

# **FAQ Consent Management Plattform (CMP)**

## **Why do we use cookies and similar technologies on our website?**

Without the use of technologies, it is impossible to have the internet or access websites on one's device. The only way to read without technology is by buying a newspaper at a newsstand. However, we apply our technologies prudently and in accordance with existing data protection laws. We are therefore only permitted to use certain technologies if we receive your consent. We obtain this consent and manage it through what is known as our Consent Management Platform (CMP).

## **Why is consent requested and what is it used for?**

Some data processing operations are only possible with your explicit consent. With the introduction of our Consent Management Platform (CMP), we enable every user to decide for themselves about their privacy settings. Legally, we differentiate between consent for setting cookies and similar technologies on a device and consent for processing personal data. We have decided, to set cookies and similar technologies for the use of personalised advertising only with your consent. The different purposes for which we request consent can already be seen on the first page of the CMP. If you would like detailed information, please click on the 'Settings or Reject' button. Of course, you can always refer to our privacy policy for all information.

## **For which categories do we need your consent?**

Those are:

- Store and/or access information on a device
- Personalised advertising and content, advertising and content measurement, audience research and services development
- Display third-party content (social networks, video)

## **When do we allow the use of cookies and similar technologies without consent?**

Certain technologies – including specific cookies – are technically essential and therefore may be set without consent under current law. These include technologies necessary for loading a webpage or processing a payment, as well as those that enhance internet security, help prevent crime, or are required for the operation of the site in its current form. Additionally, some website functions, such as contact forms, troubleshooting, etc., need cookies to function properly. There is no option to reject these cookies, but they can be disabled through the settings of the respective browser. More information can be found in the 'Special Purposes' category.

## **What data processing do we allow without consent?**

Data processing that is necessary, for example, to fulfill our contractual obligations may be carried out without your consent. In this case, the legal basis is the fulfillment of our contractual obligation to you, such as due to an existing subscription.

Data processing may also be based on our legitimate interest, such as economically operating our online service, if no withdrawal has occurred. This includes, for example, technologies that determine whether you are reading our site on a small mobile phone or a large screen, and adjust the format of our content and ads to fit your display size.

It is important to distinguish: The setting of a cookie itself cannot be based on legitimate interest; the legitimate interest is only relevant for the underlying data processing. Thus, a cookie-based application requires both consent for setting the cookie (unless it is 'Essential') and a legitimate interest or consent for the underlying processing. It will not be used if one of the two legal bases is missing.

### How can I restrict processing activities and the setting of cookies that require consent?

On our Consent Management Platform (CMP), we offer extensive options to minimize cookie and tracking technologies on our site. You can access the CMP via the cookie banner that appears at the start of your website visit. There, under 'Settings or Reject', you can reduce data processing to a minimum. Please note that some functions may then not be available and usability may decrease.

**Step 1:**

Click on 'Settings or Reject' on the first level of the banner (instead of 'Accept All').

**Data Protection and User Experience**

We transfer personal data to up to 274 [third-party vendors](#) who help us improve and finance our web offering. In this context, user profiles are also created (based on cookie IDs and other technologies), enriched with data from other websites, and processed outside the EEA. To facilitate this, we also share your encoded privacy preferences, known as a TC-String, with these third-party vendors. We require your consent to do this and to be able to use certain services for the purposes outlined below. By clicking 'Accept All', you agree to these terms (which can be withdrawn at any time). This includes [your consent to the transfer of certain personal data to third countries, e.g. the USA, under Article 49 \(1\) \(a\) of the GDPR](#). Under 'Settings or Reject', you can change your settings or reject data processing. You can modify your selection at any time under 'Privacy Manager' at the bottom of the page.

**Store and/or access information on a device** ▼

**Personalised advertising and content, advertising and content measurement, audience research and services development** ▼

**Display third-party content (Social Networks, Video)** ▼

Settings or Reject

Accept All

You can exercise your rights to reject to data processing based on legitimate interests by selecting 'Settings or Reject'.

**Step 2:**

Do nothing on the second level. Do not click any of the available opt-in options (thus leaving it at the default setting). This will deselect all third-party vendors requiring consent 'all at once,' since you have not given consent

## Data Protection and User Experience

[Consent](#)

For the purposes that can be selected or deselected here, processings by the Third-party vendors listed below will only be carried out if you give your consent.

**Store and/or access information on a device**

 OFF ▼

**Personalised advertising and content, advertising and content measurement, audience research and services development**

 OFF ▼

**Display third-party content (Social Networks, Video) \***

 OFF ▼

**Special Purposes**

 ▼

**Features**

 ▼

Additionally, we also work with some third-party vendors based on legitimate interest and other legal grounds without consent. You can reject these processings individually or collectively by following the provided buttons.

[Legitimate Interest](#)

You can manage a list of all third-party vendors here.

