



# Privacy Policy Tchibo GmbH

**Note: This Privacy Policy is not a full translation of the German version. Services, including but not limited to Recruiting, Tchibo Community, TchiboEXPERTS, or Gala von Eduscho are not or not fully described in this Privacy Policy. Please refer to the German version.**

## 1. Scope

Many customers, suppliers, service providers, applicants and employees entrust personal data to Tchibo on a daily basis. Tchibo considers it part of its corporate responsibility to protect the information and data that is entrusted to it. Data protection principles, such as data minimization, transparency and security are therefore of the highest priority at Tchibo.

We have set the objective of setting out our Privacy Policy in such a way that everybody can obtain a speedy overview of the purposes for which Tchibo processes personal data. However, persons who are interested in the details should also be provided with sufficient information. All information below refers to the use of the digital services via PC's, smartphones, tablets and all other mobile or stationary end devices that can be connected to the Internet.

Please read our Privacy Policy carefully. Should you have any questions or comments concerning this Privacy Policy, you can address them to the email address on our [contact](#) page at any time.

This Privacy Policy contains information relating to data processing on the following websites of Tchibo GmbH and the corresponding digital processes:

[www.tchibo.de](http://www.tchibo.de)  
[www.tchibo.com](http://www.tchibo.com) (incl. recruiting)  
[www.tchibo-nachhaltigkeit.de](http://www.tchibo-nachhaltigkeit.de)  
[www.gala-von-eduscho.de](http://www.gala-von-eduscho.de)  
[www.reisen.tchibo.de](http://www.reisen.tchibo.de)  
[www.blog.tchibo.com](http://www.blog.tchibo.com)  
[www.tchiboexperts.rogpanel.de](http://www.tchiboexperts.rogpanel.de)  
[www.community.tchibo.de/de-DE/start](http://www.community.tchibo.de/de-DE/start)  
[www.we-socialquality.com/](http://www.we-socialquality.com/)

Should our digital services contain the facility to optionally enter personal data, we would kindly request that you decide for yourself which data you wish to disclose to us. The obligatory fields that are displayed as such are required by us in order to process the respective enquiry or your order. Any data in excess of the above that is gathered is

# Privacy Policy Tchibo GmbH

voluntary and is used in order to optimise the services we offer and, if applicable, for statistical purposes.

Further information can be found in the following chapters.

## **Changes to the Privacy Policy**

We reserve the right to change or adapt this Privacy Policy at any time in consideration of the valid data protection regulations.

## **2. Contact Details and Controller**

Should you have any questions, or should you wish to claim your rights in one of the named cases, please get in touch with us.

[service@tchibo.de](mailto:service@tchibo.de)

With the subject line "data protection"

### **➤ Further Contact Details**

#### **Controller:**

Tchibo GmbH  
Überseering 18  
22297 Hamburg  
Germany

#### **Executive Board:**

Thomas Linemayr (CEO), Ulf Brettschneider, Dr. Jens Köppen

#### **Chairman of the supervisory board:**

Michael Herz

#### **Contact details of the data protection officer:**

Tchibo GmbH  
Data protection officer  
Überseering 18  
22297 Hamburg  
Germany  
[datenschutz@tchibo.de](mailto:datenschutz@tchibo.de)

#### **Responsible authority:**

Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit  
Ludwig-Erhard-Str 22, 7. OG  
20459 Hamburg  
Germany

# Privacy Policy Tchibo GmbH

Tel: (040) 4 28 54 - 40 40  
Email: [mailbox@datenschutz.hamburg.de](mailto:mailbox@datenschutz.hamburg.de)

## 3. Your Rights

At all times, you are entitled to claim your rights in relation to us as an affected person. Should the respective statutory requirements be met, these include the following rights:

- Right of access in accordance with Article 15 EU GDPR

*[REQUEST FORM]*

In order to be able to process your written request, we are obliged to carefully check your identity. Please understand that we reserve the right to request further information or proof of identity, depending on the criticality of the data. In particular, this serves the purpose of protecting your data against unauthorised third-party access.

- Right to rectification in accordance with Article 16 EU GDPR
- Right to erasure in accordance with Article 17 EU GDPR
- Right to restriction of processing in accordance with Article 18 EU GDPR
- Right to data portability in accordance with Article 20 EU GDPR

*[REQUEST FORM]*

- Right to object / withdraw consent in accordance with Article 21 EU GDPR
- Right to lodge a complaint with a supervisory authority in accordance with Article 77 EU GDPR

We wish to inform you that we reserve the right not to process enquiries of excessive character or that are received without the corresponding proof of identity. We will inform you of such in writing.

Your request form as well as the information provided will be stored in our systems for a period of 2 years. The copy of your identity card (if sent) will be destroyed immediately after the identity check. The legal basis for the processing is Article 6 Paragraph 1 Letter c) EU GDPR.

### ➤ Details concerning Your Rights

#### **Access, Data Portability**

At all times, you have the right to free-of-charge confirmation concerning the data processed by us that relates to your person. In addition, at all times, you have the right to have the data that you provided to us transmitted to yourself or to a third party controller.

Should you wish to receive confirmation concerning your data that is processed by us or should you require a data transmission, please contact us in writing at [service@tchibo.de](mailto:service@tchibo.de).

# Privacy Policy Tchibo GmbH

Please bear in mind that we can only transmit data that is based on consent that has been given or on a contract.

## **Rectification, Erasure, Restriction**

Following a request from you, we will rectify, lock or delete the data relating to you that has been processed, provided that other statutory regulations (for example retention obligations under the German Commercial Code - HGB) do not prevent this. Please contact us in writing at [service@tchibo.de](mailto:service@tchibo.de).

You can view, rectify and delete the data in your customer account at any time in the "my account" area by using your email address and password.

## **Withdrawal of consent / objection**

Should you have given us your consent to the processing of your personal information, you can withdraw this at any time by means of a short written notification. Please contact us in writing at [service@tchibo.de](mailto:service@tchibo.de).

You can object to the use of your data for direct marketing purposes at any time by means of a short written notification to [service@tchibo.de](mailto:service@tchibo.de) or withdraw your consent, without any costs other than the transfer costs in accordance with the basic tariffs being incurred.

In order to cancel the subscription to the newsletter, there is a corresponding link at the end of the newsletter. Alternatively, registered users can cancel their registration to the newsletter under "my account" at [www.tchibo.de](http://www.tchibo.de).

Should you wish to object to the analysis and tracking functions with effect for the future, you can set this up via the consent banner.

Please bear in mind that this withdrawal can only prevent the gathering of data for web analysis purposes directly on the website.

Further information, including information in relation to the personal analysis of usage and purchase data that goes beyond the above, can be found [here](#). You can object to this data analysis by means of a short written notification to [service@tchibo.de](mailto:service@tchibo.de).

## **Right to lodge a complaint with a supervisory authority**

Should you wish to contact the competent supervisory authority directly, you can find the contact details [here](#).

## **4. Data Security**

During a data transfer, for example when entering your customer data into the order form, online claim form, or the contact form, as well as during the recruiting process, we offer you the SSL (secure socket layer) security procedure together with 256-bit encryption.

You can recognise the transfer of encrypted data by the picture of a closed key or lock symbol at the bottom of your browser.

# Privacy Policy Tchibo GmbH

We apply the highest level of care and security standards in order to protect your personal data against unauthorised access or loss. We wish to point out that data transfer via the Internet (for example in case of communication by email) can pose security risks. It is not possible to fully protect the data against third-party access.

## ➤ Further details

### **Security during the payment process**

Tchibo offers payment on invoice, direct debit, payment in advance, payment by credit card, PayPal (only in the Tchibo online shop), payment in instalments by direct debit (only in the Tchibo online shop) or Tchibo gift vouchers. All payment methods are comprehensively protected by the security standards listed above.

Should you pay by credit card, we have incorporated additional security: we provide this by requesting the credit card verification number in the ordering process under "payment method". The three-digit card verification number can be found in the signature field on the reverse of your credit card.

Your credit card data will not be saved by Tchibo. It will be transferred directly to **ConCardis GmbH, Eschborn** by means of an encrypted, and therefore secure, connection, and will then be processed there in order to process your payments in compliance with the requirements under data protection laws.

Your anonymised credit card data will only be retained by Tchibo if you save this when setting up a customer account. You can delete this data from your customer account at any time. In addition, it goes without saying that we fulfil the requirements of the mandatory Payment Card Industry Data Security Standard (PCI-DSS).

### **Contact form**

The contact form is intended to provide you with an easy way to contact Tchibo should you have any questions about us. The information you provide here is generally voluntary. Your information will be processed by us in order to answer your query.

Tchibo keeps the information that is necessary in accordance with commercial and tax laws for the period of time determined by legislation. For this period of time (as a rule, ten years) the data will only be processed again in case of a check by the financial administration, for financial and tax verification purposes and in order to clarify any possible criminal activity. Unless your matter is subject to the statutory retention periods, your data will be deleted once the processing purpose has been fulfilled.

In order to answer your query, it may be necessary to forward it together with your personal data to one of our subsidiary companies or to maxingvest ag.

### **Opinion survey at [tchibo-nachhaltigkeit.de](https://tchibo-nachhaltigkeit.de)**

There is also the option for you to provide us with your opinion concerning the Internet service of [tchibo-nachhaltigkeit.de](https://tchibo-nachhaltigkeit.de) via a form. As a rule, no personal data will be gathered from you or processed in this form. You can also not be personally identified by Tchibo.

# Privacy Policy Tchibo GmbH

For your own protection, please ensure that you do not disclose any information in the free text field in the opinion survey that allows you to be personally traced, should you wish to remain anonymous.

## 5. Transfer of Data

Tchibo does not disclose your data to third parties for commercial purposes (sale, rental).

Should your data be processed by service providers who support us with customer service, the delivery of our products and the creation and sending of our advertising materials, the scope of the transferred data is limited to the necessary minimum.

The data transfer takes place in encrypted form.

Within the framework of processing by a processor, our partners were carefully selected by us and are obliged, in accordance with the statutory provisions of Article 28 EU GDPR, to handle your data in a trustworthy manner and to comply with our own data protection standards. In particular, our partners are not permitted to transfer the data of our customers to third parties for direct marketing purposes or to use the data themselves for commercial purposes.

We also work with contracting and co-operation partners. Should we disclose your data to contracting or co-operation partners in order to fulfil your order, travel booking, a prize competition or in the course of partner offers and auctions in order to perform the contract, we will inform you of such separately. Our co-operation partners were carefully selected by us. In particular, our co-operation partners are not permitted to transfer the data of our customers to third parties for direct marketing purposes. The data that is forwarded in such a way may only be processed by our co-operation partners in order to fulfil the processing of your order.

Within the framework of the processing, we pass your data on to the following recipients:

- Agencies
- Information bodies, debt collection agencies (creditworthiness check, warning procedure)
- Authorities, other public bodies
- Call centres (customer support)
- Printing service providers, letter shops
- Internal bodies, group companies
- IT service providers/Cloud providers
- Co-operation partners (competitions, partner offers etc)
- Banks
- Suppliers
- Logistic service providers, post and courier service providers
- Market and opinion research companies
- Newsletter distributors
- Travel agency and tourism service providers
- Repair and service providers

# Privacy Policy Tchibo GmbH

- Telecommunications providers
- Corporate advisors / auditors /tax consultants
- Insurance companies

**Please bear in mind:** You can obtain further information in relation to the specific processing in the chapters of our Privacy Policy.

