

Data Protection

We are pleased that you are interested in our website. Protecting your privacy is very important to us. For Hoffmann, guarding the information and data entrusted to us is part of our corporate responsibility. To make sure that you feel safe when visiting our web pages, we adhere strictly to the statutory provisions when processing your personal data. Below we will provide you with detailed information about how we handle your data.

1. Who is responsible for processing my data?

1.1. When visiting this website

The responsible party (controller) when processing your data during your visit to this website is A.R Brownlow Ltd, South City Link Road, Cork, Ireland.

You can contact the Data Protection Officer by post at the address stated above, attn.: Data Protection Officer, or by email to: dataprotection@hoffmann-group.com.

1.2. For contractual performance and services

Some of the services presented to you on this website are not provided by Hoffmann SE itself, rather by the Hoffmann Group company responsible for the particular services and offerings at local level. The competent Hoffmann group company will be responsible for processing your personal data when you commission the services or offerings of a local Hoffmann Group company via this website (e.g. placing an order, services, customer support).

Hoffmann SE is always responsible for orders and service requests from consumers.

In most cases the Hoffmann Group company responsible at the place of delivery will be responsible for orders and service requests from corporate customers. The details provided in the order and contractual documents are authoritative for orders. In most cases the Hoffmann Group company responsible for the specific location will be responsible for services and enquiries with reference to a particular location.

For an overview of the Hoffmann Group companies, their local responsibilities and the contact details for the individual Data Protection Officers, [click here](#).

Where necessary, Hoffmann SE will transfer the data collected from you to the Hoffmann Group company responsible for you if you order performances and services from Hoffmann Group companies via this website.

2. When does Hoffmann collect data about you?

2.1. When visiting the website

We collect data to a limited extent in order to accept and process your orders and to send you offers that reflect your needs. You can visit our web pages without providing personal details. We save technical access data in server log files, e.g. the name of the requested file, the data and time of access, the data volume transferred and the Internet service provider. This data is used exclusively to ensure smooth operation of the website and to improve our offering.

We collect personal information in particular

- when you place an order in our web shop
- when you register a personal customer account
- when you subscribe to our newsletter
- when you use our contact and service enquiry form
- when you contact us by email.

The individual input forms state which information is collected. We use the data you provide for contractual performance, to provide the services and to process your enquiries.

2.2. Newsletter Subscription

You have the possibility to order our newsletter, in which we inform you regularly about special offers. To order our newsletter we use the opt-in procedure, i.e. we will only send you the newsletter by e-mail if you subscribe the newsletter. We will save your e-mail address, the time of registration and the IP address used for registration until you unsubscribe from the newsletter. The sole purpose of storing your e-mail address is to send you the newsletter and to provide proof of your registration.

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You are entitled to revoke your consent at any time, effective for the future. You may unsubscribe from our newsletter at any time, either by sending a message to the contact address above or by clicking on the unsubscribe link in the email.

The legal basis for data processing is your consent pursuant to Art. 6 Paragraph 1 Point a GDPR.

2.3. Webinar / Whitepaper

Our webinars are computer-based and software supported. We use the GoToWebinar software from LogMeIn Ireland Limited, Bloodstone Building Block C, 70 Sir John Rogerson's Quay, Dublin 2, Ireland. LogMeIn, Inc. is responsible for providing this service and the associated data processing. In order for the webinar to take place, we transmit your login and customer data to LogMeIn Inc. In particular, the following data is processed: Name, surname, email address, webinar ID.

We have a contract with LogMeIn to deliver this service and fully implement the strict requirements set down by the German data protection authorities when using GoToWebinar. If a transfer to an unsafe third country takes place, this is done on the basis of Art. 49 (1) a) GDPR.

You can find LogMeIn privacy policy here: <https://www.logmeininc.com/de/legal/privacy>.

Personal data you provide is processed for the purposes of preparing and implementing the webinar that you wish to participate in. This processing is required in order to fulfil the contract according to Art. 6 (1) (b) GDPR.

Your personal data will be deleted upon termination of the contract and in accordance with the legally required data retention obligations.

