



## Data Protection Statement as well as Information for the Data Subjects in accordance with Articles 13 and 14 of the EU General Data Protection Regulation

(2 October 2020)

### I. General Information

#### 1. Scope of application and general information on data processing

- 1.1 This data protection notice applies to the processing of personal data by OLYMP Stores KG and OLYMP Digital KG, which each have their address at Höpfigheimer Straße 19, 74321 Bietigheim-Bissingen, Germany.
- 1.2 The processing of personal data of the customers of our OLYMP stores is governed by the general data protection notice in this data protection statement as well as by the particular details provided in Part II. The controller within the meaning of Art. 4 EU General Data Protection Regulation (GDPR) is **OLYMP Stores KG, Höpfigheimer Str. 19, 74321 Bietigheim-Bissingen, [datenschutz@olymp.com](mailto:datenschutz@olymp.com)**.
- 1.3 Use of the website [www.olymp.com](http://www.olymp.com) and of the services and offers provided thereon is governed by the general data protection notice in this data protection statement as well as by the special terms and conditions in Part III. This website is offered by **OLYMP Digital KG, Höpfigheimer Str. 19, 74321 Bietigheim-Bissingen, [shop@olymp.com](mailto:shop@olymp.com)**, which acts as the controller within the meaning of Art. 4 GDPR. Exceptions are explained in this data protection statement.
- 1.4 Where you have consented to having your **data processed jointly by OLYMP Stores KG and OLYMP Digital KG**, or there is some other legal basis for the joint processing of your data by these two companies, both companies are joint controllers within the meaning of Art. 26 GDPR. The general data protection notice, in particular Section 3, applies.
- 1.5 You can contact our Data Protection Officer by email at [datenschutz@olymp.com](mailto:datenschutz@olymp.com) or by writing to our postal address, adding the words: "The Data Protection Office".
- 1.6 The protection of your personal data is important to us, above all for safeguarding your right of privacy in connection with the processing and use of this information. Personal data are processed in accordance with the provisions of the GDPR.

#### 2. Duration of storage

Your data will be used only as long as necessary for the existing customer relationship, unless you have given us your consent, or we have a legitimate interest in further processing. In these cases, we shall process your data until you revoke your consent or object to our legitimate interests. Regardless of the



foregoing, we shall, in certain circumstances, be obliged under provisions of commercial and fiscal law to store your address details, payment details and order details for a period of ten years.

### **3. OLYMP Stores KG and OLYMP Digital KG as joint controllers**

3.1 For the cases described in subsections 3.2 to 3.4, where OLYMP Stores KG and OLYMP Digital KG are joint controllers for the data processing, an agreement under Art. 26 (1), sentence 2 GDPR has been concluded. This agreement essentially provides as follows:

**OLYMP Stores KG and OLYMP Digital KG closely collaborate in the course of the processing of customer data. This also concerns the processing of your personal data. The Parties have jointly defined the purposes and means of this processing. Therefore, they are, under Art. 26 GDPR, jointly responsible for the protection of your personal data as regards storage, organisation and use.**

**In this respect, one of the Parties will collect the data and store the data in the joint customer data pool for further use. The Parties will use the data only within the scope permissible by law for handling contracts, taking steps prior to entering into a contract, for marketing purposes and/or for analysing and improving their services offered.**

**As part of their joint responsibility under data protection law, OLYMP Stores KG and OLYMP Digital KG have agreed upon which of them will comply with which duties under the GDPR. In particular, this concerns exercise of the data subjects' rights and compliance with the duties to inform under Articles 13 and 14 GDPR.**

**OLYMP Stores KG and OLYMP Digital KG shall make available to you, as the data subject, the information required pursuant to Articles 13 and 14 of the GDPR in a precise, transparent, comprehensible and easily accessible form in clear and simple language free of charge. Essentially, the information will be made available by means of this data protection statement. The Parties will, without delay, mutually inform each other of legal positions asserted by data subjects. They will make available to each other all information necessary for answering any requests for information. Data privacy rights may be asserted in relation to both Parties. The Parties have agreed that you, as the data subject, will receive the information from the body where the rights were asserted.**

### **3.2 OLYMP INSIDER**

Where you have registered for OLYMP INSIDER, we shall use your data in accordance with the following consent (Art. 6 (1) a) GDPR):

**I hereby agree that the data provided by me will be processed by OLYMP Stores KG and OLYMP Digital KG (hereinafter jointly "OLYMP") for marketing, information and market research purposes.**

**For carrying out certain services, my data will be passed on to commissioned companies in the course of the rendering of the services. I can gather from OLYMP's data protection statement detailed information on data protection and the safeguarding of the data subjects' rights in accordance with**

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**Art. 13 GDPR. The data protection statement is on display in printed form at the OLYMP store and can also be viewed at [www.olymp.com/datenschutz](http://www.olymp.com/datenschutz).**

**By marking these fields with a cross, I agree to receiving by**

**email    telephone    SMS**

**information on products, exclusive offers and campaigns, current trends and styles, invitations to participate in customer surveys and product ratings, as well as news concerning OLYMP.**

**Furthermore, I agree to receiving by post information on products, exclusive offers and campaigns, current trends and styles, invitations to participate in customer surveys and product ratings, as well as news concerning OLYMP.**

**I hereby consent to processing for the aforementioned purposes by OLYMP. I consent that OLYMP open and click rates will be analysed in the case of email marketing and be evaluated for needs-based marketing. I may revoke my consent at any time, also partially, with effect for the future. I can submit a revocation request by post to OLYMP Stores KG, reference: Data Privacy, Höpfigheimer Straße 19, 74321 Bietigheim-Bissingen, Germany, or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com).**

The following mandatory details will be included: your title, surname, email address and confirmation that you have taken note of the data protection notice. The provision of any other data separately marked is voluntary, and such data provided will be used for addressing you personally. Subject to your consent, the data provided by you will be stored by us for marketing purposes (the legal basis being Art. 6 (1), sentence 1, a) GDPR). If you wish to be contacted by us for this purpose, please choose the respective desired form of contact. We shall contact you by post and - depending upon your selection - also by email, telephone or SMS. If you do not wish to be contacted by post, please cross out the sentence: "*Furthermore, I agree to receiving by post information on products, exclusive offers and campaigns, current trends and styles, invitations to participate in customer surveys and product ratings, as well as news concerning OLYMP*". We shall then not send you any advertising by post. You may also state that you do not wish to be contacted in any form at all. In this case, you will nevertheless be able to take advantage of the benefits of OLYMP INSIDER at the OLYMP stores, e.g. the possibility of exchanging without a receipt or of depositing your personal fit and collar size.

You can revoke your consent at any time by post to OLYMP Stores KG, reference: Data Privacy, Höpfigheimer Straße 19, 74321 Bietigheim-Bissingen, Germany, or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com).

