

# Spreadshirt Privacy Policy

Thank you for your interest in our website. In the following, we will inform you in detail about the processing of personal data when using this website. Personal data means all data that can be personally related to you, e.g. name, address, telephone number, email address or user behavior.

## 1. Who is responsible for data processing?

The service provider and party responsible for processing personal data ("controller") is Spreadshirt, Inc., 1572 Roseytown Road, Greensburg, PA 15601 ("Spreadshirt").

If you have any questions about the collection, processing, or usage of data; if you have requests for information, correction, disabling or deletion of data; or if you want to revoke a previously given consent; or if you want to object to the usage of your information for advertising purposes, please use the settings provided in your account's user area, or else contact us at one of the following addresses:

Email: [info@spreadshirt.com](mailto:info@spreadshirt.com)

Fax: 1-877-202-0251

Postal Mail: 1572 Roseytown Road, Greensburg, PA 15601

## 2. To what extent is personal data processed?

### 2.1 Collection of personal data when you visit our website

#### a) Log files

If you visit our site for informational purposes but don't register with us, create an account, order something, or otherwise deliberately transfer information to us, we collect information from your browser to help us serve our websites to you. In particular, we collect

- IP address,
- date and time of the request,
- time zone difference to Greenwich Mean Time (GMT),
- name of the requested file,
- access status/HTTP status code,
- volume of data transferred,
- the page from which you came to visit us,
- your operating system and its interface,
- your browser type and the language and version of the browser software,
- a report of successful retrieval

The data is technically necessary for us to display our website to you. It is also evaluated to make the website user-friendly and to ensure stability and security. For this purpose, we partly use the external web

hosting service providers Fastly, Inc. and Amazon Web Services, Inc. The legal basis for the processing is our legitimate interests.

## **b) Cookies and similar technologies**

We also use “cookies” on our sites. Cookies are small text files that are assigned to your browser and stored on your device. Through them, certain information flows to the place that sets the cookie, such as settings or data for exchange with the system. This helps us to make our website more user-friendly and effective overall. The legal bases for this are your consent and our legitimate interests. Cookies cannot execute programs or transmit viruses to your device.

We use session cookies, persistent cookies, and third-party cookies.

Session cookies store what’s called a session ID, which can be used to assign different requests of your browser to a common session. This allows your device to be recognized when you return to our website. For example, this lets you store certain information you have entered (such as log-in information, language settings) in such a way that you do not have to repeat it constantly. Session cookies are automatically deleted when you log out or close your browser.

Persistent cookies remain on your device for the time being, so that we can recognize your browser on your next visit and we can, for example, assign your preferred information and settings. Long-term cookies are automatically deleted after a specified period, which may vary depending on the cookie.

When you visit our website, our partner companies also store third-party cookies on your device. The cookies contain information about how our website is used, e.g. which pages and products were visited. The data is collected in a pseudonymized form by assigning an identification number, which is not combined with any other personal data you may have provided to us.

You can delete cookies in your browser settings at any time or prevent them from being stored, although the latter may result in a restriction of the functionality of our website for you. In the relevant sections of this Privacy Policy, we explain which technologies that are comparable to cookies are used on our website and how you can object to the use of cookies and other technologies with the individual third-party providers.

## **2.2 Ordering from Spreadshirt / User Account**

a) If you want to order something in our online shop, it is necessary for the conclusion of the contract that you give us the personal data we need to process the order. The mandatory data required to process the contract is marked as such; all other data you provide is voluntary. You can either enter your data only once for the order or use your email address to set up a password-protected user account with us, in which your data can be stored for later purchases until you revoke your consent. You can deactivate or delete the data and the user account at any time via the account.

To prevent unauthorized access to your personal data by third parties, the order process is encrypted using TLS technology.

When we process the data provided by you to process your order, this includes, for example, individual customer service. In the course of order processing, we pass on personal data to one of our production companies within the group, to a shipping company commissioned by us and (with the exception of PayPal) to our bank, ADYEN B.V., Simon Carmiggeltstraat 6-50, 1011 DJ Amsterdam, Netherlands (“Adyen”). The payment data is encrypted and transmitted directly to Adyen.

Payment via PayPal is processed by PayPal, 2211 North First Street San Jose, California 95131 (“PayPal”). For information about data protection at PayPal, please refer to PayPal’s privacy policy: <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

In the case of trackable parcels, we also pass on your order and address data to parcelLab GmbH, Landwehrstraße 39, 80336 Munich, Germany, to make it possible to track your parcel and to inform you about delivery deviations or delays, for example. We also pass on your order and address data to various common carriers, depending on your delivery choices, shipping rates, and your chosen delivery destination.

The legal bases for the processing of personal data as part of order processing are to perform under a contract and our legitimate interests. Due to commercial and tax regulations, we are obliged to store your order, address and payment data for a period of ten years.

b) During the order process we also conduct a fraud prevention check via our bank Adyen, which involves using your IP address to carry out a geo-localization and compare your data with previous experience. This may mean that an order cannot be placed with the selected payment method. Our aim in this regard is to prevent any abuse of your chosen payment method by third parties and to protect ourselves from payment defaults. The legal basis for the processing is our legitimate interests.

Since this involves automated decision-making, you have the right to challenge the decision (in this case the refusal of a certain payment method) and have the decision reviewed by a person. In such cases we ask that you contact us using the contact details mentioned in Section 1. Please note that the payment method may have been rejected due to a typing error and you should, therefore, check what you have entered again during the order process if necessary.

c) During the ordering process we use Google Maps Autocomplete, a service of Google LLC ("Google"). This allows an address you start typing to be completed automatically, avoiding delivery errors. Google sometimes conducts a geo-localization using your IP address and receives the information that you have retrieved the corresponding subpage of our website. In addition, the data referred to in Section 2.1 is transmitted. This is regardless of whether you have a Google account and are logged in. Once you are logged in to your Google Account, the information will be directly associated with your account. If you do not want this assignment to occur, you must log out before entering your address. Google stores your data as user profiles and uses it (even in the case of users who are not logged in) for the purposes of advertising, market research and/or the needs-oriented design of its own website. You can object to Google creating such user profiles. For more information about the purpose and scope of data processing by Google and about protecting your privacy, please refer to Google's Privacy Policy: <https://policies.google.com/privacy>. The binding terms of use for Google Maps/Google Earth can be found here: [https://www.google.com/help/terms\\_maps.html](https://www.google.com/help/terms_maps.html). Third-party provider information: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

The legal basis for the processing is our legitimate interests.

d) After you place an order, we will process your order and address data to send you a personalized email asking you to rate our products. By obtaining ratings, our aim is to improve our services and adapt them to our customers' wishes. We use the feedback software of eKomi Ltd, Markgrafstraße 11, 10969 Berlin, Germany ("eKomi"). For the purpose of sending the feedback email (and in the event that a moderation or conciliation procedure is conducted via eKomi following negative feedback), we pass on your email address, name, order number, product types and a unique ID to eKomi for identification purposes and in order to generate a feedback link.

The legal basis for the processing is our legitimate interests. If you no longer want your data to be used for this purpose, you can object to this at any time. Just click on the unsubscribe link included with each email or send a message using the contact details provided under Section 1.

e) We also use Google Customer Reviews, a service of Google LLC ("Google"), through which we receive feedback about us as a seller and about our products. This allows us to improve our services and adapt them to our customers' wishes. The legal basis is our legitimate interests. After placing an order, you can give Google permission to use your email address to request a review. You can revoke your consent to the use of your data at any time by clicking on the unsubscribe link contained in the emails from Google. For

more detailed information about the purpose and scope of data processing by Google and about protecting your privacy, please refer to Google's Privacy Policy: <https://policies.google.com/privacy>. Third-party provider information: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

f) We also use the review services of TrustPilot, Trustpilot A/S, Pilestraede 58, 1112 Copenhagen, Denmark („Trustpilot“) to receive feedback about us as a seller. This allows us to improve our services and adapt them to our customers' wishes. The legal basis is our legitimate interests.

