

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 *DSGVO Article 49 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
- If applicable, click rates in e-mails
- If applicable, status of "bounces" or other delivery problems

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).

Notes on consent

Since the Schrems II ruling, there has not been an adequate level of data protection in the USA, and it cannot be ruled out that state security authorities will issue corresponding orders to newsletter providers in order to gain access to data. Legal protection options are also currently limited. However, since we only work with email addresses, we consider the risk to be reasonable and the probability of actual access to be rather low.

Risk of processing data in the USA

You may have heard about the above-mentioned "Schrems II" ruling of the ECJ. In this ruling, the ECJ declared the data processing regulation previously in place between the USA and the EU called the "Privacy Shield" to be invalid. In its reasoning, the ECJ pointed out that, as things stand, there is not sufficient protection per se for personal data of EU citizens in the USA, because there are far-reaching surveillance powers of the US security authorities (Section 702 Foreign Intelligence Surveillance Act (FISA) and Executive Order (E. O. 12333) and insufficient legal protection exists in this respect. Even if these risks cannot be dismissed out of hand, we currently consider the US service provider we use for sending newsletter emails to be the best choice. And the service provider essentially processes email addresses as well as the data that accumulates when maintaining the newsletter list. The need for protection of this data is therefore limited.

Proper level of data protection

We have concluded an order processing contract with ActiveCampaign in accordance with DSGVO 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".

We have also carried out a Transfer Impact Assessment (TIA) and, in view of the data protection requirements, consider data processing to be permissible to this extent.

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 requested.

Tracking of open and click rates

We "track" open and click-through rates.

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

If you do not want this to be tracked, please do not subscribe to the newsletter.

Advertisement

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 (punkt) 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 (punkt) eu

By the way: With regard to the further information obligations under the GDPR, we refer to our general [privacy policy](#).