## ➤ **Third country transfers**

Should it become necessary to transfer data to third parties in order to fulfil the data processing purpose (for example the delivery of goods), we ensure that your data remains within the European Union or the European Economic Area.

Should this not be possible in exceptional cases and should it be necessary to transfer data to a third country, Tchibo ensures all necessary measures (for example by means of EU standard contractual clauses) to create a reasonable level of data protection.

We have listed the processing in third countries below:

- **Tracking and targeting technologies**  
The processing relates to those data transfers to servers of our service providers who are headquartered in the USA. The data transfer takes place on the basis of EU Commission **standard contractual clauses**.  
You can find further information concerning tracking and targeting [here](#).
- **Global IT support**  
Within the framework of the continual monitoring and support of our IT systems, service providers who are engaged by us separately have access to our data processing systems. The data transfer takes place on the basis of EU Commission **standard contractual clauses**.
- **Predictive Index (PI) diagnostic tool**  
As part of the application procedure, we will send your first name and surname as well as your email address to PI, who are based in The United States of America. The data transfer takes place on the basis of EU Commission **standard contractual clauses**.  
You can find further information concerning recruiting [here](#).
- **Customer support**  
In order to be able to process your matter in a speedy manner, we also use service providers for our call centre. **In exceptional cases**, the call centre is not located in the European Union or the European Economic Area. Our service providers located in third countries have had obligations placed on them on the basis of the EU commission **standard contractual clauses**.
- **Tchibo Group**  
Should it be necessary, we transfer data to group companies outside the EU in order to to process your matter or for internal administrative purposes. The

# Privacy Policy Tchibo GmbH

data transfer takes place on the basis of EU Commission **standard contractual clauses**.

## 6. Necessary Provision of Data

We process personal data, such as name, address, email address etc. at various processing situations. In this Privacy Policy, we wish to provide you with as detailed an overview as possible as to how your data is handled, on what legal basis we process your data and whether the provision of your data is necessary under the contract or in accordance with the law.

Should Tchibo GmbH process your data under a contract or in accordance with the law, entry fields are shown as mandatory fields, if we require the information in order to fulfil the contract or due to a statutory requirement. For example, you can find these obligatory fields in the course of an order. Should the obligatory information not be entered, we may not be able to provide our services.

Should it be possible to enter additional personal data in optional fields, we would kindly request that you check which data you wish to disclose to us.

## 7. Tchibo Order Process

In order to conclude, perform or terminate your contract, order, or claim, we also require personal data from you. For example, this includes:

- First name, surname
- Invoice and delivery address
- Email address
- Invoice and payment data
- If applicable, date of birth
- If applicable, telephone number

The processing of the ordering process also includes the shipping of orders, the handling of your payment, the sending of electronic order confirmations and invoices. We would like to inform you that in case of a service request we reserve us the right to possibly process contact details received, in order to assist you best.

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR. You provide us with the data on the basis of the contractual relationship between yourself and Tchibo.

Unless we use your contact details for direct marketing purposes, we store the data that has been gathered in order to perform the contract until the expiry of the statutory and possible contractual warranty and guarantee rights. Following the expiry of this period, we retain the information relating to the contractual relationship which is necessary under commercial and tax laws for the period of time mandated by legislation. For this period of time (as a rule, ten years from the time of conclusion of the contract) the data will only be processed again in



# Privacy Policy Tchibo GmbH

case of a check by the financial administration for financial and tax verification purposes and in order to clarify any possible criminal activity.

## **Online customer account**

In order to provide you with the highest possible degree of user friendliness during your purchase, we provide you with the option of permanently saving your personal data in a password protected customer account. The registration is voluntary. Once a customer account has been set up, it is not necessary to enter the data again. In addition, you can view the data that has been kept in relation to you in your customer account at any time. You can also rectify the data or delete your customer account. Please bear in mind that the deletion of your customer account online only leads to a deletion in our webshop system. This does not necessarily lead to a deletion in downstream systems.

In addition to the data that is requested at the time of an order, you must also specify your own password in order to set up a customer account. Together with your email address, this is used to access your customer account.

After login a permanent cookie is set. Following a first login, the function enables you to access your shopping cart, your shopping list as well as your loyalty bean overview in a user-friendly manner 365 days after, without you being required to enter your password again. For security reasons, the access to parts of the 'my account' area, submitting orders as well as changing your address and payment data, remains password-protected. If you do not like to use this function, please logout after your visit using the logout button. The legal basis for the processing is Article 6 Paragraph 1 Letter f) EU GDPR. Our legitimate interest arises from the purposes of offering you a comfortable use of our website/application. You can find more information relating to cookies [here](#).

## **Ordering in a Store**

Should you place your order in one of our stores or have the order delivered to you from the store, the data processing takes place as described above. Should you have your order delivered to one of our stores, you will be informed by email, text message or telephone call once your order is ready for collection at the stores, depending on your choice.

## **Reporting**

In addition, we gather commercial key figures on the basis of the orders and evaluate these without relating to specific persons. The purpose of this is the commercial optimisation of our processes. The legal basis for this processing is Article 6 Paragraph 1 Letter f) EU GDPR (legitimate interest).

At all times, you have the right to free-of-charge access to personal data, data portability, rectification and, if applicable, erasure, as well as the right to object to the processing of your data that is processed by us.

### **➤ Details concerning Creditworthiness and Statutory Checks**

When using a so-called unsecure payment method, i.e. payment on account or bank debit, in order to minimise risks connected to non-payment, we carry out a creditworthiness check.

# Privacy Policy Tchibo GmbH

We assess the likelihood of non-payment looking at geosocial and order-related customer and order characteristics and external address-based creditworthiness checks. Our assessment is based on a statistical comparison with our payment experiences up to this point.

We reserve the right to obtain an external personal record from a recognised credit scoring agency in relation to you.

In such a case, we transfer your data (name, address and if applicable date of birth) to **infoscore Consumer Data GmbH, Rheinstr. 99, 76532 Baden-Baden ("ICD") for the purpose of checking creditworthiness, in order to obtain information to assess the risk of non-payment on the basis of mathematical-statistical procedures using address data, as well as to verify your address** (checking for capability of delivery). You can also find information relating to the creditworthiness check in our general terms and conditions of business. The legal basis for this processing is Article 6 Paragraph 1 Letter b) and Letter f) EU GDPR.

Transfers on the basis of these provisions may only take place if it is necessary to safeguard legitimate interests of our company or third parties and do not infringe the interests of the basic rights and basic freedoms of the person affected who requires the protection of personal data. More detailed information concerning the ICD as defined in Article 14 EU GDPR, i.e. information concerning the business purposes, the purposes of the storage of data, the data recipients, the right to access, the claim to deletion or the claim to rectification etc. can be obtained via the following link.

Should you not agree to a creditworthiness check by **infoscore Consumer Data GmbH, Rheinstraße 99, 76532 Baden-Baden**, you have the option of selecting one of the following payment methods: advance payment, payment by credit card, payment on collection of the order at a store (delivery address is the address of the store) or PayPal (only in the Tchibo online shop).

In case of payment delay, we will transfer the necessary data to a company engaged in the collection of the claim, provided that the other statutory requirements are present. The legal basis for this processing is Article 6 Paragraph 1 Letter b) and Article 6 Paragraph 1 Letter f) EU GDPR. The assertion of a contractual claim is considered to be a legitimate interest in the sense of the second regulation referred to above. Negative payment experiences from the time of the transfer of the main claim together with dunning costs or loss of claim will also be forwarded to the credit agency that co-operate with us, should the other statutory requirements be present. The legal basis for this processing is Article 6 Paragraph 1 Letter f) EU GDPR. The legitimate interest also relates to our interest and the interest of third parties in reducing contractual risks for future agreements.

In addition, for all completed orders we run assessments which check the personal data, addressees, contact details and the items bought against negative lists and historical fraud patterns.

# Privacy Policy Tchibo GmbH

These measures shall limit the risk of non-payment and safeguard our customers against misuse of their accounts or identity.

## "Terror lists" screening

The EU regulations for combating terrorism (EC) numbers 2580 / 2001 and (EC) numbers 881 /2002 require that no customer, supplier, service provider or employee of Tchibo be terror suspects named in the centrally managed lists (terrorism lists). Therefore, it is necessary for Tchibo to carry out a data comparison with the terrorism lists.

The legal basis for this processing is Article 6 Paragraph 1 Letter c) and Article 6 Paragraph 1 Letter f) EU GDPR. The regular data comparison also provides Tchibo with a streamlined customs process, which is considered to be a legitimate interest in the sense of the second regulation referred to above.

## Compliance with export prohibitions

Should you specify a delivery address outside of the EU, we check your customer data in accordance with the German Foreign Trade Law (Außenwirtschaftsgesetz) in order to comply with export prohibitions and embargoes and as proof of VAT-free charging to legitimate recipients in countries outside of the EU. In addition, we carry out a customs registration for your delivery to countries outside of the EU.

The legal basis for this processing is Article 6 Paragraph 1 Letter c) EU GDPR.

### ➤ Details concerning Order Processing

#### Logistics

If necessary, for the purpose of tracking the shipment as well as parcel notification we forward your email address to **DHL Vertriebs GmbH, Charles-de-Gaulle-Straße 20, D-52113 Bonn** or **Hermes Logistik Gruppe Deutschland GmbH, Essener Straße 89**, should you have agreed to this during the ordering process. If not, we will send you a link. By clicking, you will be forwarded to the respective logistics company.

Should you wish to have the goods delivered to a DHL parcel station, we forward your DHL customer number, your name and your invoice address to **DHL Paket GmbH, Charles-de-Gaulle-Str. 20, 53113 Bonn** for the purpose of verifying your identity, in order to ensure that the stated data was entered correctly and in order to prevent misuse.

Should you not wish for your data to be forwarded on, you can also have your order delivered to one of our stores at any time. Haulage goods are excluded from the above.

Should your order include goods that are delivered directly by the manufacturers, we will forward your name and delivery address, telephone number and email address to the manufacturers for the purpose of order processing and delivery notification. Should this be the case, you will be informed of such separately during the order process.

Should your order include a conclusion of an insurance policy, the insurance documents will be sent to you by the insurance company. For this purpose, we will forward your name, your address, telephone number and email address to the insurance company. Should this be the case, you will be informed of such separately during the order process.

# Privacy Policy Tchibo GmbH

The legal basis for data disclosure is Article 6 Paragraph 1 Letter b) and Article 6 Paragraph 1 Letter a) EU GDPR with regard to shipment tracking.

## **Payment procedure**

Should you use the **PayPal** payment service, we will forward your name, delivery address, email address and shopping basket details on to PayPal, so that PayPal can correctly allocate your order and so that you have all the relevant order information to hand at the time of confirmation of the payment via PayPal.

Should you not wish for your data to be passed on, you can select an alternative payment method at any time.

## **Customer support**

In order to be able to assist you in a speedy manner during and after your order, we offer you customer support.

