

**Privacy Policy**

**For the corporate website of A.S. Création Tapeten AG**

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**Content**

1.	General Information .....	1
2.	Your Rights .....	2
3.	Collection of personal data when interacting with our corporate website.....	3
4.	Newsletter .....	4
5.	Share Price Chart .....	5
6.	Virtual Showroom .....	5
7.	Social Media Links .....	6
8.	YouTube-Videos .....	6
9.	Analysis .....	7
10.	Server .....	9
11.	Closing Provisions .....	9

**1. General Information**

1.1 The protection of your personal data is very important to us. In the following, we inform you about the collection and use of personal data when interacting with our corporate website.

1.2 The person responsible pursuant to Article 4 (7) of the EU General Data Protection Regulation (GDPR) is A.S. Création Tapeten AG, Südstraße 47, 51645 Gummersbach, Germany.

You can contact our data protection officer at [datenschutz@as-creation.de](mailto:datenschutz@as-creation.de) or via our postal address.

1.3 In order to carry out the processing of technically necessary personal data based on your **consent** or our **legitimate interest**, cookies are stored on your computer when you use our corporate website. Cookies are small text files that are stored on your hard disk assigned to the browser you are using and through which certain information flows to the owner of the cookie. Cookies cannot execute programmes or transfer viruses to your computer.

Irrespective of your consent, you can configure your browser settings according to your wishes and, for example, refuse to accept individual or all cookies (see also section 11). We would like to point out that you may not be able to use all functions of the corporate website if you reject additional technical cookies.

1.4 Depending on their type and function, the cookies are deleted within specified periods of time. The collected personal data will be deleted within the statutory periods depending on the purpose of the data use.

#### 1.5 Cookie Consent Manager

a. When you visit our corporate website, a cookie is set to record your consent to the various services. It records whether you give your consent and if so, what consent you give. You can change this selection at any time by saving your new selection in the Cookie Consent Manager (at the bottom of every web page).

If you do not activate a service in the Cookie Consent Manager but click on this service during your visit to the corporate website, this **click** will be **recorded as consent** in the Cookie Consent Manager.

b. The following data is logged in the cookie:

- - IP address
- - Consent selection
- - Date and time of selection
- - Website from which you accessed our company homepage
- - Language used
- - Geographical data

c. If you delete all cookies, you will be asked for your consent again on your next visit. If you do not delete the cookie history, you will be asked after 6 months whether your consent selection is still up to date.

d. **Legal basis:** Your consent, according to art. 6 para. 1 p. 1 lit. a GDPR.

e. The cookie consent manager is being processing on our behalf by the service provider **Usercentrics A/S** (address: Havnegade 39, 1058 Copenhagen, Denmark). This service provider is based within the European Union.

## 2. Your Rights

2.1 You have the following rights regarding personal data concerning you:

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

2.2 If you have given **consent** to the processing of your data, you may revoke this consent in whole or in part at any time. Such revocation will affect the permissibility of processing your personal

data after you have expressed it to us. You can manage your consent in the Cookie Consent Manager (at the bottom of every web page).

- 2.3 Where we base the processing of your personal data on **legitimate interests**, you can object to the processing. Please tell us the reasons why we should not process your personal data. Based on your submission, we will review the facts of the case and either stop or adjust the data processing or explain our compelling legitimate grounds on the basis of which we will continue the processing.
- 2.4 Please direct your enquiries to our data protection officer (see section 1.2). You also have the right to direct your complain about our processing of your personal data to a data protection supervisory authority.

### 3. Collection of personal data when interacting with our corporate website

#### 3.1 Access of corporate website

When you access our corporate website, we collect the data that is technically necessary for us to display our corporate website to you in an appealing format and quality and to ensure the stability and security of the corporate website.

The following data is logged in the **server log** file:

- accessed webpage
- time at the moment of access
- amount of data sent in bytes
- website from which you accessed our corporate website
- browser used
- operating system/version used
- IP address used (if applicable: in anonymised form)
- language used

**Legal basis:** legitimate interest in necessary functionality of the corporate website according to art. 6 para. 1 p. 1 lit. f GDPR.

#### 3.2 Communication

When you contact us by **e-mail** or via a **contact form**, the data you provide (mandatory data in the contact form is marked with \*) is stored by us in a **log file** in order to answer your questions.

**Legal basis:** Processing of the data for the execution of the contract or pre-contractual measure according to art. 6 para. 1 p. 1 lit. b GDPR.

