Our Data Privacy Policy

Personal data (usually referred to just as 'data' below) will only be processed by us to the extent necessary and for the purpose of providing a functional and user-friendly website, including its contents, and the services offered there.

Per Art. 4 No. 1 of Regulation (EU) 2016/679, i.e. the General Data Protection Regulation (hereinafter referred to as the 'GDPR'), 'processing' refers to any operation or set of operations such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, or combination, restriction, erasure, or destruction performed on personal data, whether by automated means or not.

The following privacy policy is intended to inform you in particular about the type, scope, purpose, duration, and legal basis for the processing of such data either under our own control or in conjunction with others. We also inform you below about the third-party components we use to optimize our website and improve the user experience which may result in said third parties also processing data they collect and control.

Our privacy policy is structured as follows:

- I. Information about us as controllers of your data
- II. The rights of users and data subjects
- III. Information about the data processing

I. Information about us as controllers of your data

The party responsible for this website (the 'controller') for purposes of data protection law is:

Bluefootedbooby Spices UG (haftungsbeschränkt)

The controller's data protection officer is: **Bodo Scheffels**

E: bodo.scheffels@bluefootedboobyspices.com

T: 040 / 8060 194-34

Pastoratsweg 4 25881 Tating

II. The rights of users and data subjects

With regard to the data processing to be described in more detail below, users and data subjects have the right

- to confirmation of whether data concerning them is being processed, information about the data being processed, further information about the nature of the data processing, and copies of the data (cf. also Art. 15 GDPR);
- to correct or complete incorrect or incomplete data (cf. also Art. 16 GDPR);
- to the immediate deletion of data concerning them (cf. also Art. 17 DSGVO), or, alternatively, if further processing is necessary as stipulated in Art. 17 Para. 3 GDPR, to restrict said processing per Art. 18 GDPR;
- to receive copies of the data concerning them and/or provided by them and to have the same transmitted to other providers/controllers (cf. also Art. 20 GDPR);
- to file complaints with the supervisory authority if they believe that data concerning them is being processed by the controller in breach of data protection provisions (see also Art. 77 GDPR).

In addition, the controller is obliged to inform all recipients to whom it discloses data of any such corrections, deletions, or restrictions placed on processing the same per Art. 16, 17 Para. 1, 18 GDPR. However, this obligation does not apply if such notification is impossible or involves a disproportionate effort. Nevertheless, users have a right to information about these recipients.

Likewise, under Art. 21 GDPR, users and data subjects have the right to object to the controller's future processing of their data pursuant to Art. 6 Para. 1 lit. f) GDPR. In particular, an objection to data processing for the purpose of direct advertising is permissible.

III. Information about the data processing

Your data processed when using our website will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations or unless otherwise stipulated below.

Cookie Manager

To obtain consent for the use of technically unnecessary cookies on the website, the provider uses a cookie manager.

When the website is called up, a cookie with the settings information is stored on the end device of the user so that the request for consent does not have to be made on a subsequent visit.

The cookie is required to obtain legally compliant user consent.

You can prevent cookies from being installed by adjusting the settings on your internet browser.

Cookies

a) Session cookies

We use cookies on our website. Cookies are small text files or other storage technologies stored on your computer by your browser. These cookies process certain specific information about you, such as your browser, location data, or IP address.

This processing makes our website more user-friendly, efficient, and secure, allowing us, for example, to display our website in different languages or to offer a shopping cart function.

The legal basis for such processing is Art. 6 Para. 1 lit. b) GDPR, insofar as these cookies are used to collect data to initiate or process contractual relationships.

If the processing does not serve to initiate or process a contract, our legitimate interest lies in improving the functionality of our website. The legal basis is then Art. 6 Para. 1 lit. f) GDPR.

When you close your browser, these session cookies are deleted.

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b) Third-party cookies

If necessary, our website may also use cookies from companies with whom we cooperate for the purpose of advertising, analyzing, or improving the features of our website.

Please refer to the following information for details, in particular for the legal basis and purpose of such third-party collection and processing of data collected through cookies.

c) Disabling cookies

You can refuse the use of cookies by changing the settings on your browser. Likewise, you can use the browser to delete cookies that have already been stored. However, the steps and measures required vary, depending on the browser you use. If you have any questions, please use the help function or consult the documentation for your browser or contact its maker for support. Browser settings cannot prevent so-called flash cookies from being set. Instead, you will need to change the setting of your Flash player. The steps and measures required for this also depend on the Flash player you are using. If you have any questions, please use the help function or consult the documentation for your Flash player or contact its maker for support.