In general, it is possible to receive advice without disclosing information relating to your customer account. However, should identification be necessary in order to process your matter (for example clarification of matters relating to your customer account, loss report, request for access to personal data), the personal data that is requested serves the purpose of legitimating your person, the carrying out of the processing of your matter and quality assurance.

In order to process your matter, we require the following information from you, amongst others:

- First name, surname
- Invoice and delivery address
- Email address
- Order number
- If applicable, date of birth
- If applicable, telephone number
- If applicable, further identity characteristics in order to proof legitimacy

The legal basis for the order acceptance and/or order and delivery research and the handling of returns is Article 6 Paragraph 1 Letter b) EU GDPR i.e. you provide us with the data on the basis of the contractual relationship with us. Within the framework of the processing of your rights and for the purposes of the legitimation assessment, we process your data on the basis of Article 6 Paragraph 1 Letter c) EU GDPR, i.e. we are legally obliged to carry out the processing. The legal basis for the processing within the framework of our complaints management (also on social media sites) is Article 6 Paragraph 1 Letter f) EU GDPR. Our interest in gaining customer satisfaction is considered to be legitimate in the sense of the regulation referred to above.

We would like to inform you that we reserve us the right to possibly use e-mail addresses received in the context of customer service for future order processing at Tchibo. Of course, you can object to this use of your e-mail address at any time.

# Privacy Policy Tchibo GmbH

We store your data until the expiry of the statutory and/or possible contractual retention periods, warranty and guarantee rights and/or proof obligations.

Should it be necessary in order to process the order, we transfer your data to service providers who assist us with customer support.

## **We pass your data on to service providers**

- **For support when processing your matters**
- **In the course of complaints management**
- **For loss processing**
- **For the issuing of credit notes**
- **For repair orders**
- **Returns handling**
- **Only if the partner has agreed to comply with our data protection standards.**

In relation to user contributions that you have posted on the Tchibo Facebook page or on other social networks, please familiarise yourself with the Privacy Policies of the respective social networks.

As part of our customer support, you can also use the **online technical claims complaint form** on our website as an easy way to generate all necessary self-service documents to send the defective item to our repair centers for processing.

The generated documents include a DHL shipping label and a claim slip containing the data you entered in the claim form. Your given data are required to create a shipping label and to provide you with information about the status of your claim. The documents will be sent to the specified email-address. Our repair centers will receive the data of the complaint form (by including the document in your package) to handle the complaint case.

## **Quality controls**

In order to be able to offer you a continual or improved service and in order to guarantee business critical processes, processed matters are subjected to quality control, and this applies to our call centre in particular. Should you have issued your consent in accordance with Article 6 Paragraph 1 Letter a) EU GDPR, your telephone call will be recorded. We would also like to inform you that we produce transcripts of the audio files and analyse them for the purpose of early detection of product risks, monitoring of measures and evaluation of reasons for contact. The legal basis for the processing within the scope of our analysis of the transcripts is Article 6 Paragraph 1 Letter f) EU GDPR.

Our interest in early detection of product risks and evaluation of reasons for contact is considered to be legitimate in the sense of the regulation referred to above.

We store the audio file for a maximum of 30 days. We store the transcript of the audio file for a maximum of 12 months. There is no direct link between the audio file and your customer account.

# Privacy Policy Tchibo GmbH

## **Data cleansing processes**

We wish to inform you that Tchibo regularly checks the correctness of the data stored by us. The legal basis for the data processing within the framework of our cleansing process is Article 6 Paragraph 1 Letter c) EU GDPR, i.e. we are legally obliged to check the correctness of the data stored by us.

## **Notifying our customers concerning relevant processes**

We reserve the right to inform you in case of relevant processes via the contact data stored by us. Such processes may affect your order (for example delivery delays), but may also contain warnings (for example recall measures).

The processing of your data for direct marketing purposes is excluded, unless you have provided us with your consent.

The legal basis for the use of your contact data is Article 6 Paragraph 1 Letter f) EU GDPR. Our interest in informing our customers of relevant processes is considered to be legitimate in the sense of the regulation referred to above.

## **Returns analysis**

We would like to inform you that as part of our sustainability efforts we try to reduce returns. For this reason, automated evaluations are carried out regarding the frequency of returns. If an above-average return rate is recognized, we reserve the right to switch your payment method to a secure payment method for online orders. You can still place orders online. In addition, this measure will be continuously reviewed with regard to its necessity and deactivated again if applicable.

The legal basis for the processing is Article 6 Paragraph 1 Letter f) EU GDPR. Our interest in reducing returns is considered to be legitimate in the sense of the regulation referred to above.

## **8. Visiting our websites**

When accessing our [websites](#), certain data will be gathered. This data is statistically evaluated by us and is only used in order to offer individual marketing content to you and to improve the attractiveness, content and functions of our website.

In our server log files, we save information that your browser automatically sends to us for technical reasons. This includes:

- Browser type/version
- Operating system used
- Referrer URL (the most recently visited page)
- Host name of the accessing end device (IP address, anonymised)
- Date and time of the server access

In case of smartphones, tablets and other mobile end devices: manufacturer/model. No person-related saving of this data takes place. This data is also not combined with other data sources.

# Privacy Policy Tchibo GmbH

The legal basis for the processing of your IP address is Article 6 Paragraph 1 Letter f) EU GDPR. Our legitimate interest arises from the purposes of the processing listed below:

- Guaranteeing a seamless connection
- Guaranteeing comfortable use of our website/application
- Assessment of system security and stability

Your IP address is generally stored by us in anonymous form and no personal analysis takes place during this process. A full saving of the IP address only takes place in order to trace technical errors and hacking attempts, as well as to record consent, for example in the newsletter subscription.

Should you surf in our international webshops, it may be the case that the German webshop is recommended to you as an alternative on the basis of your IP address.

With the exception of saving for the purpose of recording consent, the IP address will then be deleted by us in a timely manner following your visit.

## **Geo localisation**

Within the framework of the store finder function, geo data (geo localisation) will be transferred to the website in the form of location brokerage. This takes place exclusively in order to search for your location. The data is not saved. Prior to the activation of the location function, you will be asked for your agreement by means of a security question in accordance with Article 6 Paragraph 1 Letter a) EU GDPR.

## **Google Maps**

Tchibo uses Google Maps to display interactive maps and as part of our store finder feature. Google Maps is a map service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043, USA ("Google").

In order to be able to provide you with the service, your browser will directly connect to Google servers. Tchibo has no influence over the scope of the data that Google gathers with the assistance of Google Maps. However, we wish to inform you of such to the fullest extent we can. You can also find more information on Google's website:

<https://www.google.com/policies/privacy/>

Google is informed that a user has accessed the corresponding page on the site. Should the user be logged into Google, Google can allocate the visit to his or her Google account. Should a user not have a Google account, it is still possible for Google to be informed and store his or her IP address and information that the browser automatically sends. The information is generally transferred to a Google server in the USA and processed there.

You can reject via your browser settings or via your Google account:

<https://adssettings.google.com/authenticated>.

We use Google Maps in accordance with Article 6 Paragraph 1 Letter f) EU GDPR. Our interest in tailoring our services to your requirements as best as possible is considered to be legitimate in the sense of the regulation referred to above.

# Privacy Policy Tchibo GmbH

You can object to the use of Google Maps through your cookie preference setting.

## **Google Webfonts**

To display fonts in the integrated services Google Maps and Google ReCaptcha this page uses script libraries and font libraries known as webfonts. These are provided by Google (<http://www.google.com/webfonts/>). For this, when you access the services in question, your browser downloads the required webfonts to your browser cache to avoid multiple downloads. This is also necessary in order for your browser to be able to display a visually optimized representation of these texts. If your browser does not support this function, your computer will use a standard font for the display.

Calling up these script libraries or font libraries automatically triggers a connection between the user's computer and the Google server, with the consequence that the IP address is also transmitted. You will find further information about Google webfonts at <https://developers.google.com/fonts/faq?hl=de-DE&cs=1>.

You will find general information about data protection at Google at <http://www.google.com/intl/de-DE/policies/privacy/>

You can object to the use of Google Webfonts through your cookie preference setting.

## **9. Advertising / marketing**

We process the data of our customers for direct marketing purposes in accordance with statutory provisions. In particular, during this process we ensure that our services are tailored to your requirements as best as possible. Using likelihood values, we endeavour to ideally only present advertising content to you which will be of interest.

**You can object to the use of your data for direct marketing purposes at any time by means of a short written notification to [service@tchibo.de](mailto:service@tchibo.de) or withdraw your consent, without any costs other than the transfer costs in accordance with the basic tariffs being incurred.**

**In order to cancel subscription to the newsletter, there is a corresponding link at the end of the newsletter. Alternatively, registered users can cancel their registration to the newsletter under "my account" at [www.tchibo.de](http://www.tchibo.de).**

Should you raise an objection, your stated contact address will be locked for subsequent advertising related processing. We wish to inform you that in exceptional cases, also following receipt of your objection, advertising materials may still be sent. This is for technical reasons and does not mean that we are not processing your objection.

The legal basis for this processing is Article 7 Paragraph 3 of the German Law against Unfair Competition (UWG) and Article 6 Paragraph 1 Letter f) EU GDPR. Our interest in addressing advertising in line with requirements is considered to be legitimate in the sense of the regulation referred to above.



# Privacy Policy Tchibo GmbH

## **We pass your data on to business partners**

- **in order to send advertising materials**
- **only if the partner has agreed to comply with our data protection standards.**

At all times, you have the right to free-of-charge access to personal data, data portability, rectification and, if applicable, erasure, as well as the right to object to the processing of your data that is processed by us.

### ➤ **Postal Advertising**

Should you have concluded a contract with us, we will manage you as a regular customer. In such a case, we process your postal contact data without your concrete consent in order to inform you in this way of our offers and services.

As a customer of Tchibo GmbH, you will receive catalogues, flyers, gift vouchers and similar advertising materials by post. During this process, we comply strictly with the legal regulations of the German Law against Unfair Competition (UWG).

**You can object to the processing of your postal address for direct marketing purposes at any time by contacting service@tchibo.de without any costs other than the transfer costs in accordance with the basic tariffs being incurred.**

### ➤ **Satisfaction Surveys**

#### **Satisfaction survey by email**

As customer of Tchibo, you will receive a satisfaction survey by e-mail after contacting our customer service. You will receive this e-mail only if you have subscribed to our newsletter and thus agreed to the use of your data for advertising purposes. We will only use your corresponding registered email address. Your feedback will be provided to Tchibo and stored. Your participation in the survey enables us to further improve our service for you. Tchibo can use your email address to assign the submitted feedback and/or to respond to service complaints. For this purpose, we will store the results of the survey personalised for 24 months.

The following **example** shows the typical format of an e-mail invitation to a Tchibo satisfaction survey:

**Dear / Dear Mr/Ms XXX**

**You have recently contacted our Tchibo customer service by telephone / email - and because active exchange is very important to us, we would like to know how satisfied you were with our customer service.**

**We would be delighted if you would take a moment to answer the questions and help us to further improve our service for you.**

**The results of the personalised survey are stored for 24 months. Further information on data protection can be found at [tchibo.de/datenschutz](https://www.tchibo.de/datenschutz).**

The processing of your email address takes place until revoked.

