

Privacy policy for the use of Parship

Version: 17.08.2020

Thank you for using Parship! This privacy policy explains what personal data Parship collects, how we use these data and what rights you have as a Parship user in relation to your personal data. The controller of your personal data is PE Digital GmbH (hereafter "Parship", "us", "our", "we").

[Here](#) you can find information about data processing in connection with Cookies and other tracking technologies when using the Parship website. [Here](#) you can find information about data processing in connection with tracking technologies when using the Parship app.

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Contact / Data Controller

Unless otherwise stated in this privacy policy, the controller of your personal data is PE Digital GmbH.

If you have any questions or suggestions about how we use your personal data, please contact us or our data protection officer.

Our contact details are as follows:

PE Digital GmbH, Customer Service Parship Ireland, Speersort 10, 20095 Hamburg, Germany, +49 (40) 460026 - 168 (fax number), privacypolicy@parship.ie (email)

You can reach our data protection officer at:

Dr. Stefanie Wegener, privacypolicy@parship.ie (email)

Collection, processing and use of personal data

Personal data is any information relating to an identified or identifiable natural person (e.g. name, address, phone number, date of birth or e-mail address). When we say that we process personal data, this means that we collect, store, use, transfer to others or delete such data.

Parship collects and processes your personal data exclusively in the following cases:

- If you visit us on our website without being a member.
- If you contact us directly.
- If you install our Parship app.
- If you subscribe a Parship membership (paid or free) and then use Parship.

You may choose to provide us with your personal data in connection with the conclusion and existence of the contractual relationship with Parship. In order to conclude a Parship membership, you need to provide us with special categories of personal data (e.g. the sex of the partner you are looking for, which is a data about your sexual orientation), answers to the Parship test and information to populate your Parship profile. The use of Parship services requires also that the information in your profile and your compatibility rating with other Parship members are publicly available to other members. Please note also that we offer our services in many different countries (you can see the list of these countries on our website), and your profile information that is available to other Parship members will also be available to our members in all of these countries. If you do not want Parship to process your personal data and especially special categories of data, Parship will not be able to provide you with its service as described in the General Terms and Conditions (hereafter "Service" or "Services"). Please see below for further information about the types of personal data Parship collects when you use our Service.

Data Processing through app-stores

Before you can install this app, you may have to enter into a user agreement with an app-store operator (e.g. Google or Apple) to access the relevant app-store. Our app is available on different app platforms (app-stores), depending on your particular operating system.

In order to install and use our app via these app-stores, you will need to have a valid account with the relevant app-store (e.g. iTunes account) as well as a compatible device (e.g. a smartphone). Parship has no control over the collection, processing and use of personal data in this respect. The operator of the relevant app-store will be the sole data controller of this information. If necessary, please contact the operator of the respective app-store directly for information about their processing of data. Parship is the data controller with respect to your personal data only when you use the Parship app.

What personal data does Parship collect from its members to fulfil the contractual relationship?

In order to register for Parship Service and to conclude further a Basic Membership or a Premium Membership, you will need to provide us with the personal data described below. In addition, in order to provide you with our Services (as more fully described in the [General Terms and Conditions](#)), we need to process this personal data.

Registration process

In order to register for the Parship free Service (conclusion of a "Basic Membership"), you, as a user (also called "Basic-Member"), will need to provide us with personal data, without which the registration cannot be completed. These data are:

- » Gender and sex of partner sought (your sexual preference is a data regarding your sexual orientation and therefore a sensitive personal data)
- » Email address
- » Password

If you have chosen to log in via a third-party provider such as Facebook or Apple, you do not need to enter an email address or a password during the registration process.

You can access Parship's service respectively with the email address and the password you have indicated (your access data) or alternatively, via the third party provider's login data.

During registration via Apple ("Sign in with Apple")

You can register to join the Parship Service using your Apple-ID. If you choose to do this, we will receive the information that we need for your registration directly from Apple. Apple will

also provide us with your email address that is associated with your Apple-ID. In this respect, a data transfer takes place

Please be aware that we have no control over the type and amount of information that Apple collects about you when you register for our Service using the Apple login. If you do not want Apple to collect information about you in relation to your use of our Service, you should not use the Apple login.

You may dissociate your Parship account from your Apple-ID at any time in your profile on our website. In this case, we will need your access data as explained above.

For more information about the types of information collected by Apple and how Apple uses your information, as well as about your rights and your ability to protect your data, please see Apple's Privacy Policy: <https://www.apple.com/ie/legal/privacy/en-ww/>.

During registration via Facebook ("Facebook Login")

Alternatively, you can register to join the Parship Service using your Facebook account. If you choose to do this, we will receive the information that we need for your registration directly from Facebook. Facebook will also provide us with your email address that is associated with your Facebook account. In this respect, a data transfer takes place.

Please be aware that we have no control over the type and amount of information that Facebook collects about you when you register for our Service using the Facebook login. If you do not want Facebook to collect information about you in relation to your use of our Service, you should not use the Facebook login.

You may dissociate your Parship account from your Facebook-ID at any time in your profile on our website. In this case, we will need your access data, as explained above.

For more information about the types of information collected by Facebook and how Facebook will use your information, as well as about your rights and your ability to protect your data, please see Facebook Privacy Policy: <http://www.facebook.com/policy.php>.

