

# Data Privacy

*(Status: 19.05.2021)*

devolo AG takes protection of your personal data very seriously. We want to inform you when and what data we collect and how we use them. We have introduced technical and organisational measures which ensure that both our company and external service providers comply with the regulations on data protection.

In the course of updates of our website and the implementation of new technologies to improve our service for you, changes to this Data Protection Declaration may also be necessary. We therefore recommend that you read this Data Protection Declaration again from time to time.

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## **What are personal data?**

Personal data are information which can be used to identify personal or factual information about you. Information which cannot be used to identify you (or only with a disproportionate level of effort) is not classed as personal data (e.g. data that has been pseudonymised or anonymised).

## **What are usage data?**

Usage data are pieces of information we receive when you use our services. This might be device-specific information (for example, the model of hardware used), log data (details on the use of our services, data on device events, cookies), location-specific information (if you are using our location-specific services via WiFi access points) or cookies and comparable technologies (e.g. for Google Analytics) that allow for identifying your device.

## **What data do we record?**

You can use part of our online service without revealing your identity. Your personal data will only ever be recorded for the stipulated purposes and to the extent required to attain these purposes.

## 1. Access data and hosting

You can visit our web pages without disclosing information about yourself. Every time a website is accessed, the web server automatically saves a single file known as a server log file, which includes information such as the name of the requested file, your IP address, date and time of access, the amount of data transmitted and the requesting provider (access data) and documents the access.

This access data is evaluated exclusively for the purpose of error-free operation of the website and improving our product range. This is done in order to protect our justified interest in correctly displaying our product range, which prevails in balancing the two parties' interests. All access data are deleted no later than seven days after the end of your visit to the site.

### **Hosting services through a third-party provider**

As part of processing commissioned by us, a third-party provider provides the services for hosting and displaying the website on our behalf. This is done in order to protect our justified interest in correctly displaying our product range, which prevails in balancing the two parties' interests. All data collected as described in the following during the use of this website or in forms intended for this purpose in our online shop are processed on the servers of the third-party provider. Processing on other servers takes place only to the extent explained here.

This service provider is located within a country of the European Union or the European Economic Area.

## 2. Data collection and use for implementing a contract and when opening a customer account

We collect personal data if you disclose them voluntarily as part of your order when contacting us (e.g. using the contact form or by e-mail) or when opening a customer account. Required fields are marked as such because we absolutely require the data in these cases for concluding contracts, processing your contact or opening your customer account. Without disclosing this information, you are not able to sign off your order, open your account or submit your message. The individual entry forms indicate which data are collected. We use the data disclosed by you for implementing contracts and for processing your enquiries. After a contract has been completely processed or your customer account has been deleted, your data will be restricted for further processing and deleted after expiry of the terms defined by tax and trade legislation unless you have expressly given consent to further use of your data or we reserve the right to further use of your data that is legally permitted and that we notify you about in this declaration. You can delete your customer account at any time either by sending a notice to the contact

option provided below or using a function of the customer account intended for this purpose.

### **3. Data sharing**

For fulfilment of your contract, we share your data with the shipping company we contract for your shipment insofar as this is required for the delivery of your goods. Depending on which payment service provider you select during the ordering process, we share, for processing payments, the payment data collected for this purpose with the financial institution that receives the payment and, if applicable, with payment service providers contracted by us or with the selected payment service. Selected payment service providers also collect portions of this data themselves, provided that you establish an account with them. In this case, you must use your access data to log in to the payment service provider during the ordering process. In this respect, the data privacy policy of the respective payment service provider applies.

### **4. E-mail newsletter and mailed advertisements**

#### **E-mail advertisements with newsletter subscription**

If you subscribe to our newsletter, we will use the data required for this or separately disclosed by you in order to send you our e-mail newsletter periodically based on your consent.

