

## **1. Scope and updates of this Privacy Notice**

This User Privacy Notice applies to your use of this website, applications, services (including payment services), products and tools (collectively the 'Services'), regardless of how you access or use these Services, including access via mobile devices and apps.

We may change this User Privacy Notice at any time by posting the revised User Privacy Notice on this website and indicating the effective date of the revised User Privacy Notice. You will be notified of any material changes to this User Privacy Notice via email.

## **2. What personal data we collect and process**

We collect your personal data when you use our Services, create a new reebba account, provide us with information via a web form, add or update information in your reebba account, participate in online community discussions or otherwise interact with us.

In total, we collect the following personal data:

### **2.1 Personal data you provide when using our Services or creating a reebba account**

Data that identifies you, such as your name, address, telephone numbers or email addresses, your username.

Data regarding borrowing and lending that you provide in a transaction.

Content that you share with other users through our messaging tools (see Filtering of messages sent via our messaging tools under section 11. Other important information regarding data protection for more information).

Financial information in connection with a transaction will be limited to whether you made a payment via a third-party payment handling service. No credit card or account details are held by reebba.

You may provide us with additional information through a web form or by updating or adding information to your reebba account, by participating in community discussions, member chats, inquiries, dispute resolution, customer service calls recorded with your consent, or if you contact us for any other reason regarding our Services.

Other data that we are required or entitled by applicable law to collect and process and that we need for your authentication or identification, or for the verification of the data we collect.

### **2.2 Personal data we collect automatically when you use our Services or create an reebba account**

Data that is generated as part of one of your transactions or that is linked to your reebba account as a result of a transaction in which you are involved, such as transaction amounts, time and location of transactions and whether a payment was made.

Data that is generated through your other actions when you use our Services and which is linked to your reebba account, e.g. when you post or reply to wanted notifications, send or receive messages from other users or add listings to your favourites.

Data regarding all other interactions with our Services, your communications with us.

Location data, including the location data of your mobile device. Please note that for most mobile devices, you can manage or disable the use of location services for all applications in the settings menu of your mobile device.

Computer and connection information, such as statistics regarding your use of services from reebba, information on data traffic to and from websites, referral URL, information on advertisements, your IP address, your access times, your browser history data, your language settings and your weblog information.

### **2.3 Personal data we collect in connection with the use of cookies and similar technologies**

We use cookies, web beacons and similar technologies to collect data while you use our Services. We collect this data from the devices (including mobile devices) that you use our Services with. The data collected includes the following usage- and device-related information:

- Data about the pages you visit, the access time, frequency and duration of visits, the links on which you click and other actions you take as part of your use of our Services and in advertising and email content.
- Model or device type, operating system and version, browser type and settings, device ID or individual device identifier, advertisement ID, individual device token, and cookie-related data (e.g. cookie ID).
- The IP address from which your device accesses the Services.
- Location data, including the location data of your mobile device. Please note that most mobile devices allow you to manage or disable the use of location services for all applications in the settings menu.

### **3. Purposes and legal basis for data processing and categories of recipients**

We process your personal data for various purposes and pursuant to various legal bases. We process your personal data primarily to provide and improve our Services, to provide you with a personalised user experience on this website, to contact you about your reebba account and our Services, and to detect, prevent, mitigate and investigate fraudulent or illegal activity. We also share your information with third parties for these purposes.

Below you will find a summary of the purposes for which we process your personal data, including the categories of recipients to whom we transmit personal data for the purposes stated, sorted by legal basis:

#### **3.1 We process your personal data in order to fulfil our contract with you and to provide you with our Services. This includes the following purposes:**

- Processing of data relating to you or your company for the purpose of entering into a contract with you and executing it.
- Provision of our Services, including but not limited to enabling and performing transactions with other users (including the transmission of your personal data to other users where necessary to perform the transaction, including in cases of terminated, failed or subsequently voided transactions), providing and enhancing features such as ratings and reebba account management, providing other services you may use (as described in connection with such services), and ensuring the functionality of our Services. In connection with the provision of our Services, we will send you notifications relating to the execution of

transactions and the use of our Services in accordance with the communication preferences in your reebba account.

- Solution of problems with your reebba account, arbitration of disputes, providing other services within the scope of customer service as well as enforcement of fee claims. For these purposes, we may contact you via notification in My reebba, email, telephone, SMS, push notification on your mobile device or by post. If we contact you by telephone, in order to ensure efficiency, we may use automatically dialled calls with tape announcements or automated text messages in accordance with our User Agreement and Payments Services Agreement, to the extent permitted by applicable law.
- Processing of general location data (such as IP address or postcode) in order to provide you with location-based services (such as radius search and other content that is personalised on the basis of your general location data).
- Enforcement of our User Agreement, the Payments Services Agreement, this User Privacy Notice and other rules and policies.