Data required in connexion with a Basic Membership

Amongst others, following information are requested during the personality test that follows the registration

- » Residence / postal code
- » Country of residence
- » Date of birth
- » Full name
- » Height
- » Marital status
- » Number of children

- » Education level
- » Occupation
- » Income

Furthermore, Parship needs further information from its users in order to perform its Services. This may include information about your personal values, and preferences, your appearance, and any other characteristics that are relevant for us to establish your personality evaluation and to recommend potential partners (“partner recommendations”) to you. You may also upload photos of yourself in your profile, whereby other members may see, next to your first name, your photos clearly (i.e. unblurred version) in your profile or in a blurred version via email. In addition, we will use the answers to the Parship personality test (or “questionnaire”) to automatically create your Parship personality evaluation (or “partner personality”). Please note that, although you will be able to read your personality evaluation and compatibility points in your profile, your personality evaluation is not generally publicly visible to other Parship members. Instead, those members who directly access your profile information will only have access to extracts of your personality evaluation and your compatibility points.

All information you provide us with for or as part of your Parship profile will be publicly visible to other members on our website and our app, such as information that you voluntarily choose to include in your profile, especially your first name, place of residence / postal code, and your interests.

You do not have to provide us with your mobile phone number in order to use the Parship Service. However, if you want to, you can provide it to us for an additional security measure (known as “SMS verification”). This will allow us to carry out a further identification check or to send you messages.

Upon completion of a Premium Membership

If you decide to sign up for Parship’s Premium chargeable features (“Premium Membership”) via the website (i.e. you decide to become a Premium member), we will collect following payment data during the order:

- » Name and first name
- » Residential address
- » Payment and billing details (credit card data is stored by a third party payment provider and not by Parship)

If you purchase a Premium Membership via an app store provider (e.g. Google or Apple), please refer to the terms of use of the relevant app platform operator to find out which personal data they process in relation with the purchase process. Parship does not process any payment or billing data in this respect.

Communication with the members, communication with our customer service and communication via video chat

If you correspond with other Parship members through the Parship platform, or with Parship customer service, we will collect and store this information. The messages sent between members via our Service are end-to-end encrypted.

If you contact our customer service, please note the following: if you communicate with our customer service:

- (1) using the online contact form: the content of your message to us will be encrypted in transit; our reply will be protected in transit, provided that your email provider supports Transport Layer Security (TLS) transfer encryption;
- (2) via email: the content of your message to us will only be protected in transit via TLS transfer encryption if your email provider supports TLS transport encryption.

If you would prefer not to contact our customer service by email (for example, because you are concerned that your email provider does not support TLS encryption or the content of our email is not encrypted), please contact Parship by post or fax instead. You will find our contact details under [Contact](#).

As a Premium Member, as well as in some promotions for Basic Members, you have the opportunity to communicate with other members via video chat in selected countries. For this purpose, Parship uses a service provider based in the USA with whom Parship has a data processing agreement. Parship transfers your IP address and your profile ID to this service provider when using the video chat feature. The service provider also stores data regarding the time and duration of any video chat calls. This data processing of is necessary technically and for billing purposes. The video communication is encrypted end-to-end. Video and audio content is not stored. Parship does not collect or transfer any other data in connection with video chat. If you do not want Parship to transfer your IP address and your profile ID to its service provider, or do not want the time and duration of the chat to be stored, you should not use the video chat function.

Promotional emails - Messages

When you subscribe for our free membership ("Basic Membership"), you must enter your email address on the welcome page, or we receive your email address from Apple/ Facebook (if you register via a third party login). We will use this e-mail address, or any new email addresses you may enter in your profile afterwards, to send you promotional emails about Parship's free and for-purchase products, without requiring your consent.

In addition, you will receive emails with personalised partner recommendations and guidance during your Parship membership, to help you to get the most out of the Parship Service.

As long as your email provider supports "Transport Layer Security" (TLS) transport encryption, these promotional emails (including our personalised guidance) are protected in transit via TLS transfer encryption.

If you don't want to receive promotional emails or personalised guidance anymore, you can object to our use of your email address for these purposes, at any time, either by: (i) clicking on the link in our emails to adjust your email notification settings, (ii) adjusting your settings in your profile under "[Notification options](#)", or (iii) contacting our customer service. Members who have not yet completed the Parship compatibility test may use this [link](#) for an objection. You may re-subscribe to receive such emails in your profile under "[Notification options](#)" at any time.

Push Messages

Within the use of the app, you may receive "push messages" from us, even when you are not currently using the app. These will either contain messages that we send you as part of our Service, or they may contain advertising information.

You can stop receiving push messages or adjust your settings at any time by changing the configuration settings of your mobile device or in the Parship app.

What information does Parship collect when using the Parship website?

Every time you access Parship website, we will collect your usage data. This means that, even if you have not signed up to be a Parship member, we will collect and use this information about you. This data is sent to us by your Internet browser and is stored in log files. This data includes:

- » Information about your browser type and your internet service provider as well as your operating system (for example Windows 7, Apple OS, etc.)
- » The IP address (Internet Protocol address) of the device you use to access our website or Service (for example, your computer, tablet or smartphone. We will also compare your IP address against a geo-database to collect information about your location, such as your country, state and city. In this context, Parship uses MaxMind (see explanations below)
- » Information about the page that you have accessed
- » The date and time that you used the website
- » The referrer URL (origin URL) from which you came to the page that you have accessed
- » Statistics about the amount of data transmitted during your use of the website
- » Status message as to whether you were successfully able to access the website
- » Session identifier
- » Session participant's pseudonym

- » Screen resolution used on your device

Each time a Parship member logs in to our network, we also collect their Parship user identifier.

While using the website, and in addition to the data mentioned above, cookies or pseudonym IDs (such as user-ID, ad-ID) are also stored on your device, when you visit, or after you visited, our online content. You will find specific information about this [here](#).

What information does Parship collect when using the Parship app?