If you wish to participate in one of our free webinars or download a free whitepaper or similar publication, you must subscribe to our newsletter. Subscribing to the newsletter and sending your email address is considered as compensation for provision of the free webinar / whitepaper.

At the same time, personalised profiles are created in order to provide you with better online offers relating to your personal interests. The legal basis for processing your data in this regard is Art. 6 (1) (a) GDPR.

The information under 2.2 Newsletter subscription also applies.

2.4. Contact us

You have several possibilities to get in contact with us. These include the contact form and contacting us by e-mail. In this context we process data exclusively for the purpose of communicating with you. The legal basis is Art. 6 Paragraph 1 Point b GDPR. To answer your questions quickly, we use the Live Preview setting. The data collected by us when using the contact form will be automatically deleted after your inquiry has been completely processed, unless we still need your inquiry to fulfil contractual or legal obligations.

3. How does Hoffmann use the data?

3.1. For the performance of contractual obligations (Art. 6 Paragraph 1 Point b GDPR)

Hoffmann uses your data for the purpose of offering you the best possible shopping and service experience. In doing so we treat your data responsibly. In particular Hoffmann SE and the Hoffmann Group companies use your data to

- fulfil your order
- process your service enquiry

Where a Hoffmann Group company is responsible for your order or service enquiry, we will pass on our data to the Hoffmann Group responsible for you.

Where it is necessary for the delivery of ordered products, we, i.e. the responsible Hoffmann Group company, will pass on your data to the transport company entrusted with shipping for the purpose of contractual performance. Depending on the payment service provider you select in the order process, we, i.e. the responsible Hoffmann Group company, will pass on the payment data collected for the fulfilment of payment to the banking institution authorised for payment or to the payment service provider, i.e. the payment service, commissioned by us. In some cases the selected payment service providers will collect this data themselves when you register an account with them (e.g. for payment by PayPal). In this case you will be requested to log in to the payment services provider during the order process. The Privacy Policy of the particular payment service provider will apply in these cases.

3.2. Through balancing of legitimate interests (Art. 6 Paragraph 1 Point f GDPR)

We are also entitled to use your data where it is necessary for the purposes of our legitimate, usually commercial, interests or the legitimate interests of third parties, whereby we will process the data in a pseudonymised or anonymised form where possible. This takes place for the following purposes:

- to monitor and improve the efficiency and legal compliance of business processes

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- to check creditworthiness
- to monitor, optimise and enhance services and products
- to conduct advertising (e.g. postal advertising, re-targeting), as well as for market and opinion research
- to exercise legal claims and for defence in legal disputes
- to detect, prevent and clarify criminal acts
- to guarantee the security and operability of our IT systems
- Implementation of customer satisfaction surveys by e-mail

3.3. Based on your consent (Art. 6 Paragraph 1 Point a GDPR)

Where you have given consent to the processing of your data, processing shall be lawful on the basis of consent in each case. This applies in particular to any consent you provide to contact for advertising purposes by telephone or email.

You are entitled to revoke your consent at any time, effective for the future. You may unsubscribe from our newsletter at any time, either by sending a message to the contact address above or by clicking on the unsubscribe link in the email.

3.4. For the fulfilment of legal obligations (Art. 6 Paragraph 1 Point c GDPR)

We are required to comply with a number of legal obligations, e.g. statutory retention periods for business records and provisions under export law.

4. Transfer of your data

Where it is necessary to commission the services of external providers (hosting providers, shipping services, etc.) for the operation of this website or for performances by the Hoffmann Group companies, or where a different Hoffmann Group company is responsible for processing, the respective enterprise will only receive your data in the scope that is necessary for the fulfilment of their task and function.

Where this service provider and the Hoffmann Group company process your data outside of the European Union, your data may be transferred to a country that does not uphold the same data protection standards as the European Union. We ensure in these cases that the recipient of your data is required by contract or by other means to adhere to a data protection standard equivalent to that of the European Union.

5. How does Hoffmann use your data for postal advertising?

Insofar as it is permitted by law, Hoffmann SE, i.e. the Hoffmann Group company responsible for you, reserves the right to process your data for the purpose of direct postal advertising, even without your consent. This includes the analysis of your data (e.g. master data, order data, access data) to identify your potential interest in our products and services. Analysis is conducted using statistical methods based on current customer data and generally available insight into our customers. The results are used to contact you in a targeted manner to reflect your needs and to send you relevant offerings.

