

# Imprint

Integrated Financial Planning Services  
Company owner: Glenn Kinkade (CEO)  
Karlstrasse 20  
69117 Heidelberg

Represented by: Marcia Huntington-Sell

Phone: 06221-23597  
Fax: 6221-167376  
E-Mail: [info@ifpsonline.com](mailto:info@ifpsonline.com)

## Data Privacy Information

This privacy statement informs you about how we treat your data. To make the processing of your data transparent, we would like to provide you with the following information to give you an overview of these processing operations. To keep things fair, we additionally want to inform you about your rights pursuant to the EU-General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

Integrated Financial Planning Services is the controller of the data processing (hereinafter referred to as 'we' or 'us').

### I. General Information

#### 1. Contact

If you have any questions or feedback concerning this information or wish to contact us to exercise your rights, please send your enquiry to

Integrated Financial Planning Services  
Karlstrasse 20  
69117 Heidelberg

Phone: 06221-23597  
Fax: 6221-167376  
E-Mail: [marcia.huntington-sell@ifpsonline.com](mailto:marcia.huntington-sell@ifpsonline.com)

#### 2. Legal Basis

The legal term 'personal data' refers to all information relating to an identified or identifiable natural person.

We process personal data in compliance with the data protection regulations, in particular the GDPR and the BDSG. We solely process data based on law. We process personal data

- solely with your consent (Art. 6 section 1 letter a) GDPR),
- to perform a contract to which you are a party or to take steps at your request prior to entering into a contract (Art. 6 section 1 letter b) GDPR),
- to comply with a legal obligation (Art. 6 section 1 letter c) GDPR) or

- where processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data (Art. 6 section 1 letter f) GDPR).

### 3. Period of Storage

Unless otherwise stated in the following, we will only store your data for as long as required to achieve the intended processing purpose or to fulfil our contractual or statutory obligations. In particular, such statutory retention requirements may result from regulations under commercial or tax law.

### 4. Recipients of Data

For certain processing activities, we rely on service providers. These processing activities include, for example hosting. A 'processor' is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Processors process data not for their own purposes but solely for the controller and are contractually obliged to implement appropriate technical and organizational measures ensuring data protection.

### 5. Processing in the Exercise of your Rights pursuant to Art. 15 to 22 GDPR

If you exercise your rights pursuant to Art. 15 to 22 GDPR, we process the personal data transferred in order for us to grant you your rights and to acquire proof thereof. For the purpose of providing information and preparing such information, we will process the stored data only for this purpose as well as for purposes of data protection control and otherwise restrict processing in accordance with Art. 18 GDPR. These processing operations are based on Art. 6 section 1 letter c) GDPR in combination with Art. 15 to 22 GDPR and section 34 para. 2 BDSG.

### 6. Your rights

As the data subject, you are entitled to exercise your rights against us. In particular, you have the following rights:

- Pursuant to Art. 15 GDPR and section 34 BDSG, you have the right of access to information confirming whether and, if so, to what extent we are processing personal data concerning you.
- Pursuant to Art. 16 GDPR, you have the right to rectification of your data.
- Pursuant to Art. 17 GDPR and section 35 BDSG, you have the right to erasure of your personal data.
- Pursuant to Art. 18 GDPR, you have the right to require us to restrict the processing of your personal data.
- Pursuant to Art. 20 GDPR, you have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and the right to transfer such data to another controller.
- Where you have granted us specific consent to a processing activity, you can withdraw such consent at any time pursuant to Art. 7 section 3 GDPR. Any such withdrawal of consent shall not affect the lawfulness of processing based on that consent prior to its withdrawal.
- If you are of the view that the processing of your personal data infringes GDPR provisions, you have the right to lodge a complaint with a supervisory authority pursuant to Art. 77 GDPR.

## 7. Right to object

Pursuant to Art. 21 section 1 GDPR, you have the right to object to processing activities based on Art. 6 section 1 letter e) or letter f) GDPR on grounds relating to your particular situation. If we process your personal data for the purpose of direct marketing, you may object to such processing pursuant to Art. 21 section 2 and section 3 GDPR.

## II. Data processing on our website

During use of our website, we collect information that you provide yourself. We also automatically collect certain information about your use of the site during your visit to the site. In data protection law, the IP address is also considered personal data. An IP address is assigned to each device connected to the internet by the internet provider so that it can send and receive data.

### 1. Processing of Server-Log-Files

When using our website for informative purposes only, general information that your browser transfers to our server is initially stored automatically (not via registration). This includes by default: browser type/-version, operating system used, page called, the previously visited page (referrer URL), IP address, date and time of server request and HTTP status code. The processing is carried out in pursuit of our legitimate interests and is based on Art. 6 section 1 letter f) GDPR. This processing serves the technical administration and security of the website. The data collected will be deleted when the respective session has ended unless there is a justified suspicion of illegal use based on concrete indications and further examination and processing of the information is necessary for this reason. We are unable to identify you as a data subject based on the information collected. Art. 15 to 22 GDPR therefore do not apply pursuant to Art. 11 section 2 GDPR, unless you provide additional information to enable your identification in order to exercise the rights set out in these articles.