Every time you access the Parship app with your device, Parship automatically collects data and information from your device's operating system. This includes, among other things, the storage of your IP address. In detail, Parship collects:

Usage data

Every time you access the Parship app, we will collect your usage data. This data includes:

- » The operating system used to access the app and, if necessary, the browser type
- » Your current language setting in your device
- » Information about your Internet service provider
- » The IP address (Internet Protocol address) of your device
- » Your Device ID (e.g. UDID) to identify your device for a secured authentication
- » Your User identifier on the Parship platform (only for Parship members)
- » Information about the part of the app that you have accessed and, if applicable, the webpage you accessed previously
- » The date and time that you used the app
- » Statistics about the amount of data transmitted during your use of the app
- » Status message as to whether you were successfully able to access the app
- » Session identifier

Login data

We also collect the following usage data each time a Parship member logs in to our network ("login records"):

- » Date and time of login
- » User identifier on the Parship platform (your e-mail address)
- » IP address (Internet Protocol Address)
- » Device ID (e.g. UDID) to identify your device for a secured authentication.

While using the app, and in addition to the data mentioned above, pseudonym IDs (such as user-ID, ad-ID) are also stored on your device, when you visit, or after you visited, our app. You will find specific information about this [here](#).

GPS data when using the app

If a Premium Member turns on the "radius search" option, we also collect location data about their device (such as GPS, possibly WLAN information, and device ID) to determine their location. This information will be used to allow the Premium Member to set a suitable search radius to look for other members.

Processing purposes

Parship processes the personal data of its users for the following purposes:

- » To provide our services as described in our [General Terms and Conditions](#). (The legal basis for our use of this information is contractual necessity, i.e. to provide you with the services you have asked for from Parship. The legal basis for our use of sensitive data is your consent)
- » For the prevention of and defense against abuse. Parship automatically collects, processes and uses personal data and geodata we collect during your registration and the completion of the Parship personality test and/or your Parship profile, to check for any evidence of the misuse of our Service. This information is stored in a database and compared against empirical values and information. If our automated processing activities suggest that our Service has been misused, a Parship employee will review the relevant rating and underlying clues, as well as the information in your profile (including any wording and photos you have provided) to confirm whether this is the case. In addition, customer service representatives perform profile checks to check members' profiles that have been reported by other members through the function "suspicious profile?" or as having breached our General Terms and Conditions. Furthermore, as mentioned above, if you have provided your mobile phone number, Parship may use this information to carry out an identity check ("SMS verification") (i.e. to check that you are who you say you are). (The legal basis for these activities is the legitimate interests of Parship and our Parship members, to ensure that the Parship service is not used in a way that is in breach of our General Terms and Conditions and/or the law. In doing so, we also comply with our legal obligation regarding data security to guarantee system security and to detect and trace unauthorised access attempts or accesses).
- » For automated price determination reasons. (The legal basis for these activities is contractual necessity.)
- » To ensure that you comply with your obligations under your subscription and our General Terms and Conditions, including your payment obligation (which concerns only Premium members). If you do not pay outstanding invoices /

instalments despite repeated reminders, we will transfer the data that are required for the execution of a debt collection procedure to a debt collection service provider for the purpose of fiduciary debt collection. (The legal basis for these activities is contractual necessity, but it is also within the legitimate interests of Parship to ensure that (as applicable) you provide the agreed payment for our Service in accordance with your subscription.)

- » For the protection and defence of our rights and the fulfilment of legal obligations. (The legal basis for these activities is the fulfilment of our legal obligations and our legitimate interest in asserting and defending our rights.)»

To send advertising relating to our own products through promotional emails and personalized guidance. (The legal basis is our legitimate interests in relation to sending direct marketing about our own products. In some instances, the legal basis is also your consent.)

[Here](#) you will find the processing purposes and legal basis for the processing of personal data regarding the use of "cookies" and other tracking technologies when using the Parship website. [Here](#) you will find the processing purposes and legal basis for the processing of personal data regarding the use of tracking technologies when using the Parship app.

Legal basis for the processing of personal data

- » Where we obtain your consent as our lawful basis of processing of personal data, our legal basis is point (a) of Article 6(1) of the EU General Data Protection Regulation (GDPR).
- » Where we process special categories of data according to Article 9(1) GDPR, our legal basis is point (a) of Article 9(2) GDPR - your consent.
- » When the processing of your personal data is required to fulfil our contractual relationship (either in relation to Basic Membership or Premium Membership), our legal basis for the processing is point (b) of Article 6(1) GDPR. This also applies to any processing of data that is required to carry out any pre-contractual actions.
- » When the processing of your personal data is required to fulfil a legal obligation, our legal basis is point (c) of Article 6(1) GDPR.
- » If the processing is necessary to safeguard the legitimate interests of Parship or a third party, such as our members, and the interests, fundamental rights and freedoms of the data subject do not override those legitimate interest, our legal basis for the processing is point (f) of Article 6(1) GDPR.
- » When the processing of personal data personal data is required for our own marketing (either in relation to Basic Membership or Premium Membership), our legal basis for the processing is point (f) of Article 6(1) GDPR.

When the legal basis for processing is your consent, you are entitled to withdraw your consent at any time. However, this withdrawal will not affect the lawfulness of any processing carried out on the basis of your consent before your withdrawal. If the legal basis is a legitimate interest, you are also entitled, in general, to object to the processing of your personal data, at any time, for reasons arising from your specific situation. Article 21 GDPR applies in this respect.

Transfer of data to third parties; service provider

Parship generally only discloses your personal data to third parties for the provision of the Service to you or if we have your consent. If we disclose your personal data to third parties on the basis of a legitimate interest, we will explain the legitimate interest in this privacy policy.

In addition, we may disclose your personal data to third parties where we are obliged to do so by law, a regulator or a court order.

Service providers

Parship may use service providers when collecting or processing your personal data. Parship will ensure that any service provider only receives that portion of your personal data that service provider needs for their specific activity.

