

Privacy Policy

1. Our personal data protection commitment

We, Sierra Germany Real Estate Management GmbH, with the registered office at Klaus-Bungert-Straße 8/8a, 40468 Düsseldorf, Germany, (henceforth, 'the Company') are the operator of the online service (henceforth 'the website') and are responsible for processing the personal data of users of the online service (henceforth 'the Users' or 'the Data Subjects').

Our contact details can be found in the imprint of the online service. The contact details for questions regarding the processing of personal data are named directly in this privacy policy.

We take the protection of your personal data very seriously. We collect, store, and use your personal data only in accordance with the content of this Privacy Policy and the applicable personal data protection regulations, in particular the European Union General Data Protection Regulation (GDPR) and national data protection regulations.

As part of its commitment to personal data protection, the Company will always provide you the necessary information so that you understand the manner and the conditions under which your personal data will be processed.

The present document aims precisely to inform the Users of the necessary information regarding the processing of their personal data in connection with the use of our website.

1.1. Personal data

Personal data is all information about an identified or identifiable individual. This includes information about your identity such as your name, your e-mail address, or your postal address. Any information that cannot be directly linked to your identity (e.g. statistical details such as the number of users of the website) is, however, not considered to be personal data.

You can essentially use our website without disclosing your identity and without providing any personal data. In that case, we will merely collect general information about your visit to our website. However, some of the services offered require you to provide certain personal data. As a rule, we will process such data only for purposes connected with the use of this website, including without limitation for the provision of the desired information. Whenever personal data is collected, you are only required to provide the data that is absolutely essential. Also, you may be invited to communicate additional details, which is optional information provided voluntarily. We let you know

in each case whether the input fields are for mandatory or optional details. More specific details are provided in the relevant section of this Personal Data Protection Commitment.

There is no automated decision-making on the basis of your personal data in connection with the use of our website.

1.2. Processing of personal data

We store the information provided by you on protected dedicated servers located within the European Union. Technical and organisational measures are taken to protect such servers against loss, destruction, access, modification, or dissemination of your data by unauthorized persons. Access to

your data will be permitted only to a limited number of persons in charge of the technical, commercial, or editorial support of the servers. Notwithstanding regular controls, full protection against all risks cannot be provided.

Your personal data is transmitted over the Internet in encrypted form. We use TLS/SSL encryption (Transport Layer Security/Secure Socket Layer) for data transmission. The website is only meant for, and should only be used by, those over 16 years of age. We do not process willingly and knowingly the personal data of children. If we discover that we have collected the personal data of children we will immediately proceed to its erasure. We ask that you contact us if you know that we collected or processed the personal data of children.

1.3. Disclosure of personal data to third parties

We use your personal information exclusively for providing the services that you have requested from us. Insofar as we use external service providers in performing the service requested, such external service providers will also access the data exclusively for the purpose of performing the service. By taking the necessary technical and organisational measures we ensure compliance with data protection policies and we demand the same of our external partners.

We contractually impose to our service providers acting as processors to implement adequate security measures to protect your personal data.

In the categories of recipients to whom we may communicate personal data we include:

- i. Pservers Consulting Lda., Rua Professor Vieira de Almeida 5 10 C, P-1600 Lisbon, Portugal
- ii. Performance Sales, Lda., Av. Marginal, Edifício Parque Oceano, 4^o andar, 2780-322 Oeiras
- iii. ABLE NEXT SOLUTIONS, LDA., com sede na Rua Infancia 16, nº.9-1º Esquerdo, 1250-129 Lisboa
- iv. Sierra Portugal, S.A., Lugar do Espido, Via Norte, 4470-177 Maia, Portugal
- v. iideenreich GmbH, Düsseldorf Str. 47, 10707 Berlin

And possibly other providers of the following services:

- vi. data storage (data center);
- vii. conception and execution of marketing materials and supports.
- viii. supply of the website's technological structure, technical support and systems' maintenance and applications.

We may possibly transfer your personal data in the context of a business sale or a sale of the shopping center "Spandau Arcaden", of a merger, demerger or control change within the Company or in the context of preparing any of those events. In any case, the processing of the data by the entity to whom they have been transferred will respect the terms of the present personal data protection commitment.

