

**This is the translation of the german legal document, for you to review. In case of any discrepancies or doubts regarding interpretation, the German version of this document shall prevail and be legally binding.**

## **Privacy Policy**

### **Introduction**

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

The terms used are gender-neutral.

**Last updated: 19 April 2022**

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### **Controller**

**Mehrwert LARP e.V.**

Business Address:

Am Kronsberg 7A

21379 Rulsdorf

Authorized person for data protection: **Lars Lerchenberger**

Email: [lars\\_lerchenberger@web.de](mailto:lars_lerchenberger@web.de)

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## Overview of Data Processing

### Types of Processed Data:

- Inventory data (e.g. names, addresses)
- Content data (e.g. entries in online forms)
- Contact data (e.g. email, phone numbers)
- Meta/communication data (e.g. device information, IP addresses)
- Usage data (e.g. websites visited, interest in content, access times)
- Health-related data (e.g. dietary requirements for specific events for catering planning)

### Categories of Data Subjects:

- Participants in club events
- Communication partners
- Members
- Users (e.g. website visitors, users of online services)

### Purposes of Processing:

- Participation in club events
- Provision and usability of our online offering
- Feedback collection (e.g. via online forms)
- Contact requests and communication
- Management and response to inquiries

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## Relevant Legal Bases

Below is an overview of the legal bases of the GDPR on which we process personal data. Please note that national data protection laws may also apply in your or our country of residence or business. Where applicable, we will inform you of more specific legal bases in individual cases.

- **Consent (Art. 6(1)(a) GDPR):** The data subject has given consent to the processing of their personal data for one or more specific purposes.
- **Contract performance and pre-contractual inquiries (Art. 6(1)(b) GDPR):** Processing is necessary for the performance of a contract or to take steps prior to entering into a contract at the data subject's request.
- **Legitimate interests (Art. 6(1)(f) GDPR):** Processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party unless overridden by the data subject's interests or fundamental rights and freedoms.

## National Data Protection Regulations in Germany:

In addition to the GDPR, national data protection laws in Germany apply, in particular the

**Federal Data Protection Act (BDSG).** This law includes specific regulations regarding access rights, deletion rights, the right to object, processing of special categories of personal data, processing for other purposes, data transfers, and automated decision-making including profiling.

It also governs data processing in the context of employment relationships (§ 26 BDSG), especially regarding the establishment, execution, or termination of employment, as well as employee consent. Furthermore, data protection laws of the German federal states may apply.

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### **Transfer of Personal Data**

In the context of processing, it may happen that personal data is transferred to or disclosed to other entities, companies, legally independent units, or individuals. Recipients can include IT service providers or providers of embedded content and services on websites. In such cases, we comply with legal requirements and conclude appropriate contracts or agreements to protect your data.

### **Data Transfer Within the Association:**

We may share personal data internally within the association for administrative purposes, based on our legitimate organizational and business interests, to fulfill contractual obligations, or with the data subject's consent or legal permission.

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### **Data Processing in Third Countries**

If we process data in a third country (i.e., outside the EU or EEA) or if processing is carried out by third-party services or through disclosure to other entities, this only occurs in compliance with legal requirements.

In the absence of consent or a legal requirement, we only process data in countries with a recognized adequate level of data protection or under contractual obligations (EU standard contractual clauses), certifications, or binding internal data protection rules (Art. 44–49 GDPR).

More information: [EU Commission – International Data Transfers](#)

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### **Deletion of Data**

We adhere to the principles of data minimization and avoidance. Data we process will be deleted as soon as consent is revoked or when it is no longer legally permitted (e.g. when the purpose no longer applies or the data is not needed).

If data cannot be deleted because it is legally required or needed for other purposes, its processing will be limited to those purposes (i.e., the data will be blocked and not used for other purposes).

This applies, for example, to data that must be retained for commercial or tax reasons or is needed to assert, exercise, or defend legal claims or to protect another person's rights.

Our privacy notices may include further details regarding data retention and deletion specific to individual processing activities.

