

## Privacy Policy

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Flie-San GmbH, Rosenbroecksweg 21, D-47623 KEVELAER

In compliance with the [European General Data Protection Regulation \(GDPR\)](#) and [German Privacy Policy Act \(BDSG\)](#) we hereafter inform you what [personal data](#) about you are collected on our website, their protection and your rights. Through the operation of data (e.g. Collection, [Processing](#) and Use) we are thoughtful about your [personal information](#) and proceed in due consideration of legal obligations.

### Your Right to Object

Your right to object will be affective prospectively and leaves inviolate any legitimacy of possible data processing till the date of your objection.

You have the right to object at any time to processing of your [personal data](#) (incl. [profiling](#)) for [direct marketing](#) purposes.

You have the right to object at any time to processing of your [personal data](#) (incl. [profiling](#)) for a task carried out in the [public interest](#) or in the [exercise of official authority](#), on grounds relating to your particular situation (cp. [Article 6\(1\) point \(e\) GDPR](#)).

You have the right to object at any time to processing of your [personal data](#) (incl. [profiling](#)) for the purposes of the [legitimate interests](#), on grounds relating to your particular situation (cp. [Article 6\(1\) point \(f\) GDPR](#)).

Source: [Art. 21 \(1\) and \(2\) GDPR](#)

Please consult us which processing and data in particular are relevant for you, to evaluate your individual case in reference to otherwise stated legal bases and technical, organisational contingencies (cp. [Consideration 63 sentence 7 GDPR](#)).

## Controller

Flie-San GmbH  
Rosenbroecksweg 21  
D-47623 KEVELAER

For questions and exercise of your rights please use our contact form [flie-san.de > Contact](#)

## Lawfulness

The lawfulness of our processing of your [personal data](#) on our website is reasoned

### In reference to Article 6(1) point (a) GDPR

You have given consent to the processing of your [personal data](#) for one or more specific purposes;

### In reference to Article 6(1) point (b) GDPR

Processing is necessary for our [performance of a contract](#) to which you and us are party or in order to take steps at your request prior to entering into a contract.

The purpose of data processing conforms to a specific product including our services in the first place. For further details to these purposes please see our decisive contracts and general terms.

### In reference to Article 6(1) point (c) GDPR

Processing is necessary for compliance with a [legal obligation](#) and requirement to which we are subject;

### In reference to Article 6(1) point (e) GDPR

Processing is necessary for the performance of a task carried out in the [public interest](#) or in the [exercise of official authority](#) vested in us (as the [controller](#));

### In reference to Article 6(1) point (f) GDPR.

Processing is necessary for the purposes of our [legitimate interests](#) pursued by us as the [controller](#) or by a [third party](#). Those [legitimate interests](#) and [purposes](#) are

- Public relation including the publication of our contact data,
- Marketing in our own interests for our products and services,
- Providing forms and functions to ease and establish contacts,
- To assure security measures of our website and email accounts, including services of a [third party](#).

## Collection, Processing and use of your data

You may visit and review our website without stating any of your **personal details**. Any registration or login is **not** required.

### Sources of Personal Data

Our website collects the following **personal data** including **assignable data** which allow quantifying a person with further, additional information.

#### 1. Server Log-Data of our Internet Service Provider (ISP, Host)

In this particular case our ISP collects and provides us with **assignable data** without any direct personal reference and in compliance with data protection obligations in an anonymized form:

- The IP-Address resp. Hostname (**anonymized**) of the device you connect to our website or services,
- The specification of your browser you connect with,
- The website you visited before,
- The system configuration of the device you connect with,
- Date and timestamp.

This data provided allow **no** explicit conclusions of your person and will be evaluated for statistical reasons or troubleshooting only.

#### 2. Our Email Form included within our website

In case you use our provided email form included within our website to get in touch with us via email, you are aware of voluntarily acquainting your **personal data** (your Name, Email Address, etc.) with us. Furthermore with confirmation of the [Send]-Button you actively agree to transmit and process your **personal data** for communication purposes.

We will use the communicated data, without your specific consent, exclusively to process and fulfil your requests only. At full completion of all requirements your data will be blocked for any further use. With expiration of legal retention periods your data will be deleted permanently, unless you agreed otherwise with your specific consent to process and use your data further on.

Our ISP (1.) operates, secures and backups all of our email accounts.

