

## **Privacy Policy**

### **Data protection**

The operators of this website take the protection of your personal data very seriously. We treat your personal data as confidential and in accordance with the statutory data protection regulations and this privacy policy.

If you use this website, various pieces of personal data will be collected. Personal information is any data with which you could be personally identified. This privacy policy explains what information we collect and what we use it for. It also explains how and for what purpose this happens.

Please note that data transmitted via the internet (e.g. via email communication) may be subject to security breaches. Complete protection of your data from third-party access is not possible.

### **Notice concerning the party responsible for this website**

The party responsible for processing data on this website is:

**Kenston Pension GmbH** Im  
Zollhafen 13c  
50678 Köln  
P +49 (0) 221 99 2222 3 – 0  
F +49 (0) 221 99 2222 3 – 50  
[info@kenston-pension.de](mailto:info@kenston-pension.de)  
[www.kenston-pension.de](http://www.kenston-pension.de)

The responsible party is the natural or legal person who alone or jointly with others decides on the purposes and means of processing personal data (names, email addresses, etc.).

### **Revocation of your consent to the processing of your data**

Many data processing operations are only possible with your express consent. You may revoke your consent at any time with future effect. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

### **Right to file complaints with regulatory authorities**

If there has been a breach of data protection legislation, the person affected may file a complaint with the competent regulatory authorities. The competent regulatory authority for matters related to data protection legislation is the data protection officer of the German state in which our company is headquartered. A list of data protection officers and their contact details can be found at the following link: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html).

**Right to data portability**

You have the right to have data which we process based on your consent or in fulfillment of a contract automatically delivered to yourself or to a third party in a standard, machine-readable format. If you require the direct transfer of data to another responsible party, this will only be done to the extent technically feasible.

**SSL or TLS encryption**

This site uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon is displayed in your browser's address bar.

If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties.

**Information, blocking, deletion**

As permitted by law, you have the right to be provided at any time with information free of charge about any of your personal data that is stored as well as its origin, the recipient and the purpose for which it has been processed. You also have the right to have this data corrected, blocked or deleted. You can contact us at any time using the address given in our legal notice if you have further questions on the topic of personal data.

**Opposition to promotional emails**

We hereby expressly prohibit the use of contact data published in the context of website legal notice requirements with regard to sending promotional and informational materials not expressly requested. The website operator reserves the right to take specific legal action if unsolicited advertising material, such as email spam, is received.

**Data protection officer****Statutory data protection officer**

We have appointed a data protection officer for our company:

Kenston Pension GmbH  
Hakan Takil  
Im Zollhafen 13c  
50678 Köln

E-Mail: [dsb@kenston.de](mailto:dsb@kenston.de)

## **Data collection on our website**

### **Cookies**

Some of our web pages use cookies. Cookies do not harm your computer and do not contain any viruses. Cookies help make our website more user-friendly, efficient, and secure. Cookies are small text files that are stored on your computer and saved by your browser.

Most of the cookies we use are so-called "session cookies." They are automatically deleted after your visit. Other cookies remain in your device's memory until you delete them. These cookies make it possible to recognize your browser when you next visit the site.

You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. Disabling cookies may limit the functionality of this website.

Cookies which are necessary to allow electronic communications or to provide certain functions you wish to use (such as the shopping cart) are stored pursuant to Art. 6 paragraph 1, letter f of DSGVO. The website operator has a legitimate interest in the storage of cookies to ensure an optimized service provided free of technical errors. If other cookies (such as those used to analyze your surfing behavior) are also stored, they will be treated separately in this privacy policy.

### **Server log files**

The website provider automatically collects and stores information that your browser automatically transmits to us in "server log files". These are:

- Browser type and browser version
- Operating system used
- Referrer URL
- Host name of the accessing computer
- Time of the server request
- IP address

These data will not be combined with data from other sources.

The basis for data processing is Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

### **Contact form**

Should you send us questions via the contact form, we will collect the data entered on the form, including the contact details you provide, to answer your question and any follow-up questions. We do not share this information without your permission.

We will, therefore, process any data you enter onto the contact form only with your consent per Art. 6 (1)(a) DSGVO. You may revoke your consent at any time. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

We will retain the data you provide on the contact form until you request its deletion, revoke your consent for its storage, or the purpose for its storage no longer pertains (e.g. after fulfilling your request). Any mandatory statutory provisions, especially those regarding mandatory data retention periods, remain unaffected by this provision.

### **Registration on this website**

You can register on our website in order to access additional functions offered here. The input data will only be used for the purpose of using the respective site or service for which you have registered. The mandatory information requested during registration must be provided in full. Otherwise, we will reject your registration.

