

# Privacy policy for the newsletter

Thank you for your interest in our newsletter.

Registration for the newsletter always takes place via double opt-in, i.e. you express your interest in the newsletter by entering your e-mail address and clicking on the send button. You will then receive an email from us with a link to confirm that YOU have registered for the newsletter. Only after you have clicked on the specified link is the registration for the respective newsletter completed.

If there no click on the link in the e-mail occurs, the data provided will be deleted after 7 days.

Upon completion of registration, your email address will be added to the database.

The legal basis for the newsletter is in each case the GDPR Article 6 para. 1 lit. a).

### What personal data is processed?

We process the following data for the administration and dispatch of the newsletter:

- Your e-mail address
- Date/time of entry, if applicable, place of entry, source URL of the form, IP address when registering for the newsletter
- "click rates" in e-mails
- If applicable, status of "bounces" or other delivery problems
- Notes, if applicable (we use these to note delivery problems with emails, for example)
- E-mail clients used, if applicable

## Data processing in third countries

Through the use of ActiveCampaign, personal data of newsletter subscribers is processed in a third country. For ActiveCampaign, this is the United States (USA).

#### Proper level of data protection

We have concluded a data processing contract with ActiveCampaign in accordance with GDPR Article 28. We have also concluded the new EU standard contractual clauses to ensure an adequate level of data protection. A copy of the EU standard contractual clauses used can be found on the EU Commission's website. Completed "Module 2 - Controller to Processor".

In addition, ActiveCampaign is certified in accordance with the Data Privacy Framework (DPF), so that an appropriate level of data protection is also guaranteed in this respect.

# How long will your data be stored?

We process your personal data for the duration of your newsletter subscription. If you unsubscribe from the newsletter or another reason arises for a termination of the newsletter subscription (delivery problems), we will continue to store the data for a period of up to three years.

Why? First and foremost, to ensure that unsubscribing from the newsletter does not result in a new subscription and that unwanted mailings can be suppressed. This also serves to comply with the provisions of the UWG. However, we regularly go through the processed data and delete the data that we think we really no longer need.

Furthermore, it often happens that readers of the newsletter contact us and ask why they no longer receive the newsletter. We can then clarify, at least for a longer period of time, what the reason is that the newsletter no longer reaches you.

If you want us to delete your data immediately, you can contact us at any time. We will then delete the data as requesteed.



### Tracking of open and click rates

We "track" open and click-through rates. Not necessarily always, but mostly.

Why are opening and click rates tracked?

Why is this done?

In order to guarantee a high deliverability of emails (no suppression by spam filters etc.), an email service provider must have a high "reputation". This is achieved by having customers who guarantee a high quality of emails. In other words, they send emails that the recipients want to receive. Emails that they have consciously signed up for (newsletters) or that they find "good". And that they don't complain about.

Reputation is becoming increasingly important in times when only a few large providers (such as Google with Gmail) decide whether newsletters reach the recipient's email inbox.

We use the tracking of clicks on links (or the tracking of open rates) in particular to determine whether you as a reader interact with the content of the newsletter.

This tracking allows us to track whether the content is being read, which links are interesting for our readers and where we can improve.

If you do not want all this / if you do not like it (which we can understand), you cannot subscribe to the newsletter. So it will not work without your consent.

## Legal basis for the processing of opening and click rates

The processing is necessary for the purposes of the contractual relationship or contract-like user relationship (newsletter receipt).

The legal basis may therefore be GDPR Article 6(1)(b), as the processing of opening and click rates is necessary in order to be able to send the newsletter to you.

Irrespective of this, in the specific case of ActiveCampaign, we also consider the processing of opening and click rates to be permissible on the purposes of legitimate interests (GDPR Article 6(1)(f)).

Our interest in data processing is very high in this respect because we cannot provide the emails to you without this function. You can of course object to this processing at any time by simply unsubscribing from the newsletter. You will find a link to unsubscribe at the end of every e-mail. Otherwise, you can of course also contact us directly at any time.

Finally, we also rely on the consent of the newsletter subscriber and point this out when registering for the newsletter.

#### **Adverisement**

Personal data **will not be** passed on to third parties for the purposes of advertising, market or opinion research.



# If you want to be deleted from the list

Every newsletter email contains a note on how you can have your email address deleted. Alternatively, you can contact our support at any time:

info (at) betterlinked (dot) eu

Of course, you can also contact us with questions about the protection of your personal data and also for the exercise of your data subject rights:

info (at) betterlinked (dot) eu

By the way: With regard to the further information obligations under the GDPR, we refer to our general <u>privacy policy</u>.

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