

# Privacy Policy

Personal data (usually referred to just as "data" below) will only be processed by us to the extent necessary and for the purpose of providing a functional and user-friendly website, including its contents, and the services offered there.

Per Art. 4 No. 1 of Regulation (EU) 2016/679, i.e. the General Data Protection Regulation (hereinafter referred to as the "GDPR"), "processing" refers to any operation or set of operations such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, or combination, restriction, erasure, or destruction performed on personal data, whether by automated means or not.

The following privacy policy is intended to inform you in particular about the type, scope, purpose, duration, and legal basis for the processing of such data either under our own control or in conjunction with others. We also inform you below about the third-party components we use to optimize our website and improve the user experience which may result in said third parties also processing data they collect and control.

Our privacy policy is structured as follows:

- I. Information about us as controllers of your data
- II. The rights of users and data subjects
- III. Information about the data processing

## I. Information about us as controllers of your data

The party responsible for this website (the "controller") for purposes of data protection law is:

*Elura Films KLG  
Himmelrichstasse 6a  
6003 Luzern*

*Telefon: +41 41 511 29 50  
E-Mail: [info@elurafilms.com](mailto:info@elurafilms.com)*

Data protection officer at the provider is:

*David Ammon, [david@elurafilms.com](mailto:david@elurafilms.com)*

## II. The rights of users and data subjects

With regard to the data processing to be described in more detail below, users and data subjects have the right

- to confirmation of whether data concerning them is being processed, information about the data being processed, further information about the nature of the data processing, and copies of the data (cf. also Art. 15 GDPR);
- to correct or complete incorrect or incomplete data (cf. also Art. 16 GDPR);
- to the immediate deletion of data concerning them (cf. also Art. 17 DSGVO), or, alternatively, if further processing is necessary as stipulated in Art. 17 Para. 3 GDPR, to restrict said processing per Art. 18 GDPR;
- to receive copies of the data concerning them and/or provided by them and to have the same transmitted to other providers/controllers (cf. also Art. 20 GDPR);
- to file complaints with the supervisory authority if they believe that data concerning them is being processed by the controller in breach of data protection provisions (see also Art. 77 GDPR).

In addition, the controller is obliged to inform all recipients to whom it discloses data of any such corrections, deletions, or restrictions placed on processing the same per Art. 16, 17 Para. 1, 18 GDPR. However, this obligation does not apply if such notification is impossible or involves a disproportionate effort. Nevertheless, users have a right to information about these recipients.

**Likewise, under Art. 21 GDPR, users and data subjects have the right to object to the controller's future processing of their data pursuant to Art. 6 Para. 1 lit. f) GDPR. In particular, an objection to data processing for the purpose of direct advertising is permissible.**

### III. Information about the data processing

Your data processed when using our website will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations or unless otherwise stipulated below.

#### Cookies

##### a) Session cookies

We use cookies on our website. Cookies are small text files or other storage technologies stored on your computer by your browser. These cookies process certain specific information about you, such as your browser, location data, or IP address.

This processing makes our website more user-friendly, efficient, and secure, allowing us, for example, to display our website in different languages or to offer a shopping cart function.

The legal basis for such processing is Art. 6 Para. 1 lit. b) GDPR, insofar as these cookies are used to collect data to initiate or process contractual relationships.

If the processing does not serve to initiate or process a contract, our legitimate interest lies in improving the functionality of our website. The legal basis is then Art. 6 Para. 1 lit. f) GDPR.

When you close your browser, these session cookies are deleted.

##### b) Third-party cookies

If necessary, our website may also use cookies from companies with whom we cooperate for the purpose of advertising, analyzing, or improving the features of our website.

Please refer to the following information for details, in particular for the legal basis and purpose of such third-party collection and processing of data collected through cookies.

##### c) Disabling cookies

You can refuse the use of cookies by changing the settings on your browser. Likewise, you can use the browser to delete cookies that have already been stored. However, the steps and measures required vary, depending on the browser you use. If you have any questions, please use the help function or consult the documentation for your browser or contact its maker for support. Browser settings cannot prevent so-called flash cookies from being set. Instead, you will need to change the setting of your Flash player. The steps and measures required for this also depend on the Flash player you are using. If you have any questions, please use the help function or consult the documentation for your Flash player or contact its maker for support.

If you prevent or restrict the installation of cookies, not all of the functions on our site may be fully usable.

## LinkedIn

We maintain an online presence on LinkedIn to present our company and our services and to communicate with customers/prospects. LinkedIn is a service of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA.