To inform you about important changes such as those within the scope of our site or technical changes, we will use the email address specified during registration.

We will process the data provided during registration only based on your consent per Art. 6 (1)(a) DSGVO. You may revoke your consent at any time with future effect. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

We will continue to store the data collected during registration for as long as you remain registered on our website. Statutory retention periods remain unaffected.

### **Processing of data (customer and contract data)**

We collect, process, and use personal data only insofar as it is necessary to establish, or modify legal relationships with us (master data). This is done based on Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract. We collect, process and use your personal data when accessing our website (usage data) only to the extent required to enable you to access our service or to bill you for the same.

Collected customer data shall be deleted after completion of the order or termination of the business relationship. Legal retention periods remain unaffected.

### **Data transmitted when entering into a contract with online shops, retailers, and mail order**

We transmit personally identifiable data to third parties only to the extent required to fulfill the terms of your contract, for example, to companies entrusted to deliver goods to your location or banks entrusted to process your payments. Your data will not be transmitted for any other purpose unless you have given your express permission to do so. Your data will not be disclosed to third parties for advertising purposes without your express consent.

The basis for data processing is Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

### **Data transferred when signing up for services and digital content**

We transmit personally identifiable data to third parties only to the extent required to fulfill the terms of your contract with us, for example, to banks entrusted to process your payments.

Your data will not be transmitted for any other purpose unless you have given your express permission to do so. Your data will not be disclosed to third parties for advertising purposes without your express consent.

The basis for data processing is Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

### **Social media**

#### **Share content via plugins (Facebook, Google+1, Twitter, etc.)**

The content on our pages can be shared on other social networks like Facebook, Twitter, or Google+.

This tool does not automatically transfer user data to the operators of these platforms. If users are logged into one or more of the social networks, the Like, +1, and Share buttons for Facebook, Google+1, Twitter, etc. will display an information window in which the user can edit the text before it is sent.

Our users can share the content of this page on social networks without their providers creating profiles of users' surfing behavior.

#### **Facebook plugins (Like & Share buttons)**

Our website includes plugins for the social network Facebook, Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA. The Facebook plugins can be recognized by the Facebook logo or the Like button on our site. For an overview of Facebook plugins, see <https://developers.facebook.com/docs/plugins/>.

When you visit our site, a direct connection between your browser and the Facebook server is established via the plugin. This enables Facebook to receive information that you have visited our site from your IP address. If you click on the Facebook "Like button" while you are logged into your Facebook account, you can link the content of our site to your Facebook profile. This allows Facebook to associate visits to our site with your user account. Please note that, as the operator of this site, we have no knowledge of the content of the data transmitted to Facebook or of how Facebook uses these data. For more information, please see Facebook's privacy policy at <https://de-de.facebook.com/policy.php>.

If you do not want Facebook to associate your visit to our site with your Facebook account, please log out of your Facebook account.

### **Twitter plugin**

Functions of the Twitter service have been integrated into our website and app. These features are offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. When you use Twitter and the “Retweet” function, the websites you visit are connected to your Twitter account and made known to other users. In doing so, data will also be transferred to Twitter. We would like to point out that, as the provider of these pages, we have no knowledge of the content of the data transmitted or how it will be used by Twitter. For more information on Twitter's privacy policy, please go to <https://twitter.com/privacy>.

Your privacy preferences with Twitter can be modified in your account settings at <https://twitter.com/account/settings>.

### **Google+ plugin**

Our pages use Google+ functions. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Collection and disclosure of information: Using the Google +1 button allows you to publish information worldwide. By means of the Google+ button, you and other users can receive custom content from Google and our partners. Google stores both the fact that you have +1'd a piece of content and information about the page you were viewing when you clicked +1. Your +1 can be displayed together with your profile name and photo in Google services, for example in search results or in your Google profile, or in other places on websites and advertisements on the Internet.

Google records information about your +1 activities to improve Google services for you and others. To use the Google + button, you need a globally visible, public Google profile that must contain at least the name chosen for the profile. This name is used by all Google services. In some cases, this name may also replace a different name that you have used to share content via your Google account. The identity of your Google profile can be shown to users who know your email address or other information that can identify you.

Use of collected data: In addition to the uses mentioned above, the information you provide is used in accordance with the applicable Google data protection policies. Google may publish summary statistics about users' +1 activity or share it with users and partners, such as publishers, advertisers, or affiliate websites.

### **XING Plugin**

Our website uses features provided by the XING network. The provider is XING AG, Dammtorstraße 29-32, 20354 Hamburg, Germany.

Each time one of our pages containing XING features is accessed, your browser establishes a direct connection to the XING servers. To the best of our knowledge, no personal data is stored in the process. In particular, no IP addresses are stored nor is usage behavior evaluated.