In the context of OLYMP INSIDER, please note that, when we send the newsletter, we shall evaluate your user behaviour on the basis of your consent (the legal basis being Art. 6 (1), sentence 1, a) GDPR). For this evaluation, the emails sent will contain so-called web beacons or tracking pixels; these are one-pixel image files stored on our website. For these evaluations, we shall link the data referred to in Part III., subsection 2.1, and the web beacons to your email address. With the data gained in this way, we shall create a user profile in order to tailor the newsletter to your individual interests. This will allow



us to record when you read our newsletter and what links you click on in the newsletter and to deduce your personal interests from this. We shall link these data to your customer data. You can object to this tracking at any time for the future by sending your objection to us at [shop@olymp.com](mailto:shop@olymp.com).

For sending emails, we use the customer relationship management module "Salesforce Marketing Cloud" from Salesforce.com Inc., The Landmark@One Market Street, Suite 300, San Francisco, California, CA 94105, USA. Salesforce Marketing Cloud is an administrative service for user databases. The data are processed in the USA. The appropriate safeguards for data transfer to a third country are provided by mandatory internal data protection regulations and the standard data protection clauses; further information can be found at [https://www.salesforce.com/content/dam/web/en\\_us/www/documents/legal/Agreements/data-processing-addendum.pdf](https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf). The legal basis for use of the Salesforce Marketing Cloud is Art. 6 (1), sentence 1, f) GDPR. Further information on the Salesforce Marketing Cloud and on the data processed can be found at <https://www.salesforce.com/de/company/privacy/>.

### 3.3 Newsletter

If you register for the newsletter outside of the OLYMP INSIDER programme, in particular via our website [www.olymp.com](http://www.olymp.com), this will be based on the following consent:

**I hereby agree that the data provided by me will be processed by OLYMP Stores KG and OLYMP Digital KG (hereinafter jointly "OLYMP") for marketing, information and market research purposes by email.**

**By subscribing to the newsletter, I agree to receiving by email information on products, exclusive offers and campaigns, current trends and styles, invitations to participate in customer surveys and product ratings, as well as news concerning OLYMP. I consent that OLYMP open and click rates as well as my buying behaviour will be analysed and be evaluated for needs-based marketing.**

**For carrying out certain services, my data will be passed on to commissioned companies in the course of the rendering of the services. I can gather from OLYMP's data protection statement detailed information on data protection and the safeguarding of the data subjects' rights in accordance with Art. 13 GDPR. I may revoke my consent at any time, also partially, with effect for the future. I can submit a revocation request by post to OLYMP Digital KG, reference: Data Privacy, Höpfigheimer Straße 19, 74321 Bietigheim-Bissingen, Germany, or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com).**

We need your email address for our newsletter. You can voluntarily state your title, your name, your date of birth and the OLYMP store near you. These data will be used for communication with you in the context of our newsletter offered. If you additionally receive advertising from us via other communication channels (e.g. by post), the data collected for the newsletter may also be used for sending you advertising more in line with your interests. Additionally, the data collected for the newsletter may be evaluated by us in combination with other data that we hold. By subscribing to the newsletter, you agree that we shall store the aforementioned data for sending the newsletter until you unsubscribe from our newsletter. The legal basis for the processing is the consent granted by you in

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the context of the double opt-in procedure. The goods and services advertised will be listed in the declaration of consent. The data will not be used beyond this. By unsubscribing, you can revoke your consent at any time with effect for the future. You can exercise your right of revocation in the newsletter itself or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com).

We use the so-called double opt-in procedure for registering for our newsletter. This means that, following your registration, we shall send you an email to the email address given, asking you to confirm that you wish to receive the newsletter. If you do not confirm your registration within 24 hours, the information you provided will be blocked and be automatically erased after one month. Moreover, we shall store your respective IP addresses used and the times of registration and confirmation. The purpose of the procedure is to enable your registration to be proven and, where applicable, any possible misuse of your personal data to be cleared up.

Only your email address is mandatory for sending the newsletter. The provision of any other data separately marked is voluntary, and such data provided will be used for addressing you personally. Following your confirmation, the data you provided will be stored by us for the purpose of sending the newsletter (the legal basis being Art. 6 (1), sentence 1, a) GDPR).

Your data will be passed on to OLYMP Stores KG, Höpfigheimer Str. 19, 74321 Bietigheim-Bissingen, and used there, within the scope of your consent.

Please note that, when we send the newsletter, we shall evaluate your user behaviour on the basis of your consent (the legal basis being Art. 6 (1) a) GDPR). For this evaluation, the emails sent will contain so-called web beacons or tracking pixels; these are one-pixel image files stored on our website. For these evaluations, we shall link the data referred to in Part III., subsection 2.1, and the web beacons to your email address. With the data gained in this way, we shall create a user profile in order to tailor the newsletter to your individual interests. This will allow us to record when you read our newsletter and what links you click on in the newsletter and to deduce your personal interests from this. We shall link these data to your customer data.

You can object to this tracking at any time for the future by sending your objection to us at [shop@olymp.com](mailto:shop@olymp.com).

For sending emails, we use the customer relationship management module "Salesforce Marketing Cloud" from Salesforce.com Inc., The Landmark@One Market Street, Suite 300, San Francisco, California, CA 94105, USA. Salesforce Marketing Cloud is an administrative service for user databases. The data are processed in the USA. The appropriate safeguards for data transfer to a third country are provided by mandatory internal data protection regulations and the standard data protection clauses; further information can be found at [https://www.salesforce.com/content/dam/web/en\\_us/www/documents/legal/Agreements/data-processing-addendum.pdf](https://www.salesforce.com/content/dam/web/en_us/www/documents/legal/Agreements/data-processing-addendum.pdf). The legal basis for use of the Salesforce Marketing Cloud is Art. 6 (1), sentence 1, f) GDPR. Further information on the Salesforce Marketing Cloud and on the data processed is provided at <https://www.salesforce.com/de/company/privacy/>.

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If you revoke your consent as a whole and unsubscribe from the newsletter, you will no longer receive any newsletters from us. We shall delete from our distribution list the data relating to your newsletter registration.

## 3.4 "Extended shop counter" (Instore Order)

You have the possibility of using our so-called "extended shop counter" (Instore Order) at our local OLYMP stores. This enables us to offer you at our local OLYMP stores, via a digital platform, further goods in addition to those available in the store and to thus enhance your shopping experience.

If you use the extended shop counter (Instore Order) in OLYMP stores in **Germany** to order goods and you provide personal data for this purpose, we (**OLYMP Stores KG** and **OLYMP Digital KG**) process this data for the purpose of fulfilling the contract, as per Art. 6 p. 1, lit. b of the GDPR.

If you use the extended counter (Instore Order) in an OLYMP store in **Austria, Shirthouse Handels GmbH & Co. KG**, contactable at the postal address Peter-Floridan-Gasse 4/2, 7100 Neusiedl am See, Austria, processes your personal data as the responsible party. The legal basis for this is Art. 6 p. 1 lit. b of the GDPR. If you conclude a purchase via the extended counter (Instore Order), Shirthouse Handels GmbH & Co. KG becomes your contractual partner.