If you prevent or restrict the installation of cookies, not all of the functions on our site may be fully usable.

Contact

If you contact us via email or the contact form, the data you provide will be used for the purpose of processing your request. We must have this data in order to process and answer your inquiry; otherwise we will not be able to answer it in full or at all.

The legal basis for this data processing is Art. 6 Para. 1 lit. b) GDPR.

Your data will be deleted once we have fully answered your inquiry and there is no further legal obligation to store your data, such as if an order or contract resulted therefrom.

Customer account/registration

If you create a customer account with us via our website, we will use the data you entered during registration (e.g. your name, your address, or your email address) exclusively for services leading up to your potential placement of an order or entering some other contractual relationship with us, to fulfill such

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orders or contracts, and to provide customer care (e.g. to provide you with an overview of your previous orders or to be able to offer you a wishlist function). We also store your IP address and the date and time of your registration. This data will not be transferred to third parties.

During the registration process, your consent will be obtained for this processing of your data, with reference made to this privacy policy. The data collected by us will be used exclusively to provide your customer account.

If you give your consent to this processing, Art. 6 Para. 1 lit. a) GDPR is the legal basis for this processing.

If the opening of the customer account is also intended to lead to the initiation of a contractual relationship with us or to fulfill an existing contract with us, the legal basis for this processing is also Art. 6 Para. 1 lit. b) GDPR.

You may revoke your prior consent to the processing of your personal data at any time under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent.

The data previously collected will then be deleted as soon as processing is no longer necessary. However, we must observe any retention periods required under tax and commercial law.

Newsletter and Enquiries

If you register for any free newsletter, or make an enquiry via the website 'contact-us' form the data requested from you for this purpose, i.e. your email address and, optionally, your name, address or contact details that you submit, will be sent to us. We also store the IP address of your computer and the date and time of your registration. During the registration process, we will obtain your consent to receive this newsletter and the type of content it will offer, with reference made to this privacy policy. The data collected will be used exclusively to send the newsletter and will not be passed on to third parties.

The legal basis for this is Art. 6 Para. 1 lit. a) GDPR.

You may revoke your prior consent to receive this newsletter under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent or click on the unsubscribe link contained in each newsletter.

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Order processing

The data you submit when ordering goods and/or services from us will have to be processed in order to fulfill your order. Please note that orders cannot be processed without providing this data.

The legal basis for this processing is Art. 6 Para. 1 lit. b) GDPR.

After your order has been completed, your personal data will be deleted, but only after the retention periods required by tax and commercial law.

In order to process your order, we will share your data with the shipping company responsible for delivery to the extent required to deliver your order and/or with the payment service provider to the extent required to process your payment.

The legal basis for the transfer of this data is Art. 6 Para. 1 lit. b) GDPR.

Facebook

To advertise our products and services as well as to communicate with interested parties or customers, we have a presence on the Facebook platform.

On this social media platform, we are jointly responsible with Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Irland.

The data protection officer of Facebook can be reached via this contact form:

https://www.facebook.com/help/contact/540977946302970

We have defined the joint responsibility in an agreement regarding the respective obligations within the meaning of the GDPR. This agreement, which sets out the reciprocal obligations, is available at the following link:

https://www.facebook.com/legal/terms/page_controller_addendum

The legal basis for the processing of the resulting and subsequently disclosed personal data is Art. 6 para. 1 lit. f GDPR. Our legitimate interest lies in the analysis, communication, sales, and promotion of our products and services.

The legal basis may also be your consent per Art. 6 para. 1 lit. a GDPR granted to the platform operator. Per Art. 7 para. 3 GDPR, you may revoke this consent with the platform operator at any time with future effect.

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When accessing our online presence on the Facebook platform, Facebook Ireland Ltd. as the operator of the platform in the EU will process your data (e.g. personal information, IP address, etc.).

This data of the user is used for statistical information on the use of our company presence on Facebook. Facebook Ireland Ltd. uses this data for market research and advertising purposes as well as for the creation of user profiles. Based on these profiles, Facebook Ireland Ltd. can provide advertising both within and outside of Facebook based on your interests. If you are logged into Facebook at the time you access our site, Facebook Ireland Ltd. will also link this data to your user account.

If you contact us via Facebook, the personal data your provide at that time will be used to process the request. We will delete this data once we have completely responded to your query, unless there are legal obligations to retain the data, such as for subsequent fulfillment of contracts.

Facebook Ireland Ltd. might also set cookies when processing your data.