This serves to safeguard our legitimate interests, which outweigh the interests of our clients, in addressing them in advertising in accordance with Art. 6 Paragraph 1 Point f GDPR.

You are entitled to object to the processing of your data for this form of advertising at any time. This applies also to profiling insofar as it is associated with this form of direct advertising. You may send your objection to the contact details above, i.e. to the Hoffmann Group company responsible in your case.

6. How does Hoffmann use your data for voucher campaigns?

Hoffmann customers benefit from various voucher and discount offers. If you have agreed to the promotional use of your data, we will inform you about voucher campaigns in the newsletter, by e-mail or by post. In addition, Hoffmann has a legitimate interest in sending personalised vouchers and discounts to existing customers in accordance with Art. 6 Paragraph 1 Point f DSGVO. We process your data within the scope of your voucher redemption. If you redeem personalised voucher codes in your customer account in the web shop, the data will be merged with your personal data.

You are entitled to object to the processing of your data for advertising purposes or revoke your consent at any time at dataprotection@hoffmann-group.com.

7. When does Hoffmann conduct creditworthiness and score checks?

Where Hoffmann SE, i.e. the Hoffmann Group company responsible for you, incurs costs in advance, e.g. in the case of ordering on account, the respective company reserves the right, for the protection of its legitimate interests, to obtain an identity and creditworthiness check from a specialised services company (credit agencies), i.e. to predicate the agreement to certain terms of payment on the completion of a creditworthiness check. The creditworthiness information

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may contain probability values (score values) that are calculated according to scientifically substantiated, mathematical and statistical methods and whose calculation may involve the inclusion of other address data. We use the information we receive on the statistical probability of payment default to make a balanced decision on the establishment, execution or termination of the contractual relationship. Your legitimate interests are considered in accordance with the statutory provisions.

For an overview of the credit agencies commissioned by Hoffmann SE, i.e. the Hoffmann Group companies respectively, and for any additional, specific information on data processing by the respective Group company, click [here](#).

8. Why does this website use cookies?

We use cookies on some pages to make your visit to our website more attractive and to enable the use of certain functions. Cookies are small text files that are placed on your device. Some of the cookies we use are deleted at the end of your browser session, so when you close the browser (session cookies). Other cookies remain on your device and allow us to recognise your browser on your next visit (persistent cookies). You can adjust your browser settings to receive an alert when a cookie is placed and to decide individually whether to accept, to accept cookies only in certain cases or to block cookies altogether. You may not be able to use all of the website functions if you block cookies.

Most browsers (refer to the Help tab in the browser taskbar) can be adjusted to block new cookies, to send you an alert when a new cookie is placed or to disable all cookies you have received. Refer to the operating instructions of your smartphone, tablet and other mobile or stationary devices to learn more about adjusting your settings.

We advise you nevertheless to accept the cookie function completely, as we are only able to improve our web pages to suit your needs through the use of cookies. Our cookies do not store sensitive data like passwords, credit card data or similar. They do not damage your device and do not contain viruses.

Cookies that are necessary for the purpose of electronic communication or to provide certain functions requested by you (e.g. weather forecast enquiries) are placed on your device on the basis of Art. 6 Paragraph 1 Point f GDPR. The website operator has a legitimate interest in placing cookies on your device for the purpose of error-free and optimised provision of its services. Where other cookies (e.g. cookies to analyse your Internet habits) are placed on your device, they are dealt with separately in this Privacy Policy.

9. Re-Targeting

9.1. Legal basis

If you have consented to the setting of statistics and personalisation cookies, the collection, storage and evaluation of the following cookies/pixels is based on Art. 6 Paragraph 1 Point a of the GDPR. Of course, you can revoke your consent at any time under "Cookies" in the footer of this website.

