

# Privacy policy

## Preamble

With the following privacy policy, we would like to explain to you what types of your personal data (hereinafter also referred to as "data") we process, for what purposes and to what extent. The privacy policy applies to all processing of personal data carried out by us, both in the context of the provision of our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online offer").

The terms used are not gender-specific.

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## Controller

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## Contact Data Protection Officer

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## Overview of processing

The following overview summarises the types of data processed and the purposes of their processing and refers to the data subjects.

## Types of data processed

- Inventory data.
- Payment data.
- Contact data.
- Content data
- Contract data.
- Usage data.
- Meta, communication and process data.
- Log data.

## Categories of data subjects

- Service recipients and clients.
- Interested parties.

- Communication partners.
- Users.
- Business and contractual partners.
- Purposes of processing
- Provision of contractual services and fulfilment of contractual obligations.
- Communication.
- Security measures.
- Office and organisational procedures.
- Organisational and administrative procedures.
- Feedback.
- Provision of our online services and user-friendliness.
- Information technology infrastructure.
- Public relations.
- Business processes and business management procedures.

## Relevant legal bases

**Relevant legal bases under the GDPR:** Below you will find an overview of the legal bases of the GDPR on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our country of residence or domicile. Should more specific legal bases also apply in individual cases, we will inform you of these in the privacy policy.

- **Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR)** - The data subject has given their consent to the processing of their personal data for a specific purpose or several specific purposes.
- **Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR)** - Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legal obligation (Art. 6 para. 1 sentence 1 lit. c) GDPR)** - processing is necessary for compliance with a legal obligation to which the controller is subject.
- **Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR)** - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

**National data protection regulations in Austria:** In addition to the data protection regulations of the GDPR, national data protection regulations apply in Austria. These include, in particular, the Federal Act on the Protection of Natural Persons with regard to the Processing of Personal Data (Data Protection Act - DSG). In particular, the Data Protection Act contains special regulations on the right to information, the right to rectification or erasure, the processing of special categories of personal data, processing for other purposes and transfer as well as automated decision-making in individual cases.

## Security measures

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access, input, disclosure, safeguarding availability and separation of the data. Furthermore, we have established procedures that ensure the exercise of data subject rights, the deletion of data and responses to data threats. Furthermore, we already take the protection of personal data into account during the development and selection of hardware, software and processes in accordance with the principle of data protection, through technology design and data protection-friendly default settings.

## General information on data storage and erasure

We erase personal data that we process in accordance with the statutory provisions as soon as the underlying consents are withdrawn or there is no further legal basis for the processing. This applies to cases in which the original purpose of processing no longer applies or the data is no longer required. Exceptions to this rule exist if legal obligations or special interests require longer storage or archiving of the data.

In particular, data that must be stored for commercial or tax law reasons or whose storage is necessary for legal prosecution or to protect the rights of other natural or legal persons must be archived accordingly.

Our data protection information contains additional information on the retention and deletion of data that applies specifically to certain processing operations.

If there is more than one information on the retention period or deletion period of a date, the longest period is always decisive. We only process data that is no longer stored for the originally intended purpose, but due to legal requirements or other reasons, for the reasons that justify its storage.

Retention and deletion of data: The following general retention and archiving periods apply in accordance with Austrian law:

- 10 years - Retention period for books and records, annual financial statements, inventories, management reports, opening balance sheets, accounting vouchers and invoices as well as all necessary work instructions and other organisational documents (Federal Fiscal Code (BAO §132), Commercial Code (UGB §§190-212)).
- 6 years - Other business documents: Commercial or business letters received, copies of commercial or business letters sent and other documents, provided they are relevant for tax purposes. This includes, for example, hourly wage slips, company accounting sheets, calculation documents, price labelling and payroll accounting documents, provided they are not already accounting documents and cash register strips (Federal Fiscal Code (BAO §132), Commercial Code (UGB §§190-212)).
- 3 years - Data required to consider potential warranty and compensation claims or similar contractual claims and rights and to process related enquiries based on previous business experience and common industry practices will be stored for the duration of the regular statutory limitation period of three years (§§ 1478, 1480 ABGB).

