

## Privacy policy for the [www.roboception.com](http://www.roboception.com) website

Thank you for your interest in our website [www.roboception.com](http://www.roboception.com) (the "website"). This website is operated by Roboception GmbH ("Roboception") and gives you, the user (the "user" or "you"), the opportunity to find out about our company and our products. As the user, you can also register a user account and purchase our products using this website.

The following provides information on the data that we collect and what we use it for if you visit our website or order a product. This privacy policy explains the legal basis and the purpose for which this occurs. We also inform you of your rights in relation to the use of personal data. If you have any questions regarding the use of your personal data by us, please contact us as the controller (contact under Section 1).

### 1. Controller

The operator of this website and the controller for data processing on this website is:

Roboception GmbH  
Kaflerstrasse 2  
81241 Munich, Germany

Telephone: 49 (0) 89 8895079-0

Email: [info@roboception.de](mailto:info@roboception.de)

### 2. Revocation of your consent for data processing

Many data processing operations are only possible with your express consent. You have the right to revoke any consent that you have already provided at any time with effect for the future. An informal email notification is sufficient to exercise this right (contact under Section 1). The lawfulness of the data processing that occurred up to the date of revocation remains unaffected by the revocation.

### 3. General information on data processing on our website

Various personal data is collected when you use this website.

"Personal data" is any data that can be used to identify you directly or indirectly (such as your name, address, email address, telephone number, IP address).

The collection and processing of personal data in principle only takes place if this is permitted by law or you have consented to the specific use. Once the purpose of the data processing no longer applies, the data is deleted, unless you have consented to further use or statutory retention obligations exist that prevent deletion. Specifically, the following data processing operations take place:

### 4. Data collection on our website and the creation of log files

## 4.1 Description of the data processing

Users can visit our website without registering. However, when visiting the website and accessing a file, our IT system collects access data about this process in a log file. Roboception or the webspace provider collects this information in server log files, which your browser automatically transmits to us. This information includes:

- Browser type and browser version
- Operating system used
- Referrer URL
- Host name of the accessing display device, shortened
- Time of the server request
- IP address

This data is collected automatically as soon as you enter our website. This data is not combined with other data sources.

## 4.2 Legal basis

The data processing is based on Article 6 (1) point f GDPR, which permits data processing if a legitimate interest exists, if such interest is not overridden by the interests or fundamental rights and freedoms of the user.

## 4.3 Purpose

The temporary storage of this data is required in order to present the contents of the website to the user. The collection of this information is therefore necessary to display our website. This also includes the storage of the user's IP address for the duration of the session. The storage in log files takes place in order to ensure and optimise the functionality of the website and to improve our services. It is also used to ensure the security of our IT system. These purposes represent the legitimate interests of Roboception in data processing in accordance with Article 6 (1) point f GDPR.

## 4.4 Duration of storage

This data is deleted if further storage is no longer required for the purpose for which the data was saved. For the provision of the website, this is the case at the end of the respective session. If the data is saved in log files, this is the case after seven days. Further storage is possible, if the users' IP addresses are deleted or shortened so that any assignment to the accessing user is not possible.

## 4.5 Opportunity to object

The collection of data to provide the website and the storage of the data in log files is essential for the operation of the website. As a result, the user has no opportunity to object.

## 5. Use of cookies

### 5.1 Description of the data processing

Our website uses cookies. Cookies are small text files that are stored on your display device and saved by your browser. If a user accesses a website, a cookie may be stored on the user's operating system. This enables the clear identification of the browser when the website is next accessed.

We use cookies to help make our website more user-friendly, effective and more secure. Some elements of our website require the accessing browser to be identified after changing pages on the website. The following data is stored and transmitted in this respect: language settings, items in the shopping car, login information.

We also use cookies to analyse the behaviour of users on our website. More information is provided in Sections 9 and 10.

The user data collected in this manner is pseudonymised. The data is not assigned to the user or other personal user data.

At the beginning of the use of the website, users are informed of the use of cookies for analysis purposes together with a reference to this privacy policy. The user is also informed of the possibility of preventing cookies from being stored.

### 5.2 Legal basis of the data processing

The processing of personal data using cookies takes place based on Article 6 (1) point f GDPR. Roboception has a legitimate interest in storing cookies to ensure the technically flawless and optimised provision of its services.

