entries).
- 4. Advertising Cookies: Used for personalized marketing.

For more technical details, visit <u>IETF RFC6265</u>.

Which data is processed? Cookies serve as small helpers for various tasks.

Unfortunately, the data stored in cookies cannot be generalized, but we will inform you about the processed and stored data in this privacy policy.

Storage duration of cookies The storage duration depends on the respective cookie and is specified below. Some cookies are deleted in less than an hour, while others may remain stored on a computer for several years. You also have control over the storage

duration. You can manually delete all cookies at any time via your browser (see "Right to Object" below). Furthermore, cookies based on consent are deleted at the latest after you revoke your consent, without affecting the lawfulness of storage up to that point.

Right to Object – How can I delete cookies? You decide whether and how you want to use cookies. Regardless of the service or website they originate from, you always have the option to delete, deactivate, or allow cookies only partially. For example, you can block third-party cookies while allowing all other cookies. If you want to check which cookies are stored in your browser, modify your cookie settings, or delete them, you can do so in your browser settings:

• Chrome: Delete, enable, and manage cookies in Chrome

Safari: Manage cookies and website data in Safari

Firefox: Delete cookies to remove website-stored data

Internet Explorer: Delete and manage cookies

Microsoft Edge: Delete and manage cookies

If you generally do not want cookies, you can set up your browser to notify you whenever a cookie is about to be set. This allows you to decide on a case-by-case basis whether to allow the cookie. The procedure varies depending on the browser. The best way to find instructions is to search Google with the term "delete cookies Chrome" or "disable cookies Chrome" for a Chrome browser.

Legal basis Since 2009, so-called "cookie regulations" have existed, requiring user consent (Article 6 (1) (a) GDPR) for storing cookies. However, EU countries have different implementations of these regulations. In Austria, the directive was implemented in § 165 (3) of the Telecommunications Act (2021). In Germany, the regulations were not incorporated as national law; instead, they were implemented mainly in § 15 (3) of the Telemedia Act (TMG), which was replaced by the Digital Services Act (DDG) in May 2024. For essential cookies, even without consent, there are legitimate interests (Article 6 (1) (f) GDPR), which are mostly of an economic nature. We want to provide visitors with a pleasant user experience, for which certain cookies are essential. Where non-essential cookies are used, this is done only with your consent. The legal basis is therefore Article 6 (1) (a) GDPR. The following sections provide more details about the use of cookies if applied software utilizes them.

Website Builders Introduction

What are website builders? We use a website builder for our site. These are special forms of content management systems (CMS) that allow website operators to create a website easily without programming knowledge. Many web hosts also offer website

builders. Using such a system may involve collecting, storing, and processing personal data. This privacy text provides general information about data processing through website builders. More details can be found in the provider's privacy policy.

Why do we use website builders? The main advantage of a website builder is its ease of use. We aim to offer you a clear, simple, and structured website that we can manage and maintain ourselves without external assistance. A website builder offers many helpful functions that we can use without programming knowledge, allowing us to design our web presence as we wish and provide you with an informative and pleasant experience on our website.

Which data is stored by a website builder? The exact data stored depends on the website builder used. Each provider processes and collects different visitor data. However, typical technical usage information includes the operating system, browser, screen resolution, language and keyboard settings, hosting provider, and the date of your visit. Additionally, tracking data (e.g., browser activity, clickstream activity, session heatmaps, etc.) may be processed. Personal data such as contact details (email address, phone number if provided), IP address, and geographic location data may also be stored. The provider's privacy policy specifies which data is stored in detail.

How long and where is the data stored? We provide information about data processing duration below concerning the specific website builder used, if available. Detailed information can be found in the provider's privacy policy. In general, we process personal data only as long as necessary to provide our services and products. The provider may store your data according to their own policies, over which we have no control.

Right to Object You always have the right to access, correct, and delete your personal data. If you have any questions, you can contact the responsible parties of the website builder used. Contact details can be found in our privacy policy or on the provider's website. Cookies used by the provider for functionality can be deleted, deactivated, or managed in your browser settings. However, this may affect the website's functionality.