In addition to those already expressly mentioned in this privacy policy (e.g. under Cookies & Tracking), Parship uses, amongst others, service providers to send promotional emails and push messages to members. In addition, Parship uses service providers to provide our servers. If you subscribed to your Premium Membership over the website, we also use external payment services and service providers to help us with the settlement of payments and debt collection. Depending on the particular payment method you choose when purchasing your Premium Membership over our website, Parship will send the information we collected about your payment (e.g. bank details) to the bank or to the payment service provider that we have appointed. Please be aware that, in some instances, such payment service providers will process your personal data for their own purposes (i.e., to process your payment). As such, they will be responsible for the processing of your personal data and the privacy policy of the respective payment service provider will also apply.

Generally, the service providers that we appoint are engaged as our processor, and may only use the personal data of our members in accordance with our instructions.

Please note that if you purchase a Premium Membership over the Parship app, Parship will not process any payment. In this case, the app store operator will be responsible for handling the payment process.

Transfer of data to non-EEA countries

We may disclose your personal data to third parties or to our processors who are located outside the EEA. When this happens (and before disclosing your data) we ensure that the recipient has an adequate level of protection to enable the lawful transfer of your data. For example, this may be because the recipient is in a country that the European Commission has determined offers an adequate level of data protection; or has entered into the [EU Standard Contractual Clauses](#); or (where permitted by law) because you have expressly consented to this transfer.

How do we protect your personal data?

Parship uses a variety of security measures, including state-of-the-art encryption and authentication tools, to protect the security, integrity and availability of our customers' and users' personal data. In particular, these measures include the following:

- » Strict criteria for the authorization to access your data as well as random 2-factor authentication,
- » Storage of confidential data in encrypted form,
- » Firewall protection of IT systems to prevent unauthorized access,
- » Permanent monitoring of access to IT systems to detect and prevent the misuse of personal data.

In this context, we recommend that you familiarise yourself with Parship's security tips when using the Parship service. [Here](#) you can find more information on this topic.

In this context, Parship also uses service providers from the USA. In particular, the following service providers are involved:

Cloudflare

In order to secure this website and optimize loading times (SSL certificate) we use a "Content Delivery Network" (CDN). This CDN is a service of Cloudflare, Inc, 101 Townsend St, San Francisco, CA 94107, USA. Therefore, registration and login requests are routed through the Cloudflare server and consolidated into statistics that cannot be deactivated.

We have an agreement with Cloudflare for order processing, based on EU Standard Contractual Clauses.

[Here](#) you can find information about the data collected by Cloudflare.

MaxMind

Parship uses the GeoIP2 Precision City geolocation service from MaxMind, Inc, Waltham, MA, 14 Spring St., Suite 3, Waltham, Massachusetts 02451, USA. With this service, we use IP addresses to determine approximate location/geolocation data based on the country of origin. No personal data is exchanged with MaxMind. [Here](#) you can find further information about MaxMind.

Duration of storage; retention obligations

We store your data for as long as is necessary for the provision of our Service (Basic and Premium Memberships) and any associated services or where we have a legitimate interest which permits the further storage of that information. In all other cases, we will erase your personal information once it is no longer necessary, except for any information we need to retain in order to comply with any contractual or statutory (e.g. tax or commercial) retention periods (e.g. invoices).

For Basic Members: You can choose to remove the data in your profile at any time. You can also erase your profile data yourself (when you have completed the compatibility test) by logging in to the Parship website and starting the deletion process. Otherwise, Parship automatically erases personal profile data of Basic members who are inactive for 24 months.

For Premium Members: Your personal data will be stored for the duration of our contractual relationship. However, we will erase your data following your request as long as there is no legal storage obligation that applies to that information. If your data is subject to a mandatory storage period, we will ensure that this information is isolated and stored until the expiry of the retention period. Once your Premium Membership is over, if you do not ask us to erase your data before your Premium Membership comes to an end, your Premium Membership will be converted into a Basic Membership. In this case, the description above relating to the retention period of Basic Members' data will apply.

If you uninstall the Parship app on your device, this will not delete the data in your profile. The above statements related to the deletion of Basic Members' data and Premium Members' data also apply here.

Log files are stored by Parship for 30 days and then deleted. Log files whose further retention is required for evidentiary purposes are exempt from deletion until the incident is finally resolved and may be forwarded to investigative authorities as appropriate in individual cases.

Please note that if the deletion of your data is prevented due to a mandatory retention period, your data will be blocked and stored for no other purposes, until we can delete it.

Parship will also store any personal data which is required to demonstrate that Parship has lawfully complied with a valid data subject's rights request within the required period.

Rights of the data subject at a glance

How can you exercise your rights?

To exercise your rights, please refer to the information in the [Contact](#) section to ensure that you are clearly identifiable when exercising your rights.

You can also use the settings options in your Parship profile to correct the data you provided during your registration or to object to any advertising. However, you are not able to change some specific information, such as the date of birth, which can only be changed with the support of our customer service.

Please note that if we cannot delete your data due to a mandatory retention period, we will block (restrict) your data until it can be deleted.

Right of access

You have the right to obtain confirmation from us as to whether or not we process personal data concerning you. Besides this, you also have the right to obtain access to the personal data concerning you as well as information about the categories of data that we store, the purpose of processing, any recipients, the duration of storage and your rights as a data subject.

Right to erasure

If the legal requirements are met, you can request from us the erasure of your personal data. That is particularly the case where:

- » your personal data are no longer necessary in relation to the purposes for which they were collected;
- » the only legal basis for processing was your consent and you have withdrawn your consent;
- » you have objected to the processing for advertising purposes (“object advertising”);
- » you have objected, on grounds relating to your particular situation, to the processing based on balancing of interests, and we cannot prove that there are overriding legitimate grounds for the processing;
- » your personal data have been unlawfully processed; or
- » your personal data have to be erased in order to comply with a legal obligation.

