

SVB Privacy Statement

Introduction

In order to offer our services to you, we require certain information. As an example, you have to open an account with us to order our goods. **Your privacy is extremely important to us**, which is why we believe that you should always know what type of information we require from you for placing orders and receiving our newsletter or yearly SVB catalogue. We want you to know why we collect your information and how we use this information. You should know that you have effective control of both and can exercise your rights whenever you wish to do so. That is the purpose of this privacy statement.

You can trust us in keeping your information safe. Our team and our data protection officer will protect your privacy and your rights through the use of the data protection laws, in particular the European General Data Protection Regulation (GDPR) gone into effect on 25 May 2018 and the Federal Data Protection Act (new BDSG). Our privacy statement can be found in our online shop under the tab “privacy policy” on the bottom of each page and can be printed for your records. Our IT systems are protected by means of technical and organizational measures against unauthorised access, modification or distribution of your data, as well as against loss or destruction.

Name and Contact Details of the Responsible Party

The following party is responsible for SVB customer data.

SVB-Spezialversand für Yacht- und Bootszubehör GmbH
- Thomas Stamann (General Manager) -
Gelsenkirchener Str. 25 -27
28199 Bremen
Germany
Ph.: +49 421 57 29 0 550
Email: privacy@svb.de

Contact Details of the Data Protection Officer

If you have any questions about how we protect your privacy or general enquiries on privacy policies, or would like SVB to discontinue using your information, you can contact our data protection officer below with your specific questions and concerns:

Email: privacy@svb.de / Ph.: +49 421 57 29 0 550

We can assure you that the topics and contents of such enquiries are strictly confidential.

Legal Basis

Processing of information is done in accordance with the European General Data Protection Regulation (GDPR) and the Federal Data Protection Act (new BDSG).

How We Use Your Information

Our privacy promise: we collect your data in the customer management system of SVB Spezialversand für Yacht- und Bootszubehör GmbH **only for fulfilment of your enquiries, fulfilment and processing of the sales contracts between you and us and for SVB's own informational and advertising purposes**. Employees of the SVB online shop and customer service team have access to the data stored in our customer management system. The SVB customer management system is based on the legitimate interests of SVB Spezialversand für Yacht- und Bootszubehör GmbH and facilitates compliance with the privacy laws regarding data accuracy and data portability. Your interests and fundamental rights were adequately accounted for. You are not required to share personal data with us and can for example choose to modify your cookie settings. Please note though that you might not be able to order from our online shop or might not experience the best-possible customer experience if you decide not to share your information with us. Still, the choice is yours. You decide what you are willing to share with us.

Below you will find more details regarding the type of **information we use and how we use it**:

Name, Sex, Address, Date of Birth and Phone Number:

1. **For your order to be delivered to you: we use your personal information in order to deliver your purchases to your specified delivery address.** This is an essential part of your order with us and is required to perform our contract with you.
2. So we can mail a copy of our **SVB catalogue per postal service** following your specific enquiry.
3. In order to process returns and warranty claims.
4. **We might check your credit in order to allow for immediate delivery of ordered products prior to payment.** The outcome of the automated credit check can result in the inability to choose certain types of payment (e.g. purchase on account). We submit your name, address and your date of birth to the below service provider, who will furnish us with credit-relevant information regarding your payment history and an evaluation of the risk of non-payment based on mathematical-statistical methods using address data (scoring) as well as data for verification of your address (verification of postal deliverability):

*SCHUFA
65203 Wiesbaden
and/or
CEG Creditreform Consumer GmbH
Hellersbergstr.11
41460 Neuss*

Email Addresses and Fax Numbers:

1. **Mailing of the contract outline in the form of an order summary and a 2nd confirmation of the order.** This contract will be saved in our records.

2. **Sending shipment tracking details per email, so you always know the status of your order and where your package is located.** By agreeing to the privacy statement in our online shop or by providing us with your email address over the phone, you give your consent that we are authorized to transfer your email address to the parcel service for tracking of your package. Your email address is used by the parcel services in order to offer tracking services for your order and to provide information regarding the whereabouts of your package as well as the delivery time down to the hour.
3. For sending offers that you requested from us by email or fax.
4. **Sending email newsletters for advertising purposes** with details regarding new products at SVB and services if you agree to this – based on a separate agreement, a double opt-in method. We use the services of the company SendGrid (SendGrid Inc. 1801 California, Street, Suite 500, Denver, Colorado 80202, USA) for sending newsletters and informative emails. At SVB GmbH, we use your information solely for our own advertising purposes. We would like to keep you informed regarding new products, our services as well as interesting events. Therefore, we also use your information for recommending certain products, services and events beyond your purchases that could be of interest to you. Evaluating the purchase history and sending relevant advertising by mail or email to existing customers only takes place in consideration of your legitimate rights and only for products and services of SVB GmbH. Contacting you via email is only done with your permission, which you can revoke at any time:

Email: privacy@svb.de / Ph.: 0421-57290550

Note: Further information regarding your rights is provided in the section “Your Rights as an Affected Person”.