### 5.3 Purpose of the data processing

The technically necessary cookies are used for the purpose of simplifying the use of the website by the user. Some functions of the website cannot be offered without the use of cookies. These functions require the browser to be recognised after changing pages on the website. We require cookies for the following applications: shopping cart function, implementation of language settings, memorising search terms.

The user data collected by the technically necessary cookies are not used to create user profiles. The analysis cookies are used to improve the quality of our website and optimise our offer. The data collected as a result is only used in pseudonymised user profiles. These purposes also represent the legitimate interest in processing personal data in accordance with Article 6 (1) point f GDPR.

## 5.4 Duration of storage, opportunity to object

Cookies are saved on your display device. "Session cookies" are automatically deleted at the end of your visit. Other cookies are saved on your display device until they are deleted by you; these are referred to as "permanent cookies". These cookies enable us to recognise your browser during your next visit.

You can set your browser so that you are informed of the use of cookies and so that you can only permit cookies in individual cases, while excluding the use of cookies in certain cases or in general, and you can also enable the automatic deletion of cookies when closing your browser. Disabling cookies may restrict the functionality of this website.

If the user does not want cookies to be saved on their display device, wishes to delete a stored cookie or would like to be informed of its storage, they can adjust the settings on their browser accordingly. The specific actions that need to be taken can be found in the browser's help information. We expressly note that, in this case, you may not be able to utilise all of the functions of the website to their full extent.

## 6. Registration as a user with a customer account

### 6.1 Description of the data processing

Users can register on the website with a customer account. Registration with a customer account is necessary to order products. Personal data is collected and stored to create the customer account.

The following data is entered in an input screen and transmitted to us:

Name, email address, username, name of the company and VAT number.

To order products, you also need to provide a delivery and invoice address.

The affected personal data is treated as confidential and is not forwarded to third parties, unless this is necessary to process the order or Roboception is required to do so by law.

### 6.2 Legal basis of the data processing

When registering with a customer account without ordering a product, the legal basis for processing the personal data is the user's consent to process their personal data for the customer account, Article 6 (1) point a GDPR.

If the user orders products, the data is required to complete and process the order. The legal basis for the processing is Art. 6 (1) point b GDPR.

### 6.3 Purpose of the processing

The user data is only processed if the user is registered for this purpose. User registration with a customer account is required in order to purchase our products on the website.

The personal data collected as part of the registration is exclusively used to create and provide a customer account and to perform and execute the contract on ordered Roboception products, not for other purposes. The data to be provided is required to register with a customer account and/or to perform the contract.

## **6.4 Duration of storage**

The personal data is only collected and stored for the duration of the relevant registration with the customer account. In case of registration, this therefore only takes place for the duration of the existence of a customer account or the duration of the performance of the contract. The data is then deleted, unless mandatory statutory retention obligations exist.

## **6.5 Opportunity to object**

Users have the opportunity to amend and update the stored data at any time using their customer account. Roboception will delete the customer account, if the user sends an email to [info@roboception.de](mailto:info@roboception.de) that contains their customer account details and a request for deletion. Statutory retention obligations exist for certain data for the performance of the contract (such as for invoices); in this case, the necessary data is deleted after the expiration of the statutory retention obligation.

When registering as part of a product order, the data is required to perform the contract. In this respect, the user has no right of objection with regard to the data processing.

## **7. Enquiries via the contact form**

### **7.1 Description of the data processing**

If you send us enquiries using the "Request offer" form or our contact form, we will save your details from the enquiry form, including the contact data that you have provided, in order to process the enquiry and for any follow-up questions. We will not pass this data on without your consent.

The following data is transmitted to us via the input screen and saved for this purpose: first name and surname, company, contact partner, email address and any personal details that you provide in the enquiry text.

To process this data, the user's consent is obtained and reference is made to this privacy policy as part of the transmission process. Alternatively, a telephone number is provided to establish contact. In this case, the user's personal data provided over the phone is stored.

## 7.2 Legal basis of the processing

The processing of the data entered in the contact form takes place on the basis of your consent in accordance with Article 6 (1) point a GDPR. If, in the event of telephone contact, no consent for data processing and storage is seen in the user's call, this is justified in accordance with Article 6 (1) point f GDPR. Otherwise, the user's enquiry cannot be processed.

## 7.3 Purpose of the processing

The data transmitted via the contact form must be processed in order to process the enquiry and any subsequent requests. In the event of telephone contact, this also forms the legitimate interest in processing the data.