Please note that your right of erasure is subject to restrictions. For example, we do not have to or are not allowed to delete any data that we are required to retain due to statutory retention periods. Data that we need for the establishment, exercise or defence of legal claims is also excluded from your right of erasure.

You can also delete your data from a Parship Basic Membership yourself in your profile. Alternatively, Basic Members can contact our customer service using the information under [Contact](#) and request the deletion of their data. However, Premium Members can only delete data regarding their Premium Membership by contacting our customer service. Lastly, please note that if we cannot delete your data due to a mandatory retention period, we will block (restrict) your data until it can be deleted.

Right to restriction of processing

If the legal requirements are met, you can request from us restriction of processing.

That is particularly the case where:

- » you have contested the accuracy of your personal data, as long as we can verify the accuracy of your personal data;
- » the processing is unlawful and you request the restriction of the use instead of the erasure (please see paragraph above on this matter);
- » we no longer need your personal data for the purposes of the processing, but they are required for the establishment, exercise or defence of legal claims;
- » you have objected to processing on grounds relating to your particular situation, as long as we can verify whether your legitimate grounds prevail.

Right to data portability

You have the right to receive the personal data you provided to us, based on your consent or on the performance of a contract, in a transferable format. In this respect, you may also request that we directly transmit these data to a third party, where technically feasible.

Right to withdraw consent

Where you gave us your consent to the processing of your personal data, you can withdraw this consent at any time with effect for the future. However, please note that any withdrawal of your consent will not affect the lawfulness of our processing of such data prior to the date on which you withdrew your consent. By using our Service, you will have provided us with information about your sexual orientation (such as your gender and your sexual preferences). You can withdraw your consent to our use of this information at any time with effect for the future. However, please note that any withdrawal of your consent will not affect the lawfulness of our processing of such data prior to the date on which you withdrew your consent. Once you have withdrawn your consent, we will no longer be able to provide you with partner recommendations or our Service as described in our General Terms and Conditions.

Right to object to direct marketing

You can also object at any time to the processing of your personal data for advertising purposes ("object advertising "). Please take into account that for organisational reasons, there may be a time lapse between when you submit your request and when we are able to remove your data from an ongoing campaign.

Alternatively, you may use the setting options in your profile accessible through the [Parship website](#) to rectify certain information that you provided during your registration or to object to advertising.

Right to object based on grounds relating to your particular situation

You have the right to object, on grounds relating to your particular situation, to processing of your personal data, if these grounds are based on your legitimate interests. In this respect, we will no longer process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your rights.

Right to lodge a complaint with a supervisory authority

You have the right to file a complaint with a data protection authority. You can contact the data protection authority, which is responsible for your place of residence or your state, or the data protection authority responsible for us. This is:

Free and Hanseatic City of Hamburg, The Hamburg Commissioner for Data Protection and Freedom of Information, Prof. Dr. med. Johannes Caspar, E-Mail: mailbox@datenschutz.hamburg.de

Social Media

In general, if social media plugins are used, the providers of such plugins will store cookies. However, the social media buttons that we use on our website contain only text links to the respective social media pages, they are not properly a social media plugin. Therefore, Parship will not transfer any data to the respective social media providers. The operator of the social media page is responsible for compliance with data protection law. You can get more information about their data protection practices in their respective privacy policies.

Cookies & other tracking technologies when using the Parship website

Cookies & Tracking

In addition to the processing of personal data described in the [privacy policy](#), cookies and other tracking technologies are stored on your device when or after accessing the Parship website.

A cookie is a small text file that is sent to your device when you access a website and is stored in your browser. If you then access the same webpage again, your browser will check its cookies and will recognize you as a returning user.

Third party technologies such as scripts, pixels and tags that Parship embeds in the Parship website for promotional purposes also place cookies on your device.

Some cookies are automatically erased after the end of the browser session (these are "session cookies"), whereas other cookies are stored for a predetermined amount of time or permanently in your browser, before they erase themselves (these are "temporary" or "permanent" cookies).

What cookies does Parship use in general?

Parship classifies cookies into different categories depending on their function and purpose.

"Essential" cookies

We use certain cookies to make sure that our Service is easy, secure and safe to use. This category of cookies includes e.g.:

- » Cookies that identify or authenticate our users, and cookies in connection with a secure authentication process,
- » Cookies that ensure the security of Parship's information system,
- » Cookies that control abuse,
- » Cookies that temporarily store certain user entries,
- » Cookies that store certain user preferences.

These cookies enable you to navigate safely on our website and use the functions as desired. Without these cookies, Parship cannot provide essential services. We only use these cookies when you visit our website. These cookies are also used to retrieve the optimised website display when you access our website with a mobile device, so that your mobile data volume is not unnecessarily consumed.

The legal basis is the legitimate interest of Parship and Parship members that the Parship Service is safe and easy to use and that the quality of our website and content is constantly being improved.

A consent is not required to use "essential" cookies. They cannot be deactivated.

You can find an overview and more detailed information about the "essential" cookies we use [here](#).

"Functional" cookies

"Functional" cookies enable us to record our users' usage behaviour (e.g. which banner ads you have clicked on, which subpages you have visited, which search queries you have made).

We also collect information about how Parship members and users interact with our website. This allows us to identify which pages have been visited and to gain a complete picture of user activity on our website.

This category includes, for example

- » Cookies to develop and improve products,
- » Cookies for market research to gain knowledge about target groups,
- » Cookies to create personalized content profiles,
- » Cookies to select personalized content,
- » Cookies to measure content performance.

The purpose of using "functional" cookies is to improve the performance of the website and to tailor the Parship Group platform to the users' needs in order to make Parship Group more user-friendly. We also require statistical information on the use of our online content and therefore measure the reach of our website, which we evaluate in statistical form to obtain comparable values across the market. In this context, we create user profiles with the help of cookies or by evaluating log files. As a rule, we either do not use the IP addresses of the users at all or shorten them immediately after collection.

