

Declaration of data protection

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I. Declaration of data protection – general section

1. Data protection at a glance

Our website

You visited the website www.verpackungsregister.org ('**website**') of the Stiftung Zentrale Stelle Verpackungsregister (Central Agency Packaging Register) as website operator. Our website also includes the packaging register under the name LUCID.

General notes

The following notes provide a basic overview of what happens to your personal data when you visit our website. Personal data is all data by means of which you can be personally identified.

Data collection on our website

Who is responsible for data collection on this website?

The data processing on this website is performed by the '**website operator**' which is Zentrale Stelle Verpackungsregister. You can find their contact details in Number 2 of this Declaration of Data Protection.

How do we collect your data?

One way we collect your data is by you providing it to us. This can be, for example data that you enter into a contact form.

Other data is collected automatically by our IT systems during a visit to our website. Above all this is technical data (e.g. internet browser, operating system or time the page is accessed).

What do we use your data for?

Some of the data is collected in order to ensure fault-free provision of the website and to guarantee the security of the collected data against attacks. That includes data that will be used to analyse the behaviour of users of our website. We require these data to improve our services for the purpose of optimum implementation of our tasks under the Verpackungsgesetz (Packaging Act).

What rights do you have regarding your data?

You have the right at any time in accordance with the legal requirements to receive information free of charge about the origin, recipient and purpose of your stored personal data. In addition, you have the right to demand correction, restriction of processing or deletion of these data in accordance with the legal prerequisites. Under statutory conditions, you also have the right to object to processing of your personal data. You can contact us at any time on this matter and any further questions relating to data protection using the address given in the Impressum. In addition, you have the right to complain to the competent regulatory authority.

Analysis tools and tools from third party providers

When you visit our website, your surfing behaviour may be statistically analysed. This happens above all with cookies and with what are known as analysis programs. Analysis of your surfing

behaviour generally takes place anonymously; the surfing behaviour cannot be traced back to you. You can prevent the usage of certain tools. You can find detailed information on this in the Declaration of Data Protection below under Number 2.

2. General notes and mandatory information

Data protection

The operators of these web pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this Declaration of Data Protection.

When you use this website, various personal data is collected. Personal data is data by means of which you can be personally identified. This Declaration of Data Protection explains what data we collect and what we use it for. It also explains how and for what purpose this takes place.

Please note that the transmission of data on the Internet (e.g. during communication via e-mail) may involve security vulnerabilities. Complete protection of data from access by third parties is not possible.

Note regarding the controller

The controller for data processing on this website in the meaning of data protection law is:

Stiftung Zentrale Stelle Verpackungsregister
Represented by Gunda Rachut
Öwer de Hase 18
49074 Osnabrück

Telephone: +49 541 201971-10
Fax: +49 541 201971-98
E-Mail: info@verpackungsregister.org

Registered with the Amt für regionale Landesentwicklung Weser-Ems (Office for Regional State Development Weser-Ems), no. 16/085 in the foundations register.

Revocation of your consent to data processing

Many data processing operations are only possible with your explicit consent. You can revoke at any time consent that you have previously given. An informal e-mail to us, for example, is sufficient for this purpose. The legitimacy of the data processing that has taken place prior to the revocation remains unaffected by the revocation.

Right to complain to the competent regulatory authority

In the event of data protection law infringements, the data subject has the right to complain to the competent regulatory authority.

The competent regulatory authority for data protection issues is the Landesbeauftragte für den Datenschutz Niedersachsen (State Office for Data Protection in Lower Saxony).

Right to data transferability

You have the right to have data that we process in an automated manner on the basis of your consent or in order to fulfil a contract delivered to you or to a third party in a customary, machine-readable format. If you request direct transmission of the data to another responsible person, this will only take place if it is technically feasible.

SSL and/or TLS encryption

This site uses SSL and/or TLS encryption for security reasons and to protect the transmission of confidential content, for example orders or enquiries which you send to us as site operators. You can recognise an encrypted connection by the fact that the address line of the browser changes from 'http://' to 'https://' and by the padlock symbol in your browser line.

If SSL or TLS is activated, the data that you send to us cannot be read by third parties.

Information, correction, restriction of processing, deletion

You have the right at any time – within the scope of the applicable statutory provisions – to receive information free of charge about your stored personal data, its origin and recipient and the purpose of the data processing and, as applicable, a right to the correction, restriction of processing or deletion of this data. You can contact us at any time on this matter and any further questions on the subject of personal data using the address given above.