## 7.4 Duration of storage

We only store the data that you enter in the contact form until it is no longer required to achieve the purpose of their collection. In the event that contact is established using the contact form or over the phone, this is the case once the relevant enquiry has been processed and completed. Moreover, we will delete the data before this occurs, if you request that we delete the data or revoke your consent to store the data. Mandatory statutory provisions, in particular retention periods, remain unaffected.

## 7.5 Opportunity to object and eliminate

Users may revoke the consent to process their data using the contact form at any time with effect for the future. An informal email notification to us at [info@roboception.de](mailto:info@roboception.de) is sufficient to exercise this right. We then delete the data communicated to us via the contact form and will no longer process the enquiry.

## 8. Registration for the newsletter and product recommendations via email to existing customers

### 8.1 Description of the data processing

The website provides the opportunity to subscribe to a free newsletter by email. In this case, you transmit your first name, surname and email address to us via the input screen, which we then store and process. The display device's IP address as well as the date and time of registration are also collected.

If you have ordered products on the website, via our online shop, and have provided your email address, we take the opportunity to send product recommendations for our own similar products, to the extent permitted by law, if we have informed you of this when concluding the contract and you have not submitted a corresponding objection.

The personal data that Roboception processes to send the newsletter is not passed on to external companies. The data is exclusively used to send the newsletter and the product recommendation.

## 8.2 Legal basis of the processing

The legal basis for processing personal data to send the newsletter is Article 6 (1) point a GDPR if the user has provided their consent. The legal basis for product recommendations as a result of a preceding product sale is Art. 6 (1) point f GDPR in connection with Section 7 (3) UWG (German fair trade law).

## 8.3 Purpose of the processing

The personal data collected for the newsletter is used to send the newsletter. The same applies for product recommendations to customers who have purchased products.

## 8.4 Duration of storage

The user's name and email address are stored for the newsletter's subscription period or until they unsubscribe from the newsletter. Any other data collected as part of the registration process is generally deleted after 7 days.

## 8.5 Opportunity to object and eliminate

The user can unsubscribe from the newsletter at any time and object to the receipt of emailed product recommendations via a separate link provided at the end of every newsletter. There is also the option of unsubscribing from/revoking the future receipt of the newsletter by emailing [info@roboception.de](mailto:info@roboception.de).

## 9. Facebook company page

### 9.1 Description of purpose of and legal basis for data processing

In addition to this website, we maintain a Facebook page at <https://de-de.facebook.com/roboception/>, which we use to present our business, provide information about our services and to communicate with our customers and interested parties.

In doing so, and as a matter of principle, we only process personal data if you interact with our Facebook page, e.g. when you leave a comment, click on a like button or send us a message.

The legal bases for the data processing in this regard are, depending on activity type, Article 6 paragraph 1 lit. b. GDPR (e.g. if you send us a contract-related enquiry), or your consent in accordance with Article 6 paragraph 1 lit. a. GDPR (e.g. if you "like" an article of ours, make a comment or upload content to our Facebook page).

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You can withdraw your consent given at any time with future effect by deleting the comment or the content concerned. Any processing which has taken place until such a withdrawal as a result of the consent given remains unaffected by a withdrawal of consent.

## 9.2 Analysis of user behaviour

We analyse page visits and interactions on our Facebook page. For these purposes, Facebook generates usage profiles, but only presents us with anonymous data, known as page insights. These are summaries of data which provide us with information about how users interact with our Facebook page. The legal basis for the data processing is Article 6 paragraph 1 lit f. GDPR, as we have a justified interest in marketing our business by means of social media and in analysing and evaluating the use of our Facebook page in order to improve our product range and our performance.

## 9.3 Usage of data by Facebook

On using and visiting our Facebook page, your personal data will also be processed by the Ireland-based company Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin as well as USA-based Facebook, Inc., 1601 Willow Road, Menlo Park, California 94025 (hereafter referred to as "Facebook"). In addition to the processing described above, Facebook also processes your data for the purposes of analysis and advertising or personalised advertising. According to our current knowledge, Facebook also makes use of cookies which store your usage behaviour (including a variety of end devices). In doing so, Facebook can carry out targeted advertising on its own platform as well as on third-party sites. You can find further information in Facebook's privacy statement, which can be visited here: <https://www.facebook.com/about/privacy/>.

## 9.4 Possibility of objection

Facebook provides the possibility of being able to opt out of certain data agreements; the relevant information and opt-out options can be found at <https://www.facebook.com/policies/cookies/> and at <https://www.facebook.com/settings?tab=ads> for users who are logged in.