"Functional" cookies can also be used to ensure that available website functions work properly. In this context, we store information (e.g. user names and language choices) that is completely tailored to you. Or we use cookies to activate functions you have requested. The use of such cookies only takes place when you have activated or requested the corresponding function.

Since we want to offer you a website designed for optimal user-friendliness, "functional cookies" are usually activated as soon as you visit our website. However, you can deactivate these cookies at any time - either via the [buttons](#) provided or via the settings in your browser. Data collected by "functional" cookies cannot be used to identify you personally or to track your activities on other websites.

The legal basis for the processing of "functional" cookies" is, on the one hand, Parship's legitimate interest in gaining insights into the market value of Parship's website in direct comparison with third-party websites. Parship also has a legitimate interest in the commercial usefulness of understanding Parship's market share and any corresponding findings. On the other hand, your consent is the legal basis. This applies, for example, to the creation of user categories which are the basis for tailoring advertising material or measures to your interests.

You can find an overview and more detailed information about the "functional" cookies we use [here](#). You can also get an overview of what cookies are already activated when you visit our website [here](#).

With tools that work with opt-out cookies, it should be noted that the opt-out function is device- or browser-specific and is only valid for the device or browser currently in use. If you use several devices or browsers, you must set the opt-out on each individual device and in each browser used.

“Marketing” Cookies

We also use cookies for advertising purposes ("marketing" cookies). We use profiles of usage behaviour that are created with the help of these cookies (e.g. which banner ads you have clicked on, which subpages you have visited, which search queries you have made) to display advertising or offers that are tailored to your interests ("interest-based advertising").

This category includes, for example

- » Cookies for selecting simple advertisements,
- » Cookies to create a personalised advertising profile,
- » Cookies to select personalised ads,
- » Cookies to measure ad performance.

In this context, we also allow third parties to collect our users' data through advertising cookies or pixels placed on our website. These cookies allow us and other third parties to provide you with interest-based advertising based on an analysis of your usage behaviour (e.g. which banner ads you have clicked on, which subpages you have visited) on the Internet and on our website. We also share tracking data with third parties (such as Google and Microsoft) to measure the success of these advertising campaigns (i.e., "conversion tracking"). Finally, "marketing" cookies allow us to evaluate log files with the help of tools such as Google Analytics and to create usage profiles.

The data controller responsible for the processing of data in connection with these tools is the respective provider thereof, unless we have indicated otherwise. The providers of these tools may also transfer information to third parties for the above-mentioned purposes. These tools will not use your IP address, or (if they do), they will shorten it immediately after collection. Please refer to each of these tools to find information about their respective provider and how you can object to their collection of data.

Your consent is the legal basis for the collection and evaluation of usage behaviour for interest-based advertising (exclusively PE Digital GmbH products). You can object at any time to the processing of your personal data for such purpose and [withdraw](#) your consent.

You can find an overview and more detailed information about the "marketing" cookies we use [here](#).

Legal basis for the processing of personal data in connection with cookies

- Where we obtain your consent as our lawful basis of processing, our legal basis for the processing is point (a) of Article 6(1) of the EU General Data Protection Regulation (GDPR).
- When the processing of your personal data is required to fulfil our contractual relationship (either in relation to Basic Membership or Premium Membership), our

legal basis for the processing is point (b) of Article 6(1) GDPR. This also applies to any processing of data that is required to carry out any pre-contractual actions.

- If the processing is necessary to safeguard the legitimate interest of Parship or a third party, such as our members, and the interests, fundamental rights and freedoms of the data subject do not override those legitimate interests, our legal basis for the processing is point (f) of Article 6(1) GDPR.

When the legal basis for processing is your consent, you are entitled to withdraw your consent at any time. However, this withdrawal will not affect the lawfulness of any processing carried out on the basis of your consent before your withdrawal. If the legal basis is a legitimate interest, you are also entitled, in general, to object to the processing of your personal data, at any time, for reasons arising from your specific situation. Article 21 GDPR applies in this respect.

How can you manage, prevent the use of cookies or erase cookies?

Parship provides you with a consent management ("cookie banner") that allows you to decide which cookies you want to allow. You can change your choice at any time and may withdraw any consent you may have given subsequently. You can retrieve such setting options [here](#).

For the consent management we use the Usercentrics Consent Management Platform (Usercentrics) of Usercentrics GmbH, Rosental 4, 80331 Munich, Germany. Usercentrics collects log file data and consent data using JavaScript. This JavaScript allows us to inform users about their consent to certain cookies and other technologies on our website and to collect, manage and document such consent.

You can permanently disable JavaScript at any time via your browser settings. If you do so, Usercentrics will not be able to execute JavaScript. You can find further information about Usercentrics' data protection practices at: <https://usercentrics.com/privacy-policy/>.

You can manage (able/disable and erase) cookies on our website by using the functions mentioned above, and also via your browser settings. Most browsers allow you to manage your cookies by either accepting or rejecting all cookies or by agreeing to only certain types of cookies. To learn how to manage and erase cookies, please refer to the [help](#) function of your browser.

Please note, however, that if you choose to disable or remove cookies and other web tracking mechanisms, doing so may prevent certain features on our website from working properly and therefore affect your experience on our website. In addition, you may not be able to use all the features of our Service if you disable or remove cookies and other web tracking mechanisms.

Specific Cookies and tracking mechanisms

Here you can find a complete overview of the web analytics tracking mechanisms that we use on our website. We have listed each tracking mechanism and described their intended use, as well as other important information.

For further information and help with cookies and other web tracking mechanisms, please see www.YourOnlineChoices.com.