Advertising e-mails opt-out of the Zentrale Stelle Verpackungsregister

The use of contact data published by us within the scope of the obligation to provide an imprint for the sending of unsolicited advertising and information material is hereby opted out of. The operators of the web pages expressly reserve the right to take legal action in the case of unsolicited sending of advertising information, such as through spam e-mails.

3. Data protection officer

You may contact our Data Protection Officer using the following address:

Stiftung Zentrale Stelle Verpackungsregister
Data Protection Officer
Öwer de Hase 18
49074 Osnabrück, Germany

Telephone: +49 541 201971-10

Fax: +49 541 201971-98

E-mail: datenschutz@verpackungsregister.org

4. Data collection on our website

Cookies

In some cases, the website uses what are known as cookies. Cookies do not harm your computer and do not contain viruses. Cookies help to make our Internet site more user-friendly, more effective and more secure. Cookies are small text files which are placed on your computer and stored by your browser.

Most of the cookies we use are session cookies. They are automatically deleted after the end of your visit to the website. Other cookies remain stored on your end device until you delete them. These cookies make it possible for us to recognise your browser the next time you visit the site.

You can set your browser in such a way that you are informed about the setting of cookies, and permit cookies only in individual cases, block the acceptance of cookies for certain cases or in general, and activate automatic deletion of cookies on closing of the browser. Deactivation of cookies may limit the functionality of this website.

Cookies that are required for carrying out electronic communication or for providing certain functions that you desire (e.g. changing master data using the dashboard in the login area, cf. Section II) are processed on the basis of article 6 (1) (e), (1) (f) GDPR (General Data Protection Regulation) in conjunction with section 3 BDSG (Federal Data Protection Act) and section 26 VerpackG (Packaging Act)..

Server log files

The provider of the web pages automatically collects and stores information in 'server log files', which your browser automatically transfers to us. These are:

- ◆ Type and version of browser;
- ◆ Operating system used;
- ◆ Request sent by the user, consisting of an HTTP method and the requested resource (URL);
- ◆ Website from which the user accessed our website (referrer URL);
- ◆ Host name of the computer accessing the site;
- ◆ Date and time of the server request;
- ◆ Public IP address;
- ◆ Size of the object sent back to the user.

No merging of this data with other personal data of the user is performed.

Temporary storage of the IP address is necessary to enable delivery of our website to the user's end device. For this, the IP address of the user must remain stored for the duration of the session. Storage beyond this serves the purpose of optimising the website and ensuring the security of our information technology systems.

Our data processing activities serve the purpose of fulfilling our statutory tasks and duties pursuant to article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 26 VerpackG.

The personal data stored in the log files is deleted regularly, at the latest after seven days. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do.

Collection of the data for provision of the website and storage thereof in the log files is essential for operation of the website. If you do not accept this, you cannot use our website.

5. Analysis tools

Matomo (formerly Piwik)

Our website uses the open source web analysis service Matomo (formerly Piwik) in order to analyse user behaviour on our website. For Matomo to work, the software stores a cookie on the user's end device. Cookies are text files that are stored on the user's end device and which enable the analysis of user behaviour on the website. To this end, the information generated by the cookie about the use of our website (also see below) is stored exclusively on our server in Germany.

When web pages of our website are accessed, the following information is stored:

- ◆ Public IP address of the end device used to access the page, shortened to two bytes and hence anonymised;
- ◆ Randomly generated visitor ID;
- ◆ Website from which the user accessed our website (referrer URL), including its top key words (the most frequently used search terms);
- ◆ Date and time the web page is accessed;
- ◆ Subpages that are accessed from the web page (including URL);
- ◆ Clicked-on and downloaded files;
- ◆ Clicked-on web links to other websites;
- ◆ Loading time of a web page or a download;
- ◆ How long the visitor stays on the website and its pages;
- ◆ How frequently the website was accessed;
- ◆ Further information transmitted by the user's browser (user location; country, region, town/city, screen resolution, language settings of the browser, browser used, user agent header, time in the time zone of the user).

Matomo is set in a way that the collected public IP addresses are not entirely saved. Instead, two bytes of the IP addresses are masked (e.g.: 192.168.xxx.xxx). After masking, it is no longer possible to assign the stored IP address to the aforementioned further information collected via Matomo on the used end device, and to you as a user. A full IP address will not be stored, neither will the collected information be connected to other personal data.

The information will not be disclosed to third parties.