In connection with an order, we process your order and address information in order to send you a personalized email asking you to review us. For the purpose of sending you this review request, we share the following information with TrustPilot: email address, name, and a reference number to identify your review and generate the review invitation link.

A user profile with TrustPilot is required in order to leave a review. By clicking the review invitation link, your name and email address are automatically used to pre-populate a profile for you; TrustPilot then sends you a welcome email with this profile information.

Further information is available here: <https://support.trustpilot.com/hc/en-us/articles/115005894567-Getting-started-guide-for-reviewers>. For more information about privacy at TrustPilot, see TrustPilot's privacy policy: <https://legal.trustpilot.com/for-reviewers/end-user-privacy-terms>.

If you would not like to receive review requests from TrustPilot, you can object to this anytime. Simply click on the unsubscribe link in the request email.

## 2.3 Spreadshirt Partners: Shop Partners and Marketplace Designers

a) If you want to offer designs on our marketplace or operate a shop, it is necessary for the conclusion of a contract with us that you use your email address to open a password-protected user account and store your name and address there. For the payout of earnings, it is necessary that you additionally provide your bank details or your PayPal information as well as information about your tax status. Any other information you may provide to us when using the account is voluntary. You do not have to enter a real name when choosing your username. You can manage and change this information in your account. You can also deactivate or erase it – or the entire user account. If this affects data necessary for the performance of the contract, we may retain that data for a longer period in accordance with commercial and tax regulations (standard period of ten years). We process this data to conduct the contractual relationship that exists with you; the legal bases are to perform under a contract and our legitimate interests.

b) Within the scope of the contractual relationship, we also process the email address provided by you in order to send you emails at irregular intervals containing information and tips about the Marketplace and your shops (“Partner Newsletter”). We use your name to allow us to personalize these emails. To this end, the data is passed on to the software company Emarsys eMarketing Systems AG, Hans-Fischer-Straße 10, 80339 Munich, Germany (“Emarsys”), which handles the technical side of the mailing on our behalf. You can unsubscribe from the Partner Newsletter at any time by clicking on the unsubscribe link provided in each email, informing us via the contact details specified in Section 1, or changing your newsletter settings in your user account (“Account Settings” – “Newsletter subscriptions”).

When sending the Partner Newsletter, we use Emarsys to statistically evaluate your user behavior in order to optimize the design. To enable this evaluation, the emails contain what are called web beacons or tracking pixels. These are single-pixel image files that establish a connection to our website and thus permit a log file analysis. The web beacons are linked with the data mentioned in Section 2.1 a and an individual ID. The links contained in the email also contain this ID. For example, we can see if and when an email has been opened and which links have been clicked on. The data is stored on the Emarsys servers for 13 months and collected pseudonymously, meaning the IDs are not linked to other personal data at this point, thus ruling out any possibility of direct personal reference. You can object to the recording of your usage behavior at any time by

clicking on the unsubscribe link provided in each email, informing us via the contact options listed in Section 1, or changing the newsletter settings in your user account (“Account settings” – “Newsletter subscriptions”). Recording is not possible if you have disabled the display of images in your email settings. In this case, the newsletter will not be displayed to you in full and you may not be able to use all functions. If you choose to display the images manually, recording will take place as described above.

The legal bases for the processing are your consent, to perform under a contract, and our legitimate interests.

c) If you store your address in your user account, we use Google Maps Autocomplete, a service of Google LLC (“Google”). This allows an address you start typing to be completed automatically. This helps us verify your address, which we do for tax reasons. Google sometimes conducts a geo-localization using your IP address. We also use Google Fonts to enhance the user experience in the Partner section of your account as well as Google Calendar to inform you about Partner-related promotions for customers. Via these services and applications, Google receives the information that you have retrieved the corresponding subpage of our website. In addition, the data referred to in Section 2.1 is transmitted. This is regardless of whether you have a Google account and are logged in. Once you are logged in to your Google Account, the information will be directly associated with your account. If you do not want this assignment to occur, you must log out before entering your address. Google stores your data as user profiles and uses it (even in the case of users who are not logged in) for the purposes of advertising, market research and/or the needs-oriented design of its own website. You can object to Google creating such user profiles. For more detailed information about the purpose and scope of data processing by Google and about protecting your privacy, please refer to Google’s Privacy Policy: <https://policies.google.com/privacy>. The binding terms of use for Google Maps/Google Earth can be found here: [https://www.google.com/help/terms\\_maps.html](https://www.google.com/help/terms_maps.html). Third-party provider information: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

The legal basis for the processing is our legitimate interests.

## 2.4 Communication with Spreadshirt

### a) Establishing contact

If you contact us via a contact form, letter, fax, email, social media or telephone, we process the data provided by you for the purpose of processing your inquiry and for advertising purposes. We use the software of Sematell GmbH, Neugrabenweg 1, 66123 Saarbrücken, Germany, to coordinate and process emails, which means that Sematell GmbH gains access to the data. We use the management software of Hootsuite Media, Inc, 5 East 8th Avenue, Vancouver, BC, Canada to coordinate and process enquiries via our social media channels Twitter, Facebook and Instagram. The legal basis for the processing is our legitimate interests. If the aim of establishing contact is to conclude a contract, then an additional legal basis is to perform under a contract.

### b) Blog

In our blog, where we publish various articles on topics related to our activities, you can post public comments. Your comment will be published along with your chosen username. We recommend using a pseudonym instead of your real name. It is necessary to provide a username and email address, while all other information is voluntary. The necessary information is processed to run the blog. We need your email address to contact you if a third party should complain that your comment is unlawful. We reserve the right to delete comments if third parties complain that they are unlawful. The legal basis for the processing is our legitimate interests.

### c) Forum

With the exception of a few sections, our Forum can be read without the need to register. If you wish to actively participate in the Forum under your chosen username, you must log in using your Spreadshirt user account access data. To open a Spreadshirt user account, only your email address and a password are required. We process your activities (public posts, private messages, likes, profile information, activity logs)

and your IP address in order to operate the Forum. The legal basis is our legitimate interests. If you deactivate or delete your user account, your public posts will continue to be visible. If you would like your public posts to be deleted, please contact us using the contact details provided in Section 1. When writing a comment and in the Forum settings (under “Preferences” – “Emails” and “Notifications”), you can specify in which cases and to what extent you would like to be notified by email about new activities in the Forum. You can unsubscribe again at any time, either in the Forum settings or by clicking on the unsubscribe link contained in the respective notification email.

## d) LiveChat

We also use LiveChat Inc.’s services on our forum to enable our customer service team to interact with you live through our website and provide you with real-time assistance. Livechat collects and processes information in order to enable Spreadshirt to provide you with customer service. LiveChat may collect device information such as device type, operating system type and application version to provide an optimized version of their applications for your device type. LiveChat also collects and processes your data related to your use of their customer support software and services. LiveChat uses such data for statistics purposes, to improve their services, or to create and improve new services. LiveChat collects and processes such data collectively and anonymously. LiveChat uses cookies to personalize its services to Spreadshirt and to you, but does not collect personal information with these cookies and does not link the cookie information with personal information that LiveChat may otherwise possess. LiveChat also collects your name, email address, and other information that you provide through its service and shares this with Spreadshirt in order to provide you with customer service.