If you use the extended counter (Instore Order) in an OLYMP store in **Italy, France** or the **Netherlands, Shirthouse Stores GmbH**, contactable at the postal address Höpfigheimer Strasse 19, 74321 Bietigheim-Bissingen, Germany, will process your personal data as the responsible party. The legal basis for this is Art. 6 p. 1 lit. b of the GDPR. If you conclude a purchase via the extended counter (Instore Order), Shirthouse Stores GmbH becomes your contractual partner.

If you use the extended counter (Instore Order) in an OLYMP store in **Hungary, Shirthouse Hungary Bt.**, contactable at the postal address Corvin u. 16, 9023 Győr, Hungary, processes your personal data as the responsible party. The legal basis for this is Art. 6 p. 1 lit. b of the GDPR. If you conclude a purchase via the extended counter (Instore Order), Shirthouse Hungary Bt. becomes your contractual partner.

When registering for the extended counter (Instore Order), you also have the option of consenting (Art. 6 p. 1 lit. a of the GDPR) to marketing communications via email, telephone and SMS. OLYMP Stores KG and OLYMP Digital KG are responsible for these communications and the associated processing of your personal data, regardless of where you use the extended counter (Instore Order). Consent is voluntary and can be revoked at any time using the contact details provided above. Subsection 3.3 applies mutatis mutandis to marketing communications via email.

## 4. Your rights

### 4.1 You have the following rights in relation to us regarding the personal data concerning you:

- right of access to your personal data,

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- right to rectification or erasure,
- right to restriction of processing,
- right to object to processing,
- right to data portability,

Please direct your written enquiry to OLYMP Stores KG or to OLYMP Digital KG, subject line: Data Privacy, Höpfigheimer Str. 19, 74321 Bietigheim-Bissingen, Germany, or to the email address: [datenschutz@olymp.com](mailto:datenschutz@olymp.com).

4.2 You also have the right to complain to a data privacy authority about our processing of your personal data.

## II. Data Processing by OLYMP Stores KG

1. Where you communicate personal data (surname, first name, email address, telephone number, postal address) to us either in the context of an enquiry, an order or your purchase at one of our OLYMP stores or directly to OLYMP Stores KG, this will generally take place on a voluntary basis. These data will be used for handling the contractual relationship or for processing your enquiries or your orders. Where questions that need to be cleared up arise in the context of an order, it will be possible to contact us by telephone in order to remedy any unclear points and enable the order to be quickly processed. The legal basis for this is Art. 6 (1) b) GDPR.
2. Moreover, your email address provided to us in connection with the sale of a product or service will be used by us for the direct email marketing of our own products or services similar to the ones that you ordered. You will receive these emails regardless of whether you have subscribed to the newsletter. The legal basis for this is Section 7 (3) *UWG* [Act Against Unfair Competition].

You can object at any time to the sending of these emails, without incurring any further charges apart from the cost of sending the objection (e.g. postal charges), either by post to OLYMP Stores KG, reference: Data Privacy, Höpfigheimer Straße 19, 74321 Bietigheim-Bissingen, Germany, or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com).

In the case of direct marketing by email, we shall evaluate your user behaviour. We shall use the Salesforce Marketing Cloud for sending the emails. Information on the evaluation of user behaviour and on the Salesforce Marketing Cloud can be found in Part I., subsection 3.3 of this statement.

3. In principle, we shall not pass on to third parties any personal data communicated by you to us. Such data will be passed on only
  - within the scope of the consent granted by you (cf. Part II., Section 2);

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- to commissioned subcontractors in the course of the processing of your enquiries or orders or in the course of use of our services; these subcontractors will only receive the data necessary for carrying out such order and will use these data only for the specific purpose intended;
  - to service providers in the course of commissioned data processing under Art. 28 GDPR, or
  - to entitled entities in the course of the performance of legal obligations.
4. As part of our “Click & Reserve” feature, your details will be forwarded to the store you have chosen. The legal basis for this is processing of your reservation is Art. 6, para. 1, sub-para. b. of the GDPR. Once your reservation has been completed, these details will be deleted again. Your details will remain within the OLYMP Group.

### III. Data Processing by OLYMP Digital KG

1. In the context of your use of the website [www.olymp.com](http://www.olymp.com) and of the services and offers provided thereon, the following notice additionally applies:

#### 2. Automated collection and processing of data by the browser

- 2.1 As with every website, our server automatically collects the following information and temporarily stores it in the server log files transmitted by the browser, unless you have disabled this. If you wish to view our website, we shall collect the following data that we technically need for displaying our website to you and for ensuring its stability and security (the legal basis being Art. 6 (1) f) GDPR):

- the IP address of the computer requesting access,
- the client's file request,
- the http reply code,
- the website from which you are visiting us (referrer URL),
- the time of the server request,
- the browser type and version,
- the requesting computer's operating system used.

No person-related evaluation of the server log files takes place. It is not possible for the provider to associate these data with certain persons at any point in time. Nor are these data combined with other data sources.



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- 2.2 We use the Google Tag Manager from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). This service enables website tags to be managed via an interface. The Google Tool Manager merely implements tags. This means: No cookies are used, and no personal data are collected. The Google Tool Manager triggers other tags, which in turn collect data if necessary. However, the Google Tag Manager does not access these data.
- 2.3 We use the remarketing technology from Google Ads, the advertising platform of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Using pseudonyms, users who have visited our website are appealed to again through targeted advertising on the websites of the Google partner network. Cookies that enable an Internet browser to be recognised again can be used for this purpose (cf. Section 5 in this respect). These usage profiles serve to analyse the visitor behaviour and are used for targeted product recommendation and interests-based advertising. The pseudonymised usage profiles are not combined with personal data concerning the bearer of the pseudonym without the data subject's separate express consent. Where Google transfers data to the USA in this context, the appropriate safeguards for data transfer to a third country are provided by the standard data protection clauses; further information can be found at <https://privacy.google.com/businesses/controllerterms/>. The legal basis for using Google Ads is your consent in accordance with Art. 6 (1), sentence 1, a) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant your consent for certain services or for certain categories of services or to refuse your consent. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future. Alternatively, by activating the disabling link <https://www.google.com/settings/ads/plugin> from Google, you can prevent your data being collected and stored for the purpose of web analysis and advertising control. Further information on Google Remarketing, as well as Google's data protection statement can be viewed at: <http://www.google.com/privacy/ads/> .
- 2.4 This website uses Google Analytics, a web analysis service from Google. Google Analytics uses so-called "cookies", text files that are stored on your computer and enable your use of the website to be analysed. Generally, the information generated by the cookie regarding your use of this website will be transferred to a Google server in the USA and be stored there. If IP anonymisation is activated on this website, however, your IP address will be truncated beforehand by Google within the Member States of the European Union or the European Economic Area. Only in exceptional cases is the full IP address transferred to a Google server in the USA and truncated there. On behalf of the operator of this website, Google will use this information to analyse your use of the website, compile reports on the website activities and provide the website operator with further services relating to use of the website and the Internet (such as the remarketing technology from Google Ads described in subsection 2.2). The IP address transmitted by your browser within Google Analytics will not be combined with any other Google data. You can prevent the storage of cookies by setting your browser software accordingly. Please note, however, that you may then possibly be unable to fully use all features of this website.