Computer Data (Cookies, IP Addresses*, Profiling Data) and Personal Data:

1. **Your shopping cart / SVB wish list and advertisements for products that could be of interest to you through the use of cookies.**

In order to facilitate use of our website and to improve your shopping experience, we use “cookies”. Cookies are small text files that your browser can store on the hard drive of your computer and that are helpful when using our website. We use cookies in order to better understand how our website is used and to enable easier navigation. Furthermore, cookies allow us to detect whether you have previously visited our website or are a new visitor. The cookies that we make use of do not store your personal information. If you do not wish to receive cookies, you may change the settings of your web browser accordingly.

2. **Google Remarketing**

While you are surfing the web, SVB’s advertisements are displayed by means of Google remarketing in order to show you our new and familiar products.

We utilise the remarketing technology of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; “Google”). Once you have visited our webpages and online services and have expressed your interest in our products, this technology may generate targeted ads while you are surfing Google partner sites. Display of these ads also takes place by means of cookies. These are small text files that are stored on the user’s hard drive. With these text files, the user behaviour can be analysed when a website is visited and subsequently that information is used for targeted product recommendations and interest-based advertising.

If you would like to opt out of receiving interest-based ads, you may deactivate the use of cookies through Google for these purposes by visiting the website <https://www.google.de/settings/ads/onweb>.

3. Google Analytics

To constantly improve our website and your shopping experience.

Our website is using Google Analytics, a web analysis service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). These services are used on the basis of Article 6, Paragraph 1 p. 1 lit. f. GDPR. Google Analytics uses cookies, which are text files that are placed on your computer, to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website, such as browser type/version, operating system, referrer URL (website previously visited), hostname of the computer (IP address) and time of server request will be transmitted to and stored by Google on servers in the United States. Google will not associate your IP address with any other data held by Google. We would like to point out that this website uses Google Analytics with the "anonymizeIP" code. This results in the masking of your IP address, ensuring that all data is collected anonymously. On rare occasions, the full IP address is transferred to a Google Server in the USA, where it is shortened.

Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this, you may not be able to use all the functions of this website.

You may also prevent collection of your data with regard to your use of the website (incl. your IP address) that was generated by the cookie through Google and their processing of said data by downloading and installing a browser plugin from the following link:
<http://tools.google.com/dlpage/gaoptout?hl=en>.

We further use Google Analytics to evaluate data from double-click cookies and AdWords for statistical purposes. If you would like to prevent this, you can deactivate it via the Ads Preferences Manager (<http://www.google.com/settings/ads/onweb/?hl=en>).

Additional information regarding privacy in connection with Google Analytics can be found in the support section of Google Analytics (<https://support.google.com/analytics/answer/6004245?hl=en>).

4. Social Networks – Social Plugins

Our website uses social plugins from social networks such as Youtube, Vimeo, Facebook, Twitter and Pinterest. By means of these plugins, you can for example share content or recommend products. The plugins on SVB.de are by default deactivated and thus do not send any data. By clicking on the button "activate Social Media" you can activate the plugins. The plugins can of course be deactivated again by simply clicking a button.

If these plugins are activated, your browser establishes a direct connection with the server of the respective social network as soon as you visit a page on our website. The content of the plugin is directly transferred by the social network to your browser and then embedded into the website. Once the plugins are embedded, the social network is notified when you visit a page on our website. If you are logged into the social network, the same can assign your visit to your account. If you interact with the plugins, for example click on the Facebook "Like" button or comment on

something, the relevant information is directly transferred from your browser to the social network and stored there.

Please consult the privacy statements of the respective social networks and websites regarding purpose and extent of data collection, further processing and use of the data by social networks as well as your rights and configuration options in order to protect your privacy. The links can be found below.

Even if you are not logged into social networks, websites with active social plugins may send data to the networks. If a plugin is active, a cookie with an identifier is placed whenever the website is accessed. Since your browser sends this cookie every time a connection with a network server is established, the network could basically create a profile with this information, which websites were accessed by the users of that identifier. It would then be possible later on to assign this identifier to a person when that person, for example, signed into the social network. If you do not wish that social networks collect your information via active plugins, you can select the function "Block Third Party Cookies" in your browser settings. As a result, the browser does not send cookies to the server for embedded content of other providers. However, disabling this function might in addition to the plugins also negatively affect other functions.