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### **Security Measures**

We take appropriate technical and organizational measures, in accordance with legal requirements, taking into account the state of the art, implementation costs, nature, scope, circumstances, and purposes of processing, and the varying probability and severity of the risk to individuals' rights and freedoms.

These measures include ensuring the confidentiality, integrity, and availability of data through physical and electronic access controls, as well as controls on access, input, transfer, backup, availability, and separation of data.

We have also implemented procedures to respond to data subject rights, data deletion, and data breach incidents.

Furthermore, we consider data protection in the design and selection of hardware, software, and procedures, following the principle of data protection by design and by default.

### **SSL Encryption (HTTPS):**

To protect the data you transmit through our online services, we use SSL encryption. You can recognize encrypted connections by the "https://" prefix in your browser's address bar.

Sure! Here's the **English translation** of the entire text you provided:

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### **Use of Cookies**

Cookies are text files that contain data from visited websites or domains and are stored by a browser on the user's computer. A cookie primarily serves to store information about a user during or after their visit to an online offering. The stored information can include, for example, language settings on a website, login status, a shopping cart, or the position where a video was last watched. The term "cookies" also includes other technologies that fulfill the same functions as cookies (e.g., when user information is stored using pseudonymous online identifiers, also referred to as "user IDs").

The following types and functions of cookies are distinguished:

- **Temporary cookies (also: session cookies):** These are deleted at the latest after a user has left an online service and closed their browser.
- **Persistent cookies:** These remain stored even after the browser is closed. For example, the login status can be saved, or preferred content can be displayed directly when the user revisits a website. Similarly, users' interests that are used for reach

measurement or marketing purposes can be stored in such cookies.

- **First-party cookies:** These are set by us.
- **Third-party cookies:** These are primarily used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential or strictly necessary) cookies:** These are essential for the operation of a website (e.g., to store logins or other user inputs, or for security reasons).
- **Statistics, marketing, and personalization cookies:** These are typically used for reach measurement and when user interests or behavior (e.g., viewing specific content, using functions, etc.) are stored in a user profile on individual websites. These profiles are used, for example, to display content that matches users' potential interests. This method is also known as "tracking," i.e., tracking potential user interests.

If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or when obtaining consent.

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## Notes on Legal Bases

The legal basis on which we process your personal data using cookies depends on whether we request your consent. If consent is obtained and you agree to the use of cookies, the legal basis for processing your data is the declared consent. Otherwise, the data processed by cookies are based on our legitimate interests (e.g., the operation and improvement of our online offering) or are necessary to fulfill our contractual obligations.

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## Storage Duration

Unless we provide you with specific information regarding the storage duration of persistent cookies (e.g., as part of a cookie opt-in), please assume that the storage period can be up to two years.

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## General Information on Revocation and Objection (Opt-Out)

Depending on whether the processing is based on consent or legal permission, you can revoke your consent at any time or object to the processing of your data by cookie technologies (collectively referred to as "opt-out"). You can declare your objection via your browser settings,

for example, by deactivating the use of cookies (although this may limit the functionality of our online services). You can also object to the use of cookies for online marketing purposes via services such as <https://optout.aboutads.info> and <https://www.youronlinechoices.com>. Further opt-out instructions can be found in the information about the service providers and cookies used.

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## Processing Cookie Data Based on Consent

We use a cookie consent management procedure in which user consents to the use of cookies or related processing and providers are obtained, managed, and revoked by users. The consent declaration is stored to avoid repeating the query and to comply with legal obligations to prove consent. The storage can be server-side and/or in a cookie (called an opt-in cookie or using similar technologies) to assign the consent to a user or their device.

Unless otherwise specified, the following applies to cookie consent service providers: consent may be stored for up to two years. A pseudonymous user identifier is created and stored along with the time of consent, details of the scope of consent (e.g., categories of cookies and/or service providers), as well as the browser, system, and device used.