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In view of the discussion about the use of analysis tools with full IP addresses, please note that this website uses Google Analytics with the extension "\_anonymizeIp()", and, therefore, IP addresses are further processed only in truncated form in order to rule out the possibility of these being linked directly to individuals.

We also use the features of Google Signals in connection with Google Analytics. Via Signals, Google makes available reports on cross-device user numbers, as well as on various groups of users, on the basis of different device combinations used. To this end, Google uses the data of users who have activated the "personalised advertising" option in their Google account settings. Google Signals is used only with activated IP anonymisation. This means that the users' IP address is truncated within the Member States of the EU and the European Economic Area. As a result of this truncation, it will no longer be possible to link your IP address to you personally. It is, therefore, not possible to draw conclusions about the identity of an individual user. The website visitor can object at any time to such data collection by Google Signals by disabling "personalised advertising" in his Google account: <https://support.google.com/ads/answer/2662922?hl=de>.

We use Google Analytics to analyse and regularly improve the use of our website. The statistics obtained enable us to improve our services offered and make them more interesting for you as a user. In exceptional cases where personal data are transferred to the USA, the appropriate safeguards for data transfer to a third country are provided by the standard data protection clauses; further information can be found at <https://privacy.google.com/businesses/processorterms/>. The legal basis is, under Art. 6 (1), f) GDPR, our legitimate interest in being able to analyse and regularly improve the use of our website. The statistics obtained enable us to improve our services offered and make them more attractive to you as a user.

By downloading and installing the browser plug-in available at the following link, you can prevent data (including your IP address) generated by such cookie relating to your use of the website from being collected and transmitted to Google and being processed by Google: <http://tools.google.com/dlpage/gaoptout?hl=de>.

Information on the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, fax: +33 (1) 436 1001. User terms and conditions: <http://www.google.com/analytics/terms/de.html>, data protection overview: <http://www.google.de/intl/de/policies/privacy>.

- 2.5 On this website, we use the service offered by Google Maps. This enables us to show you interactive maps, and in particular the "Store Locator", directly on our website, allowing you to conveniently use the maps feature. The legal basis for using Google Maps is, in accordance with Art. 6 (1), sentence 1, f) GDPR, our legitimate interest in a user-friendly design of our website. You can only activate Google Maps on our website if you call up the Store Locator functionality at [https://www.olymp.com/de\\_de/company/stores/](https://www.olymp.com/de_de/company/stores/). No data are transferred to Google beforehand.

As a result of your visit to the website, Google will be informed that you have accessed the corresponding subsite of our website. Additionally, the data referred to under subsection 2.1 of this

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statement will be transferred. This will happen regardless of whether Google provides a user account through which you are logged in, or whether no such user account exists. If you are logged into Google, your data will be directly associated with your account. If you do not wish to be associated with your profile at Google, you will have to log out before you activate the button. Google will store your data in the form of usage profiles and use these data for the purposes of marketing and/or market research and/or for tailoring the design of its website to your needs. In particular, such evaluation will (even for users not logged in) take place for the purpose of providing advertising tailored to the users' needs and in order to notify other users of the social network about your activities on our website. You have the right to object to the creation of such user profiles, but you will have to contact Google to exercise that right.

Further information on the purpose and scope of the collection and processing of data by the plug-in provider can be found in Google's data protection statement. There you will also find further information on your relevant rights and setting options for protecting your privacy: <http://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA. The appropriate safeguards for data transfer to a third country are provided by the standard data protection clauses; further information can be found at <https://privacy.google.com/businesses/controllerterms/>.

- 2.6 We participate in the partner programme of AWIN AG, Eichhornstraße 3, 10785 Berlin (formerly affilinet GmbH, Sapporobogen 6-8, 80637 Munich) ("AWIN"), by means of which advertisements can be placed. AWIN uses cookies to enable the origin of orders to be retraced. AWIN can recognise, *inter alia*, that you have clicked on the partner link on this website. Moreover, information on the order, on revenues and, where applicable, on returns of goods is transferred to AWIN in the event of an order. The storage of "AWIN cookies" and the transfer of information will take place on the basis of your consent in accordance with Art. 6 (1), sentence 1, a) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant your consent for certain services or for certain categories of services or to refuse your consent. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future. Further information on the use of data by AWIN can be found in the company's [data protection statement](#).
- 2.7 We likewise use the retargeting pixel Website Custom Audiences ("Facebook Pixel") from Facebook Inc., 1601 South California Avenue, Palo Alto, CA 94304, USA ("Facebook"). With the aid of this pixel, an irreversible and non-personal checksum (hash value), which can be transmitted to Facebook for marketing and analysis purposes, is generated from your usage data. The Facebook cookie is triggered for Website Custom Audiences. The legal basis for using the retargeting pixel is your consent in accordance with Art. 6 (1), sentence 1, f) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant

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your consent for certain services or for certain categories of services or to refuse your consent. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future. Further information on the scope and purpose of the collection of the data, the further processing and use of the data by Facebook and your setting options for protecting your privacy can be found in Facebook's data protection policy accessible, *inter alia*, at [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/) and at <https://de-de.facebook.com/policy.php>. If you do not wish to have your data collected via Custom Audience, or you would like to object to the use of Facebook Website Custom Audiences, you can disable this at the link [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

- 2.8 Furthermore, we use the service from KUPONA GmbH, Kothenbachweg 6, 36041 Fulda ("Kupona"). With the aid of this service, we can direct targeted advertising to customers who have previously visited our website. With the aid of a cookie, information on your usage behaviour will be collected in pseudonymised form for marketing purposes. Kupona will thus be able to analyse your usage behaviour and display targeted product recommendations when you visit other websites. The data collected via the cookie will not be used to personally identify you as a visitor to our website. Further information on data protection at Kupona can be found at <https://www.kupona.de/datenschutz> and at <https://www.kupona.de/dsgvo/>.

Kupona, for its part, uses the service Criteo from Criteo GmbH, Gewürzmühlstraße 11, 80538 Munich, for rendering the aforementioned service. Criteo is also used for the promotional targeting of persons who have previously visited our website. To this end, Criteo uses a cookie that collects information concerning your visit to our website. Further information on data protection at Criteo can be found at <http://www.criteo.com/de/privacy>. By clicking on the following link (<http://www.criteo.com/de/datenschutzrichtlinie>) and setting the slider there to "ON" for "Opt out", you can prevent information being stored and used by the Criteo service. If you select "ON", a new cookie (opt-out cookie) is placed in your browser. This cookie will signal to the Criteo service that Criteo is no longer permitted to collect and process data concerning your usage behaviour. You can re-activate this feature by setting the slider to "OFF". This setting must be created for every browser used. If you have set your browser in such a way that no cookies of any kind are placed, this will also apply to the "opt-out cookie".