# Privacy Policy Tchibo GmbH

**You can object to the processing of your email address for direct marketing purposes at any time by contacting [service@tchibo.de](mailto:service@tchibo.de) without any costs other than the transfer costs in accordance with the basic tariffs being incurred. There is also a corresponding link at the end of the email for de-registration.**

## **Satisfaction survey by telephone**

If you have contacted the Tchibo customer service by telephone and agreed to the call recording, you have the opportunity to take part in the satisfaction survey. After the conversation, you simply stay in the line to answer three short questions. Your feedback will be submitted to Tchibo and stored. Your participation in the survey enables us to further improve our service for you. Tchibo can use your telephone number to assign the submitted feedback and/or to respond to service complaints. Your participation in the survey enables us to further improve our service for you. For this purpose, we will store the results of the survey personalised for 24 months.

**You can object by hanging up immediately after the conversation.**

## **Quality controls**

In order to be able to offer you a continual or improved service and in order to guarantee business critical processes, processed matters are subjected to quality control, and this applies to our call centre in particular. Should you have issued your consent in accordance with Article 6 Paragraph 1 Letter a) EU GDPR, your telephone call will be recorded. We would also like to inform you that we produce transcripts of the audio files and analyse them for the purpose of early detection of product risks, monitoring of measures and evaluation of reasons for contact. The legal basis for the processing within the scope of our analysis of the transcripts is Article 6 Paragraph 1 Letter f) EU GDPR.

Our interest in early detection of product risks and evaluation of reasons for contact is considered to be legitimate in the sense of the regulation referred to above.

We store the audio file for a maximum of 30 days. We store the transcript of the audio file for a maximum of 12 months. There is no direct link between the audio file and your customer account.

## **➤ Product Reviews**

As a customer of Tchibo GmbH, you will receive regular product review requests from us by email. You will receive this email from us regardless of whether or not you have subscribed to a newsletter. During this process, we comply strictly with the legal regulations of the German Law against Unfair Competition (UWG). In such a case, we use your email address provided during a purchase in order to promote our own products which you have already purchased by placing a corresponding order.

With the submission of an review and/or commentary, this will be transferred to Tchibo and stored by us. Tchibo can use your email address in order to assign the submitted evaluation, to contact you for verification purposes or to respond to service complaints.

# Privacy Policy Tchibo GmbH

The product evaluation usually becomes public with your first name and first letter of your surname and will be anonymised after 2 years. Should you not wish for this to happen, please simply place a cross in the "anonymous" field and then no name will be displayed.

By means of the forwarding of a review and/or commentary, you are assigning Tchibo the non-exclusive, licence fee free, permanent and irrevocable right to use, copy, alter, publish, transfer, duplicate and make the review and/or commentary (in full or in part) available to third parties online and offline (for example in print media or catalogues), as well as to integrate these in other work forms (media, technologies etc). For example, this means that Tchibo may publish the commentary and may process the review and/or commentary for commercial purposes (for example in its advertising or for marketing purposes). In addition, the product evaluations are analysed and assessed.

The processing of your email address takes place until an objection is received.

**You can object to the processing of your email address for direct marketing purposes at any time by contacting [service@tchibo.de](mailto:service@tchibo.de) without any costs other than the transfer costs in accordance with the basic tariffs being incurred. There is also a corresponding link at the end of the email for de-registration.**

## ➤ Newsletter

With the Tchibo newsletter, it is possible for you to be regularly informed by email of our changing topics, travel, offers, services of our co-operation partners in the course of Tchibo partner campaigns and the Tchibo auction etc. In particular, you can determine the newsletter focus points yourself by stating your preferences.

In order to be sure that no errors have taken place when entering the email address, we use a double opt-in procedure. Once you have entered your email address in the registration field we send you a confirmation link. Only when you click this confirmation link your email address will be included in our mailing list. **You can withdraw your consent which has been given in such a way in accordance with Article 6 Paragraph 1 Letter a) EU GDPR at any time with effect for the future.**

**You can object to the use of your data for direct marketing purposes at any time by means of a short written notification to [service@tchibo.de](mailto:service@tchibo.de) or withdraw your consent, without any costs other than the transfer costs in accordance with the basic tariffs being incurred. In order to cancel subscription to the newsletter, there is a corresponding link at the end of the newsletter. Alternatively, registered users can cancel their registration to the newsletter under "my account" at [www.tchibo.de](http://www.tchibo.de).**

## Consent text newsletter (example)

**Yes, I wish to subscribe to the free-of-charge Tchibo newsletter which informs me by email of current Tchibo offers. View sample newsletter here. I have read the Privacy Policy .**

# Privacy Policy Tchibo GmbH

The processing of your email address takes place until a notice concerning the withdrawal of your consent is received.

Via individual functions in our newsletter, we can view in a standardised automated manner which contents of our newsletter are of particular interest to our customers. We use the results of these analysis in person-related form exclusively for the purpose of improving our services and tailoring these to requirements as well as for the purpose of direct advertising. You can find more information [here](#).

## **Consent text in relation to the person-related analysis of usage behaviour and purchase data (example)**

**Yes, I agree that Tchibo creates personalised profiles from my purchase data and usage behaviour, in order to better tailor advertising and web services to my personal interests. The consent can be withdrawn at any time with effect for the future at [service@tchibo.de](mailto:service@tchibo.de).**

**You can object to or revoke the person-related analysis of your data in order to improve our services at any time by contacting [service@tchibo.de](mailto:service@tchibo.de).**

## **Trustpilot**

In our newsletters we have integrated advertising banners and links to the “**Trustpilot**” (**Trustpilot A/S website, Pilestræde 58, 1112 Copenhagen, Denmark**). By clicking the advertising banner or link you will be forwarded to Trustpilot. Further information on Trustpilot's processing of your data can be found in the privacy policy at: <https://de.legal.trustpilot.com/for-reviewers/end-user-privacy-terms>.

The participation is voluntary. We do not transmit any personal data to Trustpilot. The legal basis for this processing is Article 6 Paragraph 1 Letter a) EU GDPR.

### **➤ Gift vouchers / discounts**

Tchibo customers benefit from various gift vouchers and discount offers. Should you have agreed to the marketing use of your data, we will inform you of gift voucher campaigns in the newsletter or by post.

Should you not have agreed to the marketing use, you will also receive information concerning campaigns as an advert in newspapers or in our stores.

We process your data in the course of your redemption of gift vouchers. Should you redeem personalised gift voucher codes or gift voucher codes in your customer account in the web shop, the data will be combined with your personal data.

The processing of your email address takes place until a notice concerning the withdrawal of your consent is received. The processing of your postal address takes place until an objection is received.

# Privacy Policy Tchibo GmbH

**You can object to the processing of your data for direct marketing purposes at any time or withdraw your consent by contacting [service@tchibo.de](mailto:service@tchibo.de) without any costs other than the transfer costs in accordance with the basic tariffs being incurred.**

## ➤ Persistent shopping basket / shopping list

For example, should you have placed a product in the shopping basket or to the shopping list and then leave the Tchibo website without closing the browser and then return to our page, a permanent cookie ensures that your shopping basket still contains the product. You can find more information relating to cookies [here](#).

Should you be logged in and subscribed to our newsletter, you will receive a shopping basket reminder email if you do not complete the purchase. **You can object to the use of your data for direct marketing purposes at any time by means of a short written notification to [service@tchibo.de](mailto:service@tchibo.de) or withdraw your consent, without any costs other than the transfer costs in accordance with the basic tariffs being incurred.**

The processing of your email address takes place until a notice concerning the withdrawal of your consent is received.

## 10. Cookies, tracking, (re) targeting

**In order to provide you with the best possible shopping experience, Tchibo processes cookies and tracking pixels. We use these in our digital services. By using our websites, you are agreeing to the saving of cookies. If required by law, we will ask you to consent. By "clicking" on our page or "OK", we will have your consent for this purpose.**

### Consent Banner

**Dear customers, Tchibo and partners are strongly focussed on providing you with a unique and enjoyable shopping experience. By "clicking" on this page or "OK", we will have your consent for this purpose. This enables us to provide you with high-quality and useful services based on your data we collect. Of course you can withdraw or change your consent at any time under "Preferences". More information.**

### Essential and functional cookies

We use essential and functional measurement and service technologies on the basis of Article 6 Paragraph 1 Letter f) EU GDPR.

### By means of this, we measure in pseudonymised form

- the frequency or page or product access,
- the browsing of our pages,
- which offers are the most interesting for you as a customer
- the assignment of purchases to an affiliate partner.

Cookies also serve the purpose of managing special and comfort functions.

# Privacy Policy Tchibo GmbH

It is also possible for us to optimally adjust our digital services to your requirements and, for example, to only present our advertising for special offers occasionally.

## **Analysis and marketing cookies**

We use analytic and marketing measurement and service technologies on the basis of Article 6 Paragraph 1 Letter a) EU GDPR (consent).

Using these technologies enables us and our advertising partners to increase the relevance of our actions and campaigns for you. You can find more information under "Details" below.

In order to measure the effectiveness of our online marketing activities, we carry out a cross device tracking (pseudonymous profile), including e.g. PC, smartphone and/or tablets.

**Your IP address is only recorded in shortened form, so that it is not possible to identify the respective connection.**

**In order to provide you with the best possible shopping experience, Tchibo processes cookies and tracking pixels. We also use these in our newsletters and push notifications, provided you have consented.**

## **Person-related Analysis**

**We wish to inform you that we also analyse your purchase and online usage behaviour data on a personalised basis**, in order to find out to what extent you find our advertising attractive, which products particularly interest you, which purchasing channels appeal to you and what type of consumer you are.

During this process, your personal data (first name, surname, address, email address if applicable), transaction data (for example purchase and order history), other core customer data/attributes and click data (for example website, newsletter) are processed in order to improve our service and tailor our offers to you (for example campaigns that are of particular interest to the user, discounts, exclusive product tests).

The legal basis for this processing is Article 6 Paragraph 1 Letter a), on the basis of your consent.

## **Consent text in relation to the person-related analysis of usage behaviour and purchase data (example)**

**Yes, I agree that Tchibo creates personalised profiles from my purchase data and usage behaviour, in order to better tailor advertising and web services to my personal interests. The consent can be withdrawn at any time with effect for the future at [service@tchibo.de](mailto:service@tchibo.de).**

**You can object to the person-related analysis of your data for the purpose of improving our services by means of a short written notification to [service@tchibo.de](mailto:service@tchibo.de) or withdraw your consent.**

# Privacy Policy Tchibo GmbH

## ➤ Details concerning Cookies and Tracking Pixels

On several pages, we use "**session cookies**". These are automatically deleted after your visit has come to an end and serve the purpose of making our service more user friendly, more effective and more secure. Our cookies are protected against reading by third parties with the assistance of the security standards of your browser.

In addition, our services contain "**permanent cookies**". These enable us to offer you personal settings or display information, such as most recently viewed articles, over a longer period of time (depending on the respective service). The period of time for which the cookies are stored depends on their purpose of use and is not the same for all cookies. However, you can reject cookies via your browser settings. We use cookies for the following purposes:

- Functionality of our digital services
- Web analytics (pseudonymous user-IDs)
- Marketing purposes.