9.2. Re-Targeting Peerius

Data is stored for marketing and optimisation purposes on this website using technologies provided by Peerius Ltd. (<http://www.peerius.com>). This data enables us to tailor our webpages to your specific interests and offer you a personalised service. This is achieved by analysing your behaviour based on the products in our shop that you have shown an interest in. None of the data will be disclosed to third parties. This data is collected using so-called "cookies". Cookies are small text files that are stored on your computer or mobile device. These cookies enable us to recognise your browser when you revisit our website. If you do not wish to use our personalised website service, you can either delete any cookies stored on your device(s) after visiting our website or configure your web browser to generally not store cookies on your computer.

Peerius's privacy statement: <https://www.episerver.com/legal/privacy-statement/>

10. Which web analysis services does Hoffmann use, and why?

10.1. Legal basis and overview of cookies used

If you have consented to the setting of statistics (analysis) and personalisation (marketing) cookies, the collection, storage and evaluation of the cookies listed below will be carried out on the basis of Art. 6 Paragraph 1 Point a GDPR. Of course, you can revoke your consent at any time under "Cookies" in the footer of this website.

Overview of the statistics and personalisation cookies used:

- 10.2. Google (Universal) Analytics
- 10.3. Econda
- 10.4. Dynatrace
- 10.5. Campaign Manager (formerly DoubleClick by Google)

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- 10.6. Commerce Connector – Conversion Tracking
- 10.7. Kameleoon
- 10.8. Microsoft 365 Marketing
- 10.9. Microsoft Clarity

10.2. Web analysis service by Google (Universal) Analytics

This website uses Google (Universal) Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (www.google.de). Google (Universal) Analytics uses "cookies", which are text files placed on your computer, and other methods to help the website analyse how you use the site. The information generated by the cookie about your use of the website will generally be transmitted to and stored by Google on servers in the United States. In case IP anonymisation is activated on this website, your IP address will be truncated by Google within the area of Member States of the European Union or in other countries which are party to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the United States and truncated there. The IP address transferred by your browser during the use of Google Analytics will not be associated with any other data held by Google.

You can prevent the collection of data generated by the cookie and related to the usage of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

In addition to the browser plug-in, you can also opt out from being tracked by Google Analytics on this website in future by clicking on this [link](#). By doing so, an opt-out cookie will be placed on your device. If you delete your cookies, you must click the link again.

10.3. Web analysis service by econda

This website uses technologies by econda GmbH (www.econda.de) to collect and save data that can be used to produce pseudonymised usage profiles. These profiles are used to analyse user habits and to improve the needs-based design of our services. Cookies may be used in this regard. Cookies are small text files that are placed on the device of the visitor to our website and that allow their recognition during the next visit to our website. The pseudonymised usage profiles are not associated with personal data about the bearer of the pseudonym without explicit consent, which must be provided separately. **You can object to the collection and storage of data at any time, effective for the future, by clicking on the following link <http://www.econda.de/econda/unternehmen/datenschutz/widerspruchscookie>.**

After your objection, an opt-out cookie will be placed on your device. If you delete your cookies, you must click the link again.

10.4. Other web analysis services by Dynatrace

This website uses technologies by Dynatrace GmbH (<https://www.dynatrace.de>) to collect and save data that can be used to produce pseudonymised usage profiles. These profiles are used to analyse user habits and to improve the needs-based design of our services. Cookies may be used in this regard. Cookies are small text files that are placed on the device of the visitor to our website and that allow their recognition during the next visit to our website. The pseudonymised usage profiles are not associated with personal data about the bearer of the pseudonym without explicit consent, which must be provided separately.

10.5. Campaign Manager (formerly DoubleClick by Google)

Our website uses online marketing tool Campaign Manager by Google Ireland Limited, Barrow Street, Dublin 4, Ireland ("Google"). Campaign Manager uses cookies to serve ads that are relevant to users, to improve campaign performance reports, or to prevent a user from seeing the same ads multiple times. Google uses a cookie ID to determine which ads are running in which browser and can prevent them from being displayed multiple times. In addition, Campaign Manager can use cookie IDs to track so-called conversions related to ad requests. For example, if a user sees a Campaign Manager ad and later uses the same browser to go to the Hoffmann's website and buy something there. The data collected in this context may be transferred by Google to a server in the USA for evaluation and stored there. If a transfer to an unsafe third country takes place, this is done on the basis of Art. 49 (1) a) GDPR.