Appendix: Technical Notes Cookies

Internet Explorer:

Instructions at

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11-win-7>

Mozilla Firefox:

Instructions at

<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

Google Chrome:

Instructions at

<https://support.google.com/chrome/answer/95647>

Safari:

Instructions at

<https://support.apple.com/en-ie/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Tracking technologies in the Parship app

Parship needs to collect and use statistical information about your use of our app in order to make it more user-friendly, to understand our market share, to conduct other market research and to make sure that we display relevant advertisements for you. To this end, we work with various service providers; and we use analytics tools in our app.

What tracking technologies does Parship use in general?

Parship classifies tracking technologies into different categories depending on their function and purpose.

"Essential" tracking technologies

We use certain tracking technologies to make sure that our Service is easy, secure and safe to use. This category of cookies includes e.g.:

- » tracking technologies that identify or authenticate our users, and tracking technologies in connection with a secure authentication process,
- » tracking technologies that ensure the security of Parship's information system,
- » tracking technologies that control abuse,
- » tracking technologies that temporarily store certain user entries,
- » tracking technologies that store certain user preferences.

These tracking technologies enable you to navigate safely on our app and use the functions as desired. Without these tracking technologies, Parship cannot provide essential services. We only use these tracking technologies when you visit our app.

The legal basis is the legitimate interest of Parship and Parship members that the Parship Service is safe and easy to use and that the quality of our app and content is constantly being improved.

A consent is not required to use "essential" tracking technologies. They cannot be deactivated.

"Functional" tracking technologies

"Functional" tracking technologies enable us to record our users' usage behaviour (e.g. which banner ads you have clicked on, which subpages you have visited, which search queries you have made).

We also collect information about how Parship members and users interact with our app. This allows us to identify which pages have been visited and to gain a complete picture of user activity on our app.

This category includes, for example

- » tracking technologies for market research to gain knowledge about target groups,
- » tracking technologies to create personalized content profiles,
- » tracking technologies to select personalized content.

The purpose of using "functional" tracking technologies is to improve the performance of the app and to tailor the Parship Group platform to the users' needs in order to make Parship Group more user-friendly. We also require statistical information on the use of our online content. In this context, we create user profiles with the help of tracking technologies.

"Functional" tracking technologies can also be used to ensure that available website functions work properly. In this context, we store information that is completely tailored to you. Or we use tracking technologies to activate functions you have requested. The use of such tracking

technologies only takes place when you have activated or requested the corresponding function.

Since we want to offer you an app designed for optimal user-friendliness, "functional tracking technologies" are usually activated as soon as you visit our app. However, you can [deactivate](#) these tracking technologies at any. Data collected by "functional" tracking technologies cannot be used to identify you personally or to track your activities on other apps.

The legal basis for the processing of "functional" tracking technologies is Parship's legitimate interest in gaining insights into the market value of Parship's app in direct comparison with third-party apps. Parship also has a legitimate interest in the commercial usefulness of understanding Parship's market share and any corresponding findings.

"Marketing" tracking technologies

We also use tracking technologies for advertising purposes ("marketing" tracking technologies). We use profiles of usage behaviour that are created with the help of these tracking technologies (e.g. which banner ads you have clicked on, which subpages you have visited, which queries you have searched) to display advertising or offers that are tailored to your interests ("interest-based advertising").

This category includes, for example

- » tracking technologies for selecting simple advertisements,
- » tracking technologies to create a personalised advertising profile,
- » tracking technologies to select personalised ads,
- » tracking technologies to measure ad performance.

In this context, we also allow third parties to collect our users' data through advertising tracking technologies placed on our website. These tracking technologies allow us and other third parties to provide you with interest-based advertising based on an analysis of your usage behaviour (e.g. which banner ads you have clicked on, which subpages you have visited) on the Internet and on our website. We also share tracking data with third parties to measure the success of these advertising campaigns (i.e., "conversion tracking"). Finally, "marketing" tracking technologies allow us to create usage profiles.

The legal basis for using "marketing" tracking technologies is the legitimate interest of Parship and other advertisers to display interest-based advertising to users and to offer users specific advertising that is tailored to their interests.

Legal basis for the processing of personal data in connection with tracking technologies

- Where we obtain your consent as our lawful basis of processing, our legal basis for the processing is point (a) of Article 6(1) of the EU General Data Protection Regulation (GDPR).
- When the processing of your personal data is required to fulfil our contractual relationship (either in relation to Basic Membership or Premium Membership), our legal basis for the processing is point (b) of Article 6(1) GDPR. This also applies to any processing of data that is required to carry out any pre-contractual actions.
- If the processing is necessary to safeguard the legitimate interest of Parship or a third party, such as our members, and the interests, fundamental rights and freedoms of the data subject do not override those legitimate interests, our legal basis for the processing is point (f) of Article 6(1) GDPR.

When the legal basis for processing is your consent, you are entitled to withdraw your consent at any time. However, this withdrawal will not affect the lawfulness of any processing carried out on the basis of your consent before your [withdrawal](#). If the legal basis is a legitimate interest, you are also entitled, in general, to object to the processing of your personal data, at any time, for reasons arising from your specific situation. Article 21 GDPR applies in this respect.

How can you manage, prevent the use of tracking technologies, or erase tracking technologies?

You may object at any time with effect for the future to the collection, the transfer and/or the analysis of your data through our tracking providers by removing the checkmark at the bottom of this page under "Allow tracking". If the checkmark is deactivated, no data will be transmitted to the tracking providers.

What specific tracking technologies does Parship use?