The legal bases for the processing are your consent and our legitimate interests.

Third-party provider information: LiveChat, Inc., One International Place Suite 1400 Boston, MA 02110-2619 USA. LiveChat Privacy policy: <https://www.livechatinc.com/privacy-policy/>.

## 2.5 Processing of data for web analytics

### a) Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google LLC (“Google”). Google uses cookies (see Section 2.1 b), which enable an analysis of your use of our website. The information generated by the cookie about usage is usually transferred to a Google server and stored there. However, due to the activation of IP anonymization on our website, where applicable, your IP address will first be shortened by Google. On our behalf, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide us with other services relating to website and internet use.

The IP address transmitted by your browser in the context of Google Analytics will not be combined with other data held by Google.

You can prevent the storage of cookies by selecting the appropriate settings in your browser software; however, please note that if you do this you may not be able to use the full functionality of our website. You can also prevent the data generated by the cookie and relating to your use of the website (including your IP address) from being recorded and processed by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout/>. Specifically in the case of mobile devices, you can prevent Google Analytics from recording data by clicking here: [Disable Google Analytics](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website.

This website uses Google Analytics with the “\_anonymizeIp()” extension. Consequently, IP addresses are further processed in shortened form, so that any personal association with the data subject can be ruled out.

As far as the data collected about you relates to you personally, that association is therefore ruled out immediately and the personal data thus erased without delay.

We use Google Analytics to analyze and regularly improve the use of our website. The statistics this yields allow us to improve our website and make it more interesting for you as a user. The legal bases for our use of Google Analytics are your consent and our legitimate interests.

Third-party provider information: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. See also the terms of use (<https://www.google.com/analytics/terms/us.html>) and privacy overview (<https://support.google.com/analytics/answer/6004245?>) for Google Analytics as well as Google's privacy policy: <https://policies.google.com/privacy>.

## **b) Adobe Analytics**

To allow us to analyze and regularly improve the use of our website, our website also uses the Adobe Analytics web analytics service. The statistics and A/B test results that this yields allow us to improve our website and make it more interesting for you as a user. The legal bases for our use of Adobe Analytics are your consent and our legitimate interests.

The analysis involves storing cookies (see Section 2.1 b) on your device. The information collected in this way is stored on servers, including in the USA. We would like to point out that if you prevent the storage of cookies, you may not be able to use this website in its entirety. You can adjust your browser settings to prevent the storage of cookies. You can also prevent Adobe Analytics from recording your data on this website by clicking here: [Disable Adobe Analytics](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website. How to prevent the recording of your data on other websites is explained on the respective sites and at <https://www.adobe.com/privacy/opt-out.html>.

Our website uses Adobe Analytics with the settings "Before Geo-Lookup: Replace visitor's last IP octet with 0" and "Obfuscate IP-Removed", which removes the last octet from your IP address and replaces it with a generic IP address, i.e. one that can no longer be assigned. Any personal connection can therefore be ruled out.

Third-party provider information: Adobe Systems Software Ireland Limited, 4–6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland, [privacy@adobe.com](mailto:privacy@adobe.com); Adobe's privacy policy: <https://www.adobe.com/privacy/policy.html>.

## **c) Hotjar**

Our website also uses the web analytics service Hotjar from Hotjar Ltd. This service allows us to track movements on our website (so-called heat maps). These make it possible to see how much time you spend on which pages, how far you scroll, the movement of your mouse and how often you click on certain links and buttons. Your keystroke data, i.e. your entries in input fields, are not recorded. Hotjar uses cookies (see point 2.1 b) to collect this information about your behavior, as well as the following information about your device: IP address of the device (only collected and stored in an abbreviated, anonymized form), screen size, device type (unique device identifiers), browser used, geographic location (country only) and language preferred when viewing the online offer. Hotjar Ltd. stores the information on servers in Ireland for 365 days, after which the data is deleted. Neither Hotjar Ltd. nor we will merge or associate the information with any other data about you, and it will not be used to identify individual users. The data collected by Hotjar Ltd. is only used for our internal evaluation of the user behavior when interacting with our online offer. It is used to improve aspects of user-friendliness of our website. To the extent that you have given us your consent, the legal basis for processing is your consent, and otherwise the legal basis is our legitimate interests.

You can prevent the storage of cookies by selecting the appropriate settings in your browser software; however, please note that if you do this you may not be able to use the full functionality of our website. You can also prevent Hotjar from recording your data on this website by clicking here: [Disable Hotjar](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device, and only prevents the recording of data for this website. How to prevent collection on other websites is explained on the respective site and here: <https://www.hotjar.com/privacy/do-not-track/>.

Third Party Information: Hotjar Ltd, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ, Malta. For more information about Hotjar Ltd.'s privacy practices, please see their privacy policy: <https://www.hotjar.com/legal/policies/privacy>.

## d) Raygun

Our website also uses the application monitoring service of Raygun Limited ("Raygun"). The service recognizes and documents, using cookies, errors and performance problems that may occur during your use of our website. In this case, the data mentioned under 2.1 a will be transmitted to Raygun and evaluated there. Processing takes place on servers in an AWS data center in the USA. We use the service to detect and correct errors and to improve our online offering. The legal bases for this are your consent and our legitimate interests.

You can adjust your browser settings to prevent cookies from being saved. Please note that by doing this you may not be able to use the full functionality of our website. You can also prevent Raygun from recording your data on this website by clicking here: [Disable Raygun](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website.

Third-party provider information: Raygun Limited, L7, 59 Courtenay Place, Te Aro, Wellington, 6011 New Zealand. Further information on data protection at Raygun can be found in the data protection declaration of Raygun: <https://raygun.com/privacy>.

## e) Web analytics by Spreadshirt's Shop Partners

Our partners can also use the Google Analytics web analytics service (see Section 2.5 a) in their Spreadshirt shops themselves, as a rule to analyze use of the shop and improve their offer in the shop. In this case, they determine the purposes and means of processing personal data. The name and contact details of our partners are stored in the legal information section of the respective shop.

## 2.6 Advertising activities by Spreadshirt

### a) Newsletter

If you register separately for our newsletter via our website and give us your consent, we will use your email address to send you regular emails about product offers, discounts and contests. To this end, we pass the data on to the software company Emarsys eMarketing Systems AG, Hans-Fischer-Straße 10, 80339 Munich, Germany ("Emarsys"), which handles the technical side of the mailing on our behalf.

When you register for our newsletter, we use the so-called double opt-in procedure. This means that after you register we will send you an email to the email address you provided, in which we ask you to confirm that you would like to receive the newsletter. If you do not confirm your registration, your information will be automatically deleted after one month. On the other hand, if you confirm the newsletter subscription, we will save your email address for the purpose of sending you the newsletter until you unsubscribe from the newsletter.



**You can revoke your consent to the sending of the newsletter at any time (without this affecting the lawfulness of the processing up to the point of revocation). You can declare your revocation by clicking on the link provided in every newsletter email, by emailing [info@spreadshirt.com](mailto:info@spreadshirt.com) or by sending a message to the contact details provided in Section 1.**

When sending the newsletter, we use Emarsys to statistically evaluate your user behavior in order to measure how successful the newsletter is and to optimize its design. To enable this evaluation, the emails contain what are called web beacons or tracking pixels. These are single-pixel image files that establish a connection to our website and thus permit a log file analysis. The web beacons are linked with the data mentioned in Section 2.1 a and an individual ID. The links contained in the newsletter also contain this ID. For example, we can see if and when an email has been opened and which links have been clicked on. The data is stored on the Emarsys servers for 13 months and collected pseudonymously, meaning the IDs are not linked to other personal data at this point, thus ruling out any possibility of direct personal reference. You can object to the recording of your usage behavior at any time by clicking on the unsubscribe link provided in each email or by informing us using the contact details provided in Section 1. Recording is not possible if you have disabled the display of images in your email settings. In this case, the newsletter will not be displayed to you in full and you may not be able to use all functions. If you choose to display the images manually, recording will take place as described above.