Due to the marketing tools used, your browser automatically establishes a direct connection to the Google server. We have no control over the extent and further use of the data collected through the use of this tool by Google and therefore inform you according to our knowledge: By integrating Campaign Manager, Google receives the information that you have the corresponding part of our website or click on an ad from us. If you are registered with a service provided by Google, Google may associate the visit with your account. Even if you are not registered with Google or have not logged in, there is a chance that the provider will find and store your IP address.

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You can prevent participation in this tracking process in several ways: a) by adjusting your browser software accordingly, in particular, the suppression of third-party cookies will prevent you from receiving any third-party ads; b) by disabling the cookies for conversion tracking, by setting your browser to block cookies from the domain <https://adssettings.google.com/authenticated>, whereby this setting will be deleted if you delete your cookies; c) by permanent deactivation in your browsers Firefox, Internet Explorer or Google Chrome under the link <http://www.google.com/settings/ads/plugin>. We point out that in this case you may not be able to use all the features of this offer in full.

In addition, you can prevent Google from collecting data about your use of the Sites and the processing of these data by Google through the use of cookies at <https://support.google.com/adsense/answer/142293?hl=EN>. Download and install the browser plug-in available under Display Settings, Campaign Manager Disable Extension.

For more information about Campaign Manager, visit <https://www.google.com/doubleclick> and Google Privacy Policy in general: <https://www.google.com/intl/en/policies/privacy>.

10.6. Commerce Connector - Conversion Tracking

We use conversion tracking software made by Commerce Connector GmbH, Deckerstrasse 41, 70372 Stuttgart, Germany. Commerce Connector provides a Buy Now button that links to suppliers whose products we sell.

When you click on the link, our partner, Commerce Connector GmbH, will store a cookie on your device for a limited period. If you make a purchase in our webshop during this period, Commerce Connector can access the cookie. This ensures that we and our suppliers receive information concerning your purchases. As a rule, this cookie becomes invalid after seven days.

Commerce Connector uses the acquired purchasing information to create anonymised sales statistics for our products that are sold via a link and subsequently provides us with these statistics. These statistics do not contain any personal data or allow us to identify any individual users. We only receive anonymised sales/order content.

If users do not agree to this data being processed, they can prevent the cookie from being installed by adjusting their browser settings accordingly. For more information, see <https://www.commerce-connector.com/web/de/policy-cco/>. You can also deactivate conversion tracking at any time by clicking on Cookies in the footer of this website and adjusting the settings accordingly.

10.7. Kameleoon

Our website uses the testing and web analysis service provided by SAS Kameleoon, 2 rue de la Chaussée d'Antin, 75009 Paris, France. Using this program enables us to analyse user behaviour in order to compile website activity reports so that we can regularly improve our services.

Cookies linked to pseudonymised IDs are set for the purpose of analysis. Your IP address is fully anonymised for this purpose and is not stored. Information generated by the cookie concerning your use of this website is stored in an aggregated and pseudonymised form. Kameleoon will not combine the IP address transmitted to the Kameleoon service by your browser with any other data.

You can prevent cookies being stored by making the appropriate settings in your browser software. You can also deactivate Kameleoon tracking at any time by clicking on Cookies in the footer of this website and adjusting the settings accordingly.

10.8. Microsoft Dynamics 365

On our website and for e-mail marketing, we use the marketing automation system Microsoft Dynamics 365 Marketing from the provider Microsoft Corporation (Microsoft Deutschland GmbH, Walter-Gropius-Straße 5, 80807 München) – hereinafter "Microsoft" – in order to conduct marketing campaigns, for analysis purposes, as well as to suitably address customers and potential customers. The processing of data takes place within the European Union.

The system components integrated into our online offerings (e.g. forms, e-mail delivery) use "cookies", which are stored on the user's computer and allow us to analyse the use of the website. On our behalf, Microsoft will use the data and information obtained via our website to evaluate the user behaviour of the respective person who used our website. Furthermore, Microsoft will use the data to compile reports on user activity on our behalf, as well as to provide our company with additional services related to the use of our website. During this, certain usage data will be linked to you personally and stored in our system. This allows us to provide you with information and offers that are tailored specifically to your interests.