**Where necessary, we transmit your personal data to processors and the following recipients for one or several of the purposes described above:**

- Other reebba users
- Payment service providers including the PayPal Inc. group of companies
- External operators of websites, applications, services and tools

**3.2 We process your personal data in order to comply with legal obligations to which we are subject. This includes the following purposes:**

- Participation in proceedings (including judicial proceedings) conducted by public authorities or government agencies, in particular, for the purpose of detecting, investigating and prosecuting illegal acts.
- Prevention, detection and mitigation of illegal activities (e.g. fraud, money laundering and terrorist financing).
- Ensuring the information security of our Services.
- Retention and storage of your personal data to comply with specific legal retention requirements (for more information on reebba's storage of your data, see Storage duration and erasure).

**Where necessary, we transmit your personal data to processors and the following recipients for one or several of the purposes described above:**

- Law enforcement agencies, courts, government agencies or public authorities, intergovernmental or supranational bodies.
- Third-party service providers.
- Third parties who are involved in judicial proceedings, in particular, if they submit a legal order, court order or equivalent legal order to us.
- Credit agencies, bureaus or associations, if required by applicable law (e.g. information on payment delays, payment defaults or other irregularities that may be relevant to your credit report).

**3.3 We process your personal data in order to protect your vital interests or the vital interests of another natural person. This includes the following purposes:**

- Prevention, detection, mitigation and investigation of unlawful activities that may result in impairment of your vital interests or the vital interests of another natural person, unless there is a statutory obligation to this effect.

**Where necessary, we transmit your personal data to processors and the following recipients for one or several of the purposes described above:**

- Law enforcement agencies, courts, government agencies or public authorities, intergovernmental or supranational bodies
- Third parties who are involved in judicial proceedings
- External service providers

**3.4 With your consent, we process your personal data for the following purposes:**

- Marketing communications by telephone or electronic mail (such as email or SMS), unless these communications are permitted without your consent under applicable law
- Processing of your exact location data to provide location-based services
- Processing of your personal data on the basis of your consent, which you have given so that we can enable you to use certain services or make them available to you

You can find information about your right to withdraw your consent below under Rights as a data subject and information with regard to the use of cookies and similar technologies below under Cookies & similar technologies.

**Where necessary, we transmit your personal data to processors and the following recipients for one or several of the purposes described above:**

- External service providers
- Other third parties with whom we partner to offer you specific services (as described at the collection of the respective user consent)
- Third-party financial institutions with whom we partner for them to provide joint content and services (such as, registration, transactions and customer support). These third-party financial institution partners will use your personal data to send you marketing communications only if you have requested their services

Without your consent, we will not pass on your personal data to third parties for their marketing or advertising purposes, nor will we sell or otherwise make it available to third parties for a fee.

**4. Storage duration and erasure**

Your personal data will be stored by us in accordance with applicable data protection laws to the extent necessary for the processing purposes set out in this User Privacy Notice (see Purposes and legal basis for data processing and categories of recipients for more information on the processing purposes). Subsequently, we will delete your personal data in accordance with our data retention and deletion policy or take steps to properly render the data anonymous, unless we are legally obliged to keep your personal data longer (e.g. for tax, accounting or auditing purposes). In Europe,

the retention periods are generally between 6 and 10 years (e.g. for contracts, notifications and business letters). As far as legally permissible or required, we restrict the processing of your data instead of deleting it (e.g. by restricting access to it). This applies in particular to cases where we may still need the data for the execution of the contract or for the assertion of or defence against legal claims. In these cases, the duration of the restriction of processing depends on the respective statutory limitation or retention periods. The data will be deleted after the relevant limitation or retention periods have expired.

The specific retention periods for personal data are as specified in the above paragraph. How long we retain personal data may vary depending on the Services we provide and our legal obligations under applicable national law. The following factors typically affect the retention period:

- **Necessity for the provision of our Services**  
This includes such things as executing the User Agreement with you, maintaining and improving the performance of our products, keeping our systems secure, and maintaining appropriate business and financial records. Most of our retention periods are determined on the basis of this general rule.
- **Special categories of personal data**  
If we store special categories of personal data, a shorter retention period is usually appropriate.
- **Consent-based processing of personal data**  
If we process personal data on the basis of consent (including consent to the extended storage), we store the data for as long as necessary in order to process it according to your consent.
- **Statutory, contractual or other similar obligations**  
Corresponding storage obligations may arise, for example, from laws or official orders. It may also be necessary to store personal data with regard to pending or future legal disputes. Personal data contained in contracts, notifications and business letters may be subject to statutory storage obligations depending on national law.

