

## Privacy Policy – [www.busundbahn.de](http://www.busundbahn.de)

Preface

### A. General Part

§ 1 General information

§ 2 Security measures

§ 3 Disclosure of data to third parties and third party providers

§ 4 Contacting us

§ 5 Use of cookies

§ 6 Analysis services

§ 7 Usage-based online advertising

§ 8 Facebook Pixels

§ 9 Rights of users

§ 10 Deletion of data

§ 11 Right of objection

### B. Special section

§ 1 Information on subscribing to a media package of NaNa - Nahverkehrs-Nachrichten, NaNa-Brief or DER NAHVERKEHR

### C. Final regulations

## Preface

1. DVV Media Group GmbH and DVV Media GmbH (hereinafter: DVV Media), Heidenkampsweg 73-79, 20097 Hamburg, Germany, e-mail address: [info@dvvmedia.com](mailto:info@dvvmedia.com) take the protection of your personal data as a user of DVV Media services (including [www.busundbahn.de](http://www.busundbahn.de), <http://opnv-archiv.de>, [www.eurailpress.de](http://www.eurailpress.de); hereinafter referred to as services) seriously. In the following you will be informed about the collection, processing and use of your data and the rights to which you are entitled.
2. The company data protection officer can be contacted as follows:  
  
Rheinisch-Bergische Verlagsgesellschaft mbH  
Data protection officer  
Zülpicher Straße 10 · 40196 Düsseldorf  
  
and by e-mail at: [datenschutz@dvvmedia.com](mailto:datenschutz@dvvmedia.com)

## A. General Part

### § 1 General information

1. Personal data are details of your personal or factual circumstances, i.e. data which identify you or which can be used to establish your identity. This includes, for example, your real name, your address, telephone number or date of birth. Personal data also includes personal data, i.e. data from which a person can be derived without direct reference, such as the IP address.
2. The data that can be related to the person include such data that arise in connection with the retrieval of [www.busundbahn.de](http://www.busundbahn.de) by their client (browser) and are stored in so-called log files on DVV Media's servers and the technical service providers.
3. We collect data on each access to the server on which the service is located (so-called server log files) on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation and security of our services) within the meaning of Art. 6 para. f GDPR.
4. These are the name of the accessed website, file, your IP number, date and time, browser type and the requesting provider.
5. Log file information is stored for a maximum of seven days for security reasons (e.g. to investigate misuse or fraud) and then deleted. Data whose further storage is required for evidentiary purposes are excluded from deletion until the respective incident has been finally clarified.
6. Furthermore, when you visit the DVV Media website, personal data is automatically processed in anonymised form. This includes usage data such as the start and end of your visit, the pages you have accessed or the length of time you have spent on the portal. This data will not be used for personal purposes.
7. DVV Media shall collect, process or use personal data only in compliance with the relevant data protection regulations. This means that user data will only be processed if a legal permission has been obtained. This means, in particular, if data processing is required or legally prescribed for the provision of our contractual services and online services, if user consent is available, or also on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation

and security of our services within the meaning of Art. 6 para. 1 lit. f GDPR, in particular for range measurement, creation of profiles for advertising and marketing purposes as well as the collection of access data and the use of the services of third-party providers).

8. We would like to point out that the legal basis of the consents Art. 6 para. 1 lit. a and Art. 7 GDPR, the legal basis for the processing for the fulfilment of our services and the implementation of contractual measures Art. 6 para. 1 lit. b GDPR, the legal basis for the processing for the fulfilment of our legal obligations Art. 6 para. 1 lit. c GDPR and the legal basis for the processing for the protection of our legitimate interests is Art. 6 para.1 lit f GDPR.

## **§ 2 Security measures**

We take organizational and technical security measures in accordance with the state of the art to ensure that the provisions of data protection laws are observed and thus to protect the data processed by us against accidental or intentional manipulation, loss, destruction or against access by unauthorized persons.

