

## **Data Protection Statement/Privacy Statement**

The private limited company ACCENTRO GmbH, Kantstraße 44/45, D-10625 Berlin (hereinafter: “we”) as operator of the website [www.wohnung-kaufen-kreuzberg.de/en](http://www.wohnung-kaufen-kreuzberg.de/en) (hereinafter: “the website”) is accountable for the personal data of the website’s users (hereinafter: “you”) within the meaning of applicable data protection laws, specifically the German Data Protection Regulation (“DSGVO”) and the German Data Protection Act (“BDSG”).

We are committed to protecting your privacy and your private data. Accordingly, we collect, process and use your personal data in compliance with the contents of these data protection regulations and the applicable data protection laws, specifically the DSGVO and the BDSG.

The purpose of this data protection regulations is to tell you which personal data we collect, process and use when you use our website. We therefore ask you to read the subsequent explanations carefully.

Personal data within the meaning of these data protection regulations are individual details about your personal or factual circumstances. This includes specifically your name, your e-mail address and, if applicable, your postal address and your telephone number as well as your credit card and account data and your sales tax details if you are a registered dealer.

### **1. Provision of this Website**

1.1 Personal data also include information about your use of our website. In this context, we collect the following personal data from you:

- your IP address,
- date and time of your query,
- time zone difference to Greenwich Mean Time,
- content of the request,
- access status/HTTP status code,
- scope of the data transfer,
- the website from which your query is forwarded,
- browser, operating system and its interface, language and version of the browser software,
- the place from where you retrieve data from our site and
- other connection data and sources that you are retrieving.

This is usually done by using log files and cookies. For details on cookies, check below.

1.2 We use these data to protect our legitimate interests,

- to have our website properly displayed on your computer,
- to ensure the functionality of the website,

- to optimise our website and
- to ensure the security of our information technology systems.

Legal basis for the data processing is Art. 6, Sec. 1, Sent. 1, Letter f, DSGVO.

1.3 The data will be deleted once they are no longer required to achieve the purpose for which they were collected.

## 2. Cookies and Targeting

2.1 We also collect information about your use of our website by using so-called browser cookies. Cookies are small text files that are saved on your data carriers and that store certain settings and data for the communication with our system via your browser. A cookie normally contains the name of the domain from which the cookie data are sent, information about the age of the cookie and an alphanumeric identifier. Cookies enable our systems to recognise the user's device and to make the user's preferences, if any, available immediately. As soon as a user accesses the platform, a cookie will be transferred to the hard disk of the user's computer.

The following cookies are used on our website:

Name	Used for	Expires after
cookieInfo	Cookie information display	30 days

2.2 The cookies we use serve exclusively the purpose of saving the above-mentioned data about your use of our website. This is done by assigning an identification number to the cookie ("cookie ID") rather than by assigning it to you personally. The cookie ID will not be matched with your name, your IP address or similar data that would enable the cookie to be associated with you personally.

2.3 If you do not wish to use browser cookies, you can adjust the relevant settings in your browser so that the storage of cookies is disabled. Please note that in this case you may only be able to use our website to a limited extent or not at all. If you only wish to accept our own cookies but not those of our service providers and partners, select the browser setting "Block third party cookies" to disable third-party cookies.

2.4 We use cookies to protect the legitimate interest we have in improving our website and in delivering a better and more personalised service to you. Cookies enable us to recognise your computer the next time you return to our website and thereby:

- to store information about your preferred activities on the website and thus to tailor our website to your specific interests;
- to store your log-in data and display preferences (e. g. language); and
- to speed up the processing of your queries.

Legal basis for the data processing via cookies is Art. 6, Sec. 1, Sent. 1, Letter f, DSGVO.

2.5 Cookies are stored until you delete them or until they expire. In the latter case, the cookie will automatically be deleted from your computer.

## 3. Contact Form

On our website, you have the option to contact us via a contact form, our callback service or our Skype callback service and to send us questions, suggestions or notes as well as to

request advertising and information material. When taking advantage of any of these contact options, the details you submit will be transmitted to us. The following details will be required disclosures in this context:

- Contact form: e-mail address, time of your query, and your IP address,
- Callback service: phone number, time of your query, and your IP address

In addition, you may provide additional details at your discretion, such as your name, your address and the properties you are interested in. We will use this data exclusively to process your query, to answer your questions, and to send you information and advertising material as requested by you. We will use the voluntarily submitted details to address you in person. They will not be processed for any other purpose. We will save your details until your query has been answered.