The legal bases for the processing are your consent and our legitimate interests.

## **b) Product recommendations**

As a Spreadshirt customer, i.e., if you order something in our online shop (see Section 2.2 a), we process the email address you provide in order to send you regular email recommendations for products that might be of interest to you based on your previous orders from us. We also use your name to allow us to personalize these emails. The data is passed on to the software company Emarsys (see Section 2.6 a), which handles the technical side of the mailing on our behalf. The legal basis for the processing is our legitimate interests.

You receive these product recommendations because you did not object to the use of your email address for this purpose by removing the corresponding check mark during the order process. If you subsequently no longer wish to receive product recommendations or any advertising messages, you can object at any time without incurring any costs other than the transmission costs at the basic rates. Just click on the unsubscribe link included with each email, send a message using the contact details provided under Section 1 or – if you have a user account with us – adjust your newsletter settings accordingly (“Account settings” - “Newsletter subscriptions”).

When sending the product recommendations, we use Emarsys to statistically evaluate your user behavior in order to measure their success and to optimize their design. The legal bases for the processing are your consent and our legitimate interests. To enable this evaluation, the emails contain what are called web beacons or tracking pixels. These are single-pixel image files that establish a connection to our website and thus permit a log file analysis. The web beacons are linked with the data mentioned in Section 2.1 a and an individual ID. The links contained in the email also contain this ID. For example, we can see if and when an email has been opened and which links have been clicked on. The data is stored on the Emarsys servers for 13 months and collected pseudonymously, meaning the IDs are not linked to other personal data at this point, thus ruling out any possibility of direct personal reference. You can object to the recording of your usage behavior at any time by clicking on the unsubscribe link provided in each email, informing us via the contact options listed in Section 1, or – if you have a user account with us – changing the newsletter settings in your user account (“Account settings” – “Newsletter subscriptions”). Recording is not possible if you have disabled the display of images in your email settings. In this case, the newsletter will not be displayed to you in full and you may not be able to use all functions. If you choose to display the images manually, recording will take place as described above.

## **c) Newsletters and product recommendations from Spreadshirt Shop Partners**

In exceptional cases where you register separately in a Spreadshirt shop for a Shop Partner's newsletter and thus give your consent, we transmit your email address to the Shop Partner so that it can send you emails on product offers, discounts and contests.

**You can revoke your consent to the sending of the newsletter at any time (without this affecting the lawfulness of the processing up to the point of revocation). This revocation must be declared vis-à-vis the Shop Partner. The contact details of the respective Shop Partner can be found in the legal information section of their Spreadshirt shop.**

The legal basis for the processing is your consent.

#### **d) Text Message Promotions**

Our website uses Attentive Mobile, Inc.'s services in order to offer special promotions via text message. This service allows you to click a promotional link which pre-populates a text message on your web-enabled mobile device. Sending this message acts as affirmative consent, or an opt-in, to receive the applicable advertised promotion as well as later promotions which are sent via text message to the same number that sent the opt-in. There are no additional fees associated with this feature; your ordinary mobile text messaging rates will apply to all messages sent and received in connection with these promotions.

Your phone number and any other information you submit via text message through the Attentive text message promotional system will be shared with Attentive in order to enable Attentive to provide this service to us. Attentive may also receive standard technical information when you interact with the Attentive service, including browser and device information such as unique device identifiers, internet protocol (IP) addresses (which may identify your general geographic location), browser types, and the date and time. Attentive also receives information about your interactions with Attentive's service and Spreadshirt's websites that incorporate the Attentive service, such as which pages you visited and how much time was spent on the page. Some of this information is collected using cookies (see Section 2.1 b for more information about cookies). Attentive appends URLs in its advertisements with unique strings to track whether a purchase has been made as a result of following an advertisement, but does not receive any personally identifiable information about individual customers in this process. Attentive uses the information described above to provide the service to Spreadshirt and you and to monitor, evaluate, and improve its service. Spreadshirt may combine this information with other information it already collects about your use of Spreadshirt's website in order to provide advertising that is more interesting to you.

**You can revoke your consent to the sending of these text message promotions at any time (without this affecting the lawfulness of the processing and messaging up to the point of revocation). To revoke your consent and unsubscribe, send a message containing any one (but only one) of the following words to the same number that sends the promotional messages: STOP, END, CANCEL, UNSUBSCRIBE, or QUIT.** You may also send only the word "HELP" to the same number that sends the promotional messages for more instructions on how to interact with the promotional text messaging service. If you have any questions or problems (especially with unsubscribing from messages), you can contact us at [info@spreadshirt.com](mailto:info@spreadshirt.com).

The legal basis for the processing is your consent.

Third-party provider information: Attentive Mobile, Inc., 56 Fifth Avenue, Suite 303 New York, NY 10010.  
Attentive privacy policy: <https://attentivemobile.com/privacy/>.

#### **e) Postal Advertisements**

We would like to occasionally inform you about new products, deals, and contests and may use your name and address to send you postal mail. In this case we share your name and address our selected shipping or mailing provider. The legal basis for the processing is our legitimate interests. You may object to the use of your personal information for this purposes anytime by notifying us at the contact information provided in Section 1.

## 2.7 Usage-based online advertising

Our website uses various conversion tracking and retargeting technologies made available by other service providers. We use these technologies to make our website interesting for you. The information also helps us to address users who have already shown an interest in our products with individually tailored advertising on the websites of our partner companies. We assume that the display of personalized, interest-based advertising is generally more interesting for the internet user than advertising that has no such personal relevance. At the same time, we want to avoid inappropriate and intrusive advertising.

General information about third-party advertising-based technologies and how to disable them can be found on the following websites, among others:

- Your Online Choices: <http://www.youronlinechoices.com/>
- YourAdChoices: <http://optout.aboutads.info/?c=2#!/>
- Network Advertising Initiative: <http://optout.networkadvertising.org/?c=1#!/>

### a) Use of Google Ads conversion tracking and Google Ads remarketing

We use Google Ads, a service of Google LLC ("Google"), to use ads to draw attention to our offers on external websites. In relation to the data of advertising campaigns, we can identify how successful the individual advertising activities are. In this way we want to show you advertising that is of interest to you, make our website more attractive to you and achieve a fair calculation of advertising costs.

These ads are deployed by Google via 'ad servers'. For this purpose, we use ad server cookies, which enable the tracking of certain parameters for measuring success, such as the display of ads or clicks by users. If you arrive at our website via a Google ad, Google Ads will store a cookie on your device. These cookies usually expire after 30 days and are not intended to identify you personally. Analysis values usually stored for this cookie are the unique cookie ID, the number of ad impressions per placement (frequency), the last impression (relevant for post-view conversions) and opt-out information (marker showing that the user no longer wishes to be targeted).

These cookies allow Google to recognize your internet browser. If a user visits certain pages of a Google Ads customer's website (in this case ours) and the cookie stored on their device has not yet expired, Google and the customer can recognize that the user has clicked on the ad and has been redirected to this site. Each Google Ads customer is assigned a different cookie. Cookies cannot therefore be tracked via the websites of Google Ads customers. We do not collect and process any personal data in the aforementioned advertising activities. Google merely provides us with statistical evaluations. On the basis of these evaluations we can identify which of the advertising activities used are particularly effective. We do not receive any further data from the use of ads; in particular we cannot identify users on the basis of this information.