Further to what informed above we will not disclose personal data to any third parties, including without limitation for advertising purposes, without your express consent. We will disclose your personal data to third parties only if you have given your consent to disclosure of the data or insofar as we are entitled or obligated to do so under legal provisions and/or administrative or judicial orders. This may include, without being limited to, giving information for purposes of criminal prosecution, in

order to avert danger, or in order to enforce intellectual property rights. If we transfer your personal data ourselves or through service providers to countries outside the European Union, we comply with the special requirements of Art. 44 ff. GDPR and also oblige our service providers to comply with these regulations. We will therefore only transfer your data to countries outside the European Union subject to the level of protection guaranteed by the GDPR. This level of protection is ensured in particular by an adequacy decision of the EU Commission or by appropriate safeguards in accordance with Art. 46 GDPR.

1.4. Legal basis of data processing

Throughout this Personal Data Protection Commitment, we refer to the legal basis on which we process your personal data.

1.5. Deletion of data and duration of storage

We invariably delete or anonymise any personal data provided by you as soon as the purpose of storage of such data has ceased to apply. However, we may continue to store your personal data beyond that, if such storage is governed by legal provisions to which we are subject, including without limitation the legal obligation to retain business records and documentation. In such a case, we will delete or anonymise the personal data after the prescribed period of time has expired. As a rule, we delete your personal data at the latest three years after the last interaction.

2. Communication with us

There are various contact channels for contacting us, including, but not limited to, the email on our website or to our social media networks (namely Facebook and Instagram). For further information about our social media channels and the contact options available there, as well as the protection of your personal data, please refer to [our privacy notice for social media networks](#).

2.1 Contact via e-mail

If you wish to contact us via e-mail, we will collect the personal data that you provide us, including, but not limited to, your name and e-mail address. We process all data transmitted through this contact channel exclusively for the purpose of answering your enquiry or reacting to your concern.

It is up to you to decide what information you provide us in that communication. In accordance with Article 6 (1) (a) of the GDPR, your consent constitutes the legal basis for processing your data.

After processing the inquiry, the data will only be stored in case of further queries. You can request the deletion of the data at any time. Otherwise, the data will be deleted as soon as it is no longer necessary for the purpose for which it was collected. For your personal data, this is the case as soon as the conversation is ended. The conversation is ended for us when it can be inferred from the circumstances that the facts have been conclusively clarified. Statutory retention obligations remain unaffected in any case.

2.2 Social Media

Our website contains links to the social networks Facebook and Instagram. The links are identified by the logo of their relevant providers.

Clicking on a link opens the relevant social media web pages; this Privacy Policy does not apply to such web pages. For further details on the provisions applicable on such web pages please refer to the relevant privacy statements of each of the providers; you can find them at:

Facebook: <https://www.facebook.com/privacy/policy>

Instagram: <https://privacycenter.instagram.com/policy>

TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>

YouTube: <https://policies.google.com/?hl=en&gl=en>

LinkedIn: <https://de.linkedin.com/legal/privacy-policy>

No personal information is forwarded to the relevant providers before clicking on the links. Calling up the linked website also constitutes the basis for data processing by the relevant website provider. For further information about our social media channels and the contact options available there, as well as the protection of your personal data, please refer to [our privacy notice for social media networks](#).

2.3 Newsletter

If you subscribe to our newsletter, we will use your e-mail address for advertising purposes of our own until you unsubscribe from the newsletter. We will regularly send you information by e-mail on current topics as well as e-mails informing you of special occasions such as special offers. Such e-mails may be personalised and individualised on the basis of information we have about you.

Unless you have given us your consent in writing, we use the so-called double opt-in procedure for subscription to our newsletter, i.e. we will send you our newsletter by e-mail only once you have expressly confirmed that you want us to activate transmission of the newsletter. We will then send you a notification e-mail and ask you to confirm, by clicking on one of the links contained in that e-mail, that you wish to receive our newsletter.

Your consent constitutes the legal basis for us to send you newsletters in accordance with Article 6 (1) (a) of the GDPR.