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## Processed Data Types

- Usage data (e.g., visited websites, interest in content, access times)
- Meta/communication data (e.g., device information, IP addresses)

**Affected Persons:** Users (e.g., website visitors, users of online services)

**Legal Bases:** Consent (Art. 6 para. 1 sentence 1 lit. a GDPR), Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f GDPR)

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## Performance of Tasks According to Statutes or Bylaws

We process data of our members, supporters, interested parties, event participants, or other individuals (collectively “data subjects”) when we have a membership or business relationship with them and are fulfilling our tasks, or when they are recipients of services and benefits. Otherwise, data is processed based on our legitimate interests, such as for administrative purposes or public relations.

The type, scope, purpose, and necessity of processing depend on the underlying membership or contractual relationship. We delete data that is no longer necessary to fulfill our statutory purposes. The necessity of data retention is regularly reviewed, and legal retention obligations apply.

**Processed Data Types:** Inventory data (e.g., names, addresses), contact data (e.g., email, phone numbers)

**Affected Persons:** Users, members, business and contractual partners

**Purposes of Processing:** Fulfillment of contracts (e.g., event participation), communication, managing inquiries

**Legal Bases:** Contract fulfillment (Art. 6 para. 1 sentence 1 lit. b GDPR), Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f GDPR)

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## Live Action Role-Playing Events

We process participant data for events and similar activities (collectively “participants” and “events”) to enable participation and use of services. If special categories of data (e.g., health, religion, politics) are processed, it is based on obviousness (e.g., theme-based events) or for health, safety, or with consent. Required fields are marked during registration and include data needed for service provision, billing, and communication.

**Processed Data Types:** Inventory data, payment data, contact data, contract data

**Affected Persons:** Interested parties, business/contractual partners, customers

**Purposes of Processing:** Event participation, communication, organizational management

**Legal Bases:** Contract fulfillment (Art. 6 para. 1 sentence 1 lit. b GDPR), Legal obligations (Art. 6 para. 1 sentence 1 lit. c GDPR), Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f GDPR)

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## Services and Service Providers Used

- **Google Drive:** Used for event registration via Google Forms. Data collected through the forms is stored on Google Drive. See Google’s Privacy Policy: <https://www.google.com/intl/de/policies/privacy>
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## Provision of Online Services and Web Hosting

To securely and efficiently provide our online offering, we use services from one or more web hosting providers. This includes infrastructure, storage, database services, security, and

technical maintenance. The processed data may include all data entered by users or generated during use, especially IP addresses.

**Server Log Files:** We (or our hosting provider) collect access data (server log files), which may include page/file names, time of access, data volume, success messages, browser and system info, referrer URL, IP addresses, and requesting provider. These serve security purposes (e.g., avoiding DDoS attacks) and to monitor server performance.

**Processed Data Types:** Content data, usage data, meta/communication data

**Affected Persons:** Users

**Purposes of Processing:** Providing online services, user-friendliness

**Legal Bases:** Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f GDPR)

**Service Provider:**

- **Jimdo:** Hosting platform for blogs/websites  
Provider: Jimdo GmbH, Stresemannstr. 375, 22761 Hamburg, Germany  
Website: <https://de.jimdo.com>  
Privacy Policy: <https://de.jimdo.com/info/datenschutzerklaerung>  
Data Processing Agreement: [Jimdo DPA](#)

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## Contact and Inquiry Management

When contacting us (e.g., via form, email, phone, or social media) or as part of business/user relationships, we process the provided data to respond and manage related measures.

**Processed Data Types:** Inventory data, contact data, content data

**Affected Persons:** Communication partners

**Purposes of Processing:** Responding to inquiries, communication

**Legal Bases:** Contract fulfillment (Art. 6 para. 1 sentence 1 lit. b GDPR), Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f GDPR)

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## Web Analysis, Monitoring, and Optimization

Web analysis (also “reach measurement”) helps evaluate visitor traffic and behavior and can include demographic info like age or gender in pseudonymous form. It helps us optimize our services and content.