If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your browser. Cookies that have already been saved can be deleted at any time. The instructions to do this depend on the browser and system being used. For Flash cookies, the processing cannot be prevented by the settings in your browser, but instead by making the appropriate settings in your Flash player. If you prevent or restrict the installation of cookies, not all of the functions of Facebook may be fully usable.

Details on the processing activities, their suppression, and the deletion of the data processed by Facebook can be found in its privacy policy:

https://www.facebook.com/privacy/explanation

It cannot be excluded that the processing by Facebook Ireland Ltd. will also take place in the United States by Meta Platforms, Inc., 1601 Willow Road, Menlo Park, California 94025.

Instagram

To advertise our products and services as well as to communicate with interested parties or customers, we have a presence on the Instagram platform.

On this social media platform, we are jointly responsible with Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Irland.

The data protection officer of Instagram can be reached via this contact form:

Data Privacy Policy

https://www.facebook.com/help/contact/540977946302970

We have defined the joint responsibility in an agreement regarding the respective obligations within the meaning of the GDPR. This agreement, which sets out the reciprocal obligations, is available at the following link:

https://www.facebook.com/legal/terms/page_controller_addendum

The legal basis for the processing of the resulting and subsequently disclosed personal data is Art. 6 para. 1 lit. f GDPR. Our legitimate interest lies in the analysis, communication, sales, and promotion of our products and services.

The legal basis may also be your consent per Art. 6 para. 1 lit. a GDPR granted to the platform operator. Per Art. 7 para. 3 GDPR, you may revoke this consent with the platform operator at any time with future effect.

When accessing our online presence on the Instagram platform, Facebook Ireland Ltd. as the operator of the platform in the EU will process your data (e.g. personal information, IP address, etc.).

This data of the user is used for statistical information on the use of our company presence on Instagram. Facebook Ireland Ltd. uses this data for market research and advertising purposes as well as for the creation of user profiles. Based on these profiles, Facebook Ireland Ltd. can provide advertising both within and outside of Instagram based on your interests. If you are logged into Instagram at the time you access our site, Facebook Ireland Ltd. will also link this data to your user account.

If you contact us via Instagram, the personal data your provide at that time will be used to process the request. We will delete this data once we have completely responded to your query, unless there are legal obligations to retain the data, such as for subsequent fulfillment of contracts.

Facebook Ireland Ltd. might also set cookies when processing your data.

If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your browser. Cookies that have already been saved can be deleted at any time. The instructions to do this depend on the browser and system being used. For Flash cookies, the processing cannot be prevented by the settings in your browser, but instead by making the appropriate settings in your Flash player. If you prevent or restrict the installation of cookies, not all of the functions of Instagram may be fully usable.

Details on the processing activities, their suppression, and the deletion of the data processed by Instagram can be found in its privacy policy:

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https://help.instagram.com/519522125107875

It cannot be excluded that the processing by Facebook Ireland Ltd. will also take place in the United States by Meta Platforms, Inc., 1601 Willow Road, Menlo Park, California 94025.

LinkedIn

We intend to maintain an online presence on LinkedIn to present our company and our services and to communicate with customers/prospects. LinkedIn is a service of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Irland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA.

We would like to point out that this might cause user data to be processed outside the European Union, particularly in the United States. This may increase risks for users that, for example, may make subsequent access to the user data more difficult. We also do not have access to this user data. Access is only available to LinkedIn.

The LinkedIn privacy policy can be found here:

https://www.linkedin.com/legal/privacy-policy

Pinterest

We may maintain an online presence on Pinterest to present our company and our services and to communicate with customers/prospects. Pinterest is a service of Pinterest Inc., 651 Brannan Street, San Francisco, CA, 94107, USA.

We would like to point out that this might cause user data to be processed outside the European Union, particularly in the United States. This may increase risks for users that, for example, may make subsequent access to the user data more difficult. We also do not have access to this user data. Access is only available to Pinterest.

The Pinterest privacy policy can be found here:

https://policy.pinterest.com/de/privacy-policy

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Twitter

We may maintain an online presence on Twitter to present our company and our services and to communicate with customers/prospects. Twitter is a service provided by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.

We would like to point out that this might cause user data to be processed outside the European Union, particularly in the United States. This may increase risks for users that, for example, may make subsequent access to the user data more difficult. We also do not have access to this user data. Access is only available to Twitter.

The privacy policy of Twitter can be found at

https://twitter.com/privacy

YouTube

We may maintain an online presence on YouTube to present our company and our services and to communicate with customers/prospects. YouTube is a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, a subsidiary of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043 USA.

We would like to point out that this might cause user data to be processed outside the European Union, particularly in the United States. This may increase risks for users that, for example, may make subsequent access to the user data more difficult. We also do not have access to this user data. Access is only available to YouTube.