You may withdraw your consent at any time without incurring any costs. Simply use the unsubscribe link contained in every newsletter or send us a message to our data protection contacts. Your declaration of consent may be stored for as long as you may assert claims for damages according to our legitimate interest in defending legal claims against us pursuant to Art. 6 (1) (f) GDPR. As a rule, we delete your personal data at the latest three years after the last interaction.

2.4 Brevo

For the distribution of our newsletter, we use Brevo. Brevo is a service provided by Sendinblue GmbH, Köpenicker Str. 126, 10179 Berlin, Germany (hereinafter: "Brevo"). The email addresses of our newsletter recipients, as well as any additional data processed in connection with newsletter distribution, are stored on Brevo's servers in Germany. Brevo also offers various analytics that enable us to determine, for example, whether and to what extent newsletters are opened or used, how many users a newsletter has been sent to, whether emails have been rejected, and whether users have unsubscribed from the mailing list after receiving an email. In addition, it is possible to analyse whether

a predefined action has taken place after clicking on a link in the newsletter. Further information on data protection in connection with Brevo can be found at <https://www.brevo.com/legal/termsofuse/>.

Brevo uses the information provided and collected to send and evaluate the newsletters on our behalf. We have entered into a data processing agreement with Brevo.

The legal basis for our cooperation with Brevo is your explicit consent pursuant to Art. 6 para. 1 lit. a) of the General Data Protection Regulation (GDPR).

3. More information about the usage of our website

3.1. Information related to your computer

Every time you access our website, we will collect the following information relating to your computer: the IP address of your computer, the inquiry of your web browser, and the time stamp of that inquiry. In addition, the status and the amount of data transmitted in the course of the inquiry are collected. We also collect product and version information about the web browser used and the operating system of the computer. The IP address of your computer is stored only for the duration of your use of our website; afterwards, it is deleted or anonymized by truncation. The remaining data is stored for a limited period of time. As a rule, we delete any type of personal data at the latest three years after the last interaction.

We use this data to operate the website, more specifically for troubleshooting, or in order to assess the degree of utilization of the website, or to carry out adjustments or improvements thereof. Such purposes also constitute our legitimate interest in data processing in accordance with Article 6 (1) (f) of the GDPR.

3.2. Use of cookies

Like many other websites, our website uses cookies. Cookies are small text files that are stored on your computer and store certain settings and data of your web browser for the exchange with our website. Cookies enable us to recognise your computer and to make any default settings immediately available. The cookies we use are, as far as possible, so-called session cookies, which are automatically deleted at the end of the browser session. In some cases, cookies with a longer storage period may also be used so that your settings and preferences can be taken into account the next time you visit our website.

Most browsers are set to automatically accept cookies. However, you can deactivate the storage of cookies or set your browser to notify you as soon as cookies are sent. It is also possible to manually delete cookies that have already been stored via your browser settings. Please note that you may only be able to use our online offering to a limited extent or not at all if you refuse the use of cookies or delete necessary ones.

If cookies are not necessary for our online offering, we will ask for your consent to the use of cookies when you first visit the online offering. With regard to non-essential third-party cookies, you will find a more detailed description of the third-party services we use in our cookie policy at <https://www.spandau-arcaden.de/en/cookies-policy/>.

3.3. Integration of third-party services

We use third-party services for some functions in our online offering. These services are predominantly optional functions that you must explicitly select or use. We have agreements with the respective providers for the provision or integration of their services and these agreements explicitly require third-party providers to provide transparent information on the scope of the personal data processing and to comply with applicable data protection regulations.

3.3.1. Google Analytics

We use Google Analytics for statistical evaluation.

Google Analytics is a web analytics service provided by Google Ireland Limited, Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how you use the site. The information generated by the cookie about your use of this website will as a rule be transmitted to and stored by Google. It cannot be ensured that data may not be transferred to the USA, and that government agencies may have access to this data. However, thanks to standardized IP anonymization, your IP address is truncated by Google on servers in the European Union beforehand. On behalf of the Company, Google will use this information for the purpose of evaluating your use of the website, without enabling us to identify yourself, and always provide us with aggregate statistics, compiling reports on website activity, and providing other services relating to website activity and Internet usage for the website owner. In addition, Google may use the data for its own purposes. As part of these purposes, Google may, for example, create profiles of user behaviour or link the data to other data, such as an existing Google account. We have no influence on these data processing operations. According to Google, the IP address transmitted by your browser as part of Google Analytics is not merged with other data that Google collects or already has. You may refuse the use of cookies by selecting the appropriate settings on your browser software; however, please note that if you do this you may not be able to use the full functionality of this website. You can prevent the data generated by the cookie and based on your usage of this website (including your IP address) being sent to and processed by Google by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout?hl=en>.