In particular, the following information will be collected: Client ID, geographical location, type of browser, duration of visit, and pages accessed.

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You can permanently prevent cookies from being saved by our website at any time via the corresponding settings of the internet browser used, or by configuring the corresponding settings by clicking on "Cookies" in the footer of our website.

Users will find additional information on privacy in Microsoft's privacy statement at <https://privacy.microsoft.com/en-gb/privacystatement>.

Users will find additional information on the use of cookies in the context of the system at <https://docs.microsoft.com/en-gb/dynamics365/customer-engagement/marketing/cookies>.

10.9. Microsoft Clarity

We use Microsoft Clarity from the provider Microsoft Corporation, One Microsoft Way, Redmond, WA 98052 USA - hereinafter "Microsoft" - on our website. Microsoft Clarity is used for statistical analysis of the use of our website.

Microsoft Clarity uses cookies, which enable an analysis of the use of our website, as well as a so-called tracking code, which is executed when this service is called up. The usage and user-related data, such as IP address, location, time or frequency of the visit to our website are transmitted to a Microsoft server in the USA and stored there. To protect your data, we use Microsoft Clarity with the IP anonymisation function. This function allows Microsoft to shorten the IP address within the EU or EEA.

The data collected is used by Microsoft to provide us with an evaluation of visits to our website and of the usage activities there. Microsoft may also use this data for advertising purposes and other services related to the use of our website and the use of the Internet.

The processing of your data is based on your consent pursuant to Art. 6 para. 1 lit. a) GDPR.

You can permanently prevent the setting of cookies by our website at any time by means of a corresponding setting of the Internet browser used or by making the corresponding settings by clicking on "Cookies" in the footer area of our website.

You can find Microsoft's data protection information in the Microsoft Privacy Statement at <https://privacy.microsoft.com/de-de/privacystatement>.

Further information and the terms of use of Microsoft Clarity can be found at <https://clarity.microsoft.com/terms>.

Revocation option (opt-out): <https://choice.microsoft.com/de-DE/opt-out>

11. Which Social Plugin is Hoffmann using?

On our website we offer you the possibility of using "Social-Media-Buttons". These buttons are only included on the website as a graphic with a link to the corresponding website of the button provider. By clicking on the icon you will be directed to the services of the relevant provider. Only then will your data be sent to the respective providers. If you do not click on the icon, there is no exchange between you and the providers of the social media buttons. Information about the collection and use of your data in the social networks can be found in the terms of use of the respective providers.

We have integrated the social media buttons of the following companies on our website:

Facebook Inc. (1601 S. California Ave – Palo Alto – CA 94304 – USA)

Twitter Inc. (795 Folsom St. – Suite 600 – San Francisco – CA 94107 – USA)

Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland)

LinkedIn Corporation (2029 Stierlin Court, Mountain View, CA 94043, USA)

WhatsApp Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland)

12. When is your data erased?

Your data is blocked for further use after complete performance of the contract or deletion of your customer account; the data is erased after the end of the retention period required under fiscal or commercial law, except where you have provided explicit consent for the continued use of your data or we have reserved the right to continue using your data in a lawful manner and have informed you in this Privacy Policy. You may delete your customer account at any time, either by sending a message to the contact address above or by using the relevant function in your customer account.

13. Which data protection rights do you have?

In your dealings with Hoffmann SE and Hoffmann Group companies, you have a right, provided the legal requirements are satisfied in each case, to information (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR) and data portability (Art. 20 GDPR). You also have the right to lodge a complaint with a supervisory authority responsible for data protection (Art. 77 GDPR).

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Where you have granted consent to Hoffmann SE or a Hoffmann Group company, you may revoke this consent at any time, effective for the future, by email, fax or letter. For the contact details of the Hoffmann Group company responsible for you, click [here](#).

Where Hoffmann SE and the Hoffmann Group company process your data based on the balancing of legitimate interests, you are entitled to object to the processing. Once you have raised your objection, your data will no longer be processed, unless the responsible company can prove that processing is based on compelling legitimate reasons that override your interests, rights or freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

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