The YouTube privacy policy can be found here:

https://policies.google.com/privacy

General introduction

Facebook

Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, a subsidiary of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA.

Privacy Policy: https://www.facebook.com/policy.php

Instagram

Data Privacy Policy

Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, a subsidiary of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA.

Privacy Policy: https://help.instagram.com/519522125107875

LinkedIn

LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Irland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085 USA.

Privacy Policy: https://www.linkedin.com/legal/privacy-policy

Pinterest

Pinterest Inc., 651 Brannan Street, San Francisco, CA, 94107, USA.

Privacy Policy: https://policy.pinterest.com/de/privacy-policy

twitter

Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA

Privacy Policy: https://twitter.com/privacy

YouTube

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland, a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA

Privacy Policy: https://policies.google.com/privacy

Facebook & Instagram plug-in

Our website uses the plug-in of for Social Media feeds from Facebook and Instagram social network. Facebook.com and Instagram.com are services provided by Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Irland.

In case you have granted your consent to this processing the legal basis is Article 6 para. 1 lit. a GDPR. The legal basis can also be Article 6 para. 1 lit. f GDPR. Our legitimate interest lies in improving the quality of our website.

Further information about the possible plug-ins and their respective functions is available from Smash Balloon at

https://smashballoon.com/
and https://developers.facebook.com/docs/plugins/

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If the plug-in is stored on one of the pages you visit on our website, your browser will download an icon for the plug-in from Facebook's servers in the USA. For technical reasons, it is necessary for Facebook to process your IP address. In addition, the date and time of your visit to our website will also be recorded.

If you are logged in to Facebook while visiting one of our plugged-in websites, the information collected by the plug-in from your specific visit will be recognized by Facebook. The information collected may then be assigned to your personal account at Facebook. If, for example, you use the Facebook Like button, this information will be stored in your Facebook account and published on the Facebook platform. If you want to prevent this, you must either log out of Facebook before visiting our website or use an add-on for your browser to prevent the Facebook plug-in from loading.

Further information about the collection and use of data as well as your rights and protection options in Facebook's privacy policy found at

https://www.facebook.com/policy.php

Google Analytics

We use Google Analytics on our website. This is a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland (hereinafter: Google).

The Google Analytics service is used to analyze how our website is used. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site.

Usage and user-related information, such as IP address, place, time, or frequency of your visits to our website will be transmitted to a Google server in the United States and stored there. However, we use Google Analytics with the so-called anonymization function, whereby Google truncates the IP address within the EU or the EEA before it is transmitted to the US.

The data collected in this way is in turn used by Google to provide us with an evaluation of visits to our website and what visitors do once there. This data can also be used to provide other services related to the use of our website and of the internet in general.

Google states that it will not connect your IP address to other data. In addition, Google provides further information with regard to its data protection practices at

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https://www.google.com/intl/de/policies/privacy/partners, including options you can exercise to prevent such use of your data.

In addition, Google offers an opt-out add-on at

https://tools.google.com/dlpage/gaoptout?hl=en

in addition with further information. This add-on can be installed on the most popular browsers and offers you further control over the data that Google collects when you visit our website. The add-on informs Google Analytics' JavaScript (ga.js) that no information about the website visit should be transmitted to Google Analytics. However, this does not prevent information from being transmitted to us or to other web analytics services we may use as detailed herein.

Google Fonts

Our website uses Google Fonts to display external fonts. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland (hereinafter: Google).

To enable the display of certain fonts on our website, a connection to the Google server in the USA is established whenever our website is accessed.

The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the optimization and economic operation of our site.

When you access our site, a connection to Google is established from which Google can identify the site from which your request has been sent and to which IP address the fonts are being transmitted for display.

Google offers detailed information at

https://adssettings.google.com/authenticated https://policies.google.com/privacy in particular on options for preventing the use of data.

jQuery CDN

We use the service jQuery CDN, a Content Delivery Network ('CDN'), on our website to optimise the retrieval speed, the design and presentation of the content of our website on different devices.

This is a service of the jQuery Foundation, hereinafter referred to as "jQuery". jQuery is distributed for the JS Foundation via the StackPath CDN.

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In order to be able to deliver the content of our website quickly, the service uses so-called JavaScript libraries. Relevant files are loaded from the CDN server if they are not already available in your browser cache when you visit another website. In the case of a connection to the CDN server, your IP address is recorded. It cannot be ruled out that a connection will be established to a server outside the EU.