You can prevent the storage of cookies by setting your browser software accordingly. Please note, however, that you may then possibly be unable to fully use all features of this website.

The legal basis for using Kupona and Criteo is your respective consent in accordance with Art. 6 (1), sentence 1, a) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant your consent for certain services or for certain categories of services or to refuse your consent. The granting of consent for Criteo is independent of consent for Kupona; both are separately mentioned on the cookie banner and can be



individually controlled. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future.

- 2.9 We likewise use "Bing Ads", a service from the Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA ("Microsoft"). This service enables us to track users' activities on our website, if these users arrived at our website via Bing Ads advertisements. If you reach our website via such advertisement, a cookie will be placed on your computer. A Bing tag is integrated into our website. This is a code via which, in combination with the cookie, some non-personal data concerning the use of the website are stored. These data include, *inter alia*, time spent on the website, accessed areas of the website, and the advertisement via which the users arrived at the website. No information relating to your identity will be collected. The legal basis for using Bing Ads is your consent in accordance with Art. 6 (1), sentence 1, a) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant your consent for certain services or for certain categories of services or to refuse your consent. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future.

The information collected may also be transferred to Microsoft servers in the USA and be stored there for a period invariably no longer than 180 days. Where Microsoft transfers data to the USA in this context, permission to transfer data to a third country is subject to your consent; further information can be found at <https://privacy.microsoft.com/de-de/privacystatement>. By disabling the placement of cookies, you can prevent the data generated by the cookie relating to your use of the website from being collected and processed. This may, however, limit the website's functionality in certain circumstances. In certain circumstances, Microsoft may, by means of so-called cross-device tracking, additionally track your usage behaviour across several of your electronic devices, enabling it to insert personalised advertising on or in Microsoft websites and apps. You can disable this behaviour at <http://choice.microsoft.com/de-de/opt-out>.

Further information on the analysis services from Bing can be found on the Bing Ads website (<https://ads.microsoft.com/>). Further information on data protection at Microsoft and Bing can be found in Microsoft's data protection policy (<https://privacy.microsoft.com/de-de/privacystatement>).

- 2.10 For the purpose of size guidance, we offer an online size guide for assisting you with choosing the correct clothing size during the ordering process. The size guide is opened by means of the "Size guide" button and is operated by Fit Analytics GmbH, Sanderstraße 28, 12047 Berlin, [www.fitanalytics.com](http://www.fitanalytics.com), ("Fit Analytics"). When using the size guide, you can, on request, submit the following data to Fit Analytics in order to obtain a size recommendation:

- body size,
- weight,

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- body shape (chest size, waist size),
- wearing preferences (e.g. "tighter" or "baggy"),
- age (optional),
- reference brand and item (optional).

These usage data will be collected by Fit Analytics exclusively in anonymous form and be processed only for the purpose of calculating for every customer the individually correct clothing size and to continually optimise the procedures upon which the recommendations are based. A so-called "session cookie" is used for this. This cookie stores the following data:

- recommended clothing size,
- session ID (randomised sequence of numbers),
- time and date stamp,
- browser type,
- anonymised IP address (by means of IP masking).

The storage of the IP address takes place only in shortened (anonymised) form and is additionally encrypted by means of a hashing procedure. It is used exclusively for session recognition and for defending against cyber attacks (e.g. DoS attacks). The session cookie has a life of ten days so that returning customers can be automatically identified within this period, and they no longer need to re-enter the data required for the size recommendations. The recommended size can then also be displayed directly on the product details page without the size guide having to be opened again.

For calculating the recommended size, Fit Analytics additionally uses anonymised purchase and returns data collected in our online shop in the course of an order. The data collected, which do not allow any conclusions to be drawn about an individual, encompass the following details:

- time and date stamp of the purchase,
- order number,
- product number,
- clothing size chosen,
- price (currency where applicable).

The legal basis for using Fit Analytics is, in accordance with Art 6 (1), sentence 1, f) GDPR, our legitimate interest in a customer-friendly design of the purchase process and in avoiding returns due to incorrect



clothing sizes. You can object to this legitimate interest by choosing "Settings" in the cookie banner, and deselecting the box already ticked for "Fit Analytics", when you first visit our website. If you visit the website at a later date, you can create this setting under "Cookie settings" at the bottom of our website (so-called footer) at any time with effect for the future.

You can prevent the storage of the session cookie by configuring your web browser accordingly. Stating the session ID deposited in your session cookie, you can request from Fit Analytics (datenschutz@fitanalytics.com) access to your stored data or the erasure thereof. As Fit Analytics does not store any personally identifiable information of any kind relating to your person, such access or erasure is only possible if the respective session ID is stated. Further information and the contact details for obtaining further information can be gathered from the data protection statement of Fit Analytics at [https://www.fitanalytics.com/files/Fit\\_Analytics\\_Privacy\\_Policy\\_Website.pdf](https://www.fitanalytics.com/files/Fit_Analytics_Privacy_Policy_Website.pdf).

- 2.11 On this website, we use a web analysis service plug-in from New Relic. This plug-in enables us to collect statistical evaluations concerning the speed of the website and ascertain whether the website is accessible and how quickly the respective page is displayed when accessed. This service is operated by New Relic Inc. (188 Spear Street, Suite 1200 San Francisco, CA 94105, USA; "New Relic").

New Relic uses cookies. When a user accesses a website containing a plug-in from New Relic, the user's browser establishes a direct connection to the New Relic servers. We use New Relic on the basis of our legitimate interest in analysing the use of our website (Art. 6 (1), f) GDPR). New Relic has informed us that the service does not collect any personal data via our website or process such data in any other form.

- 2.12 For so-called site-wide messages and exit intent layers, our website uses the services from Hello Bar LLC, 450 B Street #775, San Diego, CA 92101. Site-wide messages and exit intent layers are particular, specially highlighted notifications on our website by means of which we would like to draw your attention to certain offers and services. The legal basis for this is your consent in accordance with Art. 6 (1), sentence 1, (a) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant your consent for certain services or for certain categories of services or to refuse your consent. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future. Information on data protection at Hello Bar can be found at <https://www.hellobar.com/gdpr/> and at <https://www.hellobar.com/privacy-policy/>.

- 2.13 Our website uses the web analysis and optimisation service "Google Optimize" provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter "Google Optimize"). To increase the attractiveness of our website, we use the Google Optimize service by displaying new variants, features and content of our website to some of our users and evaluating the change of use. Google Optimize is a sub-service of Google Analytics (see subsection 2.3.).