We delete the data accruing in connection with the communication after the storage is no longer necessary, at the latest after 10 years.

#### 4. Newsletter

4.1 We use the double-opt-in procedure to register for our newsletter. This means that after you have registered for our newsletter you receive an e-mail in which you are asked to confirm that you wish to receive the newsletter. The only mandatory information for receiving the newsletter is your e-mail address. You can voluntarily enter your first and last name and your company name. The voluntary information will only be used to address you personally. If you do not confirm your registration within 7 days, your information will be blocked and automatically deleted after one month.

We offer these Newsletters:

Newsletter	Information on new products and services, among other things
Social media for painters	Posts for Instagram and Facebook - incl. images and text suggestions.

4.2 To prove the time and scope of the subscription to the newsletter (as well as any un-subscription), we store the following data by setting a cookie:

- timestamp of registration or un-subscription (date and time).
- IP address
- newsletter selection

4.3 **Legal basis** (newsletter): Processing of data based on consent according to art. 6 para. 1 p. 1 lit. a GDPR. **Legal basis** (cookie): legal obligation to be able to provide proof of consent according to art. 6 para. 1 p. 1 lit. c GDPR.

4.4 The newsletter is sent as part of processing on our behalf by the service provider **rapidmail GmbH** (address: Wentzingerstrasse 21, 79106 Freiburg, Germany), to whom we pass on your e-mail address for this purpose. This service provider is based within the European Union. A transfer of data to third countries does not occur. You can find the data protection declaration of rapidmail GmbH here: <https://www.rapidmail.de/datensicherheit>

4.5 You can revoke your consent to receive the newsletter at any time by unsubscribing. You can revoke your consent (i) by clicking on the link provided in every newsletter email, or (ii) by sending a message to [contact@as-creation.de](mailto:contact@as-creation.de)

4.6 We carry out a statistical analysis of which links are clicked in the newsletter. For this purpose, the emails sent contain a so-called tracking pixel that connects to rapidmail's servers when the email is opened. This enables us to determine whether a newsletter message has been opened. Furthermore, it can be determined whether and which links in the newsletter message are clicked. Optionally, links in the email can be set as tracking links with which your clicks can be counted. With the data obtained in this way, we can measure the success between information in the newsletter and visits to the corresponding corporate website campaign.

For the evaluation, no complete IP addresses and cookies are collected and processed. The evaluation presents the data of the opening and clicking recipients anonymously.

## 5. Share Price Chart

- 5.1 In section "Company / Investor Relations" you have the option to view the current share price. The share price is integrated via **iFrame** and is only displayed if you have agreed to the extended functions or if you click on the display option (see section 1.5 for the consequence).
- 5.2 When you access the share price chart the following personal data is collected:
- e-mail address
  - location
  - IP address
- 5.3 The share-price-chart service is provided by the service provider **Investis Digital Ltd** (address: Counting House, 53 Tooley Street, London SE1 2QN, UK). The privacy policy of Investis Digital Ltd. as well as information on data processing by Investis Digital Ltd. can be found here: <https://www.investisdigital.com/privacy-policy>
- 5.4 We do not receive any data from Investis Digital Ltd.
- 5.5 **Legal basis:** (i) the integration of the share price is based on our legitimate interest in providing shareholders and interested parties with up-to-date information, pursuant to art. 6 para. 1 sentence 1 lit. f GDPR; (ii) the processing of statistical data is based on our legitimate interest in further developing the functionality of the website, pursuant to art. 6 para. 1 sentence 1 lit. f GDPR.

## 6. Virtual Showroom

- 6.1 In the Virtual Showroom we offer you a virtual tour of our showroom. The video is hosted on the server of **Matterport Inc.** (address: 352 E. Java Drive, Sunnyvale, CA 94089, USA). Matterport Inc. collects and stores personal data in the USA. By entering the Virtual Showroom, Matterport Inc. collects and stores the following data:
- browser type/version
  - operating system used
  - referrer URL (the previously visited page)
  - deferrer URL (the page visited afterwards)
  - IP address
  - user behaviour (click activities)
- 6.2 More information on Matterport Inc. privacy and its cookie policy you can find here:
- <https://matterport.com/privacy-policy>
  - <https://matterport.com/cookie-policy>
- 6.3 We receive neither personal data nor statistical data from Matterport Inc.
- 6.4 **Legal basis:** legitimate interest in an appealing product presentation, according to art. 6 para. 1 p. 1 lit. f GDPR.