Google Analytics

Parship uses the Analyse tool Google Analytics. Google Analytics is provided by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). Parship uses Google Analytics with the additional feature offered by Google for the anonymization of IP addresses: Google shortens usually the IP address already within the EU, and only in exceptional cases in the US but, in this case, it will only store it in abbreviated form there. Google evaluates the use of the app on behalf of Parship, in order to evaluate the user's use, to compile reports on the app activity, and to provide Parship with other services related to the app activity and the use of internet, such as Google Analytics demographics and interest reports.

Parship does not use the Google Analytics Advertising Features.

How and to which extent does Google process data is described [here](https://policies.google.com/privacy?hl=en) (https://policies.google.com/privacy?hl=en).

You may object at any time with effect for the future to the collection, the transfer and/or the analysis of your data through the above-mentioned tracking provider by removing the checkmark at the bottom of this page under "Allow tracking". If the checkmark is deactivated, no data will be transmitted to this tracking provider.

Google Firebase

Parship uses Google Analytics for Firebase and Firebase Crashlytics from the Google Firebase platform of Google Ireland Ltd (Gordon House, Barrow Street, Dublin 4, Ireland "Google"). Google Firebase offers a variety of features that are shown on the following overview page: <https://firebase.google.com/products/>. These functions may access and store personal data of Parship users, such as content created by the Parship's users or information regarding their interaction with the apps. Firebase provides also interfaces that allow interaction between users of the app and other services.

Parship uses Google Analytics for Firebase and Firebase Crashlytics which collect data such as the first opening of the app, the uninstallation, updates, a crash or the frequency of use of the app. Certain users' interests are also evaluated. To do this, Google accesses the Channel ID of the end device.

The information processed by Google Firebase may be used in conjunction with other Google services (e.g. Google marketing services). In this case, information such as the Android Channel ID or the Identifier for iOS is processed in order to identify mobile devices of the users. For more information about Google's use of data, please visit the overview page at <https://www.google.com/policies/technologies/ads>. Google's privacy policy is available at <https://www.google.com/policies/privacy>.

A transfer of your data to non-EEA countries cannot be excluded.

You may object at any time with effect for the future to the collection, the transfer and/or the analysis of your data through the above-mentioned tracking provider by removing the checkmark at the bottom of this page under "Allow tracking". If the checkmark is deactivated, no data will be transmitted to this tracking provider.

Adjust

We use so-called Mobile-Tracking Technologies. For this purpose we use the app analytical service from adjust GmbH, Saarbrücker Str. 38a, 10405 Berlin, Germany. With the help of these services, we collect statistical data on the use of our offer in order to improve constantly our offer. As part of using our app, information, which your mobile device transmits to us, are collected and analysed. Following data are collected: IP address, which

are immediately hashed, MAC address, pseudonymised device ID (Identifier For Advertisers - IDFA or Google Advertiser ID - GAID), type of browser, language, Internet service provider, network status, time zone, URL of the access and exit pages, spent time and date of access, clickstream data and other statistic information about the use of our services. The data collected this way are used to create pseudonymised user profiles. An inference to your person is thereby for us not possible.

Please refer to the adjust privacy policy for further details [here](https://www.adjust.com/privacy-policy/) (https://www.adjust.com/privacy-policy/).

You may object at any time with effect for the future to the collection, the transfer and/or the analysis of your data through the above-mentioned tracking provider by removing the checkmark at the bottom of this page under "Allow tracking". If the checkmark is deactivated, no data will be transmitted to this tracking provider.

Google Ads

Parship uses the online advertising program "Google Ads" an analytics service provided by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland („Google"). Within Google Ads, we use the following features:

- Google Ads Conversion-Tracking. With this tool, we can determine whether you have clicked on a Parship ad placed by Google. This information is used to generate conversion statistics for Parship. This allows us to see if you have purchased our product or downloaded our app.
- Google Ads Remarketing. This feature enables Parship to target Parship app visitors with advertising on other platforms by showing Parship visitors personalised, interest-based ads when they visit other offers in Google Display Network, or use Google's or a partner's search engine.
- Google Ads Similar Audience. Through this feature, Parship can extend its audience appeal by targeting ads to users who have similar interests to those who already use or plan to use our app. Our interest is to reach those users who are not directly looking for our products or services but who can interact with our advertisements because of their interests.

For more information about Google Ads and Google's privacy policy, please visit [here](https://policies.google.com/technologies/ads?hl=en) (https://policies.google.com/technologies/ads?hl=en).

You may object at any time with effect for the future to the collection, the transfer and/or the analysis of your data through the above-mentioned tracking provider by removing the checkmark at the bottom of this page under "Allow tracking". If the checkmark is deactivated, no data will be transmitted to this tracking provider.

Facebook

Parship wants to present "interest based advertising" on Facebook and to limit the frequency of display of certain advertisements. For this purpose, Parship uses the tool "Custom Audiences" from the social network Facebook operated by Facebook Ireland Ltd, Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook").

Facebook uses a hashed user-specific Facebook ID to assign Facebook user to a "Custom Audience" according to Parship rules. Parship ads will be then displayed on Facebook towards this "Custom Audience". However, ads are displayed only to "Custom Audience" above a minimum of 20 different users – therefore no inference can be drawn based on the ad placement about the individual user's characteristics. The assignment to a "Custom audience" is made for a maximum of 180 days. This period of time starts afresh when you visit our app again and a compliance with the same "Custom Audience" rules applies.

You can find information on data protection on Facebook [here](https://www.facebook.com/privacy/explanation) (https://www.facebook.com/privacy/explanation).

You may object at any time with effect for the future to the collection, the transfer and/or the analysis of your data through the above-mentioned tracking provider by removing the checkmark at the bottom of this page under "Allow tracking". If the checkmark is deactivated, no data will be transmitted to this tracking provider.

Other tracking mechanisms

[Here](#) you can find a complete overview of all tracking technologies that we use on our platform. We have listed each tracking technology and described their intended use, as well as other important information.