Google Optimize uses cookies which enable your use of certain variants of our website to be optimised and analysed. Normally, the information generated by these cookies concerning your use of our website will be transferred to a Google server in the USA and be stored there. In this respect, we use Google Optimize with activated IP anonymisation so that your IP address is truncated beforehand by Google within Member States of the European Union or the European Economic Area. Only in exceptional cases is the full IP address transferred to a Google server in the USA and truncated there. In exceptional cases where personal data are transferred to the USA, the appropriate safeguards for data transfer to a third country are provided by the standard data protection clauses; further information can be found at <https://privacy.google.com/businesses/processorterms/>.

The legal basis for the data processing is your consent in accordance with Art. 6 (1) a) GDPR. When you first visit our website, you will be asked whether you wish to consent to the placement of cookies that collect personal data. You have the choice of granting your consent for all cookies ("Accept" button) or creating user-defined settings under the "Settings" button. By unticking or ticking the box there, you can decide whether to grant your consent for certain services or for certain categories of services or to refuse your consent. Consent is voluntary. By deselecting a previously ticked box under "Cookie settings" at the bottom of our website (so-called footer), you can revoke your consent at any time with effect for the future.

You can prevent the storage of these cookies also by setting your Internet browser accordingly. Further information on the collection and processing of data by Google can be gathered from Google's data protection notice accessible at <http://www.google.com/policies/privacy>.

2.14 We integrate the feature ReCaptcha from Google for recognising bots, e.g. in the case of entries in online forms. The legal basis for our legitimate interest is avoiding misuse of our web service (Art. 6 (1) f) GDPR). Further information on the purpose and scope of the collection and processing of data by Google ReCaptcha can be found in the data protection statement: <https://www.google.com/policies/privacy/>; you can opt out from any tracking via: <https://adssettings.google.com/authenticated>. There you will also find further information on your relevant rights and setting options for protecting your privacy: <http://www.google.de/intl/de/policies/privacy>. Google also processes your personal data in the USA. The appropriate safeguards for data transfer to a third country are provided by the standard data protection clauses; further information can be found at <https://privacy.google.com/businesses/controllerterms/>.

2.15 We use the service Usercentrics from Usercentrics GmbH, Rosental 4, 80331 Munich, Germany ("Usercentrics") for complying with our obligations under data protection law, in particular for managing and controlling the automated processing of data as well as consents under data protection law. This service helps us to obtain, as required by law, consents for cookies and tracking. The Usercentrics script is automatically loaded when our website is visited. A window (so-called "cookie banner") in which you can generally grant your consent to the use of cookies, or create user-defined settings, will be opened when you first visit. Usercentrics will store this selection and then load further cookies in accordance with your consent or other legal bases. The cookie banner will no longer open



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when you make further visits. Instead, Usercentrics will immediately load the cookies commensurate with the selection you made during your first visit. You can change this selection at any time under "Cookie settings" at the bottom of our website (so-called footer) with effect for the future.

Usercentrics records the date and time of your visit, device information, browser information, your anonymised IP address as well as information on your selection in the data privacy settings. Where these data allow conclusions to be drawn regarding your person, Usercentrics will not use these data for its own purposes and will process these data exclusively within the European Union. Further information on data protection at Usercentrics can be found at <https://usercentrics.com/de/datenschutzerklaerung/>.

The legal basis for using Usercentrics is Art. 6 (1) c) GDPR, as this use is necessary for complying with our statutory duties in connection with data protection, in particular the GDPR. As a further legal basis, there is also a legitimate interest therein within the meaning of Art. 6 (1) f) GDPR.

- 2.16 We collaborate with the platform "Unidays" from Myunidays Ltd, 2 Castle Boulevard, NG7 2FB, Nottingham, United Kingdom. Unidays is a platform that offers exclusive benefits for students. As a student, you can obtain via Unidays a discount code that you can redeem in the OLYMP online shop. We do not receive any personal data from Unidays in this respect. We shall only be able to associate a discount code with you if you use the discount code in our online shop and provide your details in the course thereof. In our online shop, however, it is registered when a discount code from Unidays is redeemed. We report the purchase to Unidays, quoting the discount code. Unidays can associate the discount code with its users. For Unidays, therefore, the discount codes are personal data. If an order is returned, we notify Unidays of the scope of the returns, quoting the discount code.

The legal basis for the reporting of purchases and returns to Unidays, quoting the discount code, are your membership at Unidays and your purchase from us in accordance with Art. 6 (1) b) GDPR.

Further information on data protection at Unidays can be found at <https://www.myunidays.com/LK/en-GB/privacy-policy>.

- 2.17 This website uses functions of the Google service called Campaign Manager, in particular, the Floodlight function. The provider is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, U.S.A.

Campaign Manager is used to display ads in line with users' interests throughout Google's advertising network. Ads can be adjusted to any user's interests in a targeted manner with the help of Campaign Manager. For example, our ads can be displayed in Google search results or in banners on third-party websites connected to Campaign Manager. To facilitate the display of ads in line with a user's interests, Campaign Manager must be able to recognize the user. To this end, a cookie is saved in the user's browser. The cookie contains information on the websites the user visits, the user's clicks, and diverse other types of information. This information is assembled in a pseudonymized user profile so interest-specific ads can be displayed to the user. During this process, data is transmitted to Google. Where personal data are transferred to the USA, the appropriate safeguards for data transfer to a third



country are provided by the standard data protection clauses; further information can be found at <https://privacy.google.com/businesses/processorterms/>.

Floodlight is a conversion tracking system used to measure the effectiveness of advertising measures. Using a cookie we can determine whether you executed specific actions on our website after you clicked on one of our ads in Google or on a third-party website.

Cookies are saved and personal data is processed based on consent pursuant to Art. 6 1 p. 1 lit. a of the GDPR. During your first visit to our website you will be asked if you consent to our saving of cookies that record your personal data. You can give consent for all cookies to be saved (Accept button) or you can define personalized settings (Settings button). Also, you can put a checkmark in the respective box to give consent to specific services or specific categories of services or you can withhold your consent. Your consent is voluntary and under Cookie Settings in the bottom of our website (footer) you can uncheck the box to prevent the saving of cookies in the future.

In addition, you can deactivate personalized ads under Settings for Ads in Google (<https://www.google.com/settings/ads>) and you will not receive any more personalized ads via any Google services. For more information on your options to object to ads displayed by Google, please go to these links: <https://policies.google.com/technologies/partner-sites> and <https://policies.google.com/privacy>.

## 2.18 KUPONA Retargeting

This website uses features from KUPONA. The provider is KUPONA GmbH, Kothenbachweg 6, 36041 Fulda, Germany (hereinafter "KUPONA").