## **§ 3 Disclosure of data to third parties and third party providers**

1. Data will only be passed on to third parties within the framework of legal requirements. We only pass on user data to third parties if this is necessary, e.g. on the basis of Art. 6 para. 1 lit. b GDPR for contractual purposes or on the basis of justified interests pursuant to Art. 6 para. 1 lit. f GDPR in the economic and effective operation of our business. This concerns internal and external service providers for contract processing and order processing.
2. If we use subcontractors to provide our services, we take appropriate legal precautions as well as appropriate technical and organizational measures to ensure the protection of personal data in accordance with the relevant statutory provisions.
3. If content, tools or other means from other providers (hereinafter "third party providers") are used in the context of this data protection declaration and their named registered office is in a third country, it is to be assumed that data is transferred to the countries in which the third party providers have their registered office. Third countries are countries in which the GDPR is not directly applicable law, i.e. in principle countries outside the EU or the European Economic Area. Data is transferred to third countries either if an appropriate level of data protection, user consent or legal permission is available.

## **§ 4 Contacting us**

When contacting us (via contact form or e-mail), the user's details are processed for processing the contact enquiry and its handling in accordance with Art. 6 para. 1 lit. f GDPR.

## **§ 5 Use of cookies**

1. Cookies are small amounts of data that are transmitted from the Internet to your computer together with the data you actually requested. This data is stored there

and kept ready for later retrieval. DVV Media uses the following types of cookies for [www.busundbahn.de](http://www.busundbahn.de):

a) Session cookies:

These are cookies that are only stored on your computer for the duration of an Internet session. These cookies are deleted after the end of the session, i.e. after leaving the website or by closing the browser window.

b) Use of Cookies - B2B Media Group EMEA GmbH:

We work together with the B2B Media Group EMEA GmbH, a provider for web analysis and target group marketing. B2B Media Group EMEA GmbH uses so-called cookies, a text file that is stored in the browser of the computer and collects/contains anonymous usage data. These data can be used to create user profiles under a pseudonym. However, no personal information is collected without the consent of the data subject. If IP addresses are collected, they are stored anonymously by deleting the last numeric keypad and are not merged with the cookies. The cookies are either B2B Media Group EMEA GmbH cookies or cookies from service providers who are also obliged to comply with data protection regulations used by B2B Media Group EMEA GmbH, such as krux digital Inc., Google Inc. etc.. You can delete cookies directly in your browser at any time. B2B Media Group EMEA GmbH uses this data to evaluate the use of the website by visitors and for the purpose of usage-based online advertising (OBA).

c) Use of cookies - InnoCraft Ltd (Matomo; formerly Piwik):

This website uses Matomo, an open source web analysis tool (<http://de.matomo.org>), to collect and store data for marketing and optimization purposes. These data can be used to create user profiles under a pseudonym. Cookies may be used for this purpose. Cookies are small text files that are stored locally in the cache of the visitor's Internet browser. The cookies enable the recognition of the Internet browser. The data collected with Matomo will not be used to personally identify the visitor of this website and will not be combined with personal data about the bearer of the pseudonym without the separately given consent of the person concerned.

d) The web analysis tool Econda (cf. §8 No. 1.) can set cookies to enable the recognition of an Internet browser.

e) Google-Re/Marketing Services:

We use the marketing and remarketing services (hereinafter "Google Marketing Services") of Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 949043, USA (hereinafter "Google") on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f GDPR).

Google is certified under the Privacy-Shield Agreement and thus offers a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

Google Marketing Services allow us to target ads for and on our site so that users can only see ads that are potentially relevant to their interests. For example, if a user sees ads for products he has been interested in on other websites, this is referred to as "remarketing". For these purposes, when our and other websites on which Google Marketing Services are active are accessed, a Google code is executed directly by Google and so-called (re)marketing tags

(invisible graphics or code, also known as "web beacons") are integrated into the website. With their help, an individual cookie, i.e. a small file, is stored on the user's device (comparable technologies can also be used instead of cookies). Cookies can be set by various domains, including google.com, doubleclick.net, invitemediamedia.com, admeld.com, googlesyndication.com or googleadservices.com. This file contains information about which websites the user has visited, which contents he is interested in and which offers he has clicked on, as well as technical information about the browser and operating system, referring websites, visiting time and further information about the use of the online offer. The IP address of the users is also recorded, whereby we inform within the framework of Google Analytics that the IP address is shortened within member states of the European Union or in other signatory states to the Agreement on the European Economic Area and only in exceptional cases completely transferred to a Google server in the USA and shortened there. The IP address is not combined with the user's data within other Google offers. The above information may also be linked by Google to such information from other sources. If the user then visits other websites, the ads tailored to his interests can be displayed.