## Third Party Cookies

We use so-called third party cookies and tracking pixel of our affiliate partners on our websites. Information about the websites visited and products viewed are collected. Visitors are identified through a pseudonymous ID. Based on this information, our affiliate partners will display use-based online advertising of Tchibo products and services for our visitors. Details about our **affiliate partners** can be found in the consent banner under "preferences".

## Partner Networks

In our digital services, we use services of partners that collect information about the websites visited and products viewed in order to display use-based online advertising within their networks.

In order to obtain detailed information concerning the business purpose, the purposes of the processing, the data recipients, the right of access, the claim to deletion or rectification etc., please contact our partners directly. You can find information about here:

- **AWIN AG**, Eichhornstraße 3, 10785 Berlin  
<https://www.awin.com/de/rechtliches/privacy-policy>
- **Criteo GmbH**, Gewürzmühlstraße. 11, 80538 München  
<https://www.criteo.com/de/privacy/>
- **Quantcast International Limited**, Beaux Lane House, Lower Mercer Street, 1st Floor, Dublin 2, Ireland  
<https://www.quantcast.com/privacy/>
- **Outbrain UK Limited**, 5th Floor, The Place, 175 High Holborn, London, WC1V 7AA, United Kingdom  
<https://www.outbrain.com/legal/privacy#privacy-policy>

# Privacy Policy Tchibo GmbH

The legal basis for this processing is Article 6 Paragraph 1 Letter a), on the basis of your consent.

In our digital services, we offer vouchers by **Sovendus GmbH**, Moltkestr. 11, 76133 Karlsruhe ("Sovendus"). In the course the selection of a voucher offer that is relevant for you, your IP address will be pseudonymised and encrypted by us before being transmitted to Sovendus. The IP address is used by Sovendus solely for the purposes of data security, which means in the course of offering you a voucher, and will be anonymised within seven days. In addition, we will transmit your pseudonymised coupon code to Sovendus exclusively for billing purposes. If you are interested in a voucher offered by Sovendus, your form of address will be transmitted in an encrypted form in the context of the preparation of the voucher when clicking displayed banner. By clicking the offer you will be forwarded to Sovendus.

Further information on the processing of your data by Sovendus can be found in the privacy policy at [www.sovendus.de/datenschutz](http://www.sovendus.de/datenschutz).

Transfers of your data may only take place if you have consented. The legal basis for this processing is Article 6 Paragraph 1 Letter a) and Article 6 Paragraph 1 Letter b) EU GDPR.

In our digital services, you may collect Payback points by **PAYBACK GmbH**, Theresienhöhe 12, 80339 München („Payback“). In order to collect Payback points, you must access Tchibo offers via your customer area on "Payback.de". To enable you to collect points on your purchase, a so-called order tracking system is required to transmit the amount of the shopping basket and order to Payback for processing.

Further information on the processing of your data by Payback can be found in the privacy policy at [www.payback.de/info/datenschutz](http://www.payback.de/info/datenschutz).

The legal basis for this processing is Article 6 Paragraph 1 Letter a) and Article 6 Paragraph 1 Letter b) EU GDPR.

## Tracking pixels

Information concerning the attractiveness of our online service is very important to us and helps us to constantly optimise our digital services for you. For this reason, we use tracking pixels (small graphics) in our digital services. Tracking pixels serve similar purposes to cookies.

Should a service be opened, the tracking pixel is loaded and processed by a server on the internet. By means of this, we can see what content is visited by our customers from what region, how frequently, and what actions have been carried out using our digital services. This data is processed under a pseudonym. Your IP address is only recorded in shortened form, so that it is not possible to identify the respective connection.

We use this processing on the basis of Article 6 Paragraph 1 Letter f) insofar as it concerns system monitoring, functionality or aggregated statistics (e.g. coverage measurement/evaluation). This serves to optimise our processes from a business



# Privacy Policy Tchibo GmbH

management point of view. We also use this processing in accordance with Article 6 Paragraph 1 Letter a) EU GDPR insofar as it is for analysis and marketing purposes.

## **Preventing the recording of usage behaviour**

**On our websites, you can determine your tracking preferences yourself at any time via the consent banner, i.e. you can agree or refuse tracking.**

Most browsers accept cookies automatically, however they offer the option of rejecting cookies or displaying a warning prior to saving. The help function in the menu list of most web browsers explains how you can instruct your browser not to accept new cookies, how you can be informed by the browser that you are receiving a new cookie or how you can disconnect all received cookies.

However, we would recommend you leave the cookie function fully switched on, so that you are able to use all of the functions of our online service.

Our cookies do not save any sensitive data such as passwords, credit card data or similar data. Cookies do not cause any damage to your end device and do not contain any viruses.

Should you not wish to activate cookies or should you not be able to activate cookies, you also have the option of ordering by telephone from our customer service department (freephone 0800 300 01 11) or to buy from a store close to you (store finder: <http://www.tchibo.de/filialfinder>).

**Please bear in mind:** This deactivation will be recorded by a cookie on your computer, smartphone or tablet in the browser in which the objection was raised and will not be connected to your customer account. Therefore, the deactivation must be carried out separately for each of your devices and for each browser. Your browser must also accept cookies.

Should your browser automatically delete cookies on closing, the opt-out cookies (deactivation function) will also be deleted.

In order to prevent tracking pixels on our websites, you can use tools such as Ghostery, web-washer, bugnossys or AdBlock.

**We also use tracking technologies in our newsletters and push notifications. Of course, you can object to the evaluation of your data for the purpose of improving our offers at any time by writing to [service@tchibo.de](mailto:service@tchibo.de).**

The use-based online advertising is managed by these partners. Should you no longer wish to be notified of online advertising that corresponds to your interests, you can object to use-based online advertising on the websites by individual partners or all of our partners.

<http://www.youronlinechoices.com/de/praeferenzmanagement/>  
<http://optout.networkadvertising.org/?c=1#!/>  
<http://optout.aboutads.info/?c=2#!/>

# Privacy Policy Tchibo GmbH

**Please bear in mind:** All advertising partners of all websites you visited are listed.

## ➤ **Details concerning Analytics**

For the purpose of focussed designing, business analysis and management of the web presence and continual optimisation of our websites, we use the services explained in more detail below on the legal basis of Article 6 Paragraph 1 Letter a) and f) EU GDPR.

All of the named processings lead to a data transfer to the server of the providers of tracking and targeting technologies engaged by us. Some of these servers are located in the USA. The data transfer takes place on the basis of EU Commission **standard contractual clauses**.

**Should you not agree to the saving and analysis of your data, you can object to the saving and processing at any time by clicking on the corresponding link below (if available) or by changing your settings within the consent banner.** In such a case, an opt-out cookie will be deposited in your browser, which means that the services used will not process any session data. However, in such a case, you will no longer be able to use all of the functions of our digital services.

You can also prevent the saving of the cookies by setting your browser software accordingly; however, we wish to point out that in such a case, you may not be able to fully use all the functions of our websites.

## **Google reCAPTCHA**

In our digital services, we use the **reCaptcha service of Google Inc. ("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA** in order to protect ourselves against spam and misuse. The purpose of this service is to determine whether an entry was carried out by a person or by automated machine processing.

The legal basis for this processing is Article 6 Paragraph 1 Letter f) EU GDPR.

In order to determine this, when you use the reCaptcha service, Google places a cookie in your browser and processes the following data:

- Referrer URL (address of the page on which Captcha is being used)
- Browser, browser size and browser resolution, browser plugins, date, language setting
- Mouse and touch events inside the reCaptcha box
- Allocation to a Google account (should you already be logged into Google when using the reCaptcha service, this is recognised and assigned)

Your entry behaviour (for example answering the reCaptcha question, entry speed in the form fields, order of entry fields selection by the user) is processed in order to improve sample recognition on the part of Google.

Google continues to read to the cookies from other Google services, such as Gmail, Search and Analytics. All named data is sent to Google in encrypted form. Google's subsequent

# Privacy Policy Tchibo GmbH

analysis takes a decision as to what form the Captcha is deployed on the page – either as a checkbox or by text entry. No reading or saving of personal data from the entry fields of the respective form takes place. Further information concerning the data protection regulations of Google can be found at [www.google.com/policies/privacy/](http://www.google.com/policies/privacy/).

## **Google Adwords Conversion Tracking**

We use **Google Conversion Tracking, a service of Google Inc. ("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA**. A cookie is set on your computer by Google Adwords should you access our website via a Google advert. These cookies cease to be valid after 30 days and do not serve the purpose of personal identification. Should you visit certain websites of Tchibo and should the cookie not yet have expired, Google and Tchibo can recognise that you clicked on the Google advert and were redirected to this page. Each customer of Adwords receives a separate cookie. Therefore, cookies cannot be traced via the websites of Adwords customers.

The legal basis for this processing is Article 6 Paragraph 1 Letter a) EU GDPR.

The purpose of the information generated with the assistance of the conversion cookie is to create conversion statistics for Adwords customers who have opted in to conversion tracking. Tchibo is informed of the total number of users who clicked on its advert and who were redirected to a page that contains a conversion tracking tag. However, we do not receive any information that can personally identify a user. You can find Google's Privacy Policy relating to conversion tracking here: <https://services.google.com/sitestats/de.html>.

## **Google Analytics**

Tchibo uses **Google Analytics, a service of Google Inc. ("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA**.

Google Analytics processes "cookies": text files which are saved on your computer and which enable an analysis of your use of the website. The information that is generated by the cookie concerning your use of the website is maybe transferred to a Google server in the USA and stored there. In case of activation of the IP anonymisation on this website, you IP address will, however be shortened first by Google within Member States of the European Union or in other Member States of the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information in order to analyse your use of the website, to compile reports concerning the website activities and to provide other services to the website operator concerning the use of the website and use of the Internet. The IP address transferred by your browser through Google Analytics will not be combined with other data by Google.

We use this processing on the basis of Article 6 Paragraph 1 Letter f) for range measurement and evaluation (so-called statistics). In this case no further processing of your data for marketing or retargeting purposes will take place. This serves to optimise our processes from an economic point of view. If you have given your consent (Article 6 Paragraph 1 Letter a) EU GDPR), we will also process your data for marketing purposes.

# Privacy Policy Tchibo GmbH

Further information concerning terms and conditions of use and data protection can be found at <http://www.google.com/analytics/terms/de.html> and at <http://www.google.com/intl/de/analytics/privacyoverview.html>. We wish to point out that on this website, Google Analytics was extended with the "gat.\_anonymizeIp();" code, in order to guarantee the anonymous processing of IP addresses (IP masking).

## **You can object to the use of Google Analytics through:**

<https://tools.google.com/dlpage/gaoptout?hl=de>

## **Facebook**

On our digital services, we use the pseudonymous tracking functions of **Facebook Inc. ("Facebook") 1 Hacker Way, Menlo Park, CA 94025, USA**. The technology enables us to target Internet users who have shown interest in our online shop and products with advertising via Facebook. We are sure that the inclusion of interest-related advertising is of more interest to you than advertising without this connection.

We do not transfer any email addresses of our customers to Facebook.