## 7. Social Media Links

Social media links from **Facebook, Twitter, Instagram, Pinterest** are used on our corporate website.

When you click on a social media link, you will be directed to our social media account with the respective social network. The respective network collects personal data about you; for more information, please see our privacy policy for social media (<https://www.as-creation.com/datenschutz>) as well as the privacy policies of the respective social media provider.

If you do not want the social networks to directly assign the data collected via our website to your profile in the respective service, you must log out of the respective service before visiting our corporate website.

## 8. YouTube-Videos

8.1 On our web pages, information and application tips are offered in the form of videos that can be played via YouTube. These videos can be presented in three different ways:

- a. YouTube video is directly playable on our website. The video is embedded in "enhanced data protection mode", i.e. data about you as a user is only collected by YouTube when you play the videos.
- b. YouTube video is only linked. When you click on a marked preview image you leave our website and are redirected to [www.youtube-nocookie.com](http://www.youtube-nocookie.com) ; for shorts you are redirected to [www.youtube.com](http://www.youtube.com)

8.2 YouTube is operated by **Google Inc.** (address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). The **responsible party** and contact person in the EU is Google Ireland Limited (address: Gordon House, Barrow Street, Dublin 4, Ireland).

8.3 Only when you play a video data is collected by YouTube. Despite the data protection-friendly "no-cookie" setting, YouTube may use cookies. We have no influence on the data collection. The data collection takes place regardless of whether you have a user account with YouTube or not.

If you are logged in to your Google account, your data will be directly assigned to your Google account. If you do not wish to have your account profile associated with YouTube, you must log out of Google before activating the video. YouTube stores your data as usage profiles and uses them for the purposes of advertising, market research and/or designing its own. Such an evaluation is carried out in particular (even for users who are not logged in) to provide needs-based advertising and to inform other users of the social network about your activities on our corporate website.

For further information on the purpose and scope of data collection and its processing by YouTube, please refer to the privacy policy. There you will also find further information on your

rights and setting options to protect your privacy:

<https://www.google.de/intl/de/policies/privacy>

8.4 We only collect non-personal data for analysis purposes (e.g., number of clicks on the video and time of day), which are transmitted to Google Analytics to create statistics.

8.5 **Legal basis:** Your consent according to art. 6 para. 1 p. 1 lit. a GDPR.

## 9. Analysis

9.1 We use the following Google services on our corporate website:

- a. Google **Web Analytics** is a service for recording the interaction of a user with our corporate website and the contents of our corporate website. This enables us (i) to ensure that our corporate website is designed and continuously optimised to meet your needs; and (ii) to statistically record and evaluate your usage in order to optimise our services for you.

For this analysis, **cookies** are stored on your computer, which record the following information about your use of this corporate website:

- browser type/version
- operating system used
- referrer URL (the previously visited page)
- IP address
- time of server request
- user behaviour (click activities)

- b. Via Google **Tag Manager**, your IP address is shortened by Google (so-called IP masking), so that no conclusions can be drawn about you as a private individual. Only user behaviour is recorded. The IP address remains anonymised, even if the collected data is transmitted outside the EU/EEA.

9.2 Google Web Analytics and Google Tag Manager are services of **Google Inc.** (address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). The **responsible party** and contact person in the EU is Google Ireland Limited (address: Gordon House, 4 Barrow Street, Dublin D04 E5W5, Ireland).

- a. If you have a Google account and have consented to your web and app browsing history being linked to your Google account by Google, information from your Google account will be used to personalise ads. Your Google ID will be temporarily associated with your Google Analytics data in order to optimise your targeting. To deactivate this function, please refer to the information provided by Google itself and in section 11.

More information on data protection and cookies at Google can be found in Google's privacy policy: <https://policies.google.com/privacy>

- b. We are a contractual partner of Google and only receive **anonymised, statistical data** regarding our corporate website. We do not receive any further data, and in particular we cannot identify users from this information. We have no influence on the data collected by Google, nor are we aware of the full extent of the data collection and the storage period. We have also concluded a data processing agreement with Google Inc. (USA) in accordance with Art. 28 GDPR.
- c. **Legal basis** for (i) processing your data for marketing purposes is your consent pursuant to art. 6 para. 1 sentence 1 lit. a GDPR; (ii) processing anonymous data for statistical purposes is our legitimate interest in the design of our corporate website as well as efficiency of advertising pursuant to art. 6 para. 1 sentence 1 lit. f GDPR.