The data of the users is processed pseudonymously within the framework of Google Marketing Services. This means, for example, that Google does not store and process the names or e-mail addresses of users, but processes the relevant data cookie-related within pseudonymous user profiles. This means that from Google's point of view, the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if a user has expressly permitted Google to process the data without this pseudonymisation. The data collected by Google Marketing Services about users is transmitted to Google and stored on Google servers in the USA.

We may use the Google Marketing Service "DoubleClick" to integrate third-party advertisements. DoubleClick uses cookies to enable Google and its partner sites to serve ads based on users' visits to our website or other websites on the Internet.

We may use Google Marketing Services "AdSense" to integrate third-party advertisements. AdSense uses cookies to enable Google and its partner websites to serve ads based on users' visits to our website or other websites on the Internet.

We may also use Google Tag Manager to integrate and manage Google analytics and marketing services into our websites.

Further information on data use for marketing purposes by Google can be found on the <https://www.google.com/policies/technologies/ads/> page; Google's data protection declaration can be found at <https://www.google.com/policies/privacy/>

If you wish to object to interest-based advertising by Google Marketing Services, you can use the setting and opt-out options provided by Google (<https://www.google.com/ads/preferences>).

- f) Google Analytics Cookies (data collection for optimization purposes):  
On the basis of our legitimate interests (i.e. interests in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 Para. 1 lit. f GDPR) we use Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how

users use the site. The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, because we have activated IP anonymisation on this website, your IP address will first be reduced by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and only shortened there. Google is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>). Google will use this information on our behalf to evaluate your use of the website on our behalf, to compile reports on website activity for website operators and to provide other services relating to website and internet use. This website uses the Google Analytics reports on demographic characteristics in which data from interest-based advertising by Google and visitor data from third-party providers (e.g. age, gender and interests) are used. This data cannot be traced back to a specific person and can be deactivated at any time via the display settings. 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 Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing [tools.google.com/dlpage/gaoptout?hl=en](https://tools.google.com/dlpage/gaoptout?hl=en). Users' personal data will be deleted or made anonymous after 26 months. For more information on data use by Google and options for setting and objecting, please visit the Google websites:  
<https://www.google.com/policies/privacy/partners/>,  
<https://www.google.com/policies/technologies/ads/>,  
<https://adssettings.google.com/anonymous>

2. In general, you also have the option of deleting cookies via the corresponding browser function and setting there how your browser should proceed with cookies. However, it should be noted that the use of the services may be impaired if cookies are generally rejected.
3. You may opt-out of the use of cookies for range measurement and promotional purposes via the deactivation page of the Network Advertising Initiative (<http://optout.networkadvertising.org/>) and additionally the US website (<http://www.aboutads.info/choices>) or the European website (<http://www.youronlinechoices.com/uk/your-ad-choices>).
4. The information transmitted by the cookies is used exclusively for advertising in which products are presented that are distributed by DVV Media.

## **§ 6 Analysis services**

1. We use content and service offers of third parties within our services in order to integrate their content and services on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art.6 para.1 lit. f GDPR).

2. econda GmbH ([www.econda.de](http://www.econda.de)) uses solutions and technologies to collect and store anonymized data and to create user profiles from this data using pseudonyms in order to design and optimize this website according to requirements. For this purpose, cookies may be used that enable the recognition of an Internet browser. However, user profiles are not merged with data about the bearer of the pseudonym without the express consent of the visitor. In particular, IP addresses are made unrecognizable immediately after receipt, which makes it impossible to assign user profiles to IP addresses. Visitors to this website can object to this data collection and storage at any time for the future here:  
[www.econda.de/econda/unternehmen/datenschutz/widerspruchscookie/](http://www.econda.de/econda/unternehmen/datenschutz/widerspruchscookie/).
3. We also use Google Analytics; see § 6 para.1 lit.e) of this data protection declaration.