Further information concerning the data protection regulations of Facebook can be found at <http://www.facebook.com/policy.php>.

The legal basis for this processing is Article 6 Paragraph 1 Letter a) EU GDPR.

## **Exactag**

**Exactag GmbH ("Exactag"), Wanheimer Straße 68, 40468 Düsseldorf** collects and processes data for marketing and optimisation purposes on our digital services and their subpages. From this data, it is possible to create usage profiles under a pseudonym. The cookies enable the internet browser to be recognised once again.

Further information concerning the data protection regulations can be found at <https://www.exactag.com/datenschutz/>

We use this processing on the basis of Article 6 Paragraph 1 Letter f) for range measurement and evaluation (so-called statistics). In this case no further processing of your data for marketing or retargeting purposes will take place. This serves to optimise our processes from an economic point of view. If you have given your consent (Article 6 Paragraph 1 Letter a) EU GDPR), we will also process your data for marketing purposes.

## **You can object to the use of Google Analytics through:**

<https://m.exactag.com/optout.aspx?url=https://www.exactag.com/bestaetigung/>

## **Dynamic Yield**

Tchibo uses the services of **Dynamic Yield Ltd. (Dynamic Yield GmbH Frankfurt am Main, c/o MAZARS Tax GmbH, Theodor-Stern Kai 1, 60596 Frankfurt am Main)** to optimise our online offering and make your website visit a personalised experience, e.g. through appropriate product recommendations and content. We use the page content you visited, your interactions with the page and selected customer data such as affinities, gender and newsletter and TchiboCard membership status to recommend interesting products or other relevant content to you. Dynamic Yield collects pseudonymous information about your usage activities on our site. Cookies are used to store exclusively pseudonymised

# Privacy Policy Tchibo GmbH

information under a randomly generated user ID (pseudonym). IP addresses are stored exclusively anonymous and not person-related.

In addition, you can find further information on the personalisation technology used under the following link: <https://www.dynamicsyield.com/platform-privacy-policy/>

The legal basis for this processing is Article 6 Paragraph 1 Letter a) EU GDPR.

## **Pinterest**

On our digital services, we use the pseudonymous tracking functions of **Pinterest Europe Ltd. („Pinterest“) Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland**. The technology enables us to target Internet users who have shown interest in our online shop and products with advertising via Pinterest. We are sure that the inclusion of interest-related advertising is of more interest to you than advertising without this connection.

We do not transfer any email addresses of our customers to Pinterest.

Further information concerning the data protection regulations of Pinterst can be found at <https://policy.pinterest.com/>.

The legal basis for this processing is Article 6 Paragraph 1 Letter a) EU GDPR.

## **11. Social Bookmarks / Social Media**

On order to make our websites more attractive and more user friendly, we use "social bookmarks". We use these in accordance with Article 6 Paragraph 1 Letter f) EU GDPR in order to raise awareness of our company. The promotional purpose behind it is considered a legitimate interest under the EU GDPR. The responsibility for operation in conformity with data protection laws must be guaranteed by the respective provider.

Social bookmarks are internet bookmarks which enable you to access our presence via the respective providers

- Facebook (Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA)
- Twitter (Twitter, Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA)
- YouTube (YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA)
- Xing (XING SE, Dammtorstraße 30, 20354 Hamburg, Germany)
- LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Irland)
- Pinterest (Pinterest Inc., 808 Brannan Street, San Francisco, CA 94103, USA)
- Instagram (Instagram LLC, 1601 Willow Rd, Menlo Park, CA 94025, USA)
- WhatsApp (WhatsApp Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Irland)
- Kununu (kununu GmbH, Neutorgasse 4-8, Top 3.02, A - 1010 Wien, Österreich), Operator of the website: New Work SE, Dammtorstraße 30, 20354 Hamburg, Deutschland.

This means that the social bookmarks (buttons) are included as links. By clicking on the buttons, you are directed to our page by the respective providers, i.e. your information is not transferred until you click for the first time and are directed to the respective provider.

Information concerning the handling of your personal data when using the services of the provider can be found in the Privacy Policy of the respective provider.

# Privacy Policy Tchibo GmbH

When you visit our **social media pages**, it may be necessary to process data concerning you.

We operate the following social media sites:

- Facebook: <http://www.facebook.com/tchibo.de>  
<https://www.facebook.com/galavoneduschoDE/>  
<https://facebook.com/ZinoDavidoffCafe/>  
<https://facebook.com/DavidoffCafeArabia/>
- Instagram: <https://www.instagram.com/tchibo/>  
[https://www.instagram.com/galavoneduscho\\_de/](https://www.instagram.com/galavoneduscho_de/)  
<https://instagram.com/davidoffcafe Arabia>
- YouTube: <https://www.youtube.com/tchibo>  
[https://www.youtube.com/channel/UCzO1AYkvYZxxkWfNNdPQO\\_g](https://www.youtube.com/channel/UCzO1AYkvYZxxkWfNNdPQO_g)
- Pinterest: [https://www.pinterest.de/galavoneduscho\\_de/](https://www.pinterest.de/galavoneduscho_de/)  
<https://www.pinterest.de/TchiboDE/>
- XING: <https://www.xing.com/companies/tchibo>
- LinkedIn: <https://de.linkedin.com/company/tchibo>
- Kununu: <https://www.kununu.com/de/tchibo>

You can find our contact details [here](#).

Besides us, the respective operator of the social media platform is also responsible for processing your personal data. As far as we can influence this and parameterize the data processing, we will work within the scope of the possibilities available to us to ensure that the operator of the social media platform handles your data in a manner that complies with data protection regulations. In this context, please also note the data protection declarations of the respective social media platform.

## Data processing by us

The data you enter on our social media pages, such as usernames, comments, videos, pictures, likes, public messages, etc. are published by the social media platform and are not processed by us at any time for other purposes. We only reserve the right to delete content if this should be necessary. We may share your content on our site if this is a feature of the social media platform and communicate with you via the social media platform.

If you send us a request on the social media platform, we may also refer you to other, secure communication channels that guarantee confidentiality, depending on the content. For example, you have the possibility to send us your inquiries at any time to the address given in the imprint.

The legal basis for processing your data is Article 6 Paragraph 1 Letter f) EU GDPR. The data processing is carried out in the legitimate interest of carrying out public relations work for our company and being able to communicate with you.

Some social media platforms compile statistics which are based on usage data and contain information about your interaction with our social media site. We cannot influence or prevent the execution and provision of these statistics.

# Privacy Policy Tchibo GmbH

We process this information in accordance with Article 6 Paragraph 1 Letter f) EU GDPR in the legitimate interest of validating the use of our social media pages and improving our content in line with the needs of our target groups. We also occasionally use the described social media platforms to display targeted advertising. For this purpose we use target group definitions which are provided to us by the social media provider. We only use anonymous target group definitions - i.e. we define characteristics based on general demographic data, behaviour, interests and connections, for example. The operator of the social media platform uses these to display advertisements to its users accordingly. The legal basis for this is the consent that the operator of the social media platform has obtained from its users. If you wish to revoke this consent, please use the revocation options provided by the provider of the social media platform, as the social media platform operator is responsible for this processing. Occasionally, we or the provider of the social media platform may also use publicly available data to define target groups. The legal basis for this processing is then Article 6 Paragraph 1 Letter f) EU GDPR. The legitimate interest on our part is to define the target group as appropriately as possible. We never use sensitive categories of personal data mentioned in Article 9 and 10 GDPR to define target groups.

We do not use target group definition based on location data. We do not pass on personal data to the operator of the social media platform within the scope of target group definition. Occasionally we also use information about visits to or interaction with other sites (so-called remarketing) to define target groups. For this purpose we also use cookies, among other things. In these cases, however, we obtain the consent of the users in advance on the respective pages via an consent banner and provide information on data processing at this point. **You can revoke this consent at any time by calling up the consent banner of the corresponding website again.**

**If you wish to object to a specific data processing on which we have an influence, please contact us in writing at: [service@tchibo.de](mailto:service@tchibo.de).**

We will delete your personal data if they are no longer required for the aforementioned processing purposes and no legal storage obligations prevent deletion.

At all times, you have the right to free-of-charge access to personal data, data portability, rectification and, if applicable, erasure, as well as the right to object to the processing of your data that is processed by us.

## **Data processing by the operator of the social media platform**

The operator of the social media platform uses webtracking methods. Web tracking can also be carried out regardless of whether you are logged on or registered with the social media platform.

We would therefore like to point out that it cannot be ruled out that the social media platform provider will use your profile and behavior data to evaluate your habits, personal relationships, preferences, etc. In this respect we have no influence on the processing of your data by the provider of the social media platform.

For more information on data processing by the provider of the social media platform, further objection possibilities and, if applicable, the agreement according to Article 26 GDPR, please refer to the provider's data protection declaration:

- Twitter: <https://www.twitter.com/privacy>

# Privacy Policy Tchibo GmbH

- Facebook: <https://www.facebook.com/about/privacy/update> und [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)
- YouTube: <https://www.youtube.com/privacy>
- Pinterest: <https://www.pinterest.com/about/privacy/>
- Instagram: <https://www.instagram.com/legal/privacy/>  
[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)
- XING: <https://privacy.xing.com/de/datenschutzerklaerung>
- Kununu: <https://privacy.xing.com/de/datenschutzerklaerung>
- LinkedIn: [https://www.linkedin.com/legal/privacy-policy?\\_l=de\\_DE](https://www.linkedin.com/legal/privacy-policy?_l=de_DE)

## Your contributions relating to Tchibo on social media sites

We wish to inform you that we regularly check social media presences and forums and blogs, in order to record reports concerning Tchibo.

Your contributions are evaluated by us internally and processed as reports. During this process, no connection is made to your person or customer account. Your name and picture remain anonymous. Our interest in accordance with Article 6 Paragraph 1 Letter f) EU GDPR analysing the perception of the brand and the reactions to trends as well as gaining customer satisfaction is considered to be legitimate in the sense of the regulation referred to above.

## Share Function

Furthermore, we use so-called **share functions** for the networks of Facebook, Twitter, Pinterest and WhatsApp. So-called "sharing functions" are technologies that enable you as a user to make certain content known to members of social networks via a direct connection. To integrate the sharing function, we use a technical solution that prevents data (e.g. IP address) from being transmitted to social networks such as Facebook as soon as you open our website. **This means that the buttons are deactivated by default.** They are only activated the first time you click on the buttons.

Tchibo has no influence on the scope of the data that Facebook, WhatsApp, Twitter or Pinterest collects using the plug-ins. However, we would still like to inform you about this as far as we are able to.

By activating the share function, providers receive the information that a user has called up the relevant page of the offer. If the user is logged in, the visit can be assigned to the user account. When users interact with the buttons, for example by pressing the Like button or posting a comment, the corresponding information is transmitted directly from your browser to Facebook, Twitter or Pinterest and stored there. If a user is not a member of Facebook, Twitter or Pinterest, there is still the possibility that the provider will find out his IP address and save it.

