

Data privacy policy for Veroval medi.connect from PAUL HARTMANN AG

PAUL HARTMANN AG (HARTMANN) is the operator of the Veroval medi.connect web application, the Veroval medi.connect app and the Veroval products, and aims to protect your privacy. This data privacy policy should provide you with information on how HARTMANN collects, uses and stores your personal data when you use the Veroval medi.connect web application, the Veroval medi.connect app and the Veroval products, which are compatible with Veroval medi.connect. HARTMANN believes that protecting your privacy is of the utmost importance. Compliance with the statutory data privacy provisions is therefore a matter of course for HARTMANN. HARTMANN firmly believes that data privacy starts with transparency. It is therefore very important to HARTMANN that you know at all times when HARTMANN is storing what personal data about you, how HARTMANN is using your personal data, and also how you can restrict or prevent HARTMANN's use of your personal data.

The operator of the Veroval medi.connect web application, the Veroval medi.connect app and the Veroval products, and thus the service provider within the meaning of the German Telemedia Act (TMG) and the responsible authority within the meaning of the German Federal Data Protection Act (BDSG) is PAUL HARTMANN AG, based in Heidenheim, Germany.

By using our web application and by using our apps that are available on iTunes, Google Play or our website, you agree to us collecting, processing and using your personal data in accordance with this data privacy policy and the legal provisions. You may withdraw your consent at any time with effect for the future.

1. What is personal data?

Personal data is all the information about an identified or identifiable person's personal and factual circumstances. This includes information and details such as your (real) name, your address or other postal address and your phone number. This also includes your email address if it refers to your name in such a way that makes you identifiable. It does not include information which cannot be used to determine your identity. Such information includes, for example: all information that does not refer to your name, e.g. that only indicates your gender, age or training.

2. Use and transfer of personal data

HARTMANN is committed to protecting your privacy and only uses your personal information within the company and only passes it on to those companies engaged to perform contracts concluded with you or otherwise involved in service provision. Otherwise, your personal details shall not be transferred to third parties if you have not expressly given your consent to this effect or if we are obliged to publish the same due to a court or an official order.

3. Creating a voluntary Veroval medi.connect user account

When you create a voluntary Veroval medi.connect user account, you are asked to provide personal data such as your email address and your name. You provide your full name on a voluntary basis. You log into your account with your email address and your password. Your Veroval medi.connect user account is password-protected. You can add additional

information – as well as your gender, date of birth, height and weight – to your profile. This information is used to calculate calorie consumption during activities, for example.

4. Adding a Veroval product to your Veroval medi.connect user account

If you add Veroval products to your Veroval medi.connect user account, you will be prompted to provide additional information, including your gender, height, weight and date of birth. This information is used to calculate calorie consumption during activities, for example.

5. Synchronizing the device and uploading health data

You can upload health data and activity data (activity time, calorie consumption, heart rate) from the device to the Veroval medi.connect user account. This gives you the opportunity to analyse your health data or your activity data.

If you synchronise the device via the Veroval medi.connect web application or the app, data is collected by HARTMANN for transfer purposes, including the IP address used during the synchronisation process, the time and date of synchronisation, system crash / diagnostics logs, information about the device, as well as the device's battery level. HARTMANN uses this information to identify and resolve synchronisation problems.

Other people cannot see your health data or activity data. However, you can create a guest account or share your data via PDF.

6. Using our Veroval medi.connect app

When you download and use the Veroval medi.connect app, HARTMANN will also collect, process and use additional data.

a. Downloading the app

When you download the app, the necessary information will be transferred to the App Store / Play Store, i.e. particularly your account's email address and password, the download time, the payment information and the individual device code. HARTMANN does not have any influence over this data collection process, however. Your personal data will not be transferred to third parties outside of the contract without your express consent or without any legal basis.

b. Using the app

When you use the app, HARTMANN collects additional personal data. Your personal data (email address, surname, first name, date of birth, gender, height, health data and nutritional data in the app) are only processed by HARTMANN in accordance with the provisions set down in German data protection legislation. The following regulations provide you with information about the nature, scope and purpose of the collection, processing and use of personal data. This data privacy policy only refers to the website mentioned. If you are transferred to other websites via links, please find out about how your data is handled there.