Data processing: purpose and legal basis

Storage of Matomo cookies and the processing of the above-mentioned data allows us to analyse the user behaviour on our website. The findings resulting from this provide for a continuous

optimisation of the information offered on our website and its usability, and thus help to duly inform the public within the framework of our statutory tasks and duties. Anonymising the IP addresses captured, and thus the data mentioned above processed by Matomo, serves the interests of website users pertaining to protection of their personal data. The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG, section 26 VerpackG.

Ways to object

The cookie enabling the functioning of Matomo is stored on the website user's end device. Therefore, you – as a user – are in full control over the use of cookies. By adjusting the settings of your browser software accordingly, you can prevent cookies being stored, and you can delete cookies that have already been stored on your end device any time. If cookies for our website are disabled altogether, this might result in not all functions of our website being fully available.

You have the option of opting out of the analysis of your user behaviour on our website. To do so, you have to click on the link below. This will result in another cookie (a so-called 'opt-out cookie') being stored on your system, that will signal our system not to store the data of your end device. Should you delete the opt-out cookie from your end device, Matomo will return to capturing the data of your end device when you visit our website, until the opt-out cookie is stored again by clicking on the link below.

www.verpackungsregister.org/en/tracking-opt-out/

6. Newsletter

Newsletter data

If you wish to receive the newsletter offered on the website, we require an e-mail address from you. You then receive, via the e-mail address provided, a confirmation link (double opt-in process). If you are in agreement, you confirm your wish to receive the newsletter by activating the link. We use the e-mail address solely for sending the newsletter and do not pass this on to third parties.

Processing of the data entered into the newsletter registration form takes place solely on the basis of your consent (article 6 (1) (a) GDPR). You can revoke your consent to storage of the data, e-mail address and to the use thereof for sending the newsletter at any time, for example via the 'Unsubscribe' link in the newsletter. The legitimacy of the data processing that has taken place prior to the revocation remains unaffected by the revocation.

The data provided to us by you for the purposes of obtaining the newsletter is stored by us regularly until your revocation, and will be deleted thereafter. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do. Data that we have stored for other purposes (e.g. e-mail addresses for the members area) remains unaffected by this.

MailChimp

This website uses the services of MailChimp for sending newsletters. The provider is the Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

MailChimp is a service by means of which, among other things, the dispatch of newsletters can be organised and analysed. If you enter data for the purpose of obtaining the newsletter (e.g. e-mail address), this is stored on the MailChimp servers in the USA.

MailChimp has a certification in accordance with the 'EU-US Privacy Shield'. The 'Privacy Shield' is an agreement between the European Union (EU) and the USA which is designed to ensure compliance with European data protection standards in the USA.

With the aid of MailChimp, we can analyse our newsletter campaigns. When you open an e-mail sent with MailChimp, a file contained within the e-mail (a 'web beacon') is linked to the MailChimp servers in the USA. By this means it can be established whether a newsletter message has been opened and which links clicked on if applicable. In addition, technical information is collected (e.g. time accessed, IP address, type of browser and operating system). Without any additional information, this information cannot be matched to the particular newsletter recipient. It serves the sole purpose of the statistical analysis of newsletter campaigns. The results of these analyses can be used to adapt future newsletters better to the interests of the recipient.

If you do not wish an analysis by MailChimp to take place, you must cancel the newsletter. We provide a relevant link for this purpose in every newsletter message. In addition you can also cancel the newsletter directly on the website.

This data processing takes place on the basis of your consent (article 6 (1) (a) GDPR). You can revoke this consent at any time by cancelling your newsletter subscription. The legitimacy of the data processing that has already taken place remains unaffected by the revocation.

The data collected through MailChimp by you for the purposes of you obtaining the newsletter is stored by us until you have been removed from the newsletter mailing list and deleted regularly both from our servers and from the MailChimp servers after subscription has been cancelled. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do. Data that we have stored for other purposes (e.g. e-mail addresses for the members area) remains unaffected by this.

You can find more details in the MailChimp data provisions at: <https://mailchimp.com/legal/terms/>

Conclusion of a data processing agreement

We have concluded a 'Data Processing Agreement' with MailChimp in which we require MailChimp to protect our customers' data and to not pass them on to third parties. This contract can be viewed at the following link: <https://mailchimp.com/legal/forms/data-processing-agreement/sample-agreement/>

7. Plugins and tools

YouTube

Our website uses plugins of the site YouTube. The operator of such website is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit one of our pages equipped with a YouTube plugin, a link is created to the YouTube servers. In the process, the YouTube server is informed which of our sites you have visited.