Legal basis We have a legitimate interest in using a website builder to optimize our online service and present it efficiently and attractively. The legal basis for this is Article 6 (1) (f) GDPR (Legitimate Interests). We only use the builder if you have given consent. If data processing is not essential for operating the website, data is processed only based on your consent, especially tracking activities. The legal basis is therefore Article 6 (1) (a) GDPR.

What is WordPress? We use the well-known content management system WordPress.com, provided by Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA. Since its launch in 2003, WordPress has become one of the world's most popular CMS platforms. It helps us design and display website content (text, audio, video) in an organized manner. Using WordPress may involve collecting, storing, and processing personal data. This mainly includes technical data such as the operating system, browser, screen resolution, or hosting provider. However, personal data such as IP address, geographic data, or contact details may also be processed.

Why do we use WordPress? Although we have many strengths, programming is not one of them. Still, we want a functional and visually appealing website that we can manage ourselves. WordPress allows us to operate our site easily without programming knowledge. If technical issues arise, we rely on experts familiar with HTML, PHP, CSS, etc. Thanks to WordPress's ease of use and extensive features, we can design our web presence as desired and provide a user-friendly experience.

Which data does WordPress process? Non-personal data includes browser activity, clickstream data, session heatmaps, computer data, operating system, browser, screen resolution, language and keyboard settings, internet provider, and visit date. Personal data includes contact details (email or phone, if provided), IP address, and geographic location. WordPress may also use cookies to collect behavioral data on our website, such as frequently visited pages, session duration, and bounce rates. WordPress can also use pixel tags (web beacons) to identify users and personalize advertising.

More details on WordPress's privacy policy can be found at: Automattic Privacy Policy.

What Data is Stored by Web Design Tools?

When you visit our website, web design elements may be embedded in our pages that can also process data. The exact data that is processed strongly depends on the tools used. Below, you can see exactly which tools we use on our website. For more detailed information about data processing, we also recommend reading the respective privacy policies of the tools used. These usually specify which data is processed, whether cookies are used, and how long the data is stored. For example, fonts like Google Fonts automatically transmit information such as language settings, IP address, browser version, browser screen resolution, and browser name to Google servers.

Duration of Data Processing

The duration of data processing is highly individual and depends on the web design elements used. If cookies are used, storage duration can range from just one minute to several years. Please inform yourself accordingly. We recommend reading our general section on cookies as well as the privacy policies of the tools used. These typically specify which cookies are used and what information is stored in them. Google Font

files, for example, are stored for one year to improve website loading times. In general, data is only stored for as long as necessary to provide the service. If required by law, data may be stored for longer periods.

Right to Object

You have the right to revoke your consent to the use of cookies or third-party providers at any time. This can be done through our cookie management tool or via other opt-out functions. You can also prevent data collection by cookies by managing, disabling, or deleting cookies in your browser settings. However, some data (mostly related to fonts) cannot be easily deleted because they are automatically collected and transmitted to a third-party provider (e.g., Google) when a page is accessed. In such cases, please contact the support of the respective provider. For Google, you can reach support at https://support.google.com/?hl=en.

Legal Basis

If you have consented to the use of web design tools, the legal basis for data processing is this consent. According to Art. 6(1)(a) GDPR (Consent), this consent serves as the legal basis for processing personal data, as may occur when using web design tools. Additionally, we have a legitimate interest in improving the web design of our website to provide you with a professional and appealing web experience. The corresponding legal basis is Art. 6(1)(f) GDPR (Legitimate Interests). However, we only use web design tools with your consent, which we want to emphasize once again here.

For information on specific web design tools, please refer to the following sections.

Google Fonts Local Privacy Policy

Our website uses Google Fonts from Google Inc. For users in the European region, Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland) is responsible. We have integrated Google Fonts locally, meaning on our web server and not on Google's servers. This ensures no connection to Google's servers and thus no data transmission or storage.

What are Google Fonts?