KUPONA will be used to show you, within the KUPONA advertising network, advertisements relating to your interests. Your interests will be ascertained on the basis of your previous usage behaviour. In this respect, KUPONA will, for example, record which products you have looked at, have put in the shopping basket or have purchased. Further details relating to the data collected by KUPONA can be found here:

<https://www.kupona.de/dsgvo/#datenschutzverordnung>

In order to be able to show you advertising relating to your interests, we or other KUPONA partners need to be able to recognise you. To this end, a cookie will be stored on your device, or a comparable indicator linking your user behaviour to a pseudonymous user profile will be used. Details relating hereto can be gathered from KUPONA's Data Protection Statement at:

<https://www.kupona.de/dsgvo/#datenschutzverordnung>



KUPONA uses the following subcontractors / technologies:

<b>Name and address of the subcontractor</b>	<b>Description of the sub-services</b>
Neory GmbH Brandschachtstraße 2, 44149 Dortmund, Germany	Adserver, data management platform
Google DV360, represented by Google LLC ("Google"), Amphitheatre Parkway, Mountain View, CA 94043, USA	Demand side platform
Platform 161 Johan Huizingalaan 763a 4th floor, 1066 VH Amsterdam, Netherlands	Demand side platform
The UK Trade Desk Ltd, 20 Farringdon Road, London, England EC1M 3HE	Demand side platform
Criteo SA, 32 Rue Blanche, 75009 Paris, France	Demand side platform

Some of the companies involved in the processing have their registered office outside of the EU (the respective registered office is noted, insofar as these are named). Insofar as data are transferred to these companies, an EU Commission adequacy decision exists, or so-called EU standard contractual clauses (can be requested from KUPONA for viewing if need be) legitimising the third-country transfer have been agreed upon. A transition period up to the end of 2020 during which transfers to the United Kingdom will not be deemed to be transfers to a third country has been agreed upon with the United Kingdom.

Depending upon the data processing company, your personal data and the KUPONA cookies stored in your browser will be stored for a maximum of 30 to 180 days from the date of collection.

KUPONA will use your personal data only with your consent on the basis of Art. 6 (1a) GDPR; the consent is revocable at any time.

Additionally, it is possible to opt out of the data processing at any time at the following link:

[www.kupona.de/datenschutz/widerspruch](http://www.kupona.de/datenschutz/widerspruch)

### **3. Collection and processing of data communicated voluntarily**

#### **3.1 General contact**

Where you communicate personal data (surname, first name, email address, postal address) to us either by email or via our website, this generally takes place on a voluntary basis. These data will be used for handling the contractual relationship, for processing your enquiries or orders (the legal basis being Art. 6 (1) b) GDPR) and for our own market or opinion research and for our own advertising by post (the legal basis being Art. 6 (1) f) GDPR). The data will not be used beyond this. In particular, the data will not be passed on to third parties for the purposes of marketing, market research or opinion research.



### 3.2 Use of our online shop

If you wish to place an order in our online shop, it is essential for the conclusion of a contract that you provide your personal data needed by us for handling your order. Mandatory details necessary for handling contracts are separately marked; the provision of further details is voluntary. The data provided by you will be processed by us for handling your order. Where questions that need to be cleared up arise in the context of an order, it will be possible to contact us by telephone in order to remedy any unclear points and enable the order to be quickly processed. Article 6 (1) b) GDPR is the legal basis for this.

You can voluntarily set up a customer account, which will enable us to store your data for subsequent further purchases. When a customer account is created, the data provided by you for creating the account will be revocably stored. You can always erase all further data in the customer area. If you wish to have your customer account deleted, please send an email to [shop@olymp.com](mailto:shop@olymp.com).

In the course of payment processing, your data will be passed on to our payment service providers PAYONE GmbH, Lyoner Straße 9, 60528 Frankfurt am Main, Germany and Wirecard AG, Einsteinring 35, 85609 Aschheim, Germany and, in the case of payment using Paypal, to PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg, Luxembourg (the legal basis being Art. 6 (1), b) GDPR).

### 3.3 KLARNA INVOICE

On the basis of the following declaration of consent (Art. 6 (1) a) GDPR), you can carry out a purchase on account via the payment service provider Klarna:

By deciding on Klarna invoice as the payment option, you consent that we shall collect and transfer to Klarna AB, Sveavägen 46, 11134 Stockholm, Sweden (hereinafter called "Klarna") the personal data necessary for handling the purchase on account, and you consent to an identity and credit check. These personal data will include your first name and surname, address, date of birth, gender, email address, IP address, telephone number as well as the order-related data necessary for handling the purchase on account, such as the number of items, item number, invoice amount and tax as a percentage.

These data will be transferred so that Klarna can create an invoice for handling your purchase with the invoice processing of your choice and can carry out an identity and credit check. In this respect, Klarna has, in accordance with the *Bundesdatenschutzgesetz* [German Federal Data Protection Act], a legitimate interest in transferring the buyer's personal data and needs these data in order to obtain information from credit reference agencies for the purpose of identity and credit checking. Such credit reference agencies may include the following:

In Germany

- Schufa Holding AG, Kormoranweg 5, 65203 Wiesbaden

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- Bürgel Wirtschaftsinformationen GmbH & Co. KG, Postfach 5001 66, 22701 Hamburg
- Creditreform Boniversum GmbH, Hellersbergstraße 11, 41460 Neuss;
- Deltavista GmbH, Freisinger Landstr. 74, 80939 Munich;
- Arvato infoscore Consumer Data GmbH, Rheinstraße 99, 76532 Baden-Baden;

In Austria

- CRIF GmbH, Diefenbachgasse 35, A-1150, Vienna

In Holland

- Experian B.V., Postbus 13128, 2501 EC Den Haag,
- BKR, Dodewaardlaan 1, 4006 EA Tiel,
- FOCUM, Postbus 768, 8000 AT Zwolle

In the course of deciding on whether to establish, carry out or end the contractual relations, Klarna collects and uses, apart from verifying the address, also information on the buyer's payment history as well as probability values (scores) relating to future payment behaviour. Klarna calculates these scores on the basis of a scientifically recognised mathematical and statistical procedure. Klarna will, *inter alia*, also use your address details for this. If this calculation shows that you are not credit-worthy, Klarna will immediately inform you thereof.

Further information can be found in Klarna's data protection policy accessible for Germany [here](#), for Austria [here](#) and for Holland [here](#).

In relation to Klarna, you can revoke at any time your consent to the use of personal data. However, Klarna may possibly remain entitled to process, use and transfer personal data insofar as this is necessary for the contractual processing of payments by Klarna's services, is legally stipulated or is required by a court or a public authority.

Of course, you can obtain at any time information on the personal data stored by Klarna. If you, as the buyer, wish to do so or wish to inform Klarna of changes regarding your data stored, you can contact Klarna at [datenschutz@klarna.de](mailto:datenschutz@klarna.de)/  
[datenschutz@klarna.at](mailto:datenschutz@klarna.at)/ [dataprotectie@klarna.nl](mailto:dataprotectie@klarna.nl).