### 2. Data Transfer to third countries

Visiting our website may involve the transfer of certain personal data to third countries, i.e. countries where the DSGVO is not applicable law. Such a transfer shall be authorised if the European Commission has decided that an adequate level of data protection is ensured in such third country.

In the absence of such an adequacy decision by the European Commission, personal data will only be transferred to a third country if appropriate safeguards are in place in accordance with Art. 46 DSGVO or if one of the conditions of Art. 49 DSGVO is met.

Unless otherwise stated below, we use as appropriate safeguards the EU standard contractual clauses for the transfer of personal data to processors in third countries: <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32010D0087>.

### 3. Cookies

We use cookies and similar technologies on our website. Cookies are small text files that are stored by your browser when you visit a website. This makes the browser identifiable so it can be recognised by our web server. We use so-called 'session cookies', which are deleted when the browser session is ended. Other cookies ('persistent cookies') are automatically deleted after a specific period, which may vary depending on the cookie.

In part, the use of cookies is necessary to maintain functionality and operation of our website.

Cookies are stored on the computer of the user. Therefore, you as the user have full control over the use of cookies. You can delete cookies in the security settings of your browser at any time. You can

object to the use of cookies entirely or for certain cases in your browser settings. Further information from the Federal Office for Information Security is available at [https://www.bsi.bund.de/EN/Themen/Verbraucherinnen-und-Verbraucher/Informationen-und-Empfehlungen/Cyber-Sicherheitsempfehlungen/Updates-Browser-Open-Source-Software/Der-Browser/JavaScript-Cookies-Fingerprints/javascript-cookies-fingerprints\\_node.html](https://www.bsi.bund.de/EN/Themen/Verbraucherinnen-und-Verbraucher/Informationen-und-Empfehlungen/Cyber-Sicherheitsempfehlungen/Updates-Browser-Open-Source-Software/Der-Browser/JavaScript-Cookies-Fingerprints/javascript-cookies-fingerprints_node.html).

### III. Data processing on our social media accounts

We are represented on the social media platform Facebook of Meta Platforms Ireland Limited, (Ireland, EU), hereinafter “Meta”, with a company account. In this way, we would like to offer additional options for information about our company and for dialogue.

When you visit or interact with an account on a social platform, personal data about you may be processed. The information associated with a social media account used also regularly constitutes personal data. This also includes messages and statements made using the profile. In addition, certain information is often automatically collected during your visit to a social media account, which may also constitute personal data.

#### 1. Data processing during the visit of a social media account

When you visit our social media accounts, which we use to present our company or products from our portfolio, certain information about you is processed. Sole controllers for this processing of personal data are the operators of the social media platforms. Further information on the processing of personal data can be found in Meta’s privacy policies, which we link to as follows: Meta (<https://www.facebook.com/privacy/policy/version/5601719079934335>). Meta offers the option of objecting to certain data processing; information and opt-out-options can be found at <https://www.facebook.com/settings?tab=ads>;

The operators of the social media platforms collect and process event data and profile data and provide us with anonymized statistics and insights for our accounts, with help us to gain knowledge about the types of actions that people taken on our site (so-called “insights”). The insights are created based on certain information about people who have visited our site. This processing of personal data is carried out by the operators of the social media platforms and us as joint controllers. The processing serves our legitimate interest in analyzing the types of actions taken on our site and improving our site based on these findings. The legal basis for this processing is Art. 6 section 1 letter f) GDPR.

We cannot assign the information obtained through insights to individual user profiles that interact with our accounts. We have entered into agreements with the operator of the social media platforms on processing as joint controllers, in which the distribution of data protection obligations between us and the operator is specified. Details on the processing of personal data for the creation of insights and the agreement concluded between us and the operator can be found at the following link: Meta ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data));

You also have the option of asserting your rights against the operator. You can find further information on this under the following links: Meta (<https://www.facebook.com/privacy/explanation>);

We have agreed with Meta that the Irish Data Protection Commission is the lead supervisory authority for the processing for insights. You always have the right to lodge a complaint with the Irish Data Protection Commission (see <https://www.dataprotection.ie/>) or any other supervisory authority.

## 2. Communication via social media accounts

We also process information that you have made available to us via our company accounts on the respective social media platform. Such information may include the username used, contact details or a message to us. This processing is carried out by us as the sole controller. We process this data based on our legitimate interest in contacting enquiring persons. The legal basis for this data processing is Art. 6 section 1 letter f) GDPR. Further data processing may take place if you have given your consent (Art. 6 section 1 letter a) GDPR) or if this is necessary to fulfil a legal obligation (Art. 6 section 1 letter c) GDPR).

## IV. Contact via email

If you send us a message via our contact email address, we will process the transferred data in order to process the request. We process this data in pursuit of our legitimate interest to reach out to persons submitting requests. The legal basis for this is Art. 6 section 1 letter f) GDPR.

\*\*\*