c. Purpose of using personal data

To be able to offer you user-friendly, efficient and secure Internet services, HARTMANN needs to use your personal data. HARTMANN will therefore collect, process and use personal data to:

- Provide the services requested by you, and particularly to help you better manage your training and health;
- Inform you of changes to our services;
- Inform you of offers, such as new HARTMANN products and updates, provided that you have given separate consent to receive relevant advertising or the prerequisites set down in Section 7, Para. 3 of the German Unfair Competition Act (UWA) are met.

d. Voluntary user information in the app

The “Email address” and “Password” information is used to identify the user and for communication between the provider and the user. The email address and all other user data are not visible to other users.

e. Evaluation-related data acquisition

Log files are collected, saved and – if necessary – evaluated by the data server for the purposes of identifying and tracking misuse, analysing technical problems and evaluating server usage.

f. Technical backup copies

A backup (backup copy) is created on a regular basis to safeguard the website’s database. This data is only used to restore the database in the event of data loss.

7. Promotional activities

If you take part in a prize draw or a similar promotional activity, HARTMANN may use the information you have provided to carry out these promotional activities. If the conditions of a promotional activity conflict with this data privacy policy with regard to the handling of your personal data, the conditions of the promotional activity shall apply.

8. Providers of contents or functions

In accordance with applicable laws, under certain circumstances HARTMANN may share data in an anonymous and aggregated format with companies that provide HARTMANN with contents and functions to improve the quality of the contents or functions provided by HARTMANN or providers of contents or functions.

9. Guidelines relating to children

Veroval medi.connect and Veroval products are not aimed at individuals under the age of 13. HARTMANN requests that individuals under the age of 13 do not provide any personal data. If HARTMANN finds out that it has collected the personal data of a child under the age of 13, it shall take steps to delete such data as quickly as possible. If you find out that a user of Veroval medi.connect is younger than 13, please contact HARTMANN on datenschutz@hartmann.info.

10. Data storage location

If you provide HARTMANN with information or if you synchronise your Veroval devices with Veroval medi.connect or the Veroval medi.connect apps, your data shall be collected and stored in Germany. Your personal data may also be collected and stored on servers in the country or region you are resident in.

11. Contact

If a user contacts HARTMANN (e.g. via a contact form or by email), their information shall be stored for the purpose of processing the enquiry and for the purpose of follow-up questions arising if such information is required for processing.

12. Newsletter

By way of its free newsletter, HARTMANN provides you with information about updates and offers relating to HARTMANN and Veroval products. If you would like to receive the newsletter, HARTMANN requires a valid email address from you as well as information that allows HARTMANN to verify that you are the owner of the email address provided and that the owner agrees to receiving the newsletter. No more data is collected. This data is used only for sending the newsletter. If you have signed up for the newsletter, HARTMANN uses the data you provided during registration for the purpose of sending a newsletter. Your data shall not be transferred to third parties. Only partner companies that are responsible for technically processing sending of the newsletter are excluded. In these cases, however, the amount of data transferred is restricted only to the minimum required. The HARTMANN data privacy provisions comply with the German Federal Data Protection Act (BDSG) and the German Telemedia Act (TMG). When you sign up for the newsletter, we store your IP address and the sign-up date. This data is stored solely for proof in the event of a third party misusing an email address and signing up to receive the newsletter without the owner's knowledge. You may revoke your consent relating to the storage of your data and your email address and relating to use of the same for the purpose of sending newsletters at any time. You may revoke your consent by clicking on a link in the newsletter itself, in your profile area or by giving notification using the contact options listed under Section 8.

13. Use of cookies

Cookies are text files that contain information to identify returning visitors exclusively for the duration of their visit to our website. Cookies are stored on your computer's hard drive and do not cause any damage there. Our website's cookies do not contain any personal data about you. Cookies save you from entering data several times, make it easier for you to transfer specific content and help us to identify particularly popular areas of our website. This enables HARTMANN to coordinate the contents of its website precisely to your needs. You may make settings in your browser to disable the use of cookies at any time if you wish to do so. Please use your Internet browser's Help functions to find out how you can change these settings.