## 5. Rights as a data subject

Subject to possible restrictions under national law, as a data subject, you have the right to access, rectification, erasure, restriction of processing and data portability with regard to your personal data. In addition, you can withdraw your consent and object to our processing of your personal data on the basis of legitimate interests. You can also lodge a complaint with a supervisory authority.

Your rights in detail:

- You can withdraw your consent to the processing of your personal data by us at any time. As a result, we may no longer process your personal data based on this consent in the future. The withdrawal of consent has no effect on the lawfulness of processing based on consent before its withdrawal.
- You have the right to obtain access to your personal data that is being processed by us. In particular, you may request information on the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, the existence of the right to request rectification or erasure of personal data or restriction of

processing of personal data or to object to such processing, the right to lodge a complaint with a supervisory authority, any available information as to the personal data's source (where they are not collected from you), the existence of automated decision-making, including profiling and, where appropriate, meaningful information on its details. Your right to access may be limited by national law.

- You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- You have the right to obtain from us the erasure of personal data concerning you, unless processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims. The right to erasure may be limited by national law.
- You have the right to obtain from us restriction of processing to the extent that
  - the accuracy of the data is disputed by you,
  - the processing is unlawful, but you oppose the erasure of the personal data,
  - we no longer need the data, but you need it to assert, exercise or defend legal claims or
  - you have objected to the processing.
- You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller ('right to data portability').
- You have the right to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence, your place of work or the registered office of the controller.

If your personal data is processed on the basis of legitimate interests, you have the right to object to the processing of your personal data on grounds relating to your particular situation. This also applies to profiling. If your personal data is processed by us for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

The exercise of the above data subjects' rights (e.g. right to access or erasure) is generally free of charge. Where requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may charge an appropriate fee (at most our actual costs) in accordance with the applicable statutory regulations or refuse to process the application.

#### **Exercising your rights and managing your settings**

You can exercise your rights as a data subject via our contact forms, in addition, you are of course free to contact us in any other way.

If you would like to change your preferences regarding reebba notifications (including marketing communications), you can do so at any time by using the Contact page. If you do not wish to receive marketing communications from us, you can contact us in the same way. For technical reasons, the implementation may take a few days. For information on how to manage your cookie and similar technology preferences, see the next section Cookies & similar technologies.

#### **6. Cookies & similar technologies**

When you use our Services, we and selected third parties may use cookies and similar technologies to provide you with a better, faster and safer user experience or to show you personalised advertising. Cookies are small text files that are automatically created by your browser and stored on your device when you use the Services. Contact us for more detailed information about our use of cookies and similar technologies and your choices.

Our cookies and similar technologies have different functions:

- They may be technically necessary for the provision of our Services
- They help us optimise our Services technically (e.g. monitoring of error messages and loading times)
- They help us improve your user experience (e.g. saving font size and form data entered)

We use cookies and similar technologies that remain on your device only as long as your browser is active (session cookies), as well as cookies and similar technologies that remain on your device longer (permanent cookies). Where possible, we take appropriate security measures to prevent unauthorised access to our cookies and similar technologies. A unique ID ensures that only we and/or selected third parties have access to cookie data.

#### **Your choices regarding cookies**

You are free to disable the use of cookies and similar technologies if this is supported by your device. You can manage your cookie settings in your browser or device settings.

You can find information about third-party cookies (and similar technologies) related to advertising and how to prevent their use on the following websites:

[www.youronlinechoices.eu](http://www.youronlinechoices.eu) - opens in new window or tab

[www.aboutads.info/choices](http://www.aboutads.info/choices) - opens in new window or tab (only available in English)

[www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) - opens in new window or tab (only available in English)

Users in the European Economic Area (EEA) can also use Advertising and related preferences - opens in new window or tab to determine to what extent they consent to the processing of their personal data for advertising purposes via cookies (and similar technologies)

If you decide not to have your personal data processed by us for advertising purposes via cookies (and similar technologies), this does not mean that we will not show you advertisements. It simply means that these advertisements will not be personalised for you using first-party or third-party cookies, web beacons or similar technologies.