#### 3. CMS Our Content Management System (CMS) including extensions (plugins) hosted by our ISP (1.)

The implemented CMS WordPress (WordPress.org USA) including **plugins** of a **third party** can possibly collect diverse **assignable data** to provide services and for other reasons that deprive us of our area of accountability.

We **disabled** / deactivated all known settings not 100% conform to the GDPR and BDSG.

Our own development and programming within our CMS **do not** collect or utilise any of your **personal data**.

### Processing for Other Purposes

We assess thoughtfully which of your **personal data** are necessary to process while fulfilling your requests – and which data would be used for purposes other than those for which your **personal data** were initially collected (cp. Art. 7(4) GDPR, Art. 5(1) point (b) GDPR).

As a result should we process data for purposes other than those for which your **personal data** were initially collected without your **consent**, we as the **controller** consider any irreconcilableness based on Article 6(4) points (a) to (e) GDPR. In case of need we will obtain your specific **consent** to process.

### Sharing of Personal Data

Any sharing of your **personal data** with a **third party** will take place exclusively to process and fulfil your requests only, and in case of need with your specific **consent**. We should collect and process your data for our own marketing purposes and customer care only. We **do not** share any of your data for marketing purposes of a **third party** without your specific **consent**.

**Note:** You have the right to object at any time to processing of your **personal data** for our own **direct marketing** purposes. For your informal objection please use our contact form [flie-san.de > Contact](https://flie-san.de/Contact).

According to legal obligations sharing of your **personal data** can be required. In this case recipients are authorities to fulfil legal notification obligations (e.g. Fiscal Authorities, Social Authorities, Criminal Prosecution Authorities, Courts, etc.).

### Transfers of Personal Data to a Third Country

Any transfer of your **personal data** to service providers located outside the EU (**third country**) will take place exclusively to process and fulfil your requests and with your specific **consent** only. If necessary we will inform you beforehand about the presence of ratifications on the adequate level of data protection in a third country adopted by the Commission or other data protection guarantees (e.g. Binding Corporate Data Protection Regulations or EU Standard Protection Clauses) based on **Article 13(1) points (f) GDPR**.

### Period of Data Storage

Your **personal data** will be processed and stored for the period to fulfil our contractual and legal obligations. Backup copies of your data will be deleted permanently time delayed.

### Automated decision-making in the particular case including profiling

Based on definition **Article 4(4) GDPR** 'profiling' means any form of automated processing of your **personal data** (and possibly data of others), due to individual decision making towards you, or analysing or predicting any of your behaviours. In this context your rights are described in **Article 22 GDPR** (cp. **Paragraph 37 BDSG**).

We **do not** perform any automated individual decision making processes including **profiling**.

### Processing of Cookies

**flie-san.de** writes, reads or processes **no** self-generated Cookies.

**Third parties** are **not** allowed to collect, process or use any **personal data** via Cookies by means of our website. Cookies written and read by webserver by means of indirect or direct links to external websites deprive us of our area of accountability.

### Anonymous Cookies of Partners (Web Tracking, Web Analysis Services)

This website **does not** use techniques for Web Tracking, Web Analysis Services (e.g. **eTracker**, **Google Analytics**, etc.) – therefore no data will be collected or transferred.

### Directive on Privacy and Electronic Communications

In compliance with the **Directive on Privacy and Electronic Communications (RL 2009/136/EG)**, in short "EU Cookie Policy", a Cookie-Warning has to be displayed and agreed by the websites visitor if Cookies are in use only.

### Information about Cookies

Cookies are small text data files written by a webserver of a visited website, stored on your device and readable for diverse purposes. Generally you can differentiate Cookies:

Cookies which are deleted from your device after closing the browser (so called **Session Cookies**) – and then again Cookies which stay on your device for a longer period of time (so called **Persistent Cookies**).

More Information about Cookies you can examine at [https://en.wikipedia.org/wiki/HTTP\\_cookie](https://en.wikipedia.org/wiki/HTTP_cookie).

**Note:** You can configure storage behaviour of Cookies. The individual procedure to do so differentiates according to your browser software. In case you decide to ban all Cookies, please configure your browser settings or install a suitable browser add-on.

### Social Media

**flie-san.de** **does not** use any Social Media Plugins of services like **Facebook**, **Google**, **Google+** and **Twitter**.

In some pages of our website we present symbols (icons) of social networks like **Facebook**, **Twitter** and **Google+**.