We may also use testing (e.g., A/B tests). Data profiles may be created and stored/retrieved on devices. Collected data may include visited pages, elements used, browser/system info, usage



times, and location data (if consented). IP addresses are pseudonymized (IP masking). No real user data (like email or names) is stored—only pseudonyms.

**Legal Basis:** Consent if requested, otherwise legitimate interest

**Processed Data Types:** Usage data, meta/communication data

**Affected Persons:** Users

**Purposes of Processing:** Reach measurement, user profiling

**Security Measures:** IP masking

**Legal Bases:** Consent (Art. 6 para. 1 sentence 1 lit. a GDPR), Legitimate Interests (Art. 6 para. 1 sentence 1 lit. f GDPR)

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Let me know if you'd like a more condensed version or help integrating this into a privacy policy or terms page!

Sure! Here's the English translation of the provided text:

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### **Presence on Social Networks (Social Media)**

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

Please note that user data may be processed outside the European Union. This may pose risks for users, for example, because it could make it more difficult to enforce their rights.

Furthermore, user data within social networks is generally processed for market research and advertising purposes. For example, user profiles can be created based on user behavior and resulting interests. These profiles can in turn be used to display advertisements within and outside the networks that presumably match users' interests. For these purposes, cookies are typically stored on users' devices, which record their usage behavior and interests. Additionally, data may also be stored in usage profiles independently of the devices used by users (especially if they are members of the respective platforms and logged in).

For detailed information about the respective processing activities and options to object (opt-out), we refer to the privacy policies and statements of the operators of the respective networks.

Even for requests for information or the exercise of user rights, we note that these can be most effectively exercised directly with the providers. Only the providers have access to the users' data and can take appropriate measures and provide information. If you still need help, feel free to contact us.

**Facebook Pages:** We are jointly responsible with Facebook Ireland Ltd. for the collection (but not the further processing) of data from visitors to our Facebook page (so-called "fan page"). This includes data such as information on the types of content users view or interact with, or the actions they take (see "Things you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/policy>), as well as information about the devices used (e.g. IP

addresses, operating system, browser type, language settings, cookie data; see "Device Information" in the same policy).

As explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and uses information to provide analytics services known as "Page Insights" to page operators. This helps us understand how people interact with our pages and content.

We have concluded a specific agreement with Facebook ("Information about Page Insights", [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which particularly regulates the security measures Facebook must observe and in which Facebook agrees to fulfill users' rights (e.g., users can address access or deletion requests directly to Facebook). Users' rights (especially access, deletion, objection, and complaints to authorities) are not restricted by the agreement with Facebook. Further information is available in the "Information about Page Insights" ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)).

**Types of data processed:** Contact data (e.g., email, phone numbers), content data (e.g., entries in online forms), usage data (e.g., visited websites, interest in content, access times), meta/communication data (e.g., device information, IP addresses).

**Data subjects:** Users (e.g., website visitors, users of online services).

**Purposes of processing:** Contact inquiries and communication, feedback (e.g., collection via online form), marketing.

**Legal basis:** Legitimate interests (Art. 6(1)(f) GDPR).

#### **Used services and providers:**

- **Instagram:** Social network; Provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA; Website: <https://www.instagram.com>; Privacy Policy: <https://instagram.com/about/legal/privacy>.
- **Facebook Pages:** Profiles within the Facebook social network; Provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Standard Contractual Clauses: [https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum); Joint Responsibility Agreement: [https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data).
- **TikTok:** Social network / video platform; Provider: musical.ly Inc., 10351 Santa Monica Blvd #310, Los Angeles, CA 90025 USA; Website: <https://www.tiktok.com>; Privacy Policy: <https://www.tiktok.com/de/privacy-policy>.
- **Twitter:** Social network; Provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland; Parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Policy: <https://twitter.com/de/privacy>; Settings: <https://twitter.com/personalization>.

- **YouTube:** Social network and video platform; Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Policy: <https://policies.google.com/privacy>; Opt-out: <https://adssettings.google.com/authenticated>.
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## **Plugins and Embedded Features and Content**

We incorporate function and content elements into our online offering that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may include graphics, videos, or city maps ("content").