[Third-party vendors](#)

\* Non-IAB processing purposes

Reject as Selected

Accept All

[FAQ](#) | [Privacy Policy](#) | [Imprint](#)

### Step 3:

Click on 'Legitimate Interest'

## Data Protection and User Experience

[Consent](#)

For the purposes that can be selected or deselected here, processings by the Third-party vendors listed below will only be carried out if you give your consent.

**Store and/or access information on a device**

 OFF ▼

**Personalised advertising and content, advertising and content measurement, audience research and services development**

 OFF ▼

**Display third-party content (Social Networks, Video) \***

 OFF ▼

**Special Purposes**

 ▼

**Features**

 ▼

Additionally, we also work with some third-party vendors based on legitimate interest and other legal grounds without consent. You can reject these processings individually or collectively by following the provided buttons.

[Legitimate Interest](#)

You can manage a list of all third-party vendors here.

[Third-party vendors](#)

\* Non-IAB processing purposes

Reject as Selected

Accept All

[FAQ](#) | [Privacy Policy](#) | [Imprint](#)

Disable the 'ON' switch by clicking it (it will then show 'OFF') and save your settings by clicking 'Reject as Selected'. You have now limited data processing to the technical minimum.

**Data Protection and User Experience**

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< **Legitimate Interest**

Additionally, we also work with some third-party vendors based on legitimate interest and other legal grounds without consent. You can reject these processings individually or collectively by following the provided buttons.

ON  | ^

Advertising and content can be personalised based on your profile. Your activity on this service can be used to build or improve a profile about you for personalised advertising and content. Advertising and content performance can be measured. Reports can be generated based on your activity and those of others. Your activity on this service can help develop and improve products and services.

- + Use limited data to select advertising
- + Use limited data to select content

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**Reject as Selected** **Accept All**

[FAQ](#) | [Privacy Policy](#) | [Imprint](#)

Please note that you will need to repeat this for each device. As we are privacy-friendly and do not combine your device or cookie IDs with your name and email address, we are unable to handle the technical settings for you. We could only do so if we had significantly more data points stored from you.

### **Many banners on different websites look the same. Why is that, and what are the benefits for me?**

Consent management should be transparent for users and allow for individual settings. To help users navigate various websites quickly, a large number of publishers and other website operators have agreed on a uniform approach and developed the so-called 'IAB-TCF Standard'. The IAB-TCF Standard is designed to enable publishers to interact with partners, such as for advertising marketing, through standardized, user-friendly, and transparent procedures. This standard was developed across Europe with data protection experts to ensure a compliant implementation of legal requirements. For instance, if consent is required for data processing, this procedure transmits the consent to the partner (known as 'signal transmission'). The standards create a reliable basis for the involved parties, which is documented in the corresponding policies. For more information, please visit: <https://iab europe.eu/transparency-consent-framework/>

### **Why are the toggle switches in the 'Legitimate Interest' category, which are only accessible through a submenu, all set to 'ON'?**

Processing on the basis of legitimate interest takes place independently of any consent given for other processing operations until the user objects. This can be

done under the category 'Legitimate interest' for all processing operations at the same time ('reject all'), or individually.

Important: All required consents must be cumulative for us to carry out the processing. If, for example, consent to the setting of a cookie that is not technically necessary is not given, **we will not carry out further processing on the basis of a legitimate interest.**

This means that the categories each relate to a specific processing purpose. Therefore, certain providers can be found several times, i.e. in several categories. If a provider sets a cookie to create user profiles for advertising or market research purposes because it wants to display personalised and non-personalised advertising on an advertising space on the website and at the same time, for example, uses the same cookie to design the frequency with which an advertisement is displayed, then this provider will be found in three categories:

a) **First category: Setting a cookie for advertising purposes.** This category implements the ePrivacy Directive and the requirements of the Federal Court of Justice on 'Planet49' by obtaining consent for the setting of certain cookies regardless of subsequent processing.

b) **Second category: Selection of simple ads.** This category enables, for example, so-called 'frequency capping' (I only see an ad for a health insurance policy once, not 100 times in a row), on the basis of legitimate interest. This category is not mandatory, i.e. if you only accept personalised advertising, this category does not apply to you.

c) **Third category: Personalised ads.** We only carry out so-called programmatic advertising with the user's consent.

d) **Fourth category: Measuring ad performance.** This only takes place with your consent (both for setting the cookie and for the processing purpose of measuring ad performance).

In this example, no consent is required for 'frequency capping', as no cookie is set in category one without the user's consent, meaning that the processing listed under the category of 'Legitimate Interest' does not apply in practice. This means that processing on the basis of a legitimate interest only takes place without consent if it is also carried out without cookies ('cookie-less') or if the cookie is technically necessary. Of course, the legal ground of 'legitimate interest' for this processing must also be given as a further requirement.