For further details please visit <https://tools.google.com/dlpage/gaoptout?hl=de/> or <http://www.google.com/intl/de/analytics/privacyoverview.html> (general information on Google Analytics and data protection). Please be advised that on our web pages, Google Analytics has been extended by the code "anonymizelp();" in order to anonymise IP addresses by deleting the last octet.

Our legal basis for the use of Google Analytics is your consent according to Article 6(1)(a) of the GDPR. You can withdraw your consent at any time, for example by adjusting the cookie settings in your browser. Otherwise, the collected data will be stored until you request us to delete it, Google deletes the cookies itself, or the purpose for data storage no longer applies. Mandatory legal retention periods remain unaffected. The withdrawal of consent does not affect the lawfulness of processing based on consent before the withdrawal.

3.3.2. Google Tag Manager

We use Google Tag Manager from Google for our online offering. Google Tag Manager is a tag management system (TMS) that can be used to manage tags, i.e., tracking codes and associated code fragments, on our website. Google services can be integrated into a website via Google Tag Manager.

When using Google Tag Manager, a connection to Google's servers is established. This means that the IP address of the browser on the device used by the visitor to this website is stored by Google. It cannot be ruled out that data may be transferred to Google in the USA in this context and that US security authorities may be able to access the data under certain circumstances.

Our legal basis for using Google Tag Manager is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with effect for the future, for example by adjusting the cookie settings in your browser. For more information about Google Tag Manager and data processing by Google, please visit:

<https://support.google.com/tagmanager/answer/9323295?hl=en>

<https://www.google.com/policies/privacy/>

3.3.3. Gstatic

We use the Gstatic service as a domain from Google. Gstatic helps in particular to load content on Google faster from our content delivery networks (CDN). A CDN is a network of regionally distributed servers that cache static content such as images, scripts, and style sheets and deliver them via the server closest to the user. This enables faster and more stable delivery of content. The domain reduces bandwidth usage, increases network performance, and generally speeds up the loading of Google services. When using this service, it cannot be ruled out that data may be stored on Google servers in the USA. This may also allow US security authorities to access the data stored there. Our legal basis for using Gstatic is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with effect for the future, for example by adjusting the cookie settings in your browser. For more information about Gstatic and data processing by Google, please visit: <https://policies.google.com/privacy>.

3.3.4. Amazon Web Services

We also use Amazon Web Services. This is a cloud computing service/hosting provided by Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA. We use this service to store our data on Amazon's servers. If you transmit data to us or if data is lawfully collected from you, it will be stored in the cloud. Storage on servers in the USA means that it cannot be ruled out that US security authorities may also access the data stored there. Amazon is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. In addition, Amazon Web Services is used for statistical evaluations and for the optimal provision of content.

The legal basis is Art. 6 (1) (f) GDPR. Our legitimate interest lies in providing a secure and fast online service and optimizing our website.

Further information on data processing can be found in Amazon's privacy policy at <https://aws.amazon.com/de/privacy/>.

3.3.5. Cloudflare

We use the services of Cloudflare Germany GmbH, Rosental 7, 80331 Munich (hereinafter: "Cloudflare") to prevent misuse of our online offering. Cloudflare offers verification tools that distinguish real people from automated scripts and bots and protect our online offering from harmful scripts and bots. The use of these services requires the transfer of your IP address and other data (device information, user behaviour, and cookie content) to Cloudflare.

The legal basis for the transfer of data is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with future effect, for example by adjusting the cookie settings in your browser. In addition, the legal basis is our legitimate interest in providing a safe website according to Art. 6 (1) (f) GDPR. Otherwise, the collected data will be stored until you request us to delete it, delete the cookies set by Cloudflare yourself, or the purpose for data storage no longer applies. Mandatory legal retention periods remain unaffected.