## Business services

We process data of our contractual and business partners, e.g. customers and interested parties (collectively referred to as "contractual partners"), in the context of contractual and comparable legal relationships and related measures and with regard to communication with the contractual partners (or pre-contractual), for example to respond to enquiries.

We use this data to fulfil our contractual obligations. These include, in particular, the obligations to provide the agreed services, any updating obligations and remedies in the event of warranty and other service disruptions. In addition, we use the data to safeguard our rights and for the purpose of the administrative tasks associated with these obligations and the company organisation. We also process the data on the basis of our legitimate interests both in the proper and efficient management of our business and in security measures to protect our contractual partners and our business operations from misuse, jeopardising their data, secrets, information and rights (e.g. to involve telecommunications, transport and other auxiliary services as well as subcontractors, banks, tax and legal advisors, payment service providers or tax authorities). Within the framework of applicable law, we only pass on the data of contractual partners to third parties to the extent that this is necessary for the aforementioned purposes or to fulfil legal obligations. Contractual partners will be informed about other forms of processing, such as for marketing purposes, as part of this privacy policy.

We inform the contractual partners which data is required for the aforementioned purposes before or as part of the data collection, e.g. in online forms, by means of special marking (e.g. colours) or symbols (e.g. asterisks or similar), or personally.

We delete the data after the expiry of statutory warranty and comparable obligations, i.e. generally after four years, unless the data is stored in a customer account, e.g. as long as it must be

retained for legal archiving reasons (e.g. for tax purposes, generally ten years). We delete data disclosed to us by the contractual partner as part of an order in accordance with the specifications and generally after the end of the order.

- **Processed data types:** inventory data (e.g. full name, residential address, contact information, customer number, etc.); payment data (e.g. bank details, invoices, payment history); contact data (e.g. postal and email addresses or telephone numbers). Contract data (e.g. subject matter of the contract, term, customer category).
- **Data subjects:** Service recipients and clients; interested parties. Business and contractual partners.
- **Purposes of processing:** Provision of contractual services and fulfilment of contractual obligations; communication; office and organisational procedures; organisational and administrative procedures. Business processes and business management procedures.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- **Legal basis:** Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR); Legal obligation (Art. 6 para. 1 sentence 1 lit. c) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **FURTHER INFORMATION ON PROCESSING OPERATIONS, PROCEDURES AND SERVICES:**

- **Event management:** We process the data of the participants of the events, functions and similar activities offered or organised by us (hereinafter uniformly referred to as "participants" and "events") in order to enable them to participate in the events and make use of the services or activities associated with participation.

If we process health-related data, religious, political or other special categories of data in this context, this is done within the scope of disclosure (e.g. for themed events or for health care, security or with the consent of the data subjects).

The required information is labelled as such in the context of the conclusion of the order, order or comparable contract and includes the information required for the provision of services and billing as well as contact information in order to be able to hold any consultations. Insofar as we receive access to information from end customers, employees or other persons, we process this in accordance with the legal and contractual requirements; legal basis: fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

## **Provision of the online services and web hosting**

We process users' data in order to provide them with our online services. For this purpose, we process the user's IP address, which is necessary to transmit the content and functions of our online services to the user's browser or end device.

- **Processed data types:** Usage data (e.g. page views and length of stay, click paths, intensity and frequency of use, device types and operating systems used, interactions with content and functions); meta, communication and procedural data (e.g. IP addresses, time data, identification numbers, persons involved). Log data (e.g. log files relating to logins or the retrieval of data or access times).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and user-friendliness; information technology infrastructure (operation and provision of information systems and technical devices (computers, servers, etc.)). Security measures.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

#### **FURTHER INFORMATION ON PROCESSING OPERATIONS, PROCEDURES AND SERVICES:**

- **Provision of online offer on rented storage space:** For the provision of our online offer, we use storage space, computing capacity and software that we rent or otherwise obtain from a

corresponding server provider (also called "web host"); legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

- **Collection of access data and log files:** Access to our online offering is recorded in the form of so-called "server log files". The server log files may include the address and name of the websites and files accessed, the date and time of access, the amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider. The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the event of abusive attacks, so-called DDoS attacks), and also to monitor the utilisation of the servers and their stability.
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).
- **Deletion of data:** Log file information is stored for a maximum of 30 days and then deleted or anonymised. Data whose further storage is required for evidentiary purposes is excluded from deletion until the respective incident has been finally clarified.