9.3 We use the following service from **Hotjar** on our company homepage:

- a. **Observe** is a service for recording the interaction of a user with our company homepage and the contents of our company homepage. The Observe analysis tool is used to measure and monitor user behaviour.
- b. For this analysis, cookies are stored on your computer, which collect the following information about your use of the company website:
  - Hotjar's unique user ID;
  - Terminal screen resolution;
  - Terminal device type (individual terminal device identifiers), operating system and browser type;
  - console logs and errors;
  - geographic location (country only);
  - language preferred when viewing the Hotjar-based website;
  - Mouse events (movements, location and clicks);
  - keystrokes;
  - referring URL and domain;
  - Pages visited;
  - Date and time of access to your website and a specific event on your website;
- c. All data is stored by Hotjar on servers located in the EU or EEA.

9.4 Observe is a service provided by **Hotjar Ltd** (address: Dragonara Business Centre, 5th Floor, Dragonara Road, Paceville St Julian's STJ 3141, Malta). Hotjar Ltd is part of the Content Square SaaS Group with headquarters in Paris, France. Hotjar Ltd. and Content Square SaaS are **jointly responsible**.

More information on data protection and cookies at Hotjar Ltd. can be found in its privacy policy: <https://www.hotjar.com/privacy/>

- a. We are a contractual partner of Google and only receive anonymised, statistical data on our company homepage via its services. We do not receive any other data, in particular



we cannot identify users from this information. We have also concluded an order processing contract with Hotjar Ltd. in accordance with Art. 28 of the GDPR.

- b. **Legal basis** for (i) processing your data for marketing purposes is your consent pursuant to Art. 6 para. 1 p. 1 lit. a GDPR; (ii) processing anonymous data for statistical purposes is our legitimate interest in the design of our company homepages and efficiency of advertising pursuant to Art. 6 para. 1 p. 1 lit. f GDPR.

## 10. Server

10.1 The hosting services underlying this website are provided by **Mittwald CM Service GmbH & Co. KG** ("Mittwald") (address: Königsberger Straße 4-6, 32339 Espelkamp, Germany). Mittwald offers Software as a Service services (SaaS) in the context of cloud hosting. Mittwald collects and stores the following data in **server log files**:

- visited website
- time at the moment of access
- amount of data sent in bytes
- browser used
- operating system used
- IP address used (if applicable: in anonymised form)
- language and version of browser software

10.2 Mittwald cannot assign this data to individuals. This data will not be merged with other data sources. After a statistical analysis, the data will be deleted after seven (7) days at the latest. Further information can be found in Mittwald's privacy policy. These can be viewed here: <https://www.mittwald.de/datenschutz>

10.3 We have also concluded a data processing agreement. This agreement regulates the scope, type and purpose of Mittwald's access to data. The access options are limited to necessary accesses that are required for the fulfilment of the hosting services.

10.4 **Legal basis:** legitimate interest in necessary functionality of the website according to art. 6 para. 1 p. 1 lit. f GDPR.

## 11. Closing Provisions

11.1 In addition to the data processing described in this Privacy Policy, there may be additional data processing by third parties where you have consented to the third party linking your web and app browsing history to your account (which you have with the third party) and using information from your account to personalise ads, regardless of which website you visit.

Third parties may include (non-exhaustive list): Analytics/marketing service providers (e.g., Google), You Tube, social media networks (e.g., Facebook, Pinterest, Instagram), payment service providers (e.g., PayPal).

- 11.2 If you do not want the third party to collect (personal) data about you for statistics + marketing and to create user profiles, you can prevent the installation of cookies by setting your browser software accordingly or in your user account with the third party.
- a. Setting of the browser software (e.g., suppression of third-party cookies, i.e., you do not receive any ads from third-party providers),
  - b. Deactivation of cookies for conversion tracking, i.e., cookies from certain domains are blocked (**note**: this setting is deleted when you delete your cookies),
  - c. Deactivation of interest-based ads <http://www.aboutads.info/choices> (**note**: this setting will be deleted when you delete your cookies),
  - d. permanent deactivation in your Firefox, Internet explorer or Google Chrome browsers at the link <http://www.google.com/settings/ads/plugin>,
  - e. Deactivate device identification via "device setting".

You also have the right to object to the creation of these user profiles, whereby you must contact the respective third party to exercise this.

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