Further information on data processing by the provider of the social media platform can be found in the provider's privacy policy:

- Twitter: <https://www.twitter.com/privacy>
- Facebook: <https://www.facebook.com/about/privacy/update>
- Pinterest: <https://www.pinterest.com/about/privacy/>
- WhatsApp: <https://www.whatsapp.com/legal/>



# Privacy Policy Tchibo GmbH

If a user is a member of the providers and does not want Facebook, Twitter, Pinterest or WhatsApp to collect data about him or her through this offer and link it to his or her membership data, he or she must log out before visiting the website and before activating the share function.

The legal basis for this processing is then Article 6 Paragraph 1 Letter f) EU GDPR. The advertising purpose behind this is to be regarded as a legitimate interest within the meaning of the EU GDPR.

## 12. TchiboCard

The TchiboCard programme is the free-of-charge customer loyalty programme of Tchibo GmbH. The general terms and conditions of participation apply to membership in the TchiboCard programme, which you can accept either by filling in (signing and submitting the application form) or by registering for the TchiboCard programme at [www.tchibo.de](http://www.tchibo.de).

We require data from you in order to carry out our customer loyalty programme. For example, this includes:

- First name, surname
- Address
- If applicable, email address

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR. You provide us with the data on the basis of the contractual relationship between yourself and Tchibo.

With the TchiboCard, you can collect and redeem loyalty beans. For each purchase at one of our stores or online, loyalty beans are credited to your TchiboCard account. Your current loyalty beans balance can be found in your personal TchiboCard online account at [tchibo.de](http://tchibo.de). The legal basis for the online account management is Article 6 Paragraph 1 Letter f) EU GDPR. We consider our customer service and the uncomplicated viewing of your account to be legitimate in the sense of the regulation referred to above.

Tchibo sends you person-related advertising by post or email under the TchiboCard programme. You will receive advertisement by email provided that you have given your consent to such by clicking the confirmation link. **You can object to the processing of your data for direct marketing purposes by Tchibo GmbH at any time or withdraw your consent by sending a short notification to [service@tchibo.de](mailto:service@tchibo.de). You will not incur any expenses other than the transfer costs in accordance with the basic tariffs.** This does not affect your participation in our customer loyalty programme.

By participating in the TchiboCard programme, your personal data (first name, surname, address, email address if applicable) and purchase and order data (for example purchased products, number of items, price, location, date and time of the purchase) will be processed, evaluated and analysed in order to improve the TchiboCard programme. Should you have

# Privacy Policy Tchibo GmbH

voluntarily provided your telephone number for follow up queries, this also comes under personal data.

**By participating in the TchiboCard programme, we process this data and any online usage data related to you in order to evaluate and analyse advertising that is person-tailored to you. Furthermore, on the basis of these evaluations, advertising that is person-tailored to you will be displayed when using the online Tchibo account.**

We carry out this processing in accordance with Article 6 Paragraph 1 Letter a), Letter b) and Letter f) EU GDPR. The processing does not have any legal effects for you. Our interest in optimising our services in commercial terms for the purpose of direct advertising is considered to be legitimate in the sense of the regulation referred to above. These types of analysis help us better optimise the relevance of our advertising management, provide targeted information concerning campaigns relating to our sales and brokerage services, better manage resources in relation to logistics and sales and adjust our information services concerning the Tchibo brand as best as possible and in a relevant manner. The processing takes place until an objection is received. The processing takes place until an objection, revocation or your termination notice is received.

**You can object to or revoke the evaluation and analysis by Tchibo GmbH at any time by sending a short notification to [service@tchibo.de](mailto:service@tchibo.de).**

This does not affect your participation in our customer loyalty programme.

For customers who use a mobile Tchibo tariff product and who are also customers of Telefónica Germany GmbH & Co. OHG, Tchibo GmbH can pass their TchiboCard status on to Telefónica Germany GmbH & Co. OHG, so that they can use their TchiboCard benefits also in connection with the respective tariff product. **You can object to the disclosure of your TchiboCard status at any time with effect for the future by contacting [info@tchibo-mobil.de](mailto:info@tchibo-mobil.de).**

We store the data that has been gathered in order to carry out our customer loyalty programme until termination notice is received. We retain the information relating to the contractual relationship which is necessary under commercial and tax laws for the period of time mandated by legislation. For this period of time (as a rule, ten years from the time of conclusion of the contract) the data will only be processed again in case of a check by the financial administration for financial and tax verification purposes and in order to clarify any possible criminal activity.

Loyalty beans expire at the end of April 30<sup>th</sup> of each calendar year or at the earliest 24 months after the last purchase. Loyalty beans are cleared 6 months after expiry date.

At all times, you have the right to free-of-charge access to personal data, data portability, rectification and, if applicable, erasure, as well as the right to object to the processing of your data that is processed by us.

## 13. Tchibo Travel (Tchibo Reisen)

# Privacy Policy Tchibo GmbH

Tchibo Travel is a brokerage service of Tchibo GmbH headquartered in Hamburg, Germany.

To a limited extent, we process data in order to broker your travel bookings. For example, this includes:

- First name, surname
- Invoice and delivery address
- Email address
- Invoice and payment data
- If applicable, date of birth
- If applicable, telephone number

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR. You provide us with the data on the basis of the contractual relationship between yourself and Tchibo.

We wish to inform you that we transmit your data in the course of your travel booking to the respective **travel company in order to process the booking and provision of the trip as well as (in case of conclusion of a travel insurance) to the travel insurance provider.** Here, your data will also be stored and processed in the course of fulfilment of the contract. **The separate Privacy Policy of the partners apply here.**

We use so-called third party cookies and tracking pixel of our travel partners on our websites. Information about the websites visited and products viewed are collected. Visitors are identified through a pseudonymous ID. You can find more information about cookies, tracking pixel and analytics [here](#).

In order to obtain detailed information concerning the business purpose, the purposes of the processing, the data recipients, the right of access, the claim to deletion or rectification etc., please contact our travel partners directly. You can find information about your travel partner and the travel insurance cooperating with us [here](#).

Please obtain the general terms and conditions of business that are relevant to you from the respective travel details page. The travel general terms and conditions of business depend on the respective travel company.

Should you have acquired vouchers in the course of promotional events (such as hotel vouchers) and wish to redeem these directly on the sites of our co-operation partners, please bear in mind the **Privacy Policies that apply separately**. All co-operations are stated as such.

Unless we use your contact details for direct marketing purposes, we keep the data that has been gathered in order to perform the contract until the expiry of the statutory and possible contractual warranty and guarantee rights. Following the expiry of this period, we retain the information relating to the contractual relationship which is necessary under commercial and tax laws for the period of time mandated by legislation. For this period of time (as a rule, ten years from the time of conclusion of the contract) the data will only be processed again in case of a check by the financial administration, for financial and tax verification purposes and in order to clarify any possible criminal activity.

# Privacy Policy Tchibo GmbH

In addition, we gather commercial key figures on the basis of the travel bookings and evaluate these without relating to specific persons. The purpose of this is the commercial optimisation of our processes. The legal basis for this processing is Article 6 Paragraph 1 Letter f) EU GDPR (legitimate interest).

## **We pass your data on to service providers**

- **within the framework of voucher promotions, the issuing and redemption of vouchers**
- **when receiving orders for and dispatching our travel catalogue**
- **when sending our newsletter**
- **in order to respond to your queries (customer service)**
- **only if the partner has agreed to comply with our data protection standards.**

At all times, you have the right to free-of-charge information, blocking and, if applicable, deletion of your data that is stored by us.

Should you wish to alter the provided data in case of a travel booking you have made, please contact the travel provider directly or email [service@tchibo-reisen.de](mailto:service@tchibo-reisen.de).

## **Controller of Tchibo Travel is:**

Tchibo GmbH  
Überseering 18  
22297 Hamburg  
Germany

Board of directors:

Thomas Linemayr (chairman), Erwin Hinteregger, Ines von Jagemann, Dr. Jens Köppen, Carsten Wehrmann

Chairman of the supervisory board:

Michael Herz

### ➤ **Reimbursement of discounts**

Should the discount on travel prices not work at the time of booking, you will receive a refund from us. To a limited extent, we process data in order pay out on your voucher. For example, this includes:

- First name, surname
- Trip booked
- Email address
- Account data

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR. You provide us with the data on the basis of the contractual relationship between yourself and Tchibo.

# Privacy Policy Tchibo GmbH

## 14. Partner Offers / Auctions

Our co-operation partners develop and sell products and solutions for international markets. The product range extends from unconventional vehicles to entertainment and home electronics, which are offered in the course of this co-operation by Tchibo.

**In order to process your order, we transmit your data on to our co-operation partners.** The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR.

In order to conclude, perform or terminate your contract or order, our co-operation partners also require data from you. For example, this includes:

- First name, surname
- Invoice and delivery address
- Email address
- Invoice and payment data
- If applicable, date of birth
- If applicable, telephone number

In order to obtain detailed information concerning the business purpose, the purposes of the processing, the data recipients, the right of access, the claim to deletion or rectification etc. from our co-operation partners, please contact our co-operation partners directly. If applicable, our co-operation partners use service providers (printing shops, transportation companies, logistics companies, banks, IT service providers) in order to process your order. You can find information in this respect as well as information concerning your rights in the Privacy Policy of our co-operation partners, which we have stored for your convenience in our online shop.

In general, personal data submitted to our co-operation partners is not stored at Tchibo. Only in exceptional cases, we store the data that has been gathered in order to perform the contract until the expiry of the statutory and possible contractual warranty and guarantee rights. Following the expiry of this period, we retain the information relating to the contractual relationship which is necessary under commercial and tax laws for the period of time mandated by legislation. For this period of time (as a rule, ten years from the time of conclusion of the contract) the data will only be processed again in case of a check by the financial administration, for financial and tax verification purposes and in order to clarify any possible criminal activity.

All partner campaigns are stated as such.

### **Tchibo Auction**

In the course of the Tchibo AUCTION, we transmit the data of all bidders who have received an acceptance on to our respective provider, so that it can get in touch with you in order to carry out the process. With the acceptance of your bid, a contract is concluded, for which we require your full contact details. By means of the provision of your address, it can be ensured in case of a subsequent offer adjustment, such as the submission of a higher bid during the auction period, that only your highest bid is taken into account. In the course of the bidding and auction process, we will inform you by email prior to the end of the auction of the ranking

# Privacy Policy Tchibo GmbH

of your bid. You then have the option of submitting a new bid shortly before the end of an auction. In case of a subsequent bid adjustment, only your highest bid will be taken into account.

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR. You provide us with the data on the basis of the contractual relationship between yourself and Tchibo.

In order to obtain detailed information concerning the business purpose, the purposes of the processing, the data recipients, the right of access, the claim to deletion or rectification etc. from our auction partners, please contact our auction partners directly. If applicable, our auction partners use service providers (printing shops, transportation companies, logistics companies, banks, IT service providers) in order to process your accepted bid.

Only in exceptional cases, we keep the data that has been gathered in order to perform the contract for the maximum of 2 years.

## 15. Tchibo Blog

You can register with your email address and a "nickname" to our Tchibo blog in order to comment on the blog posts. Your email address is processed by us in order to administer your user account and to inform you of new content in the blog, should you request this.

The registration and participation in the blog is based on Article 6 Paragraph 1 Letter b) EU GDPR and is voluntary.

