

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:

Starbet Ltd
Cornerline
Dun Karm Street
Birkirkara, BKR 9039
Malta
E-Mail: privacy@starbet.com

The controller's data protection officer is:

Kim Hoong Chin

Innsbrucker Strasse 68
6176 Völs
Austria

Telephone: +43 512 563279
Email: privacy@starbet.com

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.

Server data

For technical reasons, the following data sent by your internet browser to us or to our server provider will be collected, especially to ensure a secure and stable website: These server log files record the type and version of your browser, operating system, the website from which you came (referrer URL), the webpages on our site visited, the date and time of your visit, as well as the IP address from which you visited our site.

The data thus collected will be temporarily stored, but not in association with any other of your data.

The basis for this storage is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the improvement, stability, functionality, and security of our website.

The data will be deleted within no more than seven days, unless continued storage is required for evidentiary purposes. In which case, all or part of the data will be excluded from deletion until the investigation of the relevant incident is finally resolved.

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.

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.

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.

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 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.

Credit checks and scores

If you accept any offer we make for you to pay for goods or services on account, we reserve the right to run a credit check with a credit bureau (such as Creditreform, Schufa, Bürgel, or infoscore) to obtain credit information determined on the basis of mathematical-statistical methods. For this purpose, any data you provide that is relevant to the contract, such as your name and address, will be forwarded to the credit bureau. We then use the information obtained about the statistical probability of default to decide whether we will offer you payment on account.

The legal basis for such processing is our legitimate interest to avoid default on our account per Art. 6 Para.1 lit. f) GDPR.

Newsletter

If you register for our free newsletter, the data requested from you for this purpose, i.e. your email address and, optionally, your name and address, 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.

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.

User posts, comments, and ratings

We offer you the opportunity to post questions, answers, opinions, and ratings on our website, hereinafter referred to jointly as "posts." If you make use of this opportunity, we will process and publish your post, the date and time you submitted it, and any pseudonym you may have used.

The legal basis for this is Art. 6 Para. 1 lit. a) GDPR. You may revoke your prior consent under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent.

In addition, we will also process your IP address and email address. The IP address is processed because we might have a legitimate interest in taking or supporting further action if your post infringes the rights of third parties and/or is otherwise unlawful.

In this case, the legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in any legal defense we may have to mount.

Follow-up comments

If you make posts on our website, we also offer you the opportunity to subscribe to any subsequent follow-up comments made by third parties. In order to be able to inform you about these follow-up comments, we will need to process your email address.

The legal basis for this is Art. 6 Para. 1 lit. a) GDPR. You may revoke your prior consent to this subscription 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 email.

Contests

We offer you the opportunity to take part in contests on our website. If you participate in one of our competitions, the data you provide when you enter will be processed without your further consent, but only to run the contest.

As part of the competition, we will pass on your data to the transport company entrusted with the delivery of the goods or to a financial service provider if the transfer is necessary for the delivery or payment of your winnings. If you win and your information is to be published, you will be informed of this in the declaration of consent.

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

Your consent to the processing of your data for participation in our competitions may be exercised in accordance with Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent.

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, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

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

<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 reCAPTCHA

Our website uses Google reCAPTCHA to check and prevent automated servers ("bots") from accessing and interacting with our website. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

This service allows Google to determine from which website your request has been sent and from which IP address the reCAPTCHA input box has been used. In addition to your IP address, Google may collect other information necessary to provide and guarantee this service.

The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the security of our website and in the prevention of unwanted, automated access in the form of spam or similar.

Google offers detailed information at

<https://policies.google.com/privacy>

concerning the general handling of your user data.

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, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

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.

FontAwesome

In order to be able to display fonts and visual elements of our website, we use FontAwesome's external fonts. FontAwesome is a service of

Fonticons Inc., 6 Porter Road, Apartment 3R, Cambridge, MA 02140, USA, hereinafter referred to as "FontAwesome".

When you access our website, a connection is established to the FontAwesome server in the USA in order to enable and update the display of fonts and visual elements.

The legal basis is Art. 6 para. 1 lit. f) GDPR. Our legitimate interest lies in the optimisation and economic operation of our website.

By connecting to the FontAwesome server when you access our website, FontAwesome can determine from which website your request was sent and to which IP address the font should be sent.

At

<https://fontawesome.com/privacy>

FontAwesome offers further information, in particular on the options for preventing data use.

GOOGLE Custom Search Engine ("CSE")

For full-text search on the website, we use the Google Custom Search Engine (CSE). CSE is a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, hereinafter Google.

Google is certified under the EU-US Privacy Shield, thereby ensuring compliance with EU data protection regulations when processing data in the US.

<https://www.privacyshield.gov/participant?id=a2zt0000000001L5AAI&status=Active>

CSE makes it possible to do a full-text search for content on our website. Access to this search function is via the Google Custom Search search box.

The legal basis for this processing of data is [Art. 6 para. 1 lit. f GDPR](#). Our legitimate interest is in the user-friendliness of the website.

The feature is integrated into website without modification as a software module from Google. If the search is activated by entering a search term, Google uses a plug-in to load the information you are looking for. At the same time, the search terms you enter and your IP address are transmitted to Google in order to perform the search and display the search results.

If you are logged into your existing Google Account at the time of the search, Google may associate the collected information with your user profile.

Google offers further information, in particular your options to prevent this use of your data, at the following links:

<https://policies.google.com/privacy>

<https://adssettings.google.com/authenticated>

CloudFlare

To secure our website and to optimize loading times, we use the CloudFlare CDN (content delivery network). This is a service of Cloudflare Inc., 101 Townsend Street, San Francisco, California 94107, USA, hereinafter referred to as "CloudFlare".