### 3.4 Direct advertising by E-Mail

Moreover, your email address provided to us in connection with the sale of a product or service will be used by us for the direct email marketing of our own products or services similar to the ones that you



ordered. You will receive these emails regardless of whether you have subscribed to the newsletter. The legal basis for this is Section 7 (3) *UWG* [Act Against Unfair Competition].

You can object at any time to the sending of these emails, without incurring any further charges apart from the cost of sending the objection (e.g. postal charges), either by post to OLYMP Digital KG, reference: Data Privacy, Höpfigheimer Straße 19, 74321 Bietigheim-Bissingen, Germany, or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com).

In the case of direct marketing by email, we shall evaluate your user behaviour. We shall use the Salesforce Marketing Cloud for sending the emails. Information on the evaluation of user behaviour and on the Salesforce Marketing Cloud can be found in Part I., subsection 3.3 of this statement.

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### 3.5 Application portal

Within our application portal, you can submit an application speculatively or in response to specific job offers. We offer you the possibility of using our application portal for this. Your data (title, name, email address, postal address, contact details, nationality, date of birth, qualifications, photograph, application documents) will be processed only within the scope of the respective job advertisement (Art. 6 (1) b) GDPR, Section 26 *BDSG* [German Federal Data Protection Act]) or within the scope of your consent to use for further job offers (Art. 6 (1) a) GDPR). In the input form, only the fields marked with a red asterisk are necessary for your application.

For processing the application, the application will be sent to the Olymp company advertising the specific job. This company is named at the bottom of every job advertisement. If you select the "speculative application" option, or if you answer "Yes" for the "applicant pool" option in the context of an application in response to a specific job advertisement, your application may be additionally sent to the following Olymp companies, acting as the respective controller within the meaning of Art. 4 (7) GDPR:

- OLYMP Bezner KG,
- OLYMP Retail KG,
- OLYMP Stores KG,
- MARVELIS Stores KG,
- Shirthouse Stores GmbH,

which can each be contacted at the postal address Höpfigheimer Str. 19, D-74321 Bietigheim-Bissingen, Germany, as well as to

- Shirthouse Handels GmbH & Co. KG, which can be contacted at the postal address Peter-Floridan-Gasse 4/2, 7100 Neusiedl am See, Austria.

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You can contact the data protection officers of these companies at the above address, adding the words "The Data Protection Officer", or by email at [datenschutz@olymp.com](mailto:datenschutz@olymp.com). The legal basis for the transfer and further processing by these companies is your consent (Art. 6 (1) a) GDPR in conjunction with Art. 9 (2) a) GDPR). This consent is voluntary. You can wholly or partly revoke it at any time with effect for the future by post or by email to [datenschutz@olymp.com](mailto:datenschutz@olymp.com). The data submitted by you will be processed by the aforementioned companies only for handling the application process. If you have selected "Yes" for the "applicant pool" option, we shall additionally store the data for 2 years so that the aforementioned Olymp companies can access these data and possibly contact you if there is a suitable job vacancy for you. You are entitled to the rights referred to under Part I., Section 3 of this data protection statement also in relation to the aforementioned Olymp companies.

**Notice relating to sensitive data: We expressly point out that applications, in particular CVs, job references and other data submitted by you to us, could contain particularly sensitive details concerning mental and physical health, racial or ethnic origin, political opinions, religious or philosophical convictions, trade union or political party membership or sexuality.**

**If you submit such details to us in your online application, you expressly agree that we may process these data for the purpose of processing your application. The processing of these data takes place in conformity with this data protection statement and the other relevant legal provisions.**

If you select "No" when applying for a specific vacancy advertised, the data submitted will be erased in the event that your application is rejected, or a negative decision is made concerning your application, no earlier than four months after the application procedure has ended. This will not apply where statutory provisions conflict with such erasure, or further storage is necessary for purposes of proof.

For our application portal, we use software from rexx systems GmbH, Süderstrasse 75-79, 20097 Hamburg. Our legitimate interest lies in designing the applicant user interface, and any applicant management software relating thereto, in an appealing manner. rexx systems GmbH is bound by our instructions relating to your data, and we have concluded with it an agreement on commissioned processing in accordance with Art. 28 GDPR.

#### **4. Passing-on of personal data to third parties**

In principle, we shall not pass on to third parties any personal data that you communicate to us. Such data will be passed on only

- within the scope of the consent granted by you (cf. Part II., Section 3.5);
- to commissioned subcontractors in the course of the processing of your enquiries or orders or in the course of use of our services; these subcontractors will only receive the data necessary for carrying out such order and will use these data only for the specific purpose intended (e.g. shipping service providers);
- to service providers in the course of commissioned data processing under Art. 28 GDPR, or



- to entitled entities in the course of the performance of legal obligations.

## 5. Cookies

The website uses its own cookies in order to make the website more user-friendly. Cookies are data sets sent by the web server to the user's browser and stored there for subsequent access. In particular, the cookies serve to recognise the Internet browser again. Cookies are used for session control and for statistical evaluation. These cookies do not contain any personal data of any kind. If you voluntarily decide on automatic log-in on the website, your log-in details (email address and password) will be stored on your computer in an additional cookie. You can set your browser in such a way that no cookies are installed on the hard drive, or cookies already installed are deleted again. To do so, please follow the instructions in your browser's Help feature regarding the prevention and deletion of cookies.

We use such cookie in order to be able to make available the shopping basket feature in our online shop in a technically faultless manner. The legal basis for this is, in accordance with Art. 6 (1) f) GDPR, our legitimate interest in being able to offer you a convenient purchasing experience. Additionally, the shopping basket feature is, in accordance with Art. 6 (1) b) GDPR, a necessary step to be taken prior to entering into a contract.

Our website also uses an OLYMP session cookie. This cookie stores the URI-decoded landing page URL for the current session if it contains utm- or gclid parameters. In the case of active consent for the tracking technology "Google Analytics", the stored landing page URL and referrer URL is transmitted to Google Analytics. The legal basis for the use of the OLYMP session cookie is Art. 6 (1), sentence 1, f) of the GDPR.

We also use a cookie for load balancing – that is to ensure that a client is always directed to the same back end. To do this, the load balancer sets a cookie that notes the back end used. In terms of user data, the cookie only contains the client's IP address. This is a session cookie. The legal basis is Art. 6 (1) f) of the GDPR.

## 6. Video integration with Vimeo

This website uses plugins from the video portal Vimeo. The provider is Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

We use Vimeo in "Do not track" mode. Vimeo states that this mode has the effect of preventing the player from tracking any data from the playback session. Vimeo also states that this has the same effect as enabling a "Do-not-track" header in your browser: <https://vimeo.zendesk.com/hc/en-us/articles/360001494447-Using-Player-Parameters>.

Our use of Vimeo is in the interest of providing an attractive presentation of our online content. This represents a legitimate interest within the meaning of Art. 6 (1) (f) of the GDPR.



# OLYMP

For more information on the handling of user data, please refer to the Vimeo privacy policy:  
<https://vimeo.com/privacy>.