This always requires that the third-party providers process users' IP addresses, as they would not be able to send the content to their browsers otherwise. The IP address is thus necessary for displaying this content. We strive to use only those contents whose respective providers use the IP address solely for content delivery.

Third-party providers may also use pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. With these tags, information such as visitor traffic on this website can be evaluated. Pseudonymous information may also be stored in cookies on users' devices and may contain technical information about browsers and operating systems, referring websites, visit times, and other details about the use of our online offering, possibly linked with such information from other sources.

**Legal basis notes:** If we ask users for their consent to use third-party providers, the legal basis is consent. Otherwise, the data is processed based on our legitimate interests (i.e., interest in efficient, economical, and recipient-friendly services). Please also see the cookie use information in this privacy policy.

**Types of data processed:** Usage data (e.g., visited websites, interest in content, access times), meta/communication data (e.g., device info, IP addresses), basic data (e.g., names, addresses), contact data (e.g., email, phone numbers), content data (e.g., entries in online forms).

**Data subjects:** Users (e.g., website visitors, online service users).

**Purposes of processing:** Provision of our online offering and user-friendliness, fulfillment of contractual obligations, and customer service.

**Legal basis:** Legitimate interests (Art. 6(1)(f) GDPR), Consent (Art. 6(1)(a) GDPR), Contract performance and pre-contractual inquiries (Art. 6(1)(b) GDPR).

## **Used services and providers:**

- **Google Maps:** We use maps from the service "Google Maps" provided by Google. Data processed may include IP addresses and location data (collected only with user consent, usually via mobile device settings); Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Parent: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Website: <https://cloud.google.com/maps-platform>;

Privacy Policy: <https://policies.google.com/privacy>; Opt-out: <https://tools.google.com/dlpage/gaoptout?hl=de>, Ad settings: <https://adssettings.google.com/authenticated>.

- **YouTube Videos:** Video content; Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Parent: Google LLC; Website: <https://www.youtube.com>; Privacy Policy: <https://policies.google.com/privacy>; Opt-out: <https://tools.google.com/dlpage/gaoptout?hl=de>; Ad settings: <https://adssettings.google.com/authenticated>.

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### Changes and Updates to the Privacy Policy

We ask you to regularly check the content of our privacy policy. We will update the policy whenever changes in data processing require it. We will inform you if changes require your cooperation (e.g., consent) or individual notification.

Please note that addresses and contact information of companies and organizations mentioned in this privacy policy may change over time. Please verify the information before contacting them.

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### Rights of Data Subjects

Under the GDPR, you have the following rights (Articles 15–21):

- **Right to Object:** You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you based on Article 6(1)(e) or (f) GDPR. This also applies to profiling based on these provisions. If your personal data is processed for direct marketing, you have the right to object to this at any time, including profiling related to such marketing.
- **Right to Withdraw Consent:** You can revoke any previously given consent at any time.
- **Right of Access:** You can request confirmation as to whether your data is being processed and access to this data, including other legally required information and a copy of the data.
- **Right to Rectification:** You have the right to request correction or completion of inaccurate or incomplete data.
- **Right to Erasure and Restriction of Processing:** You may request the deletion of your data or restriction of processing according to legal requirements.

- **Right to Data Portability:** You have the right to receive the data you provided in a structured, commonly used, and machine-readable format or to request its transfer to another controller.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with a supervisory authority, particularly in your place of residence, workplace, or the place of the alleged violation, if you believe that the processing of your personal data violates the GDPR.

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#### **Contact for Data Protection Questions**

If you have questions about data protection, please email us:

**Mehrwert LARP e.V.**

Head Office:

Am Kronsberg 7A

21379 Rulsdorf

Data Protection Officer: Lars Lerchenberger

**Email:** [ostreichorga@gmail.com](mailto:ostreichorga@gmail.com)

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Let me know if you'd like this formatted into a Word or PDF file or if you want a shortened summary version.