## Blogs and publication media

We use blogs or comparable means of online communication and publication (hereinafter "publication medium"). Readers' data is only processed for the purposes of the publication medium to the extent necessary for its presentation and communication between authors and readers or for security reasons. In addition, we refer to the information on the processing of visitors to our publication medium in the context of this data protection notice.

- **Processed data types:** Inventory data (e.g. full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or telephone numbers); Content data (e.g. text or image messages and contributions as well as the information relating to them, such as information on authorship or time of creation); Usage data (e.g. page views and length of stay, click paths, intensity and frequency of use, device types and operating systems used, interactions with content and functions). Meta, communication and process data (e.g. IP addresses, time data, identification numbers, persons involved).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Feedback (e.g. collecting feedback via online form); Provision of our online services and usability; Security measures. Organisational and administrative procedures.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### FURTHER INFORMATION ON PROCESSING OPERATIONS, PROCEDURES AND SERVICES:

- **Comments and contributions:** When users leave comments or other contributions, their IP addresses may be stored on the basis of our legitimate interests. This is done for our security in case someone leaves illegal content in comments and posts (insults, prohibited political propaganda, etc.). In this case, we ourselves may be prosecuted for the comment or post and are therefore interested in the identity of the author.

Furthermore, we reserve the right to process user data for the purpose of spam detection on the basis of our legitimate interests.

On the same legal basis, we reserve the right to store users' IP addresses for the duration of surveys and to use cookies in order to avoid multiple votes.

The personal information provided in the context of comments and contributions, any contact and website information as well as the content information will be stored permanently by us until the user objects; legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Contact and enquiry management

When contacting us (e.g. by post, contact form, email, telephone or via social media) and as part of existing user and business relationships, the details of the enquiring persons are processed insofar as this is necessary to respond to the contact enquiries and any measures requested.

- **Processed data types:** inventory data (e.g. full name, residential address, contact information, customer number, etc.); contact data (e.g. postal and email addresses or telephone numbers);

content data (e.g. text or image messages and contributions as well as the information relating to them, such as information on authorship or time of creation); usage data (e.g. page views and length of stay, click paths, intensity and frequency of use, device types and operating systems used, interactions with content and functions). Meta, communication and process data (e.g. IP addresses, time data, identification numbers, persons involved).

- **Affected persons:** Communication partner.
- **Purposes of processing:** Communication; organisational and administrative procedures; feedback (e.g. collecting feedback via online form). Provision of our online services and user-friendliness.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR). Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR).

#### **FURTHER INFORMATION ON PROCESSING OPERATIONS, PROCEDURES AND SERVICES:**

- **Contact form:** When contacting us via our contact form, by e-mail or other communication channels, we process the personal data transmitted to us to answer and process the respective request. This generally includes details such as name, contact information and any other information that is provided to us and is required for appropriate processing. We use this data exclusively for the stated purpose of establishing contact and communication; legal basis: fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR), legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## **Communication via messenger**

We use messengers for communication purposes and therefore ask you to observe the following information on the functionality of the messengers, encryption, the use of communication metadata and your options to object.

You can also contact us by alternative means, e.g. by telephone or email. Please use the contact options provided to you or the contact options provided within our online offering.

In the case of end-to-end encryption of content (i.e. the content of your message and attachments), we would like to point out that the communication content (i.e. the content of the message and attached images) is encrypted from end to end. This means that the content of the messages cannot be viewed, not even by the messenger providers themselves. You should always use a current version of the messenger with encryption enabled to ensure that the message content is encrypted.

However, we would also like to point out to our communication partners that although the messenger providers cannot view the content, they can find out that and when communication partners communicate with us and that technical information about the device used by the communication partners and, depending on the settings of their device, location information (so-called metadata) is also processed.

**Notes on legal bases:** If we ask communication partners for permission before communicating with them via Messenger, the legal basis for our processing of their data is their consent. Otherwise, if we do not ask for consent and you contact us, for example, on your own initiative, we use Messenger in relation to our contractual partners and in the context of contract initiation as a contractual measure and, in the case of other interested parties and communication partners, on the basis of our legitimate interests in fast and efficient communication and fulfilment of our communication partners' needs for communication via Messenger. We would also like to point out that we will not transmit the contact data provided to us to the messengers for the first time without your consent.