Further information on data protection at Cloudflare, including in relation to the Turnstile service, can be found at <https://www.cloudflare.com/de-de/privacypolicy/>.

3.3.6. Google Maps

We use the Google Maps map service for our online offering. Google Maps is a service provided by Google. Only cookies that are technically necessary are set for the maps integrated into our online offering.

In order to comply with data protection regulations, the terms of use for the map service contain data protection provisions that serve to protect you. Google's terms of use for the map service can be found at https://www.google.com/intl/de_US/help/terms_maps.html, and general explanations from Google on data protection are available at <https://policies.google.com/privacy?hl=de&gl=de>.

The legal basis for the transfer of data is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with future effect, for example by adjusting the cookie settings in your browser.

3.3.7. Use of Google Fonts

Google Fonts are used as external fonts for our online offering. Google Fonts originate from Google and are made available free of charge by Google. These Google Fonts are integrated via a server call, usually a Google server. This transmits to the server which of our web pages you have visited. Google also stores the IP address of the browser of the visitor's device. It cannot be ruled out that data may be transferred to the USA in this context and that US security authorities may be able to access the data under certain circumstances. For more information about data processing by Google, please refer to Google's privacy policy, which you can access here:

<https://developers.google.com/fonts/faq/privacy?hl=de>

www.google.com/policies/privacy/

Our legal basis for using Google Fonts is your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke your consent at any time with effect for the future, for example by adjusting the cookie settings in your browser.

3.3.8. Use of YouTube

Our online offering includes YouTube videos, which we play using a plugin from the Google-operated service YouTube (hereinafter: "YouTube").

We use the YouTube service in extended data protection mode in order to protect your privacy as much as possible. When you visit a page on our website that contains a YouTube video, Google initially only receives the information necessary for embedding the video, and no cookies are set for usage analysis. Only when you play the embedded video does Google receive further information; Google may also set cookies to analyse your user behaviour. When you play the video, Google's YouTube servers are informed, for example, which page of our online offering you are playing the video on.

If you are logged into your Google account, you enable Google or YouTube to assign your surfing behaviour directly to your personal Google profile. We therefore recommend that you only play embedded YouTube videos if you agree to the associated data processing by Google. You can prevent data being assigned to your Google profile by logging out of your YouTube account. Further information on the handling of user data can be found in Google's privacy policy at <https://www.google.de/intl/de/policies/privacy/>, which also applies to YouTube.

We use YouTube so that we can show you videos and thus better inform you about us and our services. The legal basis for the integration of the videos is our legitimate interest within the meaning of Art. 6 (1) (f) GDPR; however, the playing of the videos and the associated further data processing only takes place on the basis of your consent within the meaning of Art. 6 (1) (a) GDPR.

3.3.9. Use of Vimeo

Our online offering includes videos from the Vimeo video platform. The service is operated by Vimeo LLC, 555 West 18th Street, New York 10011, USA. (hereinafter: "Vimeo").

When you visit a page on our website that has a video embedded via Vimeo, a connection to Vimeo's servers is established. Vimeo only uses cookies that are technically necessary. No further cookies for analyzing your user behavior are set at this level.

If you are logged into your Vimeo account, you enable the provider to assign your surfing behavior directly to your personal profile. Vimeo may set cookies to analyze your user behavior. You can prevent this by logging out of your account. For more information on the handling of user data, please refer to Vimeo's privacy policy at <https://vimeo.com/privacy>.

We use Vimeo so that we can show you videos and inform you about us and our services. The legal basis for the integration of the videos is our legitimate interest within the meaning of Art. 6 (1) (f) GDPR; however, the playing of the videos and the associated further data processing only take place on the basis of your consent within the meaning of Art. 6 (1) (a) GDPR.

3.3.10. Polylang

For our website, we use WordPress plugins from WP SYNTEX S.A.R.L, 8 rue Joseph Cugnot, 38307, Bourgoin Jallieu, France, to provide content in different languages. Polylang stores the language selected by the user in a cookie so that the website is automatically displayed in that language the next time the user visits.