Due to the marketing tools used, your browser automatically establishes a direct connection to the Google server. We have no influence on the extent and further processing of the data collected by Google through the use of this tool and therefore inform you according to what we know: By integrating Google Ads Conversion, Google receives the information that you have retrieved the corresponding part of our website, or that you have clicked on one of our ads. If you are registered with a Google service, Google can associate the visit with your account. Even if you are not registered with Google or have not logged in, it is possible that Google will obtain and store your IP address.

- Google Ads remarketing

Besides Google Ads Conversion, we also use Google's remarketing feature. This is a process we use in an attempt to contact you again. After visiting our website, this feature makes it possible to show you our ads when you continue to use the internet. This is done by means of cookies stored in your browser, which Google uses to record and evaluate your usage behavior when visiting various websites. This is how Google can determine that you have previously visited our website. According to its own information, Google does

not combine the data collected in the context of remarketing with your personal data, which may be processed by Google. Specifically, according to Google, pseudonymization is used during remarketing.

There are various ways in which you can prevent your participation in this tracking procedure:

- By setting your browser software accordingly; in particular, disabling cookies from third party providers means that you will not receive any ads from third-party providers;
- By permanent deactivation in your browser Firefox, Internet Explorer or Google Chrome via the link: <https://support.google.com/ads/answer/7395996?hl=en>. Please note that by doing this you may not be able to properly use the full functionality of our website.
- By clicking on the following button: [Disable Google Ads](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website.
- By disabling interest-based ads from providers who are part of the “YourAdChoices” self-regulation initiative via the link <http://optout.aboutads.info/?c=2#!/>; please note that this setting will be erased if you erase your cookies.

The legal bases for the processing of your data are your consent and our legitimate interests.

Third-party provider information: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. For further information about privacy at Google, please refer to: <https://policies.google.com/privacy> and <https://services.google.com/sitestats/en.html>. Alternatively, you can visit the website of the Network Advertising Initiative (NAI) at: <http://www.networkadvertising.org>.

## **b) Use of Facebook Custom Audiences, Facebook Website Custom Audiences and Facebook Conversion Tracking**

### **- Facebook Custom Audiences**

Our website also uses the Website Custom Audiences remarketing function of Facebook, Inc. (“Facebook”). This allows users of the website to see interest-based ads (“Facebook Ads”) when visiting the social network Facebook or other websites that also use the process. Our intention here is to show you ads that are of interest to you.

Due to the marketing tools used, your browser automatically establishes a direct connection to the Facebook server. We have no influence on the extent and further processing of the data collected by Facebook through the use of this tool and therefore inform you according to what we know: By integrating Facebook Custom Audiences, Facebook receives the information that you have retrieved the corresponding part of our website, or that you have clicked on one of our ads. If you are registered with a Facebook service, Facebook can associate the visit with your account. Even if you are not registered with Facebook or have not logged in, it is possible that Facebook will obtain and store your IP address and other identifying information.

### **- Facebook Website Custom Audiences**

Our website also uses the Facebook product “Custom Audiences from your website”. For this purpose, we have integrated remarketing tags (so-called Facebook Pixel or web beacon) into our website. The Facebook Pixel is a small piece of JavaScript code that provides a range of functionalities for sending application-specific events and user-defined data to Facebook. We use the Facebook Pixel to track how visitors use our site. The Facebook Pixel records and reports to Facebook information about the user’s browser session, a hashed version of the Facebook ID, and the URL being viewed. Every Facebook user therefore has a device-independent Facebook ID, which enables us to recognize users across multiple devices on the social network Facebook so that we can use Facebook Ads to reach our visitors again for advertising purposes. After 180

days, the user information is deleted until the user returns to our website. No personal information is transmitted to us about individual website visitors, and we can only specifically deploy ads to website custom audiences if the custom audience has reached a critical size. This makes it impossible for us to determine the individual identities of visitors.

#### - Facebook Conversion Tracking

We also use the Facebook Pixel on our website to measure the reach of ads. This allows us to track users' actions after they have seen or clicked on a Facebook Ad. The Facebook Pixel records and reports to Facebook information about the user's browser session, a hashed version of the Facebook ID, and the URL being viewed. The way it works is comparable to Facebook Website Custom Audiences via the Facebook Pixel, which is already described above. Using the hashed Facebook ID, we can measure the reach and effectiveness of an ad to find out whether you are actually interested in our advertising. This enables us to measure the effectiveness of Facebook Ads for statistical and market research purposes. For us, the data used is not personally identifiable.

You can prevent Facebook from recording your data on this website by clicking here: [Disable Facebook Custom Audiences, Facebook Website Custom Audiences and Facebook Conversion Tracking](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website. How to prevent the recording of your data on other websites is explained on the respective sites, and if you are a user who has logged in to Facebook, here: [https://www.facebook.com/settings/?tab=ads#\\_](https://www.facebook.com/settings/?tab=ads#_).

The legal bases for the processing of data when using the functions specified above are your consent and our legitimate interests.

Third-party provider information: Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. For more information about data processing by Facebook, please refer to Facebook's privacy policy: <https://www.facebook.com/about/privacy>.

### **c) Use of LinkedIn conversion tracking and retargeting**

#### - LinkedIn conversion tracking

Our website uses the feature "LinkedIn conversion tracking" from LinkedIn Corporation ("LinkedIn") to measure the reach of ads. This is to determine how successful individual advertising activities are on LinkedIn. Our intention here is to develop and display advertising that is of interest to you and make our website more attractive. For this purpose, the LinkedIn Insight Tag is integrated into our website. This JavaScript code enables LinkedIn to use cookies to collect pseudonymous data about your visit and the use of our website (e.g. about the browser session and the website displayed) and to provide us with aggregated, non-personal statistics on this basis. This allows us to trace the actions that have taken place after a LinkedIn ad has been viewed or clicked on.

#### - LinkedIn website retargeting

Our website also uses the "LinkedIn website retargeting" feature. After visiting our website, this feature makes it possible to show you our ads when you continue to use the internet. Our intention here is to show you ads that are of interest to you. This is done by means of a cookie stored in your browser (see above for more information), which is used to record and evaluate your usage behavior. No personal information is transmitted to us about individual website visitors, and we can only specifically deploy ads to website custom audiences if the custom audience has reached a critical size. This makes it impossible for us to determine the individual identities of visitors.

There are various ways in which you can disable this tracking. You can adjust your browser settings to prevent the storage of cookies, although this may result in a restriction of the functionality of our website for you. You also can prevent LinkedIn from recording your data on this website by clicking here: [Disable LinkedIn conversion tracking and website retargeting](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website. In addition, you can disable interest-based ads from providers who are part of the “YourAdChoices” self-regulation initiative (<http://optout.aboutads.info/?c=2#!/>) or e.g. part of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>); please note that this setting will be erased if you erase your cookies.

The legal bases for the processing are your consent and our legitimate interests.

Third-party provider information: LinkedIn Corporation 2029 Stierlin Court, Mountain View, CA 94043 USA. LinkedIn’s privacy policy: <https://www.linkedin.com/legal/privacy-policy>.