Our website uses plugins from the following social networks:

YOUTUBE & VIMEO – for embedding product and informational videos

In order to provide you with helpful product and informational videos on our website, we use the services of YouTube (YouTube LLC, 901 Cherry Avenue, San Bruno, CA 94066, USA) – represented by Google (Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) and VIMEO (Vimeo, Inc. 555 West 18th Street, New York, New York 10011) for embedding videos. Simply visiting a website with an embedded video does not result in data being stored by Youtube and/or VIMEO. If you click on the video and watch it, your IP address is submitted to YouTube and/or VIMEO and YouTube/Vimeo are notified that you have watched the video. If you are logged into YouTube/Vimeo, this information will also be stored in your user account (you can prevent this by logging out of YouTube prior to watching videos).

We do not know and have no influence at all on how YouTube collects and uses your information. More detailed information can be found in the privacy statement of YouTube at <https://policies.google.com/privacy?hl=en> and the privacy statement of Vimeo at <https://vimeo.com/privacy>. Moreover, reference is made to our general explanation regarding the use and the deactivation of cookies in this privacy statement.

FACEBOOK

We use plugins of the social network facebook.com, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The link for the privacy statement of Facebook can be found here: <https://www.facebook.com/policy.php>

Furthermore, we utilise the Facebook Conversion Pixel. With your permission, we use so-called "Conversion Pixels" of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (short "Facebook"). With this tool, the user behaviour with regard to our offer can be comprehended after a user has clicked on a Facebook ad. This serves the function to measure the success of the ads and to evaluate them for statistical as well marketing purposes and potentially optimize future ads. The information collected by us is not personal, but rather anonymous – that means

we cannot assign this information to a specific person. However, Facebook stores and processes the information, which, based on our knowledge, is done as follows: Accordingly, Facebook can establish a link to the respective user profiles. Facebook can also use this information for its own advertising purposes, according to the privacy policy of Facebook (found here <https://www.facebook.com/policy>). By using this data, Facebook and its partners can place advertisements on and outside of Facebook and, where necessary, cookies will be stored on the computers of users for this purpose. You need to agree as follows to the above procedure:

Declaration of consent

"I agree to the use of Facebook Conversion Pixels." If you are younger than 13, please ask your legal guardian for permission.

I may revoke this consent at any time with future effect by deactivating the cookies in my browser settings.

TWITTER

We use plugins of the social network Twitter, which is operated by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA ("Twitter"). The link for Twitter's privacy statement can be found here: <https://twitter.com/en/privacy>

PINTEREST

We use plugins of the social network Pinterest, which is operated by Pinterest Inc., 635 High Street, Palo Alto, CA, USA ("Pinterest"). The link for the privacy statement of Pinterest can be found here: <https://policy.pinterest.com/en/privacy-policy>

5. **To prevent and detect fraud.** By accepting the privacy statement in our online store or by providing us with your email address via phone, you agree to the collection, processing and use of your personal information, as listed below, in order to detect and prevent fraud through profile tracking. Fraud affects everyone and in order to prevent this, we attempt to detect and correct it. In order to do so, we collect and store information when you visit our online shop. The following information is collected:

Your information to finalise a contract (purchased item, name, invoice and delivery address, email address, type of payment and shipping method) and your device's profile (i.e. hardware and software details of your device) by means of the following data categories: information we collect, such as the language setting of your browser or the operating system of your device.

Information about your computer collected by means of the https protocol, for example stored cookies on your device. This way, we can recognise your devices during later visits of our online shop. We automatically check whether anything indicates potential abuse of our online shop.

In the event that abuse is suspected, an employee of our online shop reviews the suspicion and the underlying evidence. If a contract is denied, you are notified; and upon request, the primary reasons for this decision can be disclosed. Your consent in particular encompasses the eventuality that you are recognised when you visit our online shop again with the purpose of automatically evaluating whether anything indicates abuse of our online shop. Your online profile information is only used by SVB for the purpose of identifying and preventing abuse (fraud prevention).

Your consent can be revoked with future effect at any time.

Email: privacy@svb.de / Ph.: +49 421 - 5729 0 550

This information is necessary for security reasons. Further use of our online shop is unfortunately not possible once you have revoked your consent.

Payment Details:

- 1. In order to process your payment for the ordered goods and to fulfil the sales contract.** We require your payment details in order to process payment and fulfil our part of the sales contract. Your bank and payment info (credit card details) that you have entered in the SVB online shop are neither collected nor processed in computer systems of SVB GmbH. Credit card details are not stored on storage mediums of SVB GmbH. Processing payments is solely done on EDV systems and in the technical and legal responsibility of our respective payment service providers. We use the following payment service providers for credit card transactions and immediate transfers:

EVO Payments International GmbH

Elsa-Brändström-Straße 10-12,
50668 Cologne, Germany

For “PayPal” payments, we use the services of:

PayPal (Europe) S.à r.l. et Cie, S.C.A

22-24 Boulevard Royal
2449 Luxembourg, Luxembourg

To process payments through “Amazon pay”, we use the service provider:

Amazon Payments Europe S.C.A.