The cookie contains only the language information and no other personal data. It is usually stored for one year.

The legal basis for the use of Polylang is Art. 6 (1) (f) GDPR, as we want to provide our users with a user-friendly and multilingual presentation of our content.

You can prevent the cookie from being set by adjusting the settings in your browser; however, this may affect the functionality of the website.

Further information on data processing by Polylang can be found in Polylang's privacy policy: <https://polylang.pro/privacy-policy/>.

3.3.11. Google reCAPTCHA

To protect our forms against misuse and spam, among other things, we use the reCAPTCHA service provided by Google for our online offering. The service analyses the extent to which manual input by a user actually takes place and is designed to filter out automated access, for example by scripts or so-called bots. To use the service, it is necessary to transfer the IP address and other data required by Google for the reCAPTCHA service (device information, user behaviour, and cookie content) to Google. The legal basis for the transfer of data is our legitimate interest pursuant to Art. 6 (1) (f) GDPR, whereby our legitimate interest relates to the protection of our online offering from misuse and the security of the online offering as a whole.

Further information on data protection at Google, including in relation to the reCAPTCHA service, can be found at <https://policies.google.com/privacy?hl=de>.

3.3.12. Cookiebot by Usercentrics

For our online offering, we use the cookie consent technology Cookiebot from Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark. We use Cookiebot to obtain your consent to store certain cookies in your browser and to document this.

When you open our website, a Cookiebot cookie is stored in your browser, in which the consents you have given or the revocation of these consents are stored. This data is not passed on to the provider of Cookiebot.

The data collected is stored until you request us to delete it, delete the Cookiebot cookie yourself, or the purpose for storing the data no longer applies. Mandatory legal retention periods remain unaffected. Details on Cookiebot's data processing can be found at <https://www.cookiebot.com/en/privacy-policy/>.

Cookiebot cookie consent technology is used to obtain the legally required consent for the use of cookies. The legal basis for this is our compliance with legal obligations according to Art. 6 (1) (c) GDPR.

3.3.13. CDN-Cloud-Service - Amazon CloudFront

We use the Amazon CloudFront from Amazon Web Services. This service is provided by Amazon Web Services, Inc, 410 Terry Avenue North, Seattle, WA 98109, USA. In order to optimize the loading times of our website and ensure high availability of content, we use a content delivery network (CDN). A CDN is a network of regionally distributed servers that cache static content such as images, scripts, and style

sheets and deliver them via the server closest to the user. This enables faster and more stable delivery of content. If you transmit data to us or if data is lawfully collected from you, it will be stored in the cloud. Storage on servers in the USA means that it cannot be ruled out that US security authorities may also access the data stored there. Amazon is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA.

When using this service, technical access data such as your IP address, information about your browser type and version, the referrer URL (the previously visited website), the time of the server request, and the amount of data transferred are processed. This data is necessary for the content to be transferred correctly from the servers to your browser.

The use of the CDN and the associated data processing are based on our legitimate interests pursuant to Art. 6 (1) (f) GDPR. Our legitimate interest lies in the technical optimization, security, and cost-effectiveness of our online offering.

3.4. Links to other websites

Our online service may contain links to other websites (examples: Google, Google Maps, Google Play Store, App Store). Generally, these links are identified as such. We cannot control to what extent linked websites comply with the applicable data protection provisions. We therefore recommend that for other providers' data protection statements, you refer to the information given on their respective websites before you call up the link.

3.5. Social networks Plugins

We may use Social Plugins on our websites to provide you a better experience across the digital channels. These social plugins imply the installation of cookies from the social network providers (Facebook, Instagram, Twitter, etc.) on your browser. In order to assure that you are informed of it and accept it, we will ask for your consent before loading any cookie or before presenting you any component or page from such providers.

More details about our Privacy Notice for Social Media are available [here](#).

3.6. Browser Notifications (web push notifications)

We may be sending you Web Push Notifications using the "OneSignal" service from OneSignal, Inc., 2850 S Delaware St Suite 201, San Mateo, CA 94403, USA. OneSignal, Inc. is an active participant in the EU-US Data Privacy Framework, which regulates the correct and secure transfer of personal data from EU citizens to the USA. OneSignal enables us to send messages directly to our users' devices, provided they have expressly consented to receiving push notifications.