## **d) Use of Bing Ads Conversion Tracking and remarketing**

### **- Bing Ads Conversion Tracking**

Our website also uses the “Bing Ads Conversion Tracking” feature from Microsoft Corporation (“Microsoft”) to measure the reach of ads. This is to determine how successful our individual advertising activities are on Bing and Yahoo. Our intention here is to develop and display advertising that is of interest to you and make our website more attractive. For this purpose, Microsoft’s UET tag (Universal Event Tracking tag) is integrated into our website. This JavaScript code enables Microsoft to use cookies to collect pseudonymous data about your visit and the use of our website (e.g. about the browser session and the website displayed) and to provide us with aggregated, non-personal statistics on this basis (e.g. how many visitors have reached a particular target page). This allows us to trace the actions that have taken place after an ad has been viewed or clicked on Bing or Yahoo.

### **- Bing Ads remarketing**

Our online offering also uses the “Bing Ads remarketing” feature. After visiting our website, this feature allows us to show you our ads when you continue to use the internet. Our intention here is to show you ads that are of interest to you. This is done by means of a cookie stored in your browser (see above for more information), which is used to record and evaluate your usage behavior. No personal information is transmitted to us about individual website visitors, and we can only specifically deploy ads to website custom audiences if the custom audience has reached a critical size. This makes it impossible for us to determine the individual identities of visitors.

There are various ways in which you can disable this tracking. You can adjust your browser settings to prevent the storage of cookies, although this may result in a restriction of the functionality of our website for you. You also can prevent Microsoft from recording your data on this website by clicking here: [Disable Bing Ads Conversion Tracking and Remarketing](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website. In addition, you can disable interest-based ads from providers who are part of the “YourAdChoices” self-regulation initiative (<http://optout.aboutads.info/?c=2#!/>) or e.g. part of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>); please note that this setting will be erased if you erase your cookies. It is also possible to disable interest-based ads at <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>.

The legal bases for the processing are your consent and our legitimate interests.

Third-party provider information: Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA. Microsoft's privacy policy: <https://privacy.microsoft.com/en-us/privacystatement>.

## e) Use of Webgains tracking

In addition, we use a plug-in of the international affiliate network Webgains, which is provided by ad pepper media GmbH ("Webgains"). This enables us to measure the success of our ads on partner sites brokered for us by Webgains. In this way we want to show you advertising that is of interest to you, make our website more attractive to you and achieve a fair calculation of advertising costs. For this purpose, a tracking code is integrated into our site. This code enables Webgains to collect pseudonymous data about your visit and the use of our online offer via cookies and make aggregated, non-personal statistics available to us on this basis, in particular about how many visitors of a certain partner site have ordered something from us after clicking on our advertisement.

There are various ways in which you can disable this tracking. You can adjust your browser settings to prevent the storage of cookies, although this may result in a restriction of the functionality of our website for you. You also can prevent Webgains from recording your data on this website by clicking here: [Disable Webgains tracking](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website. In addition, you can disable interest-based ads from providers who are part of the "YourAdChoices" self-regulation initiative (<http://optout.aboutads.info/?c=2#!/>) or e.g. part of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>); please note that this setting will be erased if you erase your cookies.

The legal bases for the processing are your consent and our legitimate interests.

Information from the third-party provider: Webgains Ltd, Third Floor, 21 Farringdon Road, London, EC1M 3HA, England. Webgains privacy policy: <http://www.webgains.com/public/en/privacy/>.

## f) Use of features by Spreadshirt's Shop Partners

Our partners can also use a Facebook Pixel (see Section 2.7 b for a detailed explanation) in their Spreadshirt shops themselves, as a rule in order to be able to show you advertising on Facebook that is of interest to you after your visit to their shop, or in order to measure the reach of ads and in turn make their products more attractive. In this case, they determine the purposes and means of processing personal data. The name and contact details of our partners are stored in the legal information section of the respective shop.

## g) ShareASale

Our website uses tracking features from ShareASale, Inc. to identify the referrers of new Spreadshirt Shop Owners. This is to be able to credit referrers who introduce new people to our Spreadshop service. For this purpose, if you come to our website from a link containing ShareASale tracking features, a cookie is placed on your computer which enables ShareASale to attribute your signup to the referrer. This allows us to improve our strategies for promoting our Spreadshop service to potential users.

There are various ways in which you can disable this tracking. You can adjust your browser settings to prevent the storage of cookies, although this may result in a restriction of the functionality of our website for you. You also can prevent ShareASale from recording your data on this website by clicking here: [Disable ShareASale conversion tracking](#). This will place an opt-out cookie which prevents recording when you visit our website in future. Please note that if you delete all cookies on your device, this opt-out cookie will also be deleted; in this case, if you still wish to object then you must place the cookie again using the above button. The opt-out cookie is set per top-level domain, per browser and per device and only prevents the recording of data for this website. In addition, you can disable interest-based ads from providers who are part of the "YourAdChoices" self-regulation initiative (<http://optout.aboutads.info/?c=2#!/>) or e.g. part of the Network

Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>); please note that this setting will be erased if you erase your cookies.

The legal bases for the processing are your consent and our legitimate interests.

Third-party provider information: ShareASale.com Inc., 15 W. Hubbard St. STE 500, Chicago IL 60654, USA.  
ShareASale Privacy policy: <http://www.shareasale.com/PrivacyPolicy.pdf>.

## 2.8. Processing of personal data when using our mobile partner app

If you are a partner of ours, we will provide you with a mobile app (hereinafter referred to as "SpreadApp") in addition to our online service that you can use to get an overview of your partner statistics (credits, sales and bestsellers) at any time.

### a) Processing of personal data when using our SpreadApp

#### - Log-in

In order to connect your mobile device to your Spreadshirt user account via the SpreadApp, it is either necessary for you to use your smartphone camera to scan the QR code displayed or to enter your Spreadshirt user name or e-mail address and password in the input screen provided. The legal basis for processing the data is to perform under a contract.

#### - App permissions and notifications

If you allow this on your mobile device, SpreadApp has the authorization to access your camera. This enables you to connect your mobile device to your user account by scanning a QR code. If you allow this on your mobile device, you will also receive notifications from SpreadApp (e.g. about new sales). You can manage these types of access at any time on your mobile device in the system settings. SpreadApp can also be used without the functions. The legal basis for the processing is your consent.

#### - Display of information from the Spreadshirt user account

The SpreadApp reads out and displays the following information from your user account: Your username, the user account number, your credit balance, an overview of your sales and your bestselling products and designs. This is necessary for the implementation of the amended contract that exists with you as our partner. The legal basis for the processing is to perform under a contract.

#### - Log files

When using the SpreadApp, we also process personal data mentioned below. These are technically necessary for us to enable you to use the functions of the app comfortably and to guarantee stability and security (legal bases are to perform under a contract and our legitimate interests):

- IP address,
- date and time of the request,
- content of the request (concrete page),
- page from which the request comes,
- access status/HTTP status code,
- the amount of data transferred in each case,
- browser,
- language and version of the browser software,



- operating system and its interface,
- device identification,
- type and name of your mobile device,
- screen size and resolution,
- country and city,
- version of the app,
- number of your Spreadshirt user account.

## b) Processing of Personal Information for Application Analysis

In addition to processing the aforementioned data, a technology comparable to cookies is used for your use of SpreadApp. By the use of JavaScript code, counting impulses are transmitted to counting servers of the service providers listed below. This information enables us to analyze how you use our SpreadApp. You can prevent this usage information from being collected by deactivating the "I'm in" button when you install the SpreadApp or by deactivating the "App analysis" button in the "Settings" section of your SpreadApp later on.