You can unsubscribe from the newsletter at any time either by sending a message to the contact provided below or using a link in the newsletter intended for this purpose. After unsubscribing, we will delete your e-mail address unless you have expressly given consent to further use of your data or we reserve the right to further use of your data that is legally permitted and that we notify you about in this declaration.

As part of processing, a service provider with which we share your e-mail address for this purpose will mail the newsletter on our behalf.

This service provider is located within a country of the European Union or the European Economic Area.

#### **Mailed advertisements and your right of objection**

Furthermore, we reserve the right to use your first and surname and your mailing address for our own advertising purposes, e.g. for sending you interesting offers and information on our products by post. This is done in order to protect our justified interest in advertising communication with our customers, which prevails in balancing the two parties' interests. As part of processing, a service provider with which we share your data for this purpose will send the advertising mail on our behalf. You can object to the storage and use of your data for these purposes at any time by sending a message to the contact option provided below.

## 5. Cookies and web analysis

In order to make our website appealing to visit and to enable the use of certain functions for displaying suitable products and for market research, we use what are called cookies on various pages. This is done in order to protect our justified interest in optimised display of our product range, which prevails in balancing the two parties' interests. Cookies are small text files that are automatically stored on your terminal device. Some of the cookies used by us are deleted again after the end of the browser session, that is, after you have closed your web browser (session cookies). Other cookies remain on your terminal device and allow us to identify your browser the next time you visit (persistent cookies). You can look up the duration of storage in the overview of the cookie settings in your browser. You can configure your browser so that you are notified when cookies are set and can decide on a case-by-case basis whether to accept them, or you can disable the use of cookies for specific situations or in general. Each browser has a different method for managing cookie settings. This method is described in the Help menu of any browser, which tells you how to change your cookie settings. You can find them for the respective browsers at the following links:

Internet Explorer™: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Safari™: <https://support.apple.com/en-mn/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Chrome™: <https://support.google.com/chrome/answer/95647?hl=en-GB&hlrm=en>

Firefox™ <https://www.mozilla.org/en-US/privacy/websites/#cookies>

Opera™: <http://help.opera.com/Windows/10.20/en/cookies.html>

*If cookies are not accepted, the functionality of our website may be limited.*

As part of applying Google Analytics (see below), this website also uses what is called the DoubleClick cookie, which makes it possible to identify your browser when you visit other websites. This is done in order to protect our justified interest in optimal marketing of our website, which prevails in balancing the two parties' interests. The information on your visit to this website is automatically generated by the cookie. It is transmitted to a server of Google in the United States of America and stored there. Whenever this happens, your IP address is truncated by activating the IP anonymisation on this website prior to its transmission within the member countries of the European Union or within

other countries that have signed the agreement on the European Economic Area. Only in exceptional cases is your full IP address transmitted to a server by Google in the United States and truncated there. The anonymised IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

Google will use this information to compile reports on the website activity and to provide further services related to the use of the website. This is done in order to protect our justified interest in optimal marketing of our website, which prevails in balancing the two parties' interests. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google DoubleClick is a service of Google LLC. ([www.google.com](http://www.google.com)). Google LLC has its headquarters in the United States and is certified under the EU-US Privacy Shield. A current certificate may be viewed [here](#). Based on this agreement between the United States and the European Commission, the latter has determined an appropriate data protection level for companies certified under the Privacy Shield.

You can disable the DoubleClick cookies using [this link](#). In addition, you can find information on setting cookies at the [Digital Advertising Alliance](#) and make adjustments in that regard. Finally, you can configure your browser so that you are notified when cookies are set and can decide on a case-by-case basis whether to accept them, or you can disable the use of cookies for specific situations or in general. If cookies are not accepted, the functionality of our website may be limited.