The processing serves our legitimate interest to offer you a convenient way to contact us or as heads of terms if you have requested them. Legal basis for the data processing is Art. 6, Sec. 1, Sent. 1, Letter f, DSGVO, or Art. 6, Sec. 1, Sent. 1, Letter b, DSGVO, as the case may be.

#### **4. Request for Information**

Our website also gives you the option to request information about, and quotes for, our properties as well as information on financing arrangements. When you request a quote, the information you enter in the input mask and your IP address are transmitted to us. Out of the data you may enter, only your e-mail address represents a required disclosure. Any other details you care to provide will solely be used by us to address you in person and to compile a personalised quote for you.

Our request for information process uses the so-called double-opt procedure. This means that, in response to your request, we will send you an e-mail to the e-mail address your submitted that will ask you to confirm that you wish to receive the quote. If you do not confirm your registration within 24 hours, any details you provided will be automatically deleted.

Your data is processed only to the extent necessary to transmit the quote or quotes you requested. Legal basis for the data processing is Art. 6, Sec. 1, Sent. 1, Letter b, DSGVO.

If you have granted your consent, we will use the contact data you provided to notify you about other properties matching your criteria and to send you relevant quotes. To this end, we will use your e-mail address and your phone number if you submitted it. Your data will be saved until you revoke your consent to it. Legal basis for the data processing is Art. 6, Sec. 1, Sent. 1, Letter a, DSGVO.

#### **5. Google Analytics**

- 5.1 Our website uses Google Analytics, a web analysis service of Google Inc. (“Google”). Google Analytics uses so-called “cookies,” which are text files placed on your computer, 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 a server in the United States. In the event that IP anonymisation is enabled, Google will truncate your IP address in advance within any member state of the European Union or within any member state of the Treaty on the European Economic Area. Only in exceptional situations will your full IP address be transmitted to a Google server in the US and truncated there. On our behalf, Google will use this information for the purpose of evaluating your use of the website,

compiling reports on website activity and providing other services relating to website activity and internet usage for us.

- 5.2 The IP address submitted by your browser within the framework of Google Analytics will not be matched with other data by Google.
- 5.3 You may refuse the storage of cookies by selecting the appropriate settings on your browser; but please note that doing so may render you unable to use the full functionality of this website. In addition, you can prevent the aggregation of data generated by the cookie and referring to your use of the online portal (including your IP address) and their transmission to Google as well as the processing of the data by Google by downloading and installing the browser plug-in available under the following link:  
(<http://tools.google.com/dlpage/gaoptout?hl=de>).
- 5.4 As an alternative to the browser add-on or on mobile endpoints, you can prevent Google Analytics from collecting data by clicking on the link below. An opt-out cookie will be set to prevent future collection of your data whenever you visit our online portal. If you delete your cookies, you will have to click this link again: [Google Analytics deaktivieren](#)
- 5.5 This website uses Google Analytics with the extension “\_anonymizeIp()”. This will cause IP addresses to be subsequently processed in truncated form, so that a personal associability can be ruled out. To the extent that the data collected about you is personal, it will be excluded immediately and the personal data will thus be promptly deleted.
- 5.6 We use these data to protect our legitimate interests, to analyse the use of our website, to improve it and to make it more interesting for you. Legal basis for the data processing is Art. 6, Sec. 1, Sent. 1, Letter f, DSGVO.

## **6. Google Web Fonts**

- 6.1 As it is in our legitimate interest to ensure the consistent representation of fonts on our website, we use so-called web fonts that are created by Google, Inc. (“Google”). To display texts and fonts correctly, your browser will load the required web fonts.
- 6.2 When you access a page, your browser will download the required web fonts from a Google server. Your IP address will be transmitted to Google in the process. If your browser does not support web fonts, a default font will be used by your computer.
- 6.3 Legal basis for the processing is Art. 6, Sec. 1, Letter f, DSGVO.
- 6.4 For more details on Google Web Fonts, go to <https://developers.google.com/fonts/faq> and see the data protection statement by Google: <https://www.google.com/policies/privacy/>

## **7. Open Street Maps**

- 7.1 To display interactive maps on our website, we have integrated map material from the open source mapping tool “OpenStreetMap” (OSM). It is operated by the Openstreetmap Foundation, 132 Maney Hill Road, Sutton Coldfield, West Midlands, B72 1JU, United Kingdom (“OpenStreetMap”).
- 7.2 Your IP address will be forwarded to OpenStreetMap before the map is displayed for you. According to its own declaration, OpenStreetMap does not store these data. To find out how OpenStreetMap saves your data, go to the data protection page of OpenStreetMap and to this website: [http://wiki.openstreetmap.org/wiki/Legal\\_FAQ](http://wiki.openstreetmap.org/wiki/Legal_FAQ).