### - Google Analytics

The SpreadApp uses Google Analytics, an analysis service of Google LLC ("Google"). The information generated by the JavaScript code about your usage is usually transmitted to a Google server in the USA and stored there for 26 months. Due to the activation of IP anonymization in the SpreadApp, your IP address will be shortened by Google. On our behalf, Google will use this information to evaluate how you use the SpreadApp in order to compile reports on app activity and to provide us with other services relating to the app use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other data from Google. SpreadApp uses Google Analytics with the extension "\_anonymizeIp()". This means that IP addresses are shortened for further processing, so that it is not possible to identify individuals. If the data collected about you is related to your person, it is excluded immediately, and the personal data is deleted immediately. We use Google Analytics to analyze and improve the use of SpreadApp on a regular basis. The statistics obtained enable us to improve our offer and make it more interesting for you as a user. The legal basis for the use of Google Analytics is our legitimate interests.

Third-party information: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. See also the terms of use (<https://marketingplatform.google.com/about/analytics/terms/us/>) and privacy policy overview (<https://support.google.com/analytics/answer/6004245?hl=en>) for Google Analytics and Google's privacy policy: <https://policies.google.com/privacy?hl=en>.

### - Adobe Analytics

Our SpreadApp also uses the Adobe Analytics analysis service to analyze and regularly improve the use of SpreadApp. The statistics obtained enable us to improve our offer and make it more interesting for you as a user. The legal basis for the use of Adobe Analytics is our legitimate interests. Our website uses Adobe Analytics with the settings "Before Geo-Lookup: Replace visitor's last IP octet with 0" and "Obfuscate IP-Removed", which removes the last octet from your IP address and replaces it with a generic IP address, i.e. one that can no longer be assigned. Any personal connection can therefore be ruled out. The usage information is stored for 25 months.

Third-party information: Adobe Systems Software Ireland Limited, 4–6 Riverwalk, Citywest Business Campus, Dublin 24, Ireland; [privacy@adobe.com](mailto:privacy@adobe.com); Adobe's privacy policy: <https://www.adobe.com/privacy/policy.html>.

### - Sentry

SpreadApp also uses the "Sentry" service of the provider Functional Software, Inc. The service detects and documents errors and performance problems that may occur during your use of SpreadApp. We use the

service to improve the technical stability of SpreadApp by monitoring system stability and detecting code errors. The data (e.g. information about the device or time of error) is collected anonymously, is not used for personal purposes and stored for 90 days. The legal basis for the processing is our legitimate interests.

Third-party information: Functional Software, Inc., 132 Hawthorne Street, San Francisco, CA 94107, USA. For more information about this third party's privacy practices, please refer to Functional Software, Inc.'s Privacy Statement: <https://sentry.io/privacy/>.

### **3. What are my rights?**

If you have given your consent to the processing of your data, you can revoke this consent with future effect at any time. This does not affect the lawfulness of processing carried out on the basis of the consent before you revoke your consent.

If we base the processing of your personal data on our legitimate interests, you are entitled to object to the processing. This is the case if the processing is not necessary in particular for the performance of a contract with you, which was described by us in each case with the description of the individual functions. When exercising such a right of objection, we ask that you explain the reasons why we should not process your personal data as carried out by us. In the event that your objection is justified, we will examine the situation and either stop or adjust the data processing or point out to you the compelling legitimate reasons on the basis of which we will continue processing.

However, you can of course object to the processing of your personal data for advertising or web analytics purposes at any time without giving reasons.

As described in the relevant sections, we sometimes use external service providers to process your data. These have been carefully selected and commissioned by us, are bound by our instructions and are regularly checked.

The personal data processed by us is generally erased or blocked as soon as the purpose of storage ceases to apply. Data may be stored for a longer period if this has been provided for by laws or other rules to which we as the controller are subject. The data will also be blocked or erased once a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or performance of a contract.

Further processing operations may be required for contests and other promotional campaigns. In such cases we will inform you in the context of the respective promotional campaign.

### **4. We Will Share Your Information with Third Parties in Specific Circumstances**

#### **a) Legal Compliance and Safety**

We will share your information with third parties in specific circumstances. If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a similar event, we may transfer your information as part of that transaction. In addition, there are a few times when we must share your information either to protect our rights, to further our legitimate interests, or to comply with a legal obligation to which we are subject. We will share your personal information when we believe in good faith that:

- a subpoena or warrant is duly issued, or we receive any other legitimate government agency request to produce information;
- we need to share the information in order to enforce or protect our own rights, for example, to respond to and resolve third-party claims or complaints, or with respect to contracts with our users and third parties;
- we need to address a security or technical issue within our website;

- sharing the information is necessary to prevent harm to others or others' property, especially in an emergency situation;

## **b) Corporate Change in Control Events**

If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a similar event, we may transfer your information as part of that transaction.

## **5. Is My Information Secure?**

We use reasonable measures to secure our website and any private information you submit to us against loss, tampering, unauthorized access, and other malicious acts. For example, we use SSL connections when possible to protect your data while it is in transit (for example login data and customer orders). However, no data transmission over the Internet is completely secure, so we cannot completely guarantee the security of any data. You use our services at your own risk, and are responsible for taking reasonable measures to secure your password, information, and account.

## **6. Do-Not-Track ("DNT") Requests**

Due to lack of technical standards across browsers, we do not respond to DNT signals.

## **7. Privacy Statement for California Residents**

### **a) The California Consumer Privacy Act**

This privacy statement supplements the information contained above and applies solely to "consumers" (as defined in the California Consumer Privacy Act ("CCPA")). All terms defined in the CCPA have the same meaning when used in this section. For example, "consumer" means a California resident, and "personal information" means "information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device" but does not include "publicly available," "de-identified," or "aggregated" information. In this section, "you" refers only to California residents.

### **b) Consumer Rights**

Consumers have the following rights under the CCPA:

- The right to request that a business disclose the categories of personal information it collects, uses, discloses, and sells about the consumer.
- The right to request the deletion of personal information collected or maintained by a business.
- The right to request that a business disclose the categories of sources for personal information collection.
- The right to request that a business disclose the business or commercial purpose for collecting personal information
- The right to request that a business disclose the categories of third parties with whom the business shares personal information.
- The right to request that a business disclose to the consumer the specific pieces of personal information it collects, uses, discloses, and sells about that consumer (or any member of the consumer's household).
- If a business discloses personal information for a business purpose, the right to request that a business disclose the categories of personal information that the business disclosed about the

consumer for a business purpose and the categories of third parties to whom personal information was disclosed for a business purpose.

- If the business sells personal information for monetary or other valuable consideration, the right to opt-out of the sale of their personal information by a business. This is the so-called “right to opt-out.”
- The right not to receive discriminatory treatment by a business for the exercise of the privacy rights conferred by the CCPA.
- The right to make requests under the CCPA by using an authorized agent designated by the consumer.

c) Our Personal Information Collection, Use, and Disclosure

In the last twelve months, we have collected and disclosed personal information as follows.