In addition, you have the option of sharing a personal website. In this respect, you can combine details concerning your person, your interests or your personal environment with your "nickname". During this process and when writing your comments, please observe our blog rules and the notice concerning the contents of external websites.

Please bear in mind that you cannot edit or delete a comment that you have written. Should you wish to edit or delete a comment, please send a short email to [redaktion.blog@tchibo.de](mailto:redaktion.blog@tchibo.de).

The editorial team reserves the right to delete contributions that breach netiquette, are not constructive to a dialogue or that do not relate to the posts. No claim to publication exists. Each user is personally responsible for his or her contributions.

### Newsletter

The Tchibo blogger newsletter offers you the option of being regularly informed of new content on the blog by email. The processing of your email address takes place until a notice concerning the withdrawal of your consent is received.

**In order to cancel subscription to the newsletter, there is a corresponding link at the end of the newsletter.** You can find more information about our newsletters [here](#).

# Privacy Policy Tchibo GmbH

## 16. Tchibo App

In general, we process your personal data as this is necessary to provide a functioning app and our content and services. You can find more information [here](#).

### “Login in Tchibo apps”

Our smartphone and tablet apps use a permanent cookie after login. Following a first login, the function enables you to order in a user-friendly manner 365 days after you last used the app, without you being required to enter your password again. For security reasons, the access to parts of the ‘my Tchibo’ area, as well as changing your address and payment data, remains password-protected. If you do not like to use this function, please logout after your visit using the logout button in the ‘my account’ area. The legal basis for the processing is Article 6 Paragraph 1 Letter f) EU GDPR. Our legitimate interest arises from the purposes of offering you a comfortable use of our website/application.

We wish to inform you that Tchibo uses cookies and tracking pixel. These are also used in the our app. You can find more information relating to cookies [here](#).

For the purpose of focussed designing, business analysis and management of the web presence and continual optimisation of our app, we additionally use the analytic services „Adjust“ (a service of adjust GmbH, Saarbrücker Str. 37A, 10405 Berlin) und „Google Firebase“ (a service of Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, U.S.A.) on the legal basis of Article 6 Paragraph 1 Letter a) EU GDPR. All of the named processings lead to a data transfer to the server of the providers of tracking and targeting technologies engaged by us. Some of these servers are located in the USA. The data transfer takes place on the basis of **EU Commission standard contractual clauses**.

**Should you not agree to the saving and analysis of your data, you can object to the saving and processing at any time by changing the setting in the ‘my Tchibo’ area or by changing your cookie preference setting.** In such a case, saving and analysis of your data will be deactivated. However, in some cases, you will no longer be able to use all of the functions of our digital services.

In the Tchibo app, you can personalise your profile with a picture from your photo gallery. For this purpose, the Tchibo app accesses your photo gallery. This picture is only processed in the app for the individual representation of your app profile. This picture is not processed for any other purposes and is not transmitted on to any third party. You can replace or delete the selected picture yourself at any time via the function in the profile.

Via the "**push notifications**" option, you can be actively informed by Tchibo in the form of push notifications and messages on your device of current offers, news, campaigns and vouchers on tchibo.de or in the Tchibo stores, even if the app is not currently being used. The notifications can appear as sounds, reports or lettered symbols. You can activate and deactivate this function at any time via your device settings or under "my Tchibo" in the Tchibo app.

# Privacy Policy Tchibo GmbH

Without your consent (Article 6 Paragraph 1 Letter a) EU GDPR), Tchibo will not send any push notifications or messages.

We use the **Push Notification Service of Apple Inc, One Infinite Loop, Cupertino, California 95014, U.S.A. for the provision of this function. ("Apple")** and the **Firebase Cloud Messaging (FCM) of Google Inc, 1600 Amphitheatre Parkway Mountain View, CA 94043, U.S.A. ("Google")**. In order to be able to provide you with push notifications, it is necessary for us to transfer non-personal, anonymous data (for example text content of the push notification) to the Apple/Google server with your consent in accordance with your settings, which then forwards this on to your Tchibo app in encrypted form as a push notification. For this purpose, Apple/Google creates a clear connection number (device token ID or registration ID) from your device ID in accordance with the operating system of your device, by means of which the content of the push notifications is transported to you in a secure encrypted format.

Via individual functions in our push notifications, we can view in a standardised automated manner which contents of our push notification are of particular interest to our customers. We use the results of these analysis in person-related form exclusively for the purpose of improving our services and tailoring these to requirements as well as for the purpose of direct advertising.

## **Consent text in relation to the person-related analysis of usage behaviour and purchase data (example)**

**Yes, I agree that Tchibo creates personalised profiles from my purchase data and usage behaviour, in order to better tailor advertising and web services to my personal interests. The consent can be withdrawn at any time with effect for the future at [service@tchibo.de](mailto:service@tchibo.de).**

**You can object to the person-related analysis of your data in order to improve our services at any time by contacting [service@tchibo.de](mailto:service@tchibo.de).**

### ➤ **Push Notifications**

#### **Setting in the iOS operating system**

When you access the app for the first time and register, you will be asked whether you wish to permit push notifications. Without your consent, which you can declare by clicking the "permit" button, Tchibo cannot send you any push notifications. You can activate and deactivate the permission for push notifications at any time. For this purpose, please open the "settings" menu on your device and select "notifications". In the following menu, you will find an overview of all the apps that are installed on your device and which have a push notification function.

#### **Setting in the Android operating system**

When you access the app for the first time and register, you will be asked whether you wish to permit push notifications. Without your consent, which you can declare by clicking the "yes" button, Tchibo cannot send you any push notifications. You can activate and deactivate



# Privacy Policy Tchibo GmbH

the permission for push notifications at any time. For this purpose, please open the "settings" menu on your device and select "apps". In the following menu, you will find an overview of all the apps that are installed on your device.

## ➤ Geo localisation

Within the framework of the store finder function, geo data (geo localisation) is transferred to the website in the form of geographic width and geographic length, should your mobile device be equipped with a GPS function. This takes place exclusively in order to search for your location. The data is not saved. Prior to the activation of the location function, you will be asked for your agreement by means of a security question in accordance with Article 6 Paragraph 1 Letter a) EU GDPR.

## 17. Prize Competitions

For participation in and the carrying out of prize competitions, as well as for the sending of prize notifications and distribution of the prizes, we require data from you. For example, this includes:

- First name, surname
- Email address
- If applicable, year of birth
- If applicable, telephone number

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR, i.e. you provide us with the data on the basis of the contractual relationship between yourself and Tchibo (terms and conditions of participation). Detailed information can be found in the respective terms and conditions of participation.

As a rule, your data is deleted at the end of the competition. We keep the data of the winners in order to perform the contract until the expiry of the statutory and possible contractual warranty and guarantee rights. Following the expiry of this period, we retain the information relating to the contractual relationship which is necessary under commercial and tax laws for the period of time mandated by legislation. For this period of time (as a rule, ten years from the time of conclusion of the competition) the data will only be processed again in case of a check by the financial administration, for financial and tax verification purposes and in order to clarify any possible criminal activity.

Should you have agreed to its use for direct advertising purposes, we will process your data until you withdraw your consent. **This consent is voluntary and can be withdrawn at any time by sending a short notification to Tchibo GmbH at [service@tchibo.de](mailto:service@tchibo.de).**

## ➤ Disclosure of Data

**We pass your data on to service providers**

- in order to send prizes
- in order to organise competitions

# Privacy Policy Tchibo GmbH

- **only if the partner has agreed to comply with our data protection standards.**

Should we host competitions on social media platforms (for example Facebook), we would kindly request that you also familiarise yourself with the data protection provisions of the respective platform.

In case of certain competitions, it is necessary **to transfer your data to our co-operation partners who support us in carrying out competitions** or to have your data processed by these in order for these to take place. We inform you about our co-operation partners in the respective terms and conditions of participation.

Should you not wish your data to be transferred for the purpose of hosting the competition, it may not be possible for you to participate.

The legal basis for the data transfer is Article 6 Paragraph 1 Letter b) and Article 6 Paragraph 1 Letter a) EU GDPR.

## **18. Recruiting**

### **Using the Predictive Index (PI) diagnostic tool**

**As part of the application procedure, a diagnostic tool for behavioural personality analysis is used. The test is provided by our partner company Predictive Index (PI). In order to carry out the test, we will send your first name and surname as well as your email address to PI, who are based in America. As this involves the transfer of data to a third country, Tchibo ensures all the necessary measures (such as the EU standard contract clauses) to create an appropriate level of data protection.**

**Participation in the online test is voluntary. Non-participation will at no time lead to discrimination in the recruitment process. The results are only viewed by specially trained recruiters, and evaluated solely with regard to the open position. No data is passed on to third parties. If you object to the use of the data during the online test, you can always contact [Recruiting@tchibo.de](mailto:Recruiting@tchibo.de). For more information, please visit PI's privacy policy at <http://www.predictiveindex.com/privacy>.**

## **19. External contracting partners**

### **Service provider / supplier management**

We wish to inform you that we process your data in the course of the co-operation between yourself and Tchibo.

In order to conclude, perform or terminate the contractual relationship, we require data from you. For example, this includes:

- Company name
- Address
- Contact person and contact data

# Privacy Policy Tchibo GmbH

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR. You provide us with the data on the basis of the contractual relationship between yourself and Tchibo.

We keep the data that is necessary to perform the contract until the expiry of the statutory and possible contractual obligations. Following the expiry of this period, we retain the information relating to the contractual relationship which is necessary under commercial and tax laws for the period of time mandated by legislation. For this period of time (as a rule, ten years from the time of conclusion of the contract) the data will only be processed again in case of a check by the financial administration, for financial and tax verification purposes and in order to clarify any possible criminal activity.

## **Contact databases**

We wish to inform you that we process your core and contact data, as well as any invoice and payment data in the course of the co-operation between yourself and Tchibo.

The legal basis for this processing is Article 6 Paragraph 1 Letter b) EU GDPR, i.e. you provide us with the data on the basis of the contractual relationship between yourself and Tchibo, as well as Article 6 Paragraph 1 Letter f) EU GDPR. Our interest in accordance with Article 6 Paragraph 1 Letter f) EU GDPR to simplify our contacts administration is considered to be legitimate in the sense of the regulation referred to above. This type of contacts administration makes it easier for Tchibo to make contact should it wish to make use of the services again (models, service providers), but also to manage our press mailing list.

The processing of your email address takes place until an objection against the processing is received.

## **"Terror lists" screening**

The EU regulations for combating terrorism (EC) numbers 2580 / 2001 and (EC) numbers 881 / 2002 require that no customer, supplier, service provider or employee of Tchibo be terror suspects named in the centrally managed lists (terrorism lists). Therefore, it is necessary for Tchibo to carry out a data comparison with the terrorism lists.

The legal basis for this processing is Article 6 Paragraph 1 Letter c) and Article 6 Paragraph 1 Letter f) EU GDPR. The regular data comparison also provides Tchibo with a streamlined customs process, which is considered to be a legitimate interest in the sense of the second regulation referred to above.

At all times, you have the right to free-of-charge access to personal data, data portability, rectification and, if applicable, erasure, as well as the right to object to the processing of your data that is processed by us.

Last changed: July 16, 2020