14. Data acquisition through the use of Google Analytics

The Veroval medi.connect web application uses Google Analytics, a web analysis service provided by Google Inc. Google Analytics uses “cookies”. You will find more information about this matter directly on Google (<https://support.google.com/analytics/answer/6004245?hl=de>). According to the Data Protection Directive and information provided by Google, these are text files that are stored on your computer and enable analysis of your use of the website. Information about the operating system, the browser, your IP address, the website you called up previously (referrer URL) and the date and time of your visit to our website are collected, for example. The information generated by this text file concerning the use of our website will then be transmitted to a Google server in the USA and saved there. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activities for the website operator and providing other services relating to website and Internet use. Google will also pass this information on to third parties if doing so is stipulated by law or if third parties process this data on Google’s behalf. Data is used in anonymous or pseudonymised form in this regard.

Google uses the DoubleClick DART cookie. Users can disable use of the DART cookie by calling up the advertising network’s and the Google content advertising network’s data privacy provisions. <http://www.google.com/settings/ads/onweb/?hl=de> No direct personal data belonging to the user is saved in this regard, only the IP address. This information is used to automatically recognise you the next time you visit our website and to make navigation easier for you. Cookies enable us to adapt a website to your interests or to save your password so you don’t have to enter it every time, for example.

You can naturally visit the HARTMANN website without cookies. If you don’t want HARTMANN to be able to recognise your computer, you can prevent the storage of cookies on your hard drive by selecting “Do not accept cookies” in your browser settings. Please refer to the instructions provided by your browser manufacturer to find out how this works in detail. However, if you do not accept cookies, this may lead to functional restrictions on our website. You may prevent the installation of cookies by selecting the appropriate settings in your Internet use program (browser). To do this, you must disable the storage of cookies in your Internet browser. For more information on this matter, please refer to the usage information provided for your Internet browser.

15. Collection and storage of usage data

To optimise the website, HARTMANN collects and stores data such as the time and date that the website was called up, the page from which you called up the website and similar information. This is done anonymously, i.e. without identifying website users personally. User profiles are created using a pseudonym if necessary. Here, too, the natural persons behind the pseudonyms are not linked with the usage data collected. HARTMANN also uses cookies to collect and store usage data. These are small text files that are stored on your computer and are used to store statistical information such as the operating system, your Internet use program (browser), your IP address, the web page called up previously (referrer URL) and the time. HARTMANN collects this data for statistical purposes only so as to further optimise its website and to make its website even more attractive. Data is collected and stored exclusively in an anonymous or pseudonymised form and cannot enable conclusions to be drawn about you as a person.

16. Information, right of objection, questions

You may request free and immediate information about any data that may be stored about you personally or about a username assigned to you at any time. HARTMANN reserves the right to provide this information electronically. In addition, you have the right to object to the further use of your personal data with effect for the future at any time. The modified or deleted information is not stored by HARTMANN. In the case of a request for information or an objection, you must provide sufficient information for individualisation and provide valid proof that the information is yours. In these cases, or if you have any other questions about data privacy at HARTMANN, contact us by email on datenschutz@hartmann.info or by post at Data Protection Officer, PAUL HARTMANN AG, Paul-Hartmann-Straße 12, 89522 Heidenheim, Germany, Tel. +49 (0)7321 36-0.

17. Checking, correcting, updating and deleting your personal data

HARTMANN takes appropriate measures to ensure wherever possible that personal data collected about you is correct, complete and up-to-date. You may request both access to your personal information and that incorrect or erroneous personal data be updated. You may also request that your personal data and your Veroval medi.connect user account be deleted. According to applicable law, HARTMANN shall respond to your enquiries promptly. For your protection, HARTMANN may only deal with enquiries relating to your personal data associated with your email address that you used to send the enquiry. HARTMANN may also need to verify your identity before implementing your request. HARTMANN may refuse to process enquiries that could compromise the privacy of other individuals or would require HARTMANN to act in such a way that is prohibited by applicable legislation.

18. Right of modification

HARTMANN reserves the right to amend this data privacy policy from time to time in accordance with the legal provisions. Amendments shall enter into force when the revised data privacy policy is published.

Heidenheim, March 2017