#### **7. Data security**

We protect your personal data through technical and organisational security measures to minimise risks associated with data loss, misuse, unauthorised access and unauthorised disclosure and alteration. To this end we use firewalls and data encryption, for example, as well as physical access restrictions for our data centres and authorisation controls for data access.

#### **8. Other important information regarding data protection**

This section contains important additional information about the protection of personal data in connection with the use of our Services, including whether you are required to provide personal data.

**What happens when you share your personal data on our sites or applications?**

Other users have access to some of the information you share on reebba or disclose to other users. For example, other users can see your listed items, wanted items, public posts and comments, whether your items are available, feedback, ratings, CO<sub>2</sub> rating and Generosity Index rating. Other users can also see any information you chose to share in your profile.

When you use our Services, your public user ID may be displayed and available to the public and associated with all of your public reebba activity. Notices sent to other users about suspicious activity and notice violations on our sites may refer to your public user ID and specific items. Accordingly, if you use a username that allows others to identify you, these others may be able to identify your reebba activities.

To help protect your personal data, we allow only limited access to other users' contact and postage information as necessary to facilitate your transactions and collect payments. However, when users are involved in a transaction, they have access to each other's name, user ID, email address and other contact and postage information.

**Your responsibilities over transactional information you receive through reebba**

When you complete a transaction with another user (or a transaction has been cancelled, failed or subsequently invalidated), if we provide you with the other user's personal data (such as name, username, email address, contact information, postage and billing information). Independent from us, you are the controller of such data and responsible for any processing.

Unless you act for purely personal purposes, we recommend that you explain your data processing activities in your own privacy notice and protect the privacy of other users. As a lender or borrower, you must in any case comply with the applicable data protection laws and in particular protect the rights of other users as data subjects, e.g. give them the opportunity to access the personal data collected by you and demand that it be erased.

You may use the personal data that you have access to only for reebba transaction-related purposes, or for other Services offered through reebba (such as postage, fraud complaints, and member-to-member communications), and for purposes expressly consented by the user to whom the data relates. Using personal data of other users that you have access to for any other purpose constitutes a violation of our User Agreement.

**Personal data relating to third parties**

If you provide us with personal data relating to another person, you must obtain the consent of this person or the disclosure of the data to us must be otherwise legally permissible. You must inform the other person of how we process personal data in accordance with our User Privacy Notice.

**Filtering of messages sent via our messaging tools**

We filter the messages sent via our messaging tools according to certain criteria and check conspicuous messages manually if necessary. The messages are first received by us and then

forwarded to the recipient. All messages are filtered according to certain criteria. If necessary, conspicuous messages are checked manually by us. In the event of a violation, we reserve the right to block the transmission of the message and to restrict the borrowing or lending functions of your reebba account or to block your reebba account.

This is to protect legitimate interests such as protecting against fraudulent or suspicious activities (e.g. spam, viruses, phishing or other illegal activities) or enforcing our User Agreement and our other rules and policies (e.g. illegal and other prohibited content), including but not limited to enforcing the prohibition of purchases and sales outside of reebba.

#### **Are you obliged to provide your personal data to us?**

Some of the personal data that you provide to us (e.g. data by which we can identify you) are required to enter into the User Agreement. The provision of any other personal data is voluntary, but may be necessary for the use of our Services, such as bidding, purchase and sales data to complete a transaction.

#### **Children's Privacy**

Our services may be used by children from the minimum age of 13 but their account must be supported by a parent or carer as specified in our [User Agreement](#). Please also see our [Safeguarding and Staying Safe Online Policy](#).

#### **Staying signed in**

When you sign into your account on our Services, we give you the option to stay signed into your account for a certain amount of time. If you are using a public or shared computer, we encourage you not to choose to stay signed in. You or any other user of the computer/browser you signed in on will be able to view and access most parts of your account and take certain specific actions during this signed in period without any further authorisation. The specific actions and account activities that you or any other user of this computer/browser may take include:

- Browse or make an offer on an item
- View the My reebba page
- View or edit the Favourites List or order details
- View the profile page
- Send member-to-member messages
- Conduct after-sale activities, such as leaving Feedback and viewing user rewards

If you attempt to change your password, User ID, update any other account information or attempt other account activity beyond those listed above, you may be required to enter your password.

You can typically end your signed-in session by either signing out and/or clearing your cookies. If you have certain browser privacy settings enabled, simply closing your browser may also end your signed-in session. If you are using a public or shared computer, you should sign out and/or clear your cookies when you are done using our Services to protect your account and your personal data.