Those services are provided and operated by companies like **Facebook Inc. USA**, **Google Inc. USA** und **Twitter Inc. USA**.

For protection of your **personal data** and to prevent any data transfer with a social network while visiting our website, any forwarding to social network is set up as a static link. Therefore a transfer of data will be established not until after you actively click those links.

### Content Delivery Networks / Resources of a third party

We **do not** obtain any content from external third party **Content Delivery Networks (CDN)** and we **do not** transfer any data to those networks. Further information about CDN is available for instance at [https://en.wikipedia.org/wiki/Content\\_Delivery\\_Network](https://en.wikipedia.org/wiki/Content_Delivery_Network).

### Data Security

Content and information of **flie-san.de** will be transferred **encoded** via Internet with the use of SSL. Your **personal data** (Your Name, your E-Mail Address, etc.) you communicate with us using our email form will be transferred **encoded** via Internet. For further information about **encryption** please refer to for instant [http://de.wikipedia.org/wiki/Transport\\_Layer\\_Security](http://de.wikipedia.org/wiki/Transport_Layer_Security)

Our Internet Service Provider secures our website and other systems involved with technical and organisational measures against losses, destruction, access, change or dissemination of your data by unauthorized parties. To prevent falsified emails and **Phishing** please categorise critically any email without a concrete and known contact, possibly asking for passwords and other login data – do not open attached files or follow offered links to uncertain locations – and delete those email immediately. **flie-san.de** **does not** send any of those critical emails asking for passwords or account data. Purposes of our emails are the processing and fulfilling of your requests.

### Consent

How mentioned above, in case of need we will obtain your specific **consent** to process your data based on **Article 7 paragraph (1) to (4) GDPR**. You have the right to object any given **consent** at any time whereas your objection will be affective prospectively and leaves inviolate any legitimacy of possible data processing till the date of your objection. Any of your specific **consent** already issued to us before the Regulation GDPR (dated 2018/05/25) became operative stays valid further on.

Minors (**children who did not complete their 16<sup>th</sup> year of one's life**) have to be assisted by their parents or legal guardian to obtain authorization for any specific **consent**. The general contract law such as the rules on the validity, formation or effect of a contract in relation to a child stays unaffected by the Regulation **GDPR** and has to be ratified with a parent or legal guardian present always.

### Information to be provided and Rights

To fulfil our obligation to give information and implement your rights by your request we communicate **personally exclusively** with you in written analogue and / or / not electronical (digital) form, and verbally. Should arise any reasonable doubt about your unique identity, we will not impart any information (cp. **Article 11, 12(6), GDPR** and **Paragraph 34 (1) to (5) BDSG**).

Please note that our obligation to give information and implement your rights is limited based on the Regulations **GDPR** and **BDSG**.

### Your Rights

In any case we process any of your **personal data** you can exercise your rights concerning their processing. Please consult us which processing and data in particular are relevant for you, to evaluate your individual case in reference to otherwise stated legal bases and technical, organisational contingencies (cp. **Consideration 63 sentence 7 GDPR**).

### Your Right of Access

Based on **Article 15(3) sentence 1 GDPR** we provide willingly a copy of your **personal data** we process at your disposal, unless otherwise vetoed by restrictions. Please note that additional copies you demand will cause administration fees based on **Article 15(3) sentence 2 GDPR**.

Please consult us which processing and data in particular are relevant for you, to evaluate your individual case in reference to otherwise stated legal bases and technical, organisational contingencies (cp. **Consideration 63 sentence 7 GDPR**).

### Your Right of Rectification

Your right to obtain rectification based on [Article 16 GDPR](#) includes as well any rectification of inaccurate [personal data](#) as the completion of incomplete [personal data](#) we process.

Please note that your [Right of Rectification](#) is limited concerning scientific or statistical research purposes based on [Paragraph 27\(2\) sentence 1 BDSG](#) and archiving purposes based on [Paragraph 28\(3\) BDSG](#).

### Your Right to Erasure

You have the [Right to Erasure](#) at any time of your [personal data](#) we process based on [Article 17\(1\) GDPR](#) unless otherwise limited.

### Your Right to Restriction of Processing

You have the [Right to Restriction of Processing](#) at any time of your [personal data](#) we process based on [Article 18\(1\) GDPR](#).

In case of a [Restriction of Processing](#) we will process your data with your specific given [consent](#) only. Please note that your [Right to Restriction of Processing](#) is limited concerning [Article 18\(2\) GDPR](#).

