

Privacy policy

1. Name and contact details of the controller and the company data protection officer

This data protection information applies to data processing by:

More responsible:

OXLY GmbH, Westerbachstraße 47, 60489 Frankfurt am Main, Germany; Email: io@oxly.io; Telephone: + 49(0)176 74140057; Fax: +49 (0)69 2649 22444

The company data protection officer of OXLY GmbH is at the above address, to Hd. Mr. Denis Makashov, respectively under io@oxly.io available.

2. Collection and storage of personal data as well as the nature and purpose of their use

a) When visiting the website

When you visit our website http://oxly.io the browser used on your device automatically sends information to the server of our website. This information is temporarily stored in a so-called log file. The following information is collected without your intervention and stored until automated deletion:

IP address of the requesting computer,

Date and time of access,

Name and URL of the retrieved file,

Website from which access is made (referrer URL),

The browser used and, if applicable, the operating system of your computer as well as the name

Your access provider.

The data mentioned will be processed by us for the following purposes:

Ensuring a smooth connection to the website,

Ensuring comfortable use of our website,

Evaluation of system security and stability as well as for other administrative purposes.

The legal basis for data processing is Art. 6 para. 1 S. 1 lit. f GDPR. Our legitimate interest follows from the purposes listed above for data collection. In no case do we use the collected data for the purpose of drawing conclusions about your person.

b) When using our contact form

For questions of any kind, we offer you the opportunity to contact us via a form provided on the website. The specification of a valid e-mail is-

Address required so that we know who the request came from and to be able to answer it. Further information can be provided voluntarily.

The data processing for the purpose of contacting us is carried out in accordance with Art. 6 para. 1 S. 1 lit. a GDPR on the basis of your voluntarily given consent.

The personal data collected by us for the use of the contact form will be automatically deleted after completion of the request made by you.

3. Transfer of data



A transfer of your personal data to third parties for purposes other than those listed below does not take place.

We only pass on your personal data to third parties if:

- If you wish to withdraw your consent pursuant to Art. 6 para. 1 S. 1 lit. a GDPRhave given express consent to this,
- The disclosure pursuant to Art. 6 para. 1 S. 1 lit. f GDPR is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,
- in the event that disclosure pursuant to Art. 6 para. 1 S. 1 lit. c GDPR there is a legal obligation, and
- If this is legally permissible and in accordance with Art. 6 para. 1 S. 1 lit. b GDPRis necessary for the processing of contractual relationships with you.

4. Cookies

We use cookies on our site. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our site. Cookies do not cause any damage to your device and do not contain viruses, Trojans or other malware.

Information is stored in the cookie, which results in each case in connection with the specifically used end device. However, this does not mean that we are directly aware of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. For example, we use so-called session cookies to recognize that you have already visited individual pages of our website. These are automatically deleted after leaving our site. In addition, we also use temporary cookies to optimize user-friendliness, which are stored on your device for a certain specified period of time. If you visit our site again to use our services, it will automatically recognize that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer for you (see para. 5). These cookies allow us to automatically recognize when you visit our site again that you have already been with us. These cookies are automatically deleted after a defined period of time.

The data processed by cookies are necessary for the purposes mentioned in order to safeguard our legitimate interests and those of third parties in accordance with Art. 6 para. 1 S. 1 lit. f GDPR required.

Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or a message always appears before a new cookie is created. However, the complete deactivation of cookies may mean that you cannot use all functions of our website.

5. Analysis Tools

a) Tracking tools

The tracking measures listed below and used by us are based on Art. 6 para. 1 S. 1 lit. f GDPR. With the tracking measures used, we want to ensure a needs-based design and the continuous optimization of our website. On the other hand, we use tracking measures to statistically record



the use of our website and to evaluate it for the purpose of optimizing our offer for you. These interests are to be regarded as legitimate within the meaning of the aforementioned provision. The respective data processing purposes and data categories can be found in the corresponding tracking tools.

i) Google Analytics

For the purpose of the needs-based design and continuous optimization of our pages, we use Google Analytics, a web analysis service of Google Inc. (https://www.google.de/intl/de/about/) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; hereinafter "Google"). In this context, pseudonymised user profiles are created and cookies (see section 4) are stored. 4) used. The information generated by the cookie about your use of this website, such as

- Browser type/version,
- operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request,

are transmitted to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on website activity and to provide other services related to website activity and Internet usage for the purposes of market research and to provide needs-based design of these Internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of us. Under no circumstances will your IP address be merged with other data from Google. The IP addresses are anonymized so that an assignment is not possible (IP masking). You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address). You can also prevent the collection of data generated by the cookie and relating to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing a browser add-on (https://tools.google.com/dlpage/gaoptout?hl=de).