7.3 We use OpenStreetMaps to act on our legitimate interest to present the location of our properties in an engaging manner to you. Legal basis for the processing is Art. 6, Sec. 1, Letter f, DSGVO.

## 8. Use of Social Media Plug-ins

8.1 At this time, we employ the following social media plug-ins: *Facebook, Instagram, Google+, Twitter, Xing, LinkedIn, Youtube, Pinterest* and *Tumblr*. In this context, we use the so-called two-click solution. This means that visiting our website will principally and initially not cause your personal data to be disclosed to the providers of the plug-ins. You can recognize the provider of the plug-in by the marked box above its initial letter or by its logo. We offer you the option to communicate directly with the provider of the plug-in via the button. Only if you click on the marked box and thereby activate it will the plug-in provider receive the information that you have accessed the corresponding website of our online presence. In Germany, Facebook and Xing will anonymise your IP address immediately upon its collection, according to the providers' own statements. This means that by activating the plug-in personal data will be transferred from you to the respective plug-in provider and saved there (in the United States in the case of US providers). Since the plug-in provider collects data mainly via cookies, we recommend that you use your browser's security settings to delete all cookies before clicking on the grayed-out box.

8.2 We have no influence on the data collected and data processing procedures, nor are we aware of the full extent of data collection, the purposes of processing or the storage periods. Neither do we have any information on the deletion of the collected data by the plug-in provider.

8.3 The plug-in provider stores the data collected about you in the form of user profiles and uses these for the purposes of advertising, market research and/or the demand-oriented design of its website. Such an evaluation takes place in particular (even for users not logged in) for the representation of demand-oriented advertisement and to notify other users of the social network of your activities on our website. You have a right to object to the creation of such user profiles, but you will have to contact the respective plug-in provider to exercise that right. Via the plug-ins, we offer you the possibility to interact with social networks and other users, which helps us to improve our online presentation and to make it more attractive for you as a user. Legal basis for the use of plug-ins is Art. 6, Sec. 1, Sent. 1, Letter a, DSGVO.

8.4 The data is transferred regardless of whether you have an account with the plug-in provider and are logged into the provider's network. If you are logged in with a given plug-in provider, your data collected from us will be directly assigned to your existing account by the plug-in provider. If you click the activated button and, e. g., set a link to the page, the plug-in provider will also save this information in your user account and share it publicly with your contacts. We recommend that you log out regularly after using a social network, especially before activating the button if you wish to avoid having your visit on our page associated with your profile with the plug-in provider.

8.5 For more information on the purpose and scope of data collection and its processing by the plug-in provider, please find below the data protection statements of these providers. They will provide, inter alia, more details about your rights and privacy settings.

8.6 Listed below are the addresses of each plug-in provider and the URL to their privacy policies:

a) Facebook Inc., 1601 S. California Ave, Palo Alto, California 94304, USA; <http://www.facebook.com/policy.php>; more details on the subject of data collection:

<http://www.facebook.com/help/186325668085084>,  
<http://www.facebook.com/about/privacy/your-info-on-other#applications> and  
<http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

b) Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA,  
<https://help.instagram.com/478745558852511>, more details on the subject of data collection:  
[https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content). Instagram has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

c) Google Inc., 1600 Amphitheater Parkway, Mountain View, California 94043, USA;  
<https://www.google.com/policies/privacy/partners/?hl=de>. Google has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

d) Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA;  
<https://twitter.com/privacy>. Twitter has adopted the EU-US Privacy Shield,  
<https://www.privacyshield.gov/EU-US-Framework>.

e) Xing AG, Gänsemarkt 43, 20354 Hamburg, Germany; <http://www.xing.com/privacy>.

f) LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA;  
<http://www.linkedin.com/legal/privacy-policy>. LinkedIn has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

g) YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA, more details on the subject of data collection: <https://policies.google.com/privacy?hl=de&gl=de>. YouTube has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

h) Pinterest Europe Ltd., Palmerston House, 2nd Floor Fenian Street, Dublin 2, Ireland, more details on the subject of data collection: <https://policy.pinterest.com/de/privacy-policy>. Pinterest has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

i) Tumblr, Inc., 770 Broadway, New York, NY 10003, USA. More details on the subject of data collection: <https://www.tumblr.com/privacy>. Tumblr has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

## 9. Google Adwords

9.1 We use the option of Google Adwords to draw attention to our attractive offers with the help of advertising materials (so-called "Google Adwords") on external websites. Doing so lets us determine how each advertising measure performs in relation to the data of our advertising campaigns. The idea is to bring you advertisements specifically of interest to you, to make our website more engaging for you and to ensure a fair calculation of advertising costs.

9.2 Advertising media of this type are delivered by Google via so-called "Ad Servers." To this end, we use ad server cookies, through which certain parameters for measuring success, such as the insertion of ads or clicks by users, can be measured. If you access our website via a Google ad, Google Adwords will store a cookie on your computer. These cookies usually expire after 30 days and are not intended to identify you personally. For cookies of this type, the unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) and opt-out information (a mark saying that the user no longer wishes to be addressed) are usually stored as analysis values.

- 9.3 These cookies enable Google to recognise your Internet browser the next time you visit. If a user visits certain pages of an Adwords client's website and the cookie stored on their computer has not yet expired, Google and the client will recognise that the user has clicked on the ad and has been redirected to this page. Each Adwords client is assigned a dedicated cookie. Accordingly, cookies cannot be traced via the websites of Adwords clients. We do not collect and process any personal data in conjunction with the aforesaid advertising measures. Google only makes statistical evaluations available to us. The evaluations show us which of the advertising measures we employed performed better than others. We do not receive any further data gathered from the use of advertising material; in particular, we have no way to identify users on the basis of this information.
- 9.4 Due to the nature of the marketing tools used, your browser will automatically set up a direct connection to the Google server. We have no influence on the extent and further use of the data collected by Google through the use of this tool and can therefore only share information to the extent of our own knowledge: By integrating AdWords Conversion, Google receives information that you have accessed the corresponding part of our website or clicked on one of our ads. If you are registered with a Google service, Google may associate your visit with your account. Even if you are not registered with Google or are not logged in, there is a chance that the provider may obtain and save your IP address.
- 9.5 You can prevent participation in this tracking process in a number of ways: a) by setting your browser software accordingly, specifically disabling third-party cookies to ensure that you do not receive any ads from third-party providers; b) by deactivating cookies for conversion tracking, which you do by setting your browser so that cookies are blocked by the domain "www.googleadservices.com", <https://www.google.de/settings/ads>, although you should note that this setting will be deleted when you delete your cookies; c) by deactivating the interest-based ads of the providers that are part of the "About Ads" self-regulation campaign via the link <http://www.aboutads.info/choices>, although you should note that this setting will be deleted when you delete your cookies; d) by permanently deactivating the plug-in in your Firefox, Internet Explorer or Google Chrome browsers under the link <http://www.google.com/settings/ads/plugin>. However, please note that in this case you may not be able to use the full functionality of this Internet presentation.
- 9.6 Legal basis for the processing of your data is Art. 6, Sec. 1, Sent. 1, Letter a, DSGVO. For details on Google's data protection, go to: <http://www.google.com/intl/de/policies/privacy> and <https://services.google.com/sitestats/de.html>. Alternatively, you may visit the website of the Network Advertising Initiative (NAI) at <http://www.networkadvertising.org>. Google has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

## **10. Embedding of YouTube Videos**

- 10.1 We have integrated YouTube videos into our online offering, which are stored on <http://www.YouTube.com> and can be played directly from our website. All of these are integrated in the "extended data protection mode," i. e. no data about you as a user will be transmitted to YouTube unless you view the videos. Only when you view a given video will your data be transmitted to YouTube. These data transmissions are outside our control.
- 10.2 By visiting the website, YouTube receives the information that you accessed the corresponding sub-page of our website. In addition, the data mentioned in item 1.1 of this statement will be transmitted. This will happen regardless of whether YouTube provides a user account through which you are logged in or whether no such user account exists. If you are logged into a Google service, your data will be directly associated with your account. If

you do not wish to be associated with your profile on YouTube, you should log out of your YouTube account before activating the button. YouTube stores the data collected about you in the form of a user profile and uses it for advertising purposes, market research and/or the demand-oriented design of its website. Such an evaluation takes place in particular (even for users not logged in) for the representation of demand-oriented advertisement and to notify other users of the social network of your activities on our website. You have a right to object to the creation of such a user profile, but you will have to contact YouTube directly to exercise that right.