For more information about data protection and the XING Share button, please see the XING privacy policy at [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection).

## **Analytics and advertising**

### **Google Analytics**

This website uses Google Analytics, a web analytics service. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there.

Google Analytics cookies are stored based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising.

### **IP anonymization**

We have activated the IP anonymization feature on this website. Your IP address will be shortened by Google within the European Union or other parties to the Agreement on the European Economic Area prior to transmission to the United States. Only in exceptional cases is the full IP address sent to a Google server in the US and shortened there. Google will use this information on behalf of the operator of this website to evaluate your use of the website, to compile reports on website activity, and to provide other services regarding website activity and Internet usage for the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with any other data held by Google.

### **Browser plugin**

You can prevent these cookies being stored by selecting the appropriate settings in your browser. However, we wish to point out that doing so may mean you will not be able to enjoy the full functionality of this website. You can also prevent the data generated by cookies about your use of the website (incl. your IP address) from being passed to Google, and the processing of these data by Google, by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

### **Objecting to the collection of data**

You can prevent the collection of your data by Google Analytics by clicking on the following link. An opt-out cookie will be set to prevent your data from being collected on future visits to this site: [Disable Google Analytics](#).

For more information about how Google Analytics handles user data, see Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=en>.

### **Outsourced data processing**

We have entered into an agreement with Google for the outsourcing of our data processing and fully implement the strict requirements of the German data protection authorities when using Google Analytics.

### **Demographic data collection by Google Analytics**

This website uses Google Analytics' demographic features. This allows reports to be generated containing statements about the age, gender, and interests of site visitors. This data comes from interest-based advertising from Google and third-party visitor data. This collected data cannot be attributed to any specific individual person. You can disable this feature at any time by adjusting the ads settings in your Google account or you can forbid the collection of your data by Google Analytics as described in the section "Refusal of data collection".

### **WordPress Stats**

This website uses the WordPress Stats tool to perform statistical analyses of visitor traffic. This service is provided by Automattic Inc., 60 29th Street # 343, San Francisco, CA 94110-4929, USA.

WordPress Stats uses cookies that are stored on your computer and allow an analysis of the use of the website. The information generated by the cookies about the use of our website is stored on servers in the USA. Your IP address will be anonymized after processing and before storage.

WordPress Stats cookies remain on your device until you delete them.

The storage of "WordPress Stats" cookies is based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising.

You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. The functionality of our services may be limited when cookies are disabled.

You can object to the collection and use of your data at any time with future effect by clicking on this link and setting an opt-out cookie in your browser: <https://www.quantcast.com/opt-out/>.

If you delete the cookies on your computer, you will have to set the opt-out cookie again.

### **Google AdSense**



This website uses Google AdSense, a service for including advertisements from Google Inc. ("Google"). It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google AdSense uses so-called "cookies", which are text files stored in your computer that enable an analysis of the way you use the website. Google AdSense also uses so-called web beacons (invisible graphics). Through these web beacons, information such as the visitor traffic on these pages can be evaluated.

The information generated by cookies and web beacons relating to your use of this website (including your IP address), and delivery of advertising formats, is transmitted to a Google server in the US and stored there. This information can be passed on from Google to contracting parties of Google. However, Google will not merge your IP address with other data you have stored.

AdSense cookies are stored based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising.

You can prevent the installation of cookies by setting your browser software accordingly. Please be aware that in this case, you may not be able to make full use of all the features of this website. By using this website, you agree to the processing of data relating to you and collected by Google as described and for the purposes set out above.

### **Google Analytics Remarketing**

Our websites use the features of Google Analytics Remarketing combined with the cross-device capabilities of Google AdWords and DoubleClick. This service is provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA.

This feature makes it possible to link target audiences for promotional marketing created with Google Analytics Remarketing to the cross-device capabilities of Google AdWords and Google DoubleClick. This allows advertising to be displayed based on your personal interests, identified based on your previous usage and surfing behavior on one device (e.g. your mobile phone), on other devices (such as a tablet or computer).

Once you have given your consent, Google will associate your web and app browsing history with your Google Account for this purpose. That way, any device that signs in to your Google Account can use the same personalized promotional messaging.

To support this feature, Google Analytics collects Google-authenticated IDs of users that are temporarily linked to our Google Analytics data to define and create audiences for cross-device ad promotion.

You can permanently opt out of cross-device remarketing/targeting by turning off personalized advertising in your Google Account; follow this link: <https://www.google.com/settings/ads/onweb/>.