We would like to point out that this might cause user data to be processed outside the European Union, particularly in the United States. This may increase risks for users that, for example, may make subsequent access to the user data more difficult. We also do not have access to this user data. Access is only available to LinkedIn. LinkedIn Corporation is certified under the Privacy Shield and committed to comply with European privacy standards.

<https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&status=Active>

The LinkedIn privacy policy can be found here:

<https://www.linkedin.com/legal/privacy-policy>

## Facebook

To advertise our products and services as well as to communicate with interested parties or customers, we have a presence on the Facebook platform.

On this social media platform, we are jointly responsible with Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland.

The data protection officer of Facebook can be reached via this contact form:

<https://www.facebook.com/help/contact/540977946302970>

We have defined the joint responsibility in an agreement regarding the respective obligations within the meaning of the GDPR. This agreement, which sets out the reciprocal obligations, is available at the following link:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

The legal basis for the processing of the resulting and subsequently disclosed personal data is Art. 6 para. 1 lit. f GDPR. Our legitimate interest lies in the analysis, communication, sales, and promotion of our products and services.

The legal basis may also be your consent per Art. 6 para. 1 lit. a GDPR granted to the platform operator. Per Art. 7 para. 3 GDPR, you may revoke this consent with the platform operator at any time with future effect.

When accessing our online presence on the Facebook platform, Facebook Ireland Ltd. as the operator of the platform in the EU will process your data (e.g. personal information, IP address, etc.).

This data of the user is used for statistical information on the use of our company presence on Facebook. Facebook Ireland Ltd. uses this data for market research and advertising purposes as well as for the creation of user profiles. Based on these profiles, Facebook Ireland Ltd. can provide advertising both within and outside of Facebook based on your

interests. If you are logged into Facebook at the time you access our site, Facebook Ireland Ltd. will also link this data to your user account.

If you contact us via Facebook, the personal data you provide at that time will be used to process the request. We will delete this data once we have completely responded to your query, unless there are legal obligations to retain the data, such as for subsequent fulfillment of contracts.

Facebook Ireland Ltd. might also set cookies when processing your data.

If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your browser. Cookies that have already been saved can be deleted at any time. The instructions to do this depend on the browser and system being used. For Flash cookies, the processing cannot be prevented by the settings in your browser, but instead by making the appropriate settings in your Flash player. If you prevent or restrict the installation of cookies, not all of the functions of Facebook may be fully usable.

Details on the processing activities, their suppression, and the deletion of the data processed by Facebook can be found in its privacy policy:

<https://www.facebook.com/privacy/explanation>

It cannot be excluded that the processing by Facebook Ireland Ltd. will also take place in the United States by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025.

Facebook Inc. has submitted to the EU-US Privacy Shield, thereby complying with the data protection requirements of the EU when processing data in the USA.

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>

## Instagram

To advertise our products and services as well as to communicate with interested parties or customers, we have a presence on the Instagram platform.

On this social media platform, we are jointly responsible with Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland.

The data protection officer of Instagram can be reached via this contact form:

<https://www.facebook.com/help/contact/540977946302970>

We have defined the joint responsibility in an agreement regarding the respective obligations within the meaning of the GDPR. This agreement, which sets out the reciprocal obligations, is available at the following link:

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

The legal basis for the processing of the resulting and subsequently disclosed personal data is Art. 6 para. 1 lit. f GDPR. Our legitimate interest lies in the analysis, communication, sales, and promotion of our products and services.

The legal basis may also be your consent per Art. 6 para. 1 lit. a GDPR granted to the platform operator. Per Art. 7 para. 3 GDPR, you may revoke this consent with the platform operator at any time with future effect.

When accessing our online presence on the Instagram platform, Facebook Ireland Ltd. as the operator of the platform in the EU will process your data (e.g. personal information, IP address, etc.).

This data of the user is used for statistical information on the use of our company presence on Instagram. Facebook Ireland Ltd. uses this data for market research and advertising purposes as well as for the creation of user profiles. Based on these profiles, Facebook Ireland Ltd. can provide advertising both within and outside of Instagram based on your interests. If you are logged into Instagram at the time you access our site, Facebook Ireland Ltd. will also link this data to your user account.

If you contact us via Instagram, the personal data you provide at that time will be used to process the request. We will delete this data once we have completely responded to your query, unless there are legal obligations to retain the data, such as for subsequent fulfillment of contracts.

Facebook Ireland Ltd. might also set cookies when processing your data.