## § 7 Usage-based online advertising

In order to optimize advertising for you on the basis of your usage interests, we have permitted the following companies to collect usage data on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation of the online offer within the meaning of Art. 6 para. 1 lit. f GDPR):

- Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA, USA. Further information is available at: [www.google.com/policies/technologies/ads](http://www.google.com/policies/technologies/ads)
- B2B Media Group EMEA GmbH, Bahnhofstraße 5, 91245 Simmelsdorf (near Nürnberg). Further information is available at: <https://b2bmg.net/index.php/datenschutz>
- The Trade Desk, Inc., 2 N. Chestnut Street, Ventura, CA 93001, USA. Further information is available at: <https://www.thetradedesk.com/general/privacy-policy>
- The ADEX, Torstr. 19, 10119 Berlin. Further information is available at: [theadexcom.softgarden.io/de/data-security](http://theadexcom.softgarden.io/de/data-security)

We collect information about your activities on our portal (e.g. clicked advertising banners, visited sub-pages of internet offers, surfing behaviour, etc.).

If you no longer wish to receive usage-based advertisements, you can object to the following links and deactivate data collection:

- [adssettings.google.com/authenticated?hl=de](https://adssettings.google.com/authenticated?hl=de)
- [b2bmg.net/index.php/datenschutz](https://b2bmg.net/index.php/datenschutz)
- [www.adsrvr.org/](http://www.adsrvr.org/)
- [de.theadex.com/opt-out](http://de.theadex.com/opt-out)

You can read more information about cookies and the individual providers on the [meine-cookies.org](http://meine-cookies.org) or [youronlinechoices.com](http://youronlinechoices.com) website. There you also have the opportunity to object to usage-based online advertising by individual companies or by all companies. Click here to go directly to the preference manager:

[www.youronlinechoices.com/de/praeferenzmanagement/](http://www.youronlinechoices.com/de/praeferenzmanagement/)

## § 8 Facebook Pixels

Due to our legitimate interests in analysis, optimization and economic operation of the online offering, remarketing tags of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA are integrated on our pages. When you visit our



pages, the remarketing tags establish a direct connection between your browser and the Facebook server. Facebook receives the information that you have visited our site with your IP address. This allows Facebook to associate the visit to our pages with your user account. We can use the information obtained in this way to display Facebook Ads. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the data transmitted or of their use by Facebook. For more information, please see Facebook's Privacy Policy ([www.facebook.com/about/privacy/](http://www.facebook.com/about/privacy/)). If you do not want data to be collected via Custom Audience, you can deactivate Custom Audiences here ([www.facebook.com/ads/website\\_custom\\_audiences/](http://www.facebook.com/ads/website_custom_audiences/)).

## **§ 9 Rights of users**

1. You have the right, upon request and free of charge, to receive information about the personal data that we have stored about you.
2. In addition, you have the right to correct inaccurate data, to restrict processing, to object to the processing and deletion of your personal data, and to assert your rights to data portability pursuant to Art. 20 GDPR and, in the event of the acceptance of unlawful data processing, to file a complaint with the competent supervisory authority.
3. You can also revoke your consent, in principle with effect for the future.

## **§ 10 Deletion of data**

The data stored by us will be deleted as soon as it is no longer required for its intended purpose and there are no legal obligations to keep it in safekeeping. If the user's data are not deleted because they are necessary for other and legally permissible purposes, their processing is restricted. This means that the data will be blocked and not processed for other purposes. This applies, for example, to user data that must be retained for commercial or tax reasons.

## **§ 11 Right of objection**

Users can object to the future processing of their personal data in accordance with legal requirements at any time. The objection may be lodged in particular against processing for direct marketing purposes.

## **B. Special section**

We process inventory data and contractual data for the purpose of fulfilling our contractual obligations and services, Art.6 Para.1 lit. b GDPR.

### **§ 1 Information on subscribing to a media package of NaNa - Nahverkehrs-Nachrichten, NaNa-Brief or DER NAHVERKEHR**

The following data is processed as inventory data for subscription customers: Identifier, password, name (business if applicable), address (business if applicable), e-mail address (business if applicable), start date and end date of the subscription if applicable, payment



frequency, payment type and account details. This data is necessary for processing the subscription contract.

Google Analytics processes the following non-personal data: Usage behavior of the app as well as calling up individual issues and articles.

### **C. Final regulations**

We reserve the right to amend this data protection declaration at any time in compliance with the applicable data protection regulations.