Google Fonts, previously known as Google Web Fonts, is an interactive directory of over 800 fonts provided by Google for free. Google Fonts allow the use of fonts without having to upload them to your own server. To prevent any data transmission to Google servers, we have downloaded the fonts and stored them on our own server. This ensures compliance with data protection regulations and prevents data transfer to Google Fonts.

Explanation of Used Terms

We strive to make our privacy policy as clear and understandable as possible. However, technical and legal topics can be complex. Sometimes, it is necessary to use legal terms (e.g., personal data) or technical expressions (e.g., cookies, IP address). We do not want to use these terms without explanation.

Below is an alphabetical list of important terms used in our privacy policy that may not have been explained in detail. If these terms are derived from the GDPR and are official definitions, we will also provide the original GDPR texts and add our explanations if necessary.

Processor

Definition according to Article 4 of the GDPR: "Processor" means a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller.

Explanation: As a company and website owner, we are responsible for all data we process. In addition to the controller, there may be so-called processors. These include any company or individual that processes personal data on our behalf, such as tax consultants, hosting providers, cloud providers, payment service providers, or large companies like Google or Microsoft.

Consent

Definition according to Article 4 of the GDPR: "Consent" of the data subject means any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

Explanation: Typically, consent is given through a cookie consent tool on websites. When visiting a website for the first time, you usually see a banner asking for your consent. Often, you can set individual preferences to decide which data processing you allow and which you do not. If you do not consent, your personal data may not be processed. Consent can also be given in writing rather than through a tool.

Personal Data

Definition according to Article 4 of the GDPR: "Personal data" means any information relating to an identified or identifiable natural person ("data subject").

Explanation: Personal data includes any data that can identify you as a person, such as:

- Name
- Address
- Email address

- Postal address
- Phone number
- Date of birth
- Identification numbers (e.g., Social Security Number, Tax ID, Passport Number, Student ID)
- Bank details (e.g., account number, credit information, account balance)

The European Court of Justice (ECJ) has also ruled that IP addresses qualify as personal data. IT experts can use an IP address to determine a device's approximate location and identify the subscriber. Therefore, storing an IP address requires a legal basis under the GDPR.

Profiling

Definition according to Article 4 of the GDPR: "Profiling" means any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person.

Explanation: Profiling involves collecting various information about a person to learn more about them. In the web sector, profiling is commonly used for advertising or credit assessments. Web analytics and advertising tools collect data on your behavior and interests on a website, creating a user profile that helps target advertisements more effectively.

Controller

Definition according to Article 4 of the GDPR: "Controller" means the natural or legal person, public authority, agency, or other body that determines the purposes and means of the processing of personal data.

Explanation: In our case, we are responsible for processing your personal data and are therefore the "controller." If we share collected data with service providers for processing, they are considered "processors," and a "data processing agreement (DPA)" must be signed.

Processing

Definition according to Article 4 of the GDPR: "Processing" means any operation performed on personal data, such as collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, alignment, restriction, erasure, or destruction.

Note: When we refer to processing in our privacy policy, we mean any form of data handling, including collection, storage, and processing.

All texts are copyright protected.

Source: Privacy Policy created with the Data Protection Generator for Austria by AdSimple.

Use of SalesViewer® technology:

This website uses SalesViewer® technology from SalesViewer® GmbH on the basis of the website operator's legitimate interests (Section 6 paragraph 1 lit.f GDPR) in order to collect and save data on marketing, market research and optimisation purposes.

In order to do this, a javascript based code, which serves to capture company-related data and according website usage. The data captured using this technology are encrypted in a non-retrievable one-way function (so-called hashing). The data is immediately pseudonymised and is not used to identify website visitors personally

The data stored by SalesViewer® will be deleted as soon as they are no longer required for their intended purpose and there are no legal obligations to retain them.

The data recording and storage can be repealed at any time with immediate effect for the future, by clicking on https://www.salesviewer.com/opt-out in order to prevent SalesViewer® from recording your data. In this case, an opt-out cookie for this website is saved on your device. If you delete the cookies in the browser, you will need to click on this link again.