**Revocation, objection and deletion:** You can revoke your consent at any time and - This text area must be activated with a premium licence. -

- **Processed data types:** Contact data (e.g. postal and email addresses or - This text area must be activated with a premium licence. - premiumtext premiumtext premiumtext premiumtext ). Content data (e.g. textual or pictorial messages and contributions as well as the information relating to them, such as information on authorship - This text area must be activated with a Premium licence. - premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext premiumtext ).

- **Persons concerned:** Communication partner.
- **Purposes of processing:** Communication.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- **Legal bases:** Consent (Art. 6 para. 1 sentence 1 lit. a) GDPR); fulfilment of contract and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b) GDPR). Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

## Presence in social networks (social media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may result in risks for users because, for example, it could make it more difficult to enforce user rights.

Furthermore, user data within social networks is generally processed for market research and advertising purposes. For example, user profiles can be created based on user behaviour and the resulting interests of users. The latter may in turn be used, for example, to place adverts within and outside the networks that presumably correspond to the interests of the users. Cookies are therefore generally stored on users' computers, in which the user behaviour and interests of the users are stored. In addition, data can also be stored in the user profiles independently of the devices used by the users (especially if they are members of the respective platforms and are logged in there).

For a detailed description of the respective forms of processing and the opt-out options, please refer to the data protection declarations and information provided by the operators of the respective networks.

In the case of requests for information and the assertion of data subject rights, we would also like to point out that these can be asserted most effectively with the providers. Only the latter have access to the user data and can take appropriate measures and provide information directly. Should you nevertheless require assistance, you can contact us.

- **Types of data processed:** Contact data (e.g. postal and e-mail addresses or telephone numbers); content data (e.g. text or image messages and contributions as well as the information relating to them, such as information on authorship or time of creation). Usage data (e.g. page views and dwell time, click paths, usage intensity and frequency, device types and operating systems used, interactions with content and functions).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of Processing:** Communication; Feedback (e.g. collecting feedback via online form). Public relations work.
- **Storage and deletion:** Deletion in accordance with the information in the section "General information on data storage and deletion".
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR).

### FURTHER INFORMATION ON PROCESSING OPERATIONS, PROCEDURES AND SERVICES:

- **Instagram:** Social network that allows you to share photos and videos, comment on and favourite posts, send messages, subscribe to profiles and pages; Service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.instagram.com>; Privacy Policy: <https://privacycenter.instagram.com/policy/>. Basis for third country transfers: Data Privacy Framework (DPF).
- **Facebook pages:** Profiles within the social network Facebook - We are jointly responsible with Meta Platforms Ireland Limited for the collection (but not the further processing) of data of visitors to our Facebook page (so-called "fan page"). This data includes information about the types of content users view or interact with, or the actions they take (see under "Things you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>), as well as information about the devices used by users (e.g. IP addresses, operating system, browser type, language settings, cookie data; see under "Device information" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>). As explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and

uses information to provide analytics services, so-called "Page Insights", for page operators so that they can gain insights into how people interact with their pages and the content associated with them. We have concluded a special agreement with Facebook ("Information on Page Insights", [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which regulates in particular which security measures Facebook must observe and in which Facebook has agreed to fulfil the rights of data subjects (i.e. users can, for example, send information or deletion requests directly to Facebook). The rights of users (in particular to information, deletion, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information on Page Insights" ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)).

- The joint responsibility is limited to the collection by and transfer of data to Meta Platforms Ireland Limited, a company based in the EU. The further processing of the data is the sole responsibility of Meta Platforms Ireland Limited, which in particular concerns the transfer of data to the parent company Meta Platforms, Inc. in the USA; service provider: Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; Legal basis: Legitimate interests (Art. 6 para. 1 sentence 1 lit. f) GDPR); Website: <https://www.facebook.com>; Privacy Policy:<https://www.facebook.com/privacy/policy/>. Basis for third country transfers: Data Privacy Framework (DPF), Standard Contractual Clauses ([https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum)).

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