

Data Protection Declaration / Privacy policy and Disclaimer:

I. Our Privacy policy for your data protection:

Law Firm Feinen ("We") are committed to protecting and respecting your privacy.

This policy (together with our GTC, contract, terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (the GDPR), the data controller is Mr. Michael Feinen, Law Firm Feinen. Our nominated representative for the purpose of the GDPR is Mr. Michael Feinen.

We may collect and process the following data about you:

Information that you provide by filling in an application form downloaded from our site.

We may ask you for information when you report a problem with our site.

If you contact us, we may keep a record of that correspondence although only sufficient information that we feel will be required to provide you with an appropriate level of customer service will be retained. We will endeavour to delete this information after we have deemed it to be legitimately no longer required for any further processing means by us.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

Details of your visits to our site and the resources that you access.

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual directly (although your IP address may constitute a means of identification)

For the same reason, we may obtain information about your general site usage whilst visiting our site by using a cookie file which is restored on the hard drive of your computer. Cookies contain information stored on your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

To estimate our audience size and usage pattern.

To store information about your preferences, and so allow us to customise our site according to your individual interests.

To speed up your searches.

To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Where we store your personal data

The data that we collect from you will not be transferred to, or stored at, any destination outside the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Uses made of the information.

We use information held about you in the following ways:

To ensure that content from our site is presented in the most effective manner for you and for your computer.

To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

To carry out our obligations arising from any contracts entered into between you and us.

To allow you to participate in any interactive features of our service, when you choose to do so.

To notify you about changes to our service.

Disclosure of your information

We do not disclose your personal information to third parties:

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Law Firm Feinen, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Your rights

You have the right to ask us not to process your personal data at any time. We will inform you (before collecting your data) if we intend to disclose your information to any third party except where required by law or general legislation. You can exercise your right to prevent processing of your information by not checking opt-in boxes on the forms we use to collect your data. You can also exercise your rights under the GDPR at any time by contacting us at Law Firm Feinen, Weissenburgstr. 74 D-50670 Köln or by emailing us at debtcollection@gmx.net.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access to information

The GDPR gives you various rights to the information we hold about you. These rights can be exercised by you in accordance with the GDPR. In line with the regulation, all reasonable requests will be free of charge and processed within the time period permitted. Repeated requests may be subject to a fee which Law Firm Feinen will advise you of prior to processing such requests.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where

appropriate, notified to you by e-mail.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Mr. Michael Feinen or by emailing us at debtcollection@gmx.net.

II. Data Protection Declaration

1. Introduction

As data processor Law Firm Feinen is committed to safeguarding the privacy of our customers. This privacy policy applies to the personal data on www.debtcollectionagency.com. In the privacy policy we determine the purposes and means of processing of the personal data.

We ask you to consent to our use of cookies in accordance with the terms of this policy either when you visit our website for the first time, or when you start using our website and have agreed to this privacy policy.

In this privacy policy, "we", "us" and "our" refer to Law Firm Feinen. For more information about us, see Section 13.

The general categories of personal data that we may process;

In the case of personal data that we did not obtain directly from you, the source and specific categories of that data

the purposes for which we may process personal data; and the legal bases of the processing.

2. Usage data

We may process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

The source of the usage data is based on Google Analytics and other companies, all of these companies are fully compliant with the GDPR policies.

This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent OR our legitimate interests, namely monitoring and improving our website and services OR the ability to fulfil our contractual agreements with our clients.

Account data

We may process account data. The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you.

The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Profile data

We may process your information included in your personal profile on our website. The profile data may include your name, address, telephone number, email address, profile pictures and gender. The profile

data may be processed for the purposes of enabling and monitoring your use of our website and services.

The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Service data

We may process your personal data that are provided during the use of our services. The service data may include product information included in your feeds, product categories, pricing, stock, FTP address, user, password, API, Data Analytics and other relevant information concerning the delivery of the product feed and price monitoring services. The source of the service data is you or your employer.

The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Publication data

We may process information that you post for publication on our website or through our services. The publication data may be processed for the purposes of enabling such publication and administering our website and services.

The legal basis for this processing is consent OR our legitimate interests, namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Enquiry data

We may process information contained in any enquiry you submit to us regarding goods and/or services. The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent.

Transaction data

We may process information relating to transactions, including purchases of goods and services, that you enter with us and/or through our website. The transaction data may include your contact details such as e-mail address, first name, last name, fiscal number, address, your card/bank account details and the transaction details.

The transaction data may be processed for supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business

Correspondence data

We may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communication made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communication with users.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3. In addition to the specific purposes for which we may process your personal Data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. Providing your personal data to others

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal basis for Lawyers in Germany, set out in this policy.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Financial transactions relating to our website and services are or may be handled by our payment service providers. We will share transaction data with our payment service providers only to the extent necessary for the purposes of processing your payments, refunding payments and dealing with complaints and queries relating to payments and refunds. You can find information about the payment service providers' privacy policies and practices here.

In addition to the specific disclosures of personal data set out in Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of personal data

In Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

The hosting facilities for our website are situated in Germany.

You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6. Retaining and deleting your data

This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain your personal data as follows:

Identifiers like Name, Contact Details and billing details will be retained for a minimum period of 3 months following your first interaction with our website our services, and for a maximum period of 6 months following that specific date.

Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

7. Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We will notify you of changes to this policy by email or through the private messaging system on our website.

8. Cookies

In Section 8, we have summarized the rights that you have under the data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights regarding your personal data under the data protection law are:

the right to access;

the right to rectification;

the right to erasure;

the right to restrict processing;

the right to object to processing;

the right to data portability;

the right to complain to a supervisory authority; and

the right to withdraw consent.

You have the right to a confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedom of others are not affected, we will supply you with a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee as established by the German Law.

You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

Under some circumstances you have the right to have your personal data erased without undue delay. These circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing;

you object to the processing under certain rules of the applicable of the data protection law. The processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions to the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

Under some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedom, or the processing is for the establishment, exercise or defense of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is: consent; or that the processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedom of others.

If you consider that our processing of your personal information infringes data protection laws, you have the legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us in addition to the other methods specified in Section 8.

About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

Cookies we use

We use cookies for the following purposes:

authentication - we use cookies to identify you when you visit our website and as you navigate our website

status - we use cookies to help us to determine if you are logged into our website

personalization - we use cookies to store information about your preferences and to personalize the website for you

security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally

advertising - we use cookies to help us to display advertisements that will be relevant to you

analysis - we use cookies to help us to analyse the use and performance of our website and services

cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

Cookies we use

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Below you can find a list of the services we use and a full list of cookies used by either of these services.

Google Analytics. <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

<https://albacross.com/cookies>

https://knowledge.hubspot.com/articles/kcs_article/account/hubspot-cookie-security-and-privacy

We publish Google AdSense interest-based advertisements on our website.

These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>.

You can also opt out of the AdSense partner network cookie using those settings or using the Network

Advertising Initiative's multi-cookie opt-out mechanism at: <http://optout.networkadvertising.org>.

However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>.

Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies.

The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

<https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

<http://www.opera.com/help/tutorials/security/cookies/> (Opera);

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

<https://support.apple.com/kb/PH21411> (Safari); and

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

Michael Feinen, nominated representative for the purpose of the GDPR, Law Firm Feinen, 07.05.2018