### **Use of Google (Universal) Analytics for web analysis**

For web page analysis, this website uses Google (Universal) Analytics, a web analytics service of Google LLC ([www.google.com](http://www.google.com)). This is done in order to protect our justified interest in optimised display of our product range, which prevails in balancing the two parties' interests. Google (Universal) Analytics uses methods that make it possible to analyse how you use the website, such as cookies. The automatically collected information on your use of this website is usually transmitted to a server of Google in the United States and stored there. By activating the IP anonymisation on this website, your IP address is truncated prior to its transmission within the member countries of the European Union or within other countries that have signed the agreement on the European Economic Area. Only in exceptional cases is your full IP address transmitted to a server by Google in the United States and truncated there. The anonymised IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data as a matter of principle.

Google LLC has its headquarters in the United States and is certified under the EU-US Privacy Shield. A current certificate may be viewed [here](#). Based on this agreement between the United States and the European Commission, the latter has determined an appropriate data protection level for companies certified under the Privacy Shield.

You may prevent Google's acquisition and processing of the data generated by the cookie and specific to your use of the website (including your IP address) by downloading and

installing the browser plugin available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

As an alternative to the browser plugin, you may click [this link](#) to prevent data recording by Google Analytics on this website in future. When doing so, an opt-out cookie is stored on your terminal device. If you delete your cookies, you must click the link again.

### **LinkedIn Insight Tag**

Our website uses the conversion tool "LinkedIn Insight Tag" from LinkedIn Ireland Unlimited Company. This tool creates a cookie in your web browser which enables the collection of the following data: IP address, device and browser properties and page events (e.g. page views). This data is encrypted, anonymised within seven days and the anonymised data is deleted within 90 days. LinkedIn does not share personal data with devolo, but offers anonymised reports on website audience and display performance. In addition, LinkedIn offers the possibility of retargeting via the Insight Tag. devolo can use this data to display targeted advertising outside of its website without identifying you as a website visitor. You can find more information on data protection at LinkedIn in the LinkedIn data protection guidelines at <https://www.linkedin.com/legal/privacy-policy>.

The data processing is based on your consent and thus on the legal basis of Art. 6 para. 1 lit. a) DSGVO. You can opt out of the collection and use of your data for the display of LinkedIn Ads at any time or revoke your consent, e.g. by changing your cookie settings on our site accordingly. LinkedIn members have the option to opt out of LinkedIn conversion tracking and to block and delete cookies or deactivate demographic features at <https://www.linkedin.com/psettings/advertising/>. There is no separate opt-out option in LinkedIn's settings for third-party impressions or click tracking for campaigns running on LinkedIn, as all underlying campaigns respect LinkedIn members' settings. You can also deactivate the LinkedIn Insight Conversion Tool and interest-based advertising as a non-member by opting out at the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

## **6. Advertising using marketing networks**

### **Google AdWords remarketing**

Using Google Adwords, we advertise this website in the Google search results and on third-party websites. For this purpose, the remarketing cookie is set by Google whenever our website is visited. This cookie automatically enables interest-based advertising using a pseudonymous cookie ID and based on the pages you have visited. This is done in order to protect our justified interest in optimal marketing of our website, which prevails in balancing the two parties' interests. Any data processing beyond this takes place only

if you have given your consent to Google for linking your web and app browser history to your Google account and using information from your Google account for personalising advertisements you view on the web. If in this case you are logged in to Google while visiting our website, Google uses your data together with Google Analytics data to compile and define target group lists for remarketing on all devices. For this purpose, Google temporarily links your personal data to Google Analytics data in order to generate target groups.

Google AdWords remarketing is a service of Google LLC ([www.google.com](http://www.google.com)). Google LLC has its headquarters in the United States and is certified under the EU-US Privacy Shield. A current certificate may be viewed [here](#). Based on this agreement between the United States and the European Commission, the latter has determined an appropriate data protection level for companies certified under the Privacy Shield.

You can disable the remarketing cookies using [this link](#). In addition, you can find information on setting cookies at the [Digital Advertising Alliance](#) and make adjustments in that regard.

## 7. Product registration

When registering the devolo products you have purchased on the website [www.devolo.de/produktregistrierung](http://www.devolo.de/produktregistrierung) (or one of its country-specific variants): Surname, first name, e-mail address, product serial number(s), date of purchase.