If you do not agree to this processing, you have the option of preventing the installation of cookies by making the appropriate settings in your browser. Cookies that have already been saved can be deleted at any time. The instructions to do this depend on the browser and system being used. For Flash cookies, the processing cannot be prevented by the settings in your browser, but instead by making the appropriate settings in your Flash player. If you prevent or restrict the installation of cookies, not all of the functions of Instagram may be fully usable.

Details on the processing activities, their suppression, and the deletion of the data processed by Instagram can be found in its privacy policy:

<https://help.instagram.com/519522125107875>

It cannot be excluded that the processing by Facebook Ireland Ltd. will also take place in the United States by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025.

Facebook Inc. has submitted to the EU-US Privacy Shield, thereby complying with the data protection requirements of the EU when processing data in the USA.

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>

### **Social media links via graphics**

We also integrate the following social media sites into our website. The integration takes place via a linked graphic of the respective site. The use of these graphics stored on our own servers prevents the automatic connection to the servers of these networks for their display. Only by clicking on the corresponding graphic will you be forwarded to the service of the respective social network.

Once you click, that network may record information about you and your visit to our site. It cannot be ruled out that such data will be processed in the United States.

Initially, this data includes such things as your IP address, the date and time of your visit, and the page visited. If you are logged into your user account on that network, however, the network operator might assign the information collected about your visit to our site to your personal account. If you interact by clicking Like, Share, etc., this information can be

stored your personal user account and possibly posted on the respective network. To prevent this, you need to log out of your social media account before clicking on the graphic. The various social media networks also offer settings that you can configure accordingly.

The following social networks are integrated into our site by linked graphics:

### Facebook

Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland, a subsidiary of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA.

Privacy Policy: <https://www.facebook.com/policy.php>

EU-US Privacy

Shield <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>

### LinkedIn

LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085 USA.

Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

EU-US Privacy

Shield <https://www.privacyshield.gov/participant?id=a2zt0000000L0UZAA0&status=Active>

### Google Analytics

We use Google Analytics on our website. This is a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

The Google Analytics service is used to analyze how our website is used. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site.

Usage and user-related information, such as IP address, place, time, or frequency of your visits to our website will be transmitted to a Google server in the United States and stored there. However, we use Google Analytics with the so-called anonymization function, whereby Google truncates the IP address within the EU or the EEA before it is transmitted to the US.

The data collected in this way is in turn used by Google to provide us with an evaluation of visits to our website and what visitors do once there. This data can also be used to provide other services related to the use of our website and of the internet in general.

Google states that it will not connect your IP address to other data. In addition, Google provides further information with regard to its data protection practices at

<https://www.google.com/intl/de/policies/privacy/partners>,

including options you can exercise to prevent such use of your data.

In addition, Google offers an opt-out add-on at

<https://tools.google.com/dlpage/gaoptout?hl=en>

in addition with further information. This add-on can be installed on the most popular browsers and offers you further control over the data that Google collects when you visit our website. The add-on informs Google Analytics' JavaScript (ga.js) that no information about the website visit should be transmitted to Google Analytics. However, this does not prevent information from being transmitted to us or to other web analytics services we may use as detailed herein.

### Google AdWords with Conversion Tracking

Our website uses Google AdWords and conversion tracking. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

We use conversion tracking to provide targeted promotion of our site. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site.

If you click on an ad placed by Google, the conversion tracking we use stores a cookie on your device. These so-called conversion cookies expire after 30 days and do not otherwise identify you personally.

If the cookie is still valid and you visit a specific page of our website, both we and Google can evaluate that you clicked on one of our ads placed on Google and that you were then forwarded to our website.

The data collected in this way is in turn used by Google to provide us with an evaluation of visits to our website and what visitors do once there. In addition, we receive information about the number of users who clicked on our advertisement(s) as well as about the pages on our site that are subsequently visited. Neither we nor third parties who also use Google AdWords will be able to identify you from this conversion tracking.

You can also prevent or restrict the installation of cookies by making the appropriate settings in your browser. Likewise, you can use the browser to delete cookies that have



already been stored. However, the steps and measures required vary, depending on the browser you use. If you have any questions, please use the help function or consult the documentation for your browser or contact its maker for support.

In addition, Google provides further information with regard to its data protection practices at

<https://services.google.com/sitestats/de.html>

<http://www.google.com/policies/technologies/ads/>

<http://www.google.de/policies/privacy/>

in particular information on how you can prevent the use of your data.