Rue Plaetis
2338 Luxembourg, Luxembourg

For payments through the credit card provider American Express / AMEX:

American Express Services Europe Limited

Theodor-Heuss-Allee 112
60486 Frankfurt am Main, Germany

We only use payment service providers that are validated according to PCI DSS* and thus fulfil the most stringent requirements for secure handling and storing of credit card details.

*[PCI DSS is the abbreviation for “Payment Card Industry Data Security Standard” and is based on the security programs Visa AIS (Account Information Security) and MasterCard SDP (Site Data Protection)].

- 2. To credit your money back to your account in case of refunds.** If you return goods to us, we use your previously used payment details to refund your payment.

We store and process this information (with the exception of the IP address*) in the central SVB customer management system of SVB GmbH for fulfilling and processing the contract as well as for our own advertising purposes. For finalising the contract and to identify you, we at least need a last name, first name and your address. For purchases in the online store, we also need your email

address to send an order confirmation and for delivery also your delivery address and phone number. Without this information, we cannot fulfil the respective contract.

*The IP address is only used, if so required for safeguarding the legitimate interests of the responsible party or a third party, as long as the interests or basic rights and freedoms of the affected person that requires protection of personal information do not outweigh these (e.g. for pursuing legal claims and for clarification of crimes).

Recipient of Personal Details

SVB does not sell your information to third parties – whether this information is personal or of another nature. You can be sure of this. Nevertheless, we have to submit your information within the scope of our statutory permission to the following types of companies in order to provide you with important services and to fulfil our sales contract:

- companies that are responsible for safely delivering your purchases and catalogue orders, such as parcel services & shipping providers, forwarders, dialogue marketing specialists / lettershop services
- payment service providers that process payments & potential refunds of your order
- IT service providers for maintenance and software support of our IT systems
- credit reporting / service providers for credit assessments, collection agencies, law enforcement authorities and institutions for credit assessments and fraud prevention
- careful disposal of your information after a certain, statutory time period: file and data storage media destruction companies

Duration of Data Storage

We store your data as long as it serves a specific purpose: as long as you have an account with us or as long as we require your information for providing services to you or (if you are in contact with our customer support) only as long as support-related reporting is necessary.

In case it necessary or required for fulfilling legal (e.g. telecommunications data retention), fiscal and official regulations, settling disputes, preventing fraud and abuse, we may store some of your information, even after you have closed your account or said account no longer is required for providing services to you.

The storage duration for certain information that is used for finalising sales contracts and for which a fiscal retention period is stipulated (receipts) is at least 10 years. During that time, use of the information is limited. The retention period begins with the end of the calendar year during which the offer was submitted or the contract was fulfilled.

Your Rights / Your Right as an Affected Person

Objection to Marketing

You have the right to object at any time to processing of your personal data for marketing purposes without incurring any costs other than the transmission costs in accordance with the basic tariffs. The below listed contacts are available to you for that purpose. For that purpose, the following contacts are available.

Revoking Consent

Your consent to processing of your personal data can be revoked at any time with future effect. Please note though that you might have to re-enter your information prior to placing a new order.

You have the following rights with regard to your personal information:

- Right to be informed
- Right to rectification. You can retrieve, verify and change your personal information by logging into “My SVB Account”. Please change your personal details as soon as possible in case they have changed or are incorrect.
- Deleting and restricting processing
- Objection against use
- Data portability
- Right to file appeals with supervisory authorities

Right to object

You have the right to object at any time to processing of your personal data. In case you object, we will no longer process your personal information, unless we can demonstrate compelling and legitimate reasons for processing that outweigh your interests, rights and freedoms. Additionally, if processing is necessary for the establishment, exercise or defence of legal claims. This also includes profiling based on those provisions. Your legal right to be informed, to correction or deletion of personal data remains unaffected. Please contact us at the below listed phone number or email address if you would like to look at your personal data and receive more information regarding fees that might be charged in accordance with applicable laws. If you assert your legal right to be informed, to correction or deletion of your personal data, we might, under certain circumstances and in accordance with applicable laws, refuse to provide information, correct or delete your personal data.

To exercise your rights, please contact our data protection officer:

Email: privacy@svb.de / Ph.: +49 421 – 5729 0 0550

We will immediately process your requests and in accordance with legal requirements at no cost. Furthermore, we will advise you of the actions we have taken.

Legal Matters and Claims

To settle claims (transport damage) and in all legal matters, SVB GmbH reserves the right to instruct external companies / law firms. In this context, information is exchanged with the intent to process the respective case.

Update and Changes

We will occasionally update our privacy statement to reflect actual circumstances and the current legal situation. In case of changes or updates to this privacy statement, we will notify you by email (provided we have your email address on file).

Stand: 25.05.2018