Through certification according to the EU-US Privacy Shield

(<https://www.privacyshield.gov/participant?id=a2zt0000000GnZKAA0&status=Active>)

CloudFlare guarantees that it will follow the EU's data protection regulations when processing data in the United States.

The legal basis for collecting and processing this information is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the secure operation of our website and in its optimization.

If you access our website, your queries are forwarded to CloudFlare servers. Statistical access data about your visit to our website is collected and CloudFlare stores a cookie on your terminal device via your browser. Access data includes

- your IP address;
- the page(s) on our site that you access;
- type and version of internet browser you are using;
- your operating system;
- the website from which you came prior to visiting our website (referrer URL);
- your length of stay on our site; and
- the frequency with which our pages are accessed.

The data is used by CloudFlare for statistical evaluations of the accesses as well as for the security and optimization of the offer.

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. Further details can be found in the section about cookies above.

CloudFlare offers further information about its data collection and processing as well your rights and your options for protecting your privacy at this link:

<https://www.cloudflare.com/privacypolicy/>.

BootstrapCDN

We use the service BootstrapCDN, a content delivery network ("CDN"), on our website to optimise the speed of retrieval, the design and presentation of the contents of our website on different devices. This is a service of StackPath, LLC, 2021 McKinney Ave. Suite 1100, Dallas, TX 75201, USA, hereinafter simply referred to as "BootstrapCDN".

In order to be able to deliver the content of our website quickly, the service uses so-called JavaScript libraries. Corresponding files are loaded from a BootstrapCDN server that records your IP address.

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt0000000CbahAAC&status=Active>

BootstrapCDN guarantees that it will follow the EU's data protection regulations also when processing data in the United States.

At

<https://www.stackpath.com/legal/master-service-agreement/#privacy>

Prospectone Sp.z.o.o. offers further data protection information.

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 BootstrapCDN'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 JavaScript code, this can mean that for technical reasons not all the content and functions of our website may be available.

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.

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 JavaScript code, this can mean that for technical reasons not all the content and functions of our website may be available.

affilinet tracking cookies

We also advertise third-party offers and services on our website. If you enter into a contract with the third party after viewing our advertising for these third party offers, we will receive a commission for this referral.

We use the affilinet tracking cookie to record this successful conversion. However, this cookie does not store any of your personal data. Only our identification number as the affiliate advertiser and the serial number of the advertising material you clicked on (e.g. a banner or a text link) are recorded. We need this information for the purpose of processing and/or receiving payment of our commissions.

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. Further details can be found in the section about cookies above.

LiveChat

We use the LiveChat service on our website for analytics purposes and as our live chat system. This is a service of LiveChat Inc., 1 International Pl, STE 1400 Boston, MA 02110 - 2619, USA, which is operated in the European Union by LiveChat Software SA. ul. Zwycięska 47, 53 - 033 Wrocław, Poland, hereinafter referred to as "LiveChat".

Through certification according to the EU-US Privacy Shield

(<https://www.privacyshield.gov/participant?id=a2zt0000000L16xAAC&status=Active>)

LiveChat guarantees that it will follow the EU's data protection regulations when processing data in the United States.

The legal basis for collecting and processing this information is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the effective and direct support of our customers and interested parties as well as the statistical analysis of visitor behavior for the purpose of optimizing and operating our website economically.

For statistical analysis of visitor behavior and operation of the live chat system, LiveChat stores a cookie on your terminal device via your browser. This cookie processes the anonymized data and creates a pseudonymized user profile. However, the data collected will not be used for your personal identification.

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. Further details can be found in the section about cookies above.

LiveChat offers further information about its data collection and processing as well your rights and your options for protecting your privacy at this link:

<https://www.livechatinc.com/legal/privacy-policy/#main>.

Klarna „CHECK-OUT“

To process orders through our online shop, we use the payment service of Klarna Bank AB, Sveavägen 46, 111 34 Stockholm, Sweden, hereinafter referred to as "Klarna", on our website.

For this purpose, we have integrated Klarna's check-out into the final order page of our online shop.

The legal basis is the fulfilment of the contract according to Art. 6 Para. 1 lit. b.) EU General Data Protection Regulation (GDPR). In addition, we have a legitimate interest in offering effective and secure payment options, so that another legal basis ensues from Art. 6 para. 1 lit f.) GDPR.

By integrating Klarna, your internet browser loads the check-out page from a Klarna server. This means that the operating system you are using, type and version of your Internet browser, website from which the check-out has been requested, date and time of the call and the IP address are sent to Klarna - even without your interaction with the check-out page.

As soon as you complete the order in our online shop, the data you have entered in the input fields of the check-out page will be processed by Klarna at your own responsibility in order to process the payment.

With the offered payment methods "PayPal" and "Advance Payment", processing without your further consent is limited to the transfer of the payment data to us or PayPal.

With the offered payment methods of "Purchase on Account", "Hire Purchase", "Credit Card", "Direct Debit" or "Immediate Payment", the following personal data is processed by Klarna for the purpose of payment processing and for identity and credit checking:

- Contact information such as names, addresses, date of birth, gender, email address, telephone number, mobile phone number, IP address, etc.
- Information on the processing of the order, such as product type, product number, price, etc.
- Payment information, such as debit and credit card data (card number, expiry date and CCV code), invoice data, account number, etc.

If you choose the payment method "Purchase on Account" or "Hire Purchase", Klarna collects and uses personal data and information about your previous payment behaviour to decide whether you will be granted the desired payment method. In addition, probability values for your future payment behaviour (so-called scoring) are used. Scoring is calculated on the basis of scientifically recognized mathematical and statistical methods.

At

https://cdn.klarna.com/1.0/shared/content/policy/data/de_de/data_protection.pdf

Klarna provides further information on the processing described above as well as the applicable data protection regulations.