According to the Facebook privacy policy, user data is also processed in the USA and other third countries. Facebook transmits user data only to countries for which the European Commission has an adequacy decision in accordance with Article 45 GDPR, or on the basis of suitable guarantees in accordance with Article 46 GDPR. Facebook Inc. is certified under the EU-US Privacy Shield and thus provides an appropriate level of data protection in accordance with Article 45 GDPR (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

## 9.5 Contract concerning shared responsibility in accordance with Article 26 GDPR

With regard to data processing by means of our Facebook page (page insights) we have automatically concluded a contract with Facebook concerning our shared responsibility in accordance with article 26 GDPR, in that we have a Facebook page (Page Controller Addendum“,



[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)). Further information in this matter can be found in Facebook's privacy statement <https://www.facebook.com/about/privacy/>.

## 10. Matomo (Piwik)

### 10.1 Description of the data processing

We use the open source web analysis tool Matomo (formerly Piwik; also refer to [www.matomo.org](http://www.matomo.org)) on our website. Matomo also uses cookies (also refer to Section 6), which are stored on your display device and which enable the use of the website to be analysed for marketing and optimisation purposes. The information on the use of this website generated by the use of Matomo is stored on our in-house server in Germany and exclusively evaluated internally.

The IP address is anonymised immediately after processing and before storage so that no personal reference to the website visitor exists. The data collected using Matomo is only used for the statistical evaluation of user access to improve the website and is not combined with personal data; this also applies for the future. It is not forwarded to third parties.

### 10.2 Legal basis of the processing

The storage of Matomo cookies takes place based on Article 6 (1) point f GDPR. Roboception has a legitimate interest in analysing the user behaviour in order to optimise the website.

### 10.3 Purpose of the processing

We use the Matomo web analysis tool to compile reports on the website activities. These purposes also represent the legitimate interest in processing personal data in accordance with Article 6 (1) point f GDPR.

### 10.4 Duration of storage, opportunities to object

You can object to the Matomo analysis. Various opportunities are available in this respect:

#### Browser plugin

For instance, you can prevent the installation of cookies by changing the settings in your browser software accordingly. If you want to prevent the analysis of your behaviour on the web in general, you can activate the "Do Not Track" option in your current web browser.

#### Objection to data collection

You can decide whether a web analysis Cookie may be stored on your browser in order to allow us to collect and analyse various statistical data. If you prefer not to allow this, click on the following link to store the Matomo deactivation Cookie on your browser.

- ☑ Your visit to this website is currently recorded by Matomo web analysis. Click here if you do not want your future visits to be recorded.

If you remove the cookies stored in your browser, please note that this will also delete the Matomo deactivation cookie for this website. The Matomo deactivation cookie only applies for the specific display device on which it was stored. If you use another display device, you would have to object to the Matomo analysis once again.

## 11. Google AdWords Conversion Tracking

### 11.1 Description of the data processing

Our website uses Google AdWords, an online Google Inc. marketing program. The provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

This uses the Conversion Tracking function. If users click on an advertisement placed by Google, a cookie for conversion tracking is set on the user's display device ("conversion cookie"). These cookies become invalid after 30 days, do not contain any personal data and are therefore not used for personal identification. If users visit our website and the cookie has not yet expired, Google and Roboception can identify that users have clicked on the advertisement and were forwarded to this website. Every Google AdWords customer receives a different cookie. Cookies can therefore not be tracked by the websites of AdWords customers.

### 11.2 Legal basis of the processing

The storage of cookies for conversion tracking takes place based on Article 6 (1) point f GDPR. Roboception has a legitimate interest in optimising its marketing by evaluating user behaviour.

### 11.3 Purpose of the processing

The information that is obtained with the help of cookies for conversion tracking is used to create conversion statistics for us. This provides information on the total number of users that have clicked on our advertisement and have been forwarded to a website with a conversion tracking tag. However, we do not receive any information that allows us to personally identify you as the user in this process.

### 11.4 Duration of storage, opportunities to object

These cookies become invalid after 30 days. If you oppose the tracking process, the cookie for conversion tracking can be deactivated via your internet browser. You can use your browser's help function for further information. You can find out more about Google's privacy provisions at <https://policies.google.com/privacy?gl=de>.

## 12. Protecting your data

Roboception constantly endeavours to take appropriate precautions to prevent unauthorised access to the users' personal data and the unauthorised use or corruption of this data and to minimise the associated risks.