You can decide yourself whether or not to provide these data. However, without this information we will be unable in these cases to offer the requested service or the service may only be available to a limited extent.

## 8. Sweepstakes and requesting an e-book

If you participate in sweepstakes or decide to request an e-book or white paper, we may collect the following personal data: name (title, first name(s), surname), e-mail address, job title, company and industry as well as address and country). After the data have been input, you will receive an e-mail containing a link to the ordered e-book.

## 9. When logging in to the website [www.mydevolo.de](http://www.mydevolo.de) or [www.mydevolo.com](http://www.mydevolo.com)

For managing the devices from the Home Control product line and the devolo Live Cam: your e-mail address (devolo ID), password, name (title, first name, surname), date of birth, language. After the data have been entered, you will receive a confirmation e-mail with an activation link. In order to use supplementary functions (e.g. weather data), you can

enter under the item "Addresses" your address data (designation, street, house number, postcode, town, country) and the required time zone, together with your telephone numbers under the item "telephone numbers".

## **10. When logging in to the website [www.devolo-cc.com](http://www.devolo-cc.com) or [devolo-cc.com](http://devolo-cc.com) (or one of its country-specific variants)**

For managing the devolo professional products in the devolo connectivity centre: e-mail address, password, date of birth and country for the creation of the user account and, as voluntary information, title, first name, surname, language. When registering a location as compulsory information: designation, company, street, house number, postcode, town, country. For registration of devices: serial number, MAC address. In order to supply the services, it shall be necessary with some product areas to record, store, process and, if necessary, pass on personal data, utilisation data and data from connected services of third-party suppliers to commissioned partners.

## **11. Contact options and your rights**

You are entitled to information on your personal data stored by us free-of-charge and, if applicable, to the correction, restriction of processing, data transferability or deletion of these data.

If you have questions concerning the collection, processing or use of your personal data or concerning disclosure, correction, locking or deleting data as well as revocation of consent you may have given or objection to a specific use of data, please contact our corporate data protection officer

Andreas Passmann  
Charlottenburger Allee 67  
52068 Aachen, Germany

[datenschutz@devolo.de](mailto:datenschutz@devolo.de)

Furthermore, you have the right of appeal before the responsible regulatory agency for data protection.

### **Right of objection**

Insofar as we process personal data to protect our justified interests, which prevail in balancing the two parties' interests, as explained above, you can object to this processing, with the objection taking effect in future. If this processing serves the purpose of direct marketing, you can exercise this right at any time as described above. Insofar as this

processing pursues other purposes, you have the right to object only if there are causes resulting from your specific situation.

After you have executed your right of objection, we will no longer process your personal data for these purposes unless we can prove the existence of compelling causes for processing that are worth protecting and that prevail over your interests, rights and freedoms, or if processing serves the enforcement, execution or defence of legal claims. This does not apply if direct marketing is the purpose of processing. In this case, we will no longer process your personal data for this purpose.

### **Protection of minors**

Persons under the age of 18 years should not transfer any personal data to us without the consent of their parents or guardian. We do not request personal data from children and adolescents. We do not consciously collect these data or transfer them to third parties.

In all cases the extent of the transmitted data will be limited to the required minimum in accordance with the provisions of the German Federal Data Protection Act (BDSG). Personal data will only be transmitted to state institutions and authorities within the framework of binding national legal regulations or if the data have to be transmitted for the purpose of law enforcement in the event of attacks on our network infrastructure.

### **Other**

devolo AG expressly warns that inherent security gaps may exist with regard to the transmission of data over the Internet (e.g. by e-mail) and that data cannot be protected with 100% security against unauthorised access.

The use of the service provider's identifying contact data—in particular the telephone/fax numbers and e-mail addresses—for commercial advertising is expressly undesired without prior written authorisation from devolo AG or unless a business relationship is already in existence. devolo AG reserves the right to take legal measures in the case of infringements.