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent Google Analytics from collecting data by clicking on this link. An opt-out cookie is set that prevents the future collection of your data when you visit this website. The opt-out cookie is only valid in this browser and only for our website and is stored on your device. If you delete the cookies in this browser, you must set the opt-out cookie again.

Further information on data protection in connection with Google Analytics can be found in the Google Analytics Help (https://support.google.com/analytics/answer/6004245?hl=de).

ii) Google Adwords Conversion Tracking

In order to statistically record the use of our website and to evaluate it for the purpose of optimizing our website for you, we also use Google Conversion Tracking. Google Adwords places a cookie (see section 4) on your computer if you have reached our website via a Google ad.

These cookies lose their validity after 30 days and are not used for personal identification. If the user visits certain pages of the Adwords customer's website and the cookie has not yet expired, Google and the customer can recognize that the user clicked on the ad and was redirected to this page.



Each Adwords customer receives a different cookie. Cookies can therefore not be tracked via the websites of Adwords customers. The information collected using the conversion cookie is used to create conversion statistics for Adwords customers who have opted for conversion tracking. The Adwords customers learn the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information that personally identifies users.

If you do not want to participate in the tracking process, you can also refuse the setting of a cookie required for this-for example via a browser setting that generally deactivates the automatic setting of cookies. You can set cookies for conversion.

Also disable tracking by setting your browser so that cookies from the domain "www.googleadservices.com" to be blocked. Google's privacy policy for conversion tracking can be found here (https://services.google.com/sitestats/de.html).

(iii) Matomo

We use the open-source software Matomo for the analysis and statistical evaluation of the use of the website. Cookies are used for this purpose (see section 4). The information generated by the cookie about the use of the website is transmitted to our servers and summarized in pseudonymous user profiles. The information is used to evaluate the use of the website and to enable a needs-based design of our website. The information is not passed on to third parties. Under no circumstances will the IP address be associated with other data concerning the user. The IP addresses are anonymized so that an assignment is not possible (IP masking). Your visit to this website is currently recorded by Matomo web analysis. Click here (https://matamo.org/docs/privacy/), so that your visit is no longer recorded.

6. Social Media Plug-ins

Instagram, Facebook, Twitter and Instagram social media plugins are used on our website based on Article 6 of the Abs. 1 page 1 lit. f GDPR to make our law firm more aware of this. The responsibility for the data protection-compliant operation is to be guaranteed by their respective providers. The integration of these plug-ins by us takes place by means of the so-called two-click method in order to protect visitors to our website in the best possible way.

a) Facebook

Our website uses social media plugins from Facebook to make their use more personal. For this we use the "LIKE" or "SHARE" button. This is an offer from Facebook.

When you access a page of our website that contains such a plugin, your browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted directly from Facebook to your browser and integrated into the website.

Facebook receives Facebook's information that your browser has accessed the corresponding page of our website, even if you do not have a Facebook account or are not currently logged in to Facebook. This information (including your IP address) is transmitted directly from your browser to a Facebook server in the USA and stored there.

Facebook can directly associate your visit to our website with your Facebook account if you are logged in to Facebook. If you interact with the plugins, for example by clicking the "LIKE" or "SHARE" button, the corresponding information is also transmitted directly to a Facebook server and stored there. Facebook will also publish the information and display it to your Facebook friends.



Facebook may use this information for the purpose of advertising, market research and demand-oriented design of the Facebook pages. Facebook creates Facebook user, interest and relationship profiles, e.g., to evaluate your use of our website with regard to the advertisements displayed to you on Facebook, to inform other Facebook users about your activities on our website and to provide other services associated with the use of Facebook. Facebook If you do not want Facebook to associate the data collected via our website with your Facebook account, you must log out of Facebook before visiting our website.