The aggregation of the data collected in your Google Account data is based solely on your consent, which you may give or withdraw from Google per Art. 6 (1) (a) DSGVO. For data collection operations not merged into your Google Account (for example, because you do not have a Google Account or have objected to the merge), the collection of data is based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing anonymous user behavior for promotional purposes.

For more information and the Google Privacy Policy, go to:  
<https://www.google.com/policies/technologies/ads/>.

### **Google AdWords and Google Conversion Tracking**

This website uses Google AdWords. AdWords is an online advertising program from Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, United States ("Google").

As part of Google AdWords, we use so-called conversion tracking. When you click on an ad served by Google, a conversion tracking cookie is set. Cookies are small text files that your internet browser stores on your computer. These cookies expire after 30 days and are not used for personal identification of the user. Should the user visit certain pages of the website and the cookie has not yet expired, Google and the website can tell that the user clicked on the ad and proceeded to that page.

Each Google AdWords advertiser has a different cookie. Thus, cookies cannot be tracked using the website of an AdWords advertiser. The information obtained using the conversion cookie is used to create conversion statistics for the AdWords advertisers who have opted for conversion tracking. Customers are told the total number of users who clicked on their ad and were redirected to a conversion tracking tag page. However, advertisers do not obtain any information that can be used to personally identify users. If you do not want to participate in tracking, you can opt-out of this by easily disabling the Google Conversion Tracking cookie by changing your browser settings. In doing so, you will not be included in the conversion tracking statistics.

Conversion cookies are stored based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising.

For more information about Google AdWords and Google Conversion Tracking, see the Google Privacy Policy: <https://www.google.de/policies/privacy/>.

You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. Disabling cookies may limit the functionality of this website.

## Google reCAPTCHA

We use "Google reCAPTCHA" (hereinafter "reCAPTCHA") on our websites. This service is provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA ("Google").

reCAPTCHA is used to check whether the data entered on our website (such as on a contact form) has been entered by a human or by an automated program. To do this, reCAPTCHA analyzes the behavior of the website visitor based on various characteristics. This analysis starts automatically as soon as the website visitor enters the website. For the analysis, reCAPTCHA evaluates various information (e.g. IP address, how long the visitor has been on the website, or mouse movements made by the user). The data collected during the analysis will be forwarded to Google.

The reCAPTCHA analyses take place completely in the background. Website visitors are not advised that such an analysis is taking place.

Data processing is based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in protecting its site from abusive automated crawling and spam.

For more information about Google reCAPTCHA and Google's privacy policy, please visit the following links: <https://www.google.com/intl/de/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

## Plugins and tools

### YouTube

Our website uses plugins from YouTube, which is operated by Google. The operator of the pages is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit one of our pages featuring a YouTube plugin, a connection to the YouTube servers is established. Here the YouTube server is informed about which of our pages you have visited.

If you're logged in to your YouTube account, YouTube allows you to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account.

YouTube is used to help make our website appealing. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO.

Further information about handling user data, can be found in the data protection declaration of YouTube under <https://www.google.de/intl/de/policies/privacy>.

### Vimeo

Our website uses features provided by the Vimeo video portal. This service is provided by Vimeo Inc., 555 West 18th Street, New York, New York 10011, USA.

If you visit one of our pages featuring a Vimeo plugin, a connection to the Vimeo servers is established. Here the Vimeo server is informed about which of our pages you have visited. In addition, Vimeo will receive your IP address. This also applies if you are not logged in to Vimeo when you visit our website or do not have a Vimeo account. The information is transmitted to a Vimeo server in the US, where it is stored.

If you are logged in to your Vimeo account, Vimeo allows you to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your Vimeo account.

For more information on how to handle user data, please refer to the Vimeo Privacy Policy at <https://vimeo.com/privacy>.

### **Google Web Fonts**

For uniform representation of fonts, this page uses web fonts provided by Google. When you open a page, your browser loads the required web fonts into your browser cache to display texts and fonts correctly.

When you call up a page of our website that contains a social plugin, your browser makes a direct connection with Google servers. Google thus becomes aware that our web page was accessed via your IP address. The use of Google Web fonts is done in the interest of a uniform and attractive presentation of our website. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO.

If your browser does not support web fonts, a standard font is used by your computer.

Further information about handling user data, can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy at <https://www.google.com/policies/privacy/>.

### **Google Maps**

This site uses the Google Maps map service via an API. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

To use Google Maps, it is necessary to save your IP address. This information is generally transmitted to a Google server in the USA and stored there. The provider of this site has no influence on this data transfer.

The use of Google Maps is in the interest of making our website appealing and to facilitate the location of places specified by us on the website. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO.

Further information about handling user data, can be found in the data protection declaration of Google at <https://www.google.de/intl/de/policies/privacy/>.