### Your Right to Data Portability

You have the [Right to Data Portability](#) at any time of your [personal data](#) we process. Different to a copy of your [personal data](#) we process – a [Data Portability](#) is specified as a structured, commonly used, machine-readable and interoperable format, which can be transmitted between [Controllers](#) of [Processors](#) (cp. [Consideration 68 GDPR](#)).

You can obtain your [Right to Data Portability](#) of your [personal data](#) based on [Article 20 GDPR](#) considering limitations.

### Your Right to Object

You have the [Right to Object](#) at any time concerning processing of your [personal data](#) we process based on [Article 21 GDPR](#) considering limitations.

### Your Right to Lodge a Complaint

You have the [Right to Lodge a Complaint](#) with a supervisory authority in any case at any time you assume a possible infringement of the Data Protection Regulation ([GDPR](#), [BDSG](#)) concerning processing of your [personal data](#). Please consult a supervisory authority in your Member State of your habitual residence, place of work or place of the alleged infringement ([Article 56, 77 GDPR](#), cp. [Paragraph 19 BDSG](#)).

Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI)  
Husarenstraße 30  
53117 Bonn  
Deutschland

## Your Obligations

Within our business relation you have to provide any of your [personal data](#) necessary for

- Initiation, entering, processing and completion of a business relationship,
- Fulfilment of its many contractual requirements,
- Inquiries of its many legal obligations.

Without the required data we are generally not able to enter into a contract with you and to fulfil contractual agreements for completion.

## Definitions (Details) according to GDPR, BDSG-new

<p><b>Consent</b> GDPR Article 4(11) GDPR BDSG-new Paragraph 46(17) BDSG</p>	<p><b>Consent</b> of the <b>data subject</b> means any freely given, <b>specific</b>, informed and unambiguous indication of the <b>data subject's</b> wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the <b>processing</b> of <b>personal data</b> relating to him or her.</p>
<p><b>Controller</b> GDPR Article 4(7) GDPR BDSG-new Paragraph 46(7) BDSG</p>	<p>The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the <b>processing of personal data</b>; where the purposes and means of such processing are determined by Union or Member State law, the <b>controller</b> or the specific criteria for its nomination may be provided for by Union or Member State law.</p>
<p><b>Other Purposes</b> GDPR Article 6(4) GDPR BDSG-new Paragraph 24 BDSG</p>	<p>The processing of <b>personal data</b> for a purpose other than that for which the <b>personal data</b> have been collected.</p>
<p><b>Personal Data</b> GDPR Article 4(1) GDPR BDSG-new Paragraph 46(1) BDSG</p>	<p>Any information relating to an identified or identifiable natural person (<b>defined as Data Subject</b>); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</p>
<p><b>Processing</b> GDPR Article 4(2) GDPR BDSG-new Paragraph 46(2) BDSG</p>	<p>Any operation or set of operations which is performed on <b>personal data</b> or on sets of <b>personal data</b>, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.</p>
<p><b>Processor</b> GDPR Article 4(8) GDPR BDSG-new Paragraph 46(8) BDSG</p>	<p><b>Old definition: Data Processor.</b> A natural or legal person, public authority, agency or other body which processes <b>personal data</b> on behalf of the <b>controller</b>.</p>
<p><b>Profiling</b> GDPR Article 4(4) GDPR BDSG-new Paragraph 46(4) BDSG</p>	<p>Any form of <b>automated processing of personal data</b> consisting of the use of <b>personal data</b> to evaluate certain personal aspects relating to a natural person, in particular to <b>analyse</b> or <b>predict</b> aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.</p>
<p><b>Pseudonymisation</b> GDPR Article 4(5) GDPR BDSG-new Paragraph 46(5) BDSG</p>	<p>The <b>processing of personal data</b> in such a manner that the <b>personal data</b> can no longer be attributed to a specific <b>data subject</b> without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the <b>personal data</b> are not attributed to an identified or identifiable natural person.</p>
<p><b>Third Party</b> GDPR Article 4(10) GDPR</p>	<p>A natural or legal person, public authority, agency or body <b>other than</b> the <b>data subject</b>, <b>controller</b>, <b>processor</b> and persons who, <b>under the direct authority</b> of the <b>controller</b> or <b>processor</b>, are authorised to process <b>personal data</b>.</p>