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Categories of Sources of Personal Information</b>	<b>Is Personal Information Disclosed to third parties for a Business Purpose?</b>	<b>Categories of Third Parties with Whom Personal Information is Shared</b>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	Yes	Directly provided by consumers Automatically collected from web browsers via log files Cookies Analytics Providers Directly provided by consumers	Yes	Shipping Providers Payment Processors Analytics Providers Marketing Partners Customs Officers (for International Shipments) Customer Reviews Providers

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Categories of Sources of Personal Information</b>	<b>Is Personal Information Disclosed to third parties for a Business Purpose?</b>	<b>Categories of Third Parties with Whom Personal Information is Shared</b>
<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A name, Social Security number, physical characteristics or description, address, telephone number, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.</p>	<p>Yes</p>	<p>Directly provided by consumers</p>	<p>Yes</p>	<p>Tax Authorities, (for compliance purposes) Payment Processors Customs Officers (for International Shipments)</p>

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Categories of Sources of Personal Information</b>	<b>Is Personal Information Disclosed to third parties for a Business Purpose?</b>	<b>Categories of Third Parties with Whom Personal Information is Shared</b>
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes	Directly provided by consumers (only if they upload a photo of themselves)	No	N/A

Category of Personal Information	Examples	Collected	Categories of Sources of Personal Information	Is Personal Information Disclosed to third parties for a Business Purpose?	Categories of Third Parties with Whom Personal Information is Shared
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	Directly provided by consumers Cookies	Yes	Marketing Partners Analytics Providers
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Yes	Directly provided by consumers (only if they upload a photo of themselves)	No	N/A

<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Categories of Sources of Personal Information</b>	<b>Is Personal Information Disclosed to third parties for a Business Purpose?</b>	<b>Categories of Third Parties with Whom Personal Information is Shared</b>
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes	Directly provided by consumers Cookies Analytics Providers	No	N/A
G. Geolocation data.	Precise physical location or movements.	No	N/A	N/A	N/A
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes	Directly provided by consumers (only if they upload a photo of themselves)	No	N/A
I. Professional or employment-related information.	Current or past job history or performance evaluations.	No	N/A	N/A	N/A



<b>Category of Personal Information</b>	<b>Examples</b>	<b>Collected</b>	<b>Categories of Sources of Personal Information</b>	<b>Is Personal Information Disclosed to third parties for a Business Purpose?</b>	<b>Categories of Third Parties with Whom Personal Information is Shared</b>
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No	N/A	N/A	N/A
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes	Directly provided by consumers Cookies	No	N/A

We collect and disclose personal information for the following business purposes.

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad

impressions, and auditing compliance with this specification and other standards.

**Personal Information Categories:** A (Identifiers), F (Internet and Network Activity)

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.

**Personal Information Categories:** A (Identifiers), F (Internet and Network Activity)

- Debugging to identify and repair errors that impair existing intended functionality.

**Personal Information Categories:** F (Internet and Network Activity)

- Short-term, transient use, provided that the personal information that is not disclosed to another third party and is not used to build a profile about a consumer or otherwise alter an individual consumer's experience outside the current interaction, including, but not limited to, the contextual customization of ads shown as part of the same interaction.

**Personal Information Categories:** A (Identifiers), D (Commercial Information), F (Internet and Network Activity)

- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.

**Personal Information Categories:** A (Identifiers), B (Personal Information as defined by CA Customer Records Law), D (Commercial Information)

- Undertaking internal research for technological development and demonstration.

**Personal Information Categories:** : A (Identifiers), D (Commercial Information), F (Internet and Network Activity)

- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business.

**Personal Information Categories:** A (Identifiers), D (Commercial Information), F (Internet and Network Activity)

We collect and disclose personal information for the following commercial purposes.

- To observe how our website is used.

**Personal Information Categories:** A (Identifiers), D (Commercial Information), F (Internet and Network Activity)

- To evaluate the website, optimize it, and make it more user-friendly.

**Personal Information Categories:** D (Commercial Information), F (Internet and Network Activity)

- To comply with various legal obligations, for example tax reporting laws.

**Personal Information Categories:** A (Identifiers), B (Personal Information as Defined by CA Customer Records Law), D (Commercial Information)

- To provide you with email advertisements, newsletters, and other similar content; and to evaluate these efforts.

**Personal Information Categories:** A (Identifiers), F (Internet and Network Activity), K (Inferences Drawn from Other Personal Information)

#### d) Other Information Sale Disclosures

[Do Not Sell My Personal Information](#). Click the link to the left to learn how to opt out of the “sale” of your personal information as defined in the CCPA.

We have no actual knowledge that the personal information we sell belongs to minors under 16 years of age.

#### e) Notice of Financial Incentive

Spreadshirt has a customer newsletter with advertisements and exclusive coupons. To subscribe, just submit your email address in the box at [spreadshirt.com](https://spreadshirt.com). Unsubscribe anytime at no cost by clicking the unsubscribe link in each newsletter email. The value of each submitted email address is approximately \$2.59 USD over the course of twelve months. Spreadshirt arrived at this value by comparing the spending habits of customers who have subscribed to the newsletter with those who have not.

#### f) How to Submit Verified Requests

To submit a request for information or deletion, please e-mail [info@spreadshirt.com](mailto:info@spreadshirt.com) or call 1-800-381-0815.

Your request will be processed only if we can verify that you are the person whose personal information is the subject of the request. If we cannot verify your identity, we will ask you to provide corrected verification information, or we will deny the request to the extent necessary.

If you request a deletion of your personal information, you will be required to confirm this deletion separately via e-mail.

All requests must be verified, meaning that we must determine that the consumer making the request is the same consumer whose personal information is the subject of the request. Verification methods will vary depending on the request, the sensitivity of the personal information that is the subject of the request, and our ability to associate the provided verification information with information in our records.

If you request disclosure of categories of personal information collected, used, and disclosed, then we will need to verify your identity by reference to at least two independent pieces of evidence describing different pieces of personal information that match the personal information in our records that is the subject of the request.

If you request disclosure of specific pieces of personal information, then we will need to verify your identity by reference to at least three independent pieces of evidence describing different pieces of personal information that match the personal information in our records that is the subject of the request.

If you request deletion of all or some personal information, then we will need to verify your identity by reference to at least two or three independent pieces of evidence describing different pieces of personal information that match the personal information in our records that is the subject of the request. The specific number and type of pieces of evidence will vary depending on the sensitivity of the personal information to be deleted.

If you do not have an account with us or have not made a purchase with us, it is possible that we will not be able to verify your request no matter what evidence you provide because we do not have enough information in our records to ensure that the information in our records is yours. This is because some of the personal information we gather is not identifiable with a specific individual (for example, we use a cookie which only stores which products you have recently viewed on our website so that these are shown to you at your next visit. You can turn this feature off by clicking the "remember history" slider button in a product result page).

#### g) Authorized Agents

If an authorized agent will make a request on your behalf under this section, your agent must provide a copy of the writing, signed by you, which authorizes the agent to act on your behalf, along with the same level of verification on the part of both the authorized agent and yourself which would be required of an individual acting on his or her own behalf.

#### h) Contacting us With Questions or Concerns About our Privacy Policies and Practices

If you have any questions or comments about the collection, processing, or usage of personal information; if

you have requests for information, correction, disabling or deletion of data, please use the settings provided in your account's user area, or else contact us at one of the following addresses:

Email: [info@spreadshirt.com](mailto:info@spreadshirt.com)

Fax: 1-877-202-0251

Phone: 1-800-381-0815

Postal Mail: 1572 Roseytown Road, Greensburg, PA 15601

i) Privacy Policy Last Updated

January 1, 2021

j) Online Eraser Law (CA Business and Professions Code §§ 22581)

To the extent it is technically feasible and provided for and allowed by applicable law, California residents under the age of 18 may email [info@spreadshirt.com](mailto:info@spreadshirt.com) anytime to ask for access to information held about you in order to have it corrected, disabled, or deleted, when possible.

Note that removal or deletion of your information does not ensure complete or comprehensive removal of the content or information posted on our website and service, or on the internet generally.

k) "Shine the Light" Law (California Civil Code Section § 1798.83)

California residents who use our Website may request certain information about our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please email us at [info@spreadshirt.com](mailto:info@spreadshirt.com)

## 8. Children's Online Privacy Protection

Our website is not intended or directed at individuals under the age of 13. We do not knowingly collect or keep any information of children under the age of 13. If we discover it, we will delete it as soon as possible.

Thank you for reading this privacy policy in its entirety!