If you are logged into your YouTube account, you are enabling YouTube to directly allocate your surfing behaviour to your personal profile. You can prevent this by logging out of your YouTube account.

YouTube is used in order to incorporate videos into our online offerings.

Insofar as it is accessible via our website YouTube is certified according to the 'EU-US-Privacy-Shield'. The 'Privacy Shield' is an agreement between the European Union (EU) and the USA which is intended to ensure compliance with European data protection standards in the USA.

The data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 26 VerpackG. Videos are included in order to optimise both the website and the information offered, so as to adequately inform the public in the interest of fulfilling our statutory tasks and duties.

You can find additional information on the handling of user data in YouTube's privacy policy at <https://www.google.de/intl/de/policies/privacy>

Google Maps

Our website uses maps provided by 'Googly Maps'. The operator of Google Maps is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

When you visit a page that includes Google Maps, Google automatically provides map data directly to you. For this purpose, the browser you use must establish a connection to Google's servers. Through this, Google obtains, among other things, knowledge that our website has been accessed from your IP address. In addition, Google may obtain location data under certain circumstances, but not without your consent, which you usually provide by making the appropriate settings on your terminal device. In addition, Google stores cookies on your end device.

Google Maps is used for the purposes of providing adequate information to the public, in fulfilment of our public tasks and duties pursuant to article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 26 VerpackG

Google is certified according to the 'EU-US-Privacy-Shield'. The 'Privacy Shield' is an agreement between the European Union (EU) and the USA, which is intended to ensure compliance with European data protection standards in the USA.

For more information about how Google uses your information, please see Google's privacy policy: <https://www.google.com/policies/privacy>

Google web fonts

This page uses so-called 'web fonts' provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to display fonts uniformly. When you access a page, your browser loads the web fonts you need into its browser cache to display text and fonts correctly.

For this purpose, the browser you use must establish a connection to Google's servers. As a result of this, Google finds out that our website was called up via your IP address. The use of Google web fonts takes place in the interest of a uniform and attractive presentation of our online offerings. This serves the purpose of the Zentrale Stelle Verpackungsregister fulfilling tasks and duties in the public interest, pursuant to article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 26 VerpackG..

Google is certified according to the 'EU-US-Privacy-Shield'. The 'Privacy Shield' is an agreement between the European Union (EU) and the USA, which is intended to ensure compliance with European data protection standards in the USA.

If your browser does not support web fonts, a standard font from your computer is used.

You can find further information on Google web fonts at <https://developers.google.com/fonts/faq> and in Google's privacy policy: <https://www.google.com/policies/privacy/>

II. Declaration of data protection for the use of LUCID

1. Login area for producers

The following information provides you with an overview of what happens to your personal data when you apply for and use a producer login on our website at www.verpackungsregister.org

Further information about us, Zentrale Stelle Verpackungsregister (Central Agency Packaging Register) as the 'controller' for data protection purposes, and about how your is processed data each time you visit our website, regardless of whether you are applying for or using your login, as well as information about your rights in connection with data processing, can be found in the General Section of this Declaration of Data Protection (Section I).

Applications for a producer login

We collect the following data as part of the producer login application process:

- ◆ Company name/name of the producers;
- ◆ Language for e-mail communication with the producer (German/English);
- ◆ Title, academic title, first and last name of the '**Authorised Person**';
- ◆ First and last name of an in-house '**Administrator**' at the level of the producer (if not the same as the Authorised Person);
- ◆ E-mail addresses as user IDs, and a login password.

Mandatory fields are marked accordingly (*) in the input masks. It is not possible to apply for a producer login if the mandatory fields are left blank.

We store a so-called 'cookie' on your end device so that our server can remember your details as you work your way through the individual web pages to apply for a producer login. Cookies are text files that are stored on your computer and enable an analysis of your use of the website. To this end, the information generated by the cookie about the use of this website is stored on our server. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot apply for a producer login without this session cookie.

After completing the producer login application, you will receive an e-mail for verification purposes, sent to the e-mail address provided, with a confirmation link that must be accessed within 24 hours to confirm the producer login application. If the link is not accessed within 24 hours, the records in the database will be deleted and you will have to complete a new producer login application from scratch. We log the successful completion of the verification process for evidentiary purposes and store the following data for this purpose:

- ◆ IP address;
- ◆ Date;
- ◆ Time the link was confirmed;

- ◆ Browser language;
- ◆ Operating system;
- ◆ Browser version.