The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as your rights and setting options for the protection of your privacy can be found in the data protection information (https://www.facebook.com/about/privacy/) from Facebook.

b) Twitter

On our website are plugins of the short message network of Twitter Inc. (Twitter) integrated. You can recognize the Twitter plugins (tweet button) by the Twitter logo on our site. An overview of tweet buttons can be found here (https://about.twitter.com/resources/buttons). When you access a page of our website that contains such a plugin, a direct connection is established between your browser and the Twitter server. Twitter receives the information that you have visited our site with your IP address. If you click on the Twitter "tweet button" while you are logged into your Twitter account, you can link the contents of our pages to your Twitter profile. This allows Twitter to associate the visit to our pages with your user account. We would like to point out that we as the provider of the pages have no knowledge of the content of the transmitted data or their use by Twitter.

If you do not want Twitter to be able to associate your visit to our pages, please log out of your Twitter user account.

Further information can be found in the privacy policy of Twitter ((https://twitter.com/privacy). c) Instagram

Instagram social plugins ("plugins") are also used on our website, which is operated by Instagram LLC, 1601 Willow Road, Menlo Park, CA 94025, USA., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram").

Instagram plugins are marked with an Instagram logo, for example in the form of an "Instagram camera"

When you access a page of our website that contains such a plugin, your browser establishes a direct connection to the servers of Instagram. The content of the plugin is transmitted directly from Instagram to your browser and integrated into the page. Instagram receives Instagram information that your browser has accessed the corresponding page of our website, even if you do not have an Instagram profile or are not currently logged in to Instagram.

This information (including your IP address) is transmitted from your browser directly to an Instagram server in the USA and stored there. Instagram can immediately associate your visit to our website with your Instagram account if you are logged in to Instagram. Instagram is a service of Instagram Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Instagram"). The information will also be published on your Instagram account and displayed to your contacts there.

Instagram If you do not want Instagram to associate the data collected via our website directly with your Instagram account, you must log out of Instagram before visiting our website. For more information, please refer to the privacy policy (https://help.instagram.com/155833707900388) from Instagram.



7. Rights of data subjects

You have the right:

To request information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you can request information about the processing purposes, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to correction, deletion, restriction of processing or objection, the existence of a right of appeal, the origin of your data, if these were not collected by us, as well as the existence of automated decision-making including profiling and, if necessary, meaningful information on their details;

To demand the immediate correction of incorrect or incomplete personal data stored by us in accordance with Art. 16 GDPR;

To request the deletion of your personal data stored by us in accordance with Art. 17 GDPR, unless the processing is necessary for the exercise of the right to freedom of expression and information, for the fulfillment of a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims;

To demand the restriction of the processing of your personal data in accordance with Art. 18 DSGVO, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you reject its deletion and we no longer need the data, but you need it to assert, exercise or defend legal claims or you have objected to the processing in accordance with Art. 21 DSGVO; In accordance with Art. 20 GDPR, to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request its transmission to another person responsible;

pursuant to Art. 7 para. 3 GDPR to revoke your once given consent to us at any time. As a result, we may no longer continue the data processing based on this consent in the future and To complain to a supervisory authority in accordance with Art. 77 GDPR. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or our office.

8. Right of objection

If your personal data are processed on the basis of legitimate interests pursuant to Art. 6 para. 1 S. 1 lit. f GDPR, you have the right to object to the processing of your personal data in accordance with Art. 21 GDPR, provided that there are reasons for this arising from your particular situation or the objection is directed against direct advertising. In the latter case, you have a general right of objection, which will be implemented by us without specifying a particular situation.

If you would like to make use of your right of revocation or objection, it is sufficient to send an e - mail to io@oxly.io.

9. Up-to-dateness and amendment of this data protection declaration

This privacy policy is currently valid and has the status April 2020.

Due to the further development of our website and offers on it or due to changed legal or official requirements, it may be necessary to change this privacy policy. The current privacy



policy can be found at any time on the website at http://oxly.io / can be retrieved and printed by you.