However, please note that the transmission of data over the internet (e.g. communication via email) may contain security gaps. The seamless protection of data against access by third parties is not possible.

## **13. Questions on data protection and user rights**

You have the right to obtain information on the source, recipients and purpose of your stored personal data at any time, free of charge. You also have the right to request the rectification, blocking or deletion of this data. To do so, and if you have other questions on the topic of data protection, you can contact us at any time using the contact details provided in Section 1. You are also entitled to lodge a complaint with the competent supervisory authority.

Specifically, as the data subject, you have the following rights in your relationship with us as the controller:

### **13.1 Right of access**

You have the right to obtain confirmation as to whether we are processing any of your personal data. If such processing exists, you can request the following information:

- the purposes for which the personal data is being processed;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data has been or will be disclosed;
- the envisaged period for which the personal data will be stored, or, if specific information is not available, the criteria used to determine that period;
- the existence of the right to request that the controller rectify or delete the concerned personal data, a right to restrict the processing by the controller or a right to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data is not collected from the data subject, any available information as to its source;
- the existence of automated decision-making, including profiling, referred to in Article 22 (1) and (4) GDPR and, at least in those cases, meaningful information about the logic involved as well as the significance and the envisaged consequences of such processing for the data subject.

Users have the right to request information on whether the concerned personal data is being transmitted to a third country or an international organisation and on the appropriate guarantees pursuant to Art. 46 GDPR in connection with the transmission.

### **13.2 Right to rectification**

You have the right to rectification and/or completion, if the processed personal data is incorrect or incomplete.

### **13.3 Right to restriction of processing**

You can request the restriction of the processing of the concerned personal data when one of the following applies:

- if you contest the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the deletion of the personal data and request the restriction of its use instead;
- Roboception no longer needs the personal data for the purposes of the processing, but you require this data for the establishment, exercise or defence of legal claims, or
- if you have objected to processing pursuant to Article 21 (1) GDPR pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where the processing of your personal data has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

If the processing is restricted in accordance with the aforementioned requirements, we will inform you before the restriction is lifted.

### **13.4 Right to deletion**

You can demand that we immediately delete your personal data and we are obliged to immediately delete this data if one of the following grounds applies:

- your personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- you withdraw your consent on which the processing is based according to Art. 6 (1) point a or Art. 9 (2) point a GDPR, and there is no other legal ground for the processing;
- you object to the processing pursuant to Article 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21 (2) GDPR;
- your personal data has been unlawfully processed;
- your personal data has to be deleted for compliance with a legal obligation in Union or Member State law to which Roboception is subject;
- your personal data has been collected in relation to the offer of information society services referred to in Article 8 (1) GDPR.

## 13.5 Right of notification

If you have asserted the right to rectification, deletion or restriction of the processing in relation to us, we are obliged to notify all recipients, to which your personal data has been disclosed, of this rectification or deletion of the data or restriction of the processing, unless this proves to be impossible or involves disproportionate effort. You have the right to be informed of these recipients.

## 13.6 Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another controller without hindrance from the controller to which the personal data has been provided, where:

- the processing is based on consent pursuant to Article 6 (1) point a GDPR or on a contract pursuant to Article 6 (1) point b GDPR; and
- the processing is carried out by automated means.

In exercising this right, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible. This must not adversely affect the rights and freedoms of others. The right to data portability does not apply for the processing of personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

## 13.7 Right to object

You have the right to object, on grounds relating to your particular situation, to the processing of your personal data which is based on Article 6 (1) points e and f GDPR at any time. Roboception will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.

If your personal data is processed for direct marketing purposes, you have the right to object, at any time, to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

If you object to the processing for direct marketing purposes, your personal data will no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

## 13.8 Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This does not apply if the decision:

- is necessary for entering into, or performance of, a contract between you and the controller;
- is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests;
- or
- is based on your explicit consent.

## **13.9 Right to lodge a complaint with a supervisory authority**

The data subject has the right to lodge a complaint with the competent supervisory authority in the event of breaches of data protection laws. The competent supervisory authority in data protection matters is the state data protection officer in the federal state in which Roboception is domiciled. A list of data protection officers and their contact details is provided in the following link: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html).

## **14. Amendments**

To ensure that the privacy policy complies with the legal provisions, Roboception reserves the right to amend the policy at any time. This also applies if the privacy policy has to be adapted as a result of a change to our offer on the website. The new privacy policy applies from the user's next visit to the website.

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