10.3 For more information on the purpose and scope of data collection and its processing by YouTube, please see YouTube's data protection statement. It will provide, inter alia, more details about your rights and privacy settings: <https://www.google.de/intl/de/policies/privacy>. Google processed your personal data in the United States, too, and has adopted the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

10.4 We use YouTube videos to pursue our legitimate interest to present content in an engaging and optimised form to you. Legal basis for the processing is Art. 6, Sec. 1, Letter f, DSGVO.

## **11. Data Security**

All information you transmit to us is stored on servers located within the European Union. We protect our website and other systems through the use of technical and organizational measures against loss, destruction, access, modification or dissemination of your data by unauthorised persons. These are adapted to reflect the latest technological standard on a case-to-case basis. Particularly your personal data is transmitted in encrypted form. To this end, we rely on the SSL (Secure Socket Layer) coding system.

## **12. No Third-Party Disclosure of Your Personal Data**

We will not disclose your personal data to third parties unless you have consented to such data disclosure or unless we are entitled or obliged to disclose data pursuant to legal regulations and/or official orders by a government agency or a court of law.

## **13. Deletion**

We will store your data for as long as we may legally do so. If you made use of your right of objection, or if the legal basis retroactively ceases to apply for some other reason, in particular because the purpose associated with the data collection has been achieved, we will delete your data immediately unless we are obliged by legal hold obligations to retain them.

## **14. Data Protection and Third-Party Websites**

Our Website may contain hyperlinks to and from third-party websites. If you follow a hyperlink to one of these websites, please note that we assume no responsibility or guarantee for third-party content or the data protection provisions govern those websites. Please be sure to check the privacy policies of such websites before submitting any personal data.

## **15. Amendments to these Data Protection Regulations**

We reserve the right to change these data protection regulations at any time with effect for the future. For the latest version of our data protection statement, go to our website. Please visit our website regularly to stay up to date about the effective data protection regulations.



## **16. Your Rights and Contact**

You may view your personal data free of charge at any time and request information about their origin, recipients or categories of recipients to whom these data are disclosed, along with the purpose of their storage and, where applicable, their correction and/or deletion and/or processing restrictions.

In addition, you have the right to object to the processing of your data at any time, provided your objection concerns the data we process to pursue one of our legitimate interests. In this case, your data will no longer be processed unless we can cite compelling reasons for processing that are worthy of protection and that outweigh your request to be excluded from processing, or if processing serves to assert, exercise or defend our claims.

If the processing of your data is consent based, you have the right to revoke your consent at any time. In this case, we will cease to process your data unless we are permitted to do so by law. The legitimacy of having processed your data prior to your revocation will not be affected by your revocation.

If you provided us with personal data, we will, upon request, make that data available to you in machine-readable form for use by other providers.

To exercise your aforementioned rights, contact us by sending an e-mail to [mail@accentro.ag](mailto:mail@accentro.ag), a facsimile to +49(30) 88 71 81 11 or a letter to: Accentro Real Estate AG, Kantstraße 44/45, D-10625 Berlin. Moreover, if you have any questions, comments or enquiries regarding the collection, processing and use of your personal data by us, please get in touch with us using the contact details provided.

If you believe that the processing of your data violates applicable data protection laws, you have the right to complain to a data protection authority. To do so, you may, for example, contact the State Commissioner for Data Protection and Freedom of Information at the following address:

Die Berliner Beauftragte für Datenschutz und Informationsfreiheit  
Friedrichstrasse 219  
D-10969 Berlin

## **17. Data Protection Officer**

17.1 If you have any questions or comments on data protection issues, please do not hesitate to contact our data protection officer. You may use the following contact details to do so:

E-mail: [datenschutz\(at\)accentro.de](mailto:datenschutz(at)accentro.de)  
Address: Kantstraße 44/45, D-10625 Berlin  
Phone: +49 30 - 887 181 798

## **18. Retrievability of this Data Protection Statement**

You may download this data protection statement here: <https://www.wohnung-kaufen-kreuzberg.de/en/contact/privacy-statement/> and save it.

Baseline date: May 2018