The Web Push Notifications that we may be sending you are about our exclusive discounts and promotions, sweepstakes, news, events and information on other activities promoted by the Company or by its respective partners.

Web Push Notifications are notifications that can be sent to a user via the browser (Chrome, Opera, Safari, etc). These are alert style messages that slide in at the top or at the bottom right hand corner of the screen when the browser is seen in computer, or that are presented in the top or middle of the screen when the browser is seen in mobile devices.

For this purpose, OneSignal processes technical data such as device identifiers, browser information, language settings, and information about whether and when a notification was received or clicked on. This data is used exclusively for the delivery and analysis of push notifications. OneSignal may use cookies or similar technologies stored in the browser for this purpose.

For further details please visit: <https://onesignal.com/blog/product-policy-updates-for-gdpr/>; <https://documentation.onesignal.com/docs/handling-personal-data>. Please be advised that OneSignal will automatically not collect IP Addresses from all EU Users.

The legal basis for processing is your consent in accordance with Art. 6 (1) (a) GDPR. We will not send you Web Push Notifications unless you give us consent. You can withdraw your consent at any time, by deactivating push notifications in the settings of your browser or device. The withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

For more information on data processing by OneSignal, please refer to OneSignal's privacy policy: <https://onesignal.com/privacy>.

4. How May You Exercise your Data Protection Rights?

We aim to provide clear information about how your personal data is processed and to outline the rights you hold under data protection legislation. If you require further details or wish to exercise any of your rights, you may contact us directly. The following sections explain the procedures for exercising your rights and how you can reach us for assistance.

4.1 Rights of persons concerned

You have extensive rights with respect to the processing of your personal data. The data subject may exercise his or her right by contacting the company at the address: dataprotection@spandau-arcaden.de.

The data subject may exercise, under the terms of the law, the following rights:

- **right of access;**
- **right to rectification;**
- **right to restriction of processing;**
- **right to withdraw the consent;**
- **right to data portability;**
- **right to object;**
- **right to erasure (or right to be forgotten)**

If you believe that our processing of your personal data is not in accordance with this Privacy Policy or the applicable data protection regulations, you have the right to lodge a complaint with the supervisory authority.

You can also complain to our data protection officer, through the following email: datenschutzbeauftragter@sonaesierra.com. The data protection officer will then investigate the matter and inform you of the outcome of the investigation.

4.2 Additional information regarding the withdrawal of consent and objection

You may at any time withdraw your consent with future effect. The withdrawal of the consent does not affect the legality of any processing performed on the basis of such consent given up until the withdrawal thereof.

Insofar as the processing of your personal data is not based on consent given by you but on another legal basis, you can object to the data processing. Your objection will lead to a review and, if necessary, to termination of the data processing. You will be informed of the outcome of the review and – if the data processing is to be continued nonetheless – you will receive further information from us on why the data processing is admissible.

4.3 Data protection officer and contact details

We have appointed an external data protection officer who supports us in data protection matters and whom you can also contact directly. If you have any questions regarding our handling of personal data or would like further information on data protection issues, please do not hesitate to contact our data protection officer and his team:

Email: dataprotection@spandau-arcaden.de

5. Updates to this Data Protection Commitment

The terms of the present commitment may be altered or updated, which will be subject to disclosure on our website. Any revision of this Data Protection Commitment is identified by the date specified (see below). We reserve the right to amend this Data Protection Commitment at any time with effect for the future. Amendments will be made, among other things, in case of technical adjustments of the website or changes of the data protection laws. The Data Protection Commitment as amended from time to time is always made available directly through our website. We recommend reading the Data Protection Commitment on a regular basis.

6. Document changes

Date	Version	Country	Comments
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17-05-2018	1.0	DE	Initial version
27-07-2018	2.0	DE	Update to the contacts
18-09-2018	3.0	DE	Update to the Data Protection Authority information
20-11-2020	4.0	DE	Additional information about Cookies, Google Analytics, Browser Notifications and Social Media
28-07-2021	5.0	DE	Amendment to the legal basis to send newsletter
19-12-2025	6.0	DE	Update