### **Does this cookie practice not violate the GDPR or the ePrivacy Directive, which explicitly require an opt-in for tracking?**

On the contrary: It is important to distinguish between the GDPR and the ePrivacy Directive or their national cookie regulations. Technically necessary cookies may be set without consent. Data processing can be based on any of the legal grounds

mentioned in Article 6 (1) GDPR, provided the respective conditions are met. You can find more details in our CMP.

### **Why do I see cookies even though I have not given my consent anywhere?**

If **no consent is given at all**, you will only see cookies that are essential and listed under 'Special Purposes'. Processing based on these cookies will only be carried out if it is based on a legitimate interest or a contractual basis, meaning they are essential to display the website or app on your device and to offer you the product you purchased in case of a subscription. This includes, for example, the ability for subscribers to log in and maintain the logged-in state across different visits to recognize you as a subscriber.

### **Why do some publishers have more than 100 trackers in use on their sites?**

Data protection law requires transparency regarding third-party vendors involved in digital advertising, among other things. However, advertising often occurs within fractions of a second, making it impossible to update the overview of third-party vendors with the required speed. Our advertising includes, for example, ads served through the auctioning of ad spaces or open auctions, as well as personalised ads in article recommendations.

Since we need to show you all potential third-party vendors **before** your reading experience to create an effective consent design, we provide an overview of all third-party vendors that **might** occupy ad spaces and thus use tracking tools for the stated purposes. However, this does not mean that all partners listed under 'third-party vendors' and set to 'ON' actually receive and process your data. To do so, you would have to visit all our conceivable pages and subpages, including all channels, integrations, and insertions from partners and sub-partners.

Additionally, all third-party vendors have committed to comply with the aforementioned IAB-TCF standard, thus acting in compliance with data protection regulations. Nevertheless, we have not allowed all of the currently more than 600 IAB-certified third parties but have made a selection here. So, if we 'allow' more than 100 third-party vendors, they are never simultaneously present in our digital offerings. Because despite all technology, we cannot read minds, foresee your browsing behavior, or the bookings of our advertisers within the tenth of a second of your visit, we depict all potential partners industry-wide (i.e., the entire advertising industry) from the outset.

### **Why do I see such a long list under third-party vendors? Do all these vendors always track?**

No, because under 'third-party vendors' you can see all the third-party vendors with whom we potentially cooperate. This is a summary of all possible partners, regardless of the legal basis applied.

Vendors set to 'ON' are allowed to process your data as described based on your settings. This is either because you, as a user, have consented to a processing that requires consent or because you have not effectively rejected another processing. Vendors set to 'OFF' do not process your data. Vendors set to 'middle' are listed multiple times (e.g., under Category 1 and 2), and are allowed for certain data processing (e.g., under Legitimate Interest), but not for others (e.g., personalised marketing).

## **What data do all these partners receive?**

We track and transmit only data related to your device or a technical identifier based on consent from the CMP. We do not track names, email addresses, or postal addresses, nor do we combine them.

## **Why does the CMP repeatedly ask for my settings through the cookie banner?**

The CMP is designed in such a way that you only have to make your settings once. The next time you visit the same page with the same device, your settings will be saved. If you see the CMP, the cookie banner, again, there may be various reasons for this:

a) **You are using a different end device or visiting a different website.** Please note that you must repeat your settings for each device and website. This also applies if you use several websites of the same group. As we do not merge your end devices or your cookie IDs with your name and email address, nor do we use your settings across multiple websites, we cannot relieve you of these multiple efforts.

b) **The technically necessary cookie has been (automatically) deleted from your end device.** The settings you have made must be saved in order to suppress the renewed query on the second visit. We store this in the browser of your own end device, again in a cookie, in a data protection-friendly manner. When you visit our website again, this enables us to recognize the settings you have made and not to display your consent a second time. However, if we do not store the cookie centrally on our own server, this has the disadvantage that the method only works as long as the cookie is not deleted from your browser. If you have not deleted the cookie yourself, the following may also have happened: The common operating systems now recognize the cookie without deleting it at regular intervals. However, it is always possible that you are using a particularly data protection-friendly system that deletes the cookie by default after logging out, after closing the browser or after a certain period of time. When you visit our website again, we will not be able to recognize your settings and will therefore have to ask you again for your consent or to change your settings. Please let us know and our technical team will find a solution for you.

c) **We work with new partners or with old partners on a changed legal basis. The system is not static, but dynamic.** New partners are constantly joining this CMP system, companies are bought, change their name, etc. To ensure that your consent is correct and that we always have consent for all partners, including new partners, you must also give or refuse your reject for them or decide whether you wish to exercise an objection. This is another advantage of our CMP: it dynamically takes such changes into account. Otherwise, your consent would quickly become worthless because it would be incomplete or no longer up to date.

## **Where can I withdraw my consent? Where can I change my settings?**

You can change your preferences at any time in the privacy settings (located in the 'Privacy Manager') or withdraw your consent using the 'Tracking Withdrawal' button in the footer, alongside the Imprint and Privacy Policy links.