The legal basis is Art. 6 para. 1 lit. f) GDPR. Our legitimate interest lies in speeding up loading times and protecting our website, as well as in analysing and optimising our website.

To totally prevent the execution of jQuery's JavaScript code, you can install a so-called JavaScript blocker, such as noscript.net or ghostery.com. . If you were to prevent or restrict the execution of the Java Script code, this can mean that for technical reasons not all the content and functions of our website may be available.

Use of PayPal as a payment method

If you decide to pay with the online payment service provider PayPal during your order process, your contact data is transmitted to PayPal as part of the order thus triggered. PayPal is an offer of PayPal (Europe) S.à.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg. PayPal thereby assumes the function of an online payment service provider and a trustee and offers buyer protection services.

The personal data transmitted to PayPal is mostly first name, last name, address, telephone number, IP address, e-mail address, or other data, which is required for order processing, as well as data related to the order, such as the number of items, item number, invoice amount and tax percentage, billing information, etc.

This transmission is necessary to process your order with the payment method you have selected, in particular to confirm your identity, to administer your payment and the customer relationship. Your data is therefore transmitted to PayPal on the basis of Article 6 para. 1 lit. b GDPR.

However, please note: PayPal may transfer the personal data to service providers, to subcontractors or other affiliated companies, to the extent necessary to fulfill the contractual obligations arising from your order or to process the data in the order on your behalf.

Depending on the payment method selected via PayPal, e.g., invoice or direct debit, the personal data transmitted to PayPal will be transmitted to credit agencies by PayPal. This transmission is used to check your identity and

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creditworthiness in relation to the order you have placed. For information on which credit agencies are involved and which data is generally collected, processed, saved and forwarded by PayPal, please refer to PayPal's data protection statement at https://www.paypal.com/de/webapps/mpp/ua/privacyfull

Google AdWords with Conversion Tracking

Our website uses Google AdWords and conversion tracking. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland (hereinafter: Google).

We use conversion tracking to provide targeted promotion of our site. In case you have granted your consent to this processing the legal basis is Article 6 para. 1 lit. a GDPR. The legal basis can also be Article 6 para. 1 lit. f GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site.

If you click on an ad placed by Google, the conversion tracking we use stores a cookie on your device. These so-called conversion cookies expire after 30 days and do not otherwise identify you personally.

If the cookie is still valid and you visit a specific page of our website, both we and Google can evaluate that you clicked on one of our ads placed on Google and that you were then forwarded to our website.

The data collected in this way is in turn used by Google to provide us with an evaluation of visits to our website and what visitors do once there. In addition, we receive information about the number of users who clicked on our advertisement(s) as well as about the pages on our site that are subsequently visited. Neither we nor third parties who also use Google AdWords will be able to identify you from this conversion tracking.

You can also prevent or restrict the installation of cookies by making the appropriate settings in your browser. Likewise, you can use the browser to delete cookies that have already been stored. However, the steps and measures required vary, depending on the browser you use. If you have any questions, please use the help function or consult the documentation for your browser or contact its maker for support.

In addition, Google provides further information with regard to its data protection practices at

https://services.google.com/sitestats/de.html

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https://www.google.com/policies/technologies/ads/ http://www.google.de/policies/privacy/

in particular information on how you can prevent the use of your data.

Google Remarketing

We use the remarketing function on our website. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Irland (hereinafter: Google).

We use this feature to deliver interest-based, personalized advertising on thirdparty websites that also participate in Google's advertising network.

In case you have granted your consent to this processing the legal basis is Article 6 para. 1 lit. a GDPR. The legal basis can also be Article 6 para. 1 lit. f GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site.

To allow this advertising service to function, Google stores a cookie with a sequence of numbers on your device via your browser when you visit our website. This cookie records both your visit and the use of our website in anonymous form. However, personal data will not be passed on. If you subsequently visit a third-party website that also uses the Google advertising network, advertising may appear that refers to our website or our offers there.

To permanently disable this feature, Google provides a browser plugin for most common browsers at

https://www.google.com/settings/ads/plugin?hl=de Likewise, the use of cookies from certain providers, e.g. via

http://www.youronlinechoices.com/uk/your-ad-choices/ or

http://www.networkadvertising.org/choices/can be deactivated by opt-out.

Bluefootedbooby Spices UG Data Privacy Policy Security & Backup of Data

Our website is hosted on a server that is protected from hacking and malware and is monitored at all times for a breach of security.

We maintain daily Backups and moves one of the daily Backups to an online secure and encrypted storage facility.

Our maintenance and monitoring procedures ensure a consistent and effective approach to the management of Security and/or Privacy Events or Incidents, including a Data Breach.

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