In technical terms, the producer login enables producer registration, the notification of changes to the registration data, as well as notification of the decision to permanently abandon the producers activities in accordance with section 9 VerpackG in each case, the submission of volume reports in accordance with section 10 VerpackG, as well as the submission of declarations of completeness in accordance with section 11 VerpackG, which are mandatory under the statutory requirements for producers as of 1 January 2019. Without the producer login, you cannot fulfil these statutory obligations for technical reasons.

The data is processed in order to make the producer login available and to facilitate its use. Data processing is based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 9 (3), 10 (2), 11 (3) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Google reCAPTCHA

We use Google reCAPTCHA ('reCAPTCHA') as part of providing the login area. The operator of reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

reCAPTCHA is designed to check whether any data entered during the process of login application emanates from a human source or from an automated programme. To do this, reCAPTCHA analyses a website visitor's behaviour based on a variety of different criteria before ending the login application with a picture identification procedure. The analysis begins automatically as soon as the website visitor identifies the pictures. As part of the analysis, reCAPTCHA evaluates a range of information (e.g., IP address, how long the visitor stays on the website or the visitor's mouse movements). Data collected during the analysis is shared with Google.

The reCAPTCHA analyses run completely in the background. Website visitors are not notified that the analysis is taking place.

The data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 26 (1) no. 1, 9 (3) VerpackG, to ensure that LUCID functions smoothly, and that the misuse of LUCID and any potential illicit automated data theft are prevented.

Further information about the Google reCAPTCHA and Google's privacy policy can be found at <https://www.google.com/intl/en/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

Producer registration

We collect the following data as part of the producer login application process:

- ◆ Title, academic title (if indicated), first and last name of the **'Authorised Person'**;
- ◆ First name, last name and e-mail address of up to three other **'Administrators'** of the producer (if not the same as the Authorised Person);
- ◆ Address (street and house number, postcode and town/city, country, additional address details), telephone number and fax number (if indicated) of the producer;
- ◆ VAT ID, or alternatively national taxpayer reference number; national identification number (type, e.g. commercial register number; number, authority, date of issue);
- ◆ Producer's brand(s) and brand exit date(s);
- ◆ 'Segment' of the producer's business activity (choice of four segments), if indicated;
- ◆ Declaration that the producer has fulfilled its return obligations by virtue of participation in one or more systems as defined in section 3 (16) VerpackG ('system(s)'), or one or more sector-specific solutions as defined in section 8 VerpackG ('sector-specific solution(s)');
- ◆ Declaration that the information is accurate;
- ◆ Previous registration number, if indicated.

Mandatory fields are marked accordingly (*) in the input masks. It is not possible to register as a producer if the mandatory fields are left blank.

We store a cookie on your end device so that our server can remember your details as you work your way through the individual web pages to register as a producer. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot register as a producer without this session cookie.

Once the producer registration process is completed, and provided that the statutory requirements are met, the registration administrative act, together with your registration number, will be sent to the e-mail address specified as the user ID in the login application. The following data will be stored for this purpose: IP address, date, time at which the link was confirmed, browser language, operating system version, browser version.

If the producer registration is not successfully completed within seven days of applying for the producer login, the records in the database will be deleted and you will have to complete a new producer login application, and register for inclusion in the register of producers again, from scratch.

The producer registration, the notification of changes to the registration data and notification of the decision to permanently abandon the producer activities in accordance with section 9 VerpackG are mandatory under the statutory requirements for producers. They are a technical prerequisite for the submission of volume reports pursuant to section 10 VerpackG and for the submission of declarations of completeness in accordance with section 11 VerpackG, which are also mandatory under the statutory requirements for producers.

The data is processed in order to allow for the registration of producers. Data processing is based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 9 (3), 10 (2), 11 (3) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Use of the login area

In order to use the login area, you have to log in using the primary e-mail address and the password you provided during the application process.

You can use the login area as a technical tool to inform us of changes to the registration data and any decision to permanently abandon the producer activities in accordance with section 9 VerpackG, as well as to submit volume reports in accordance with section 10 VerpackG and declarations of completeness in accordance with section 11 VerpackG, as is mandatory under the statutory requirements for producers.

We store a cookie on your end device so that our server can verify that your end device is logged in to the login area. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot use the login area without this session cookie.

The data is processed to enable the use of the producer login and producer registration. Data processing is based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 9 (3), 10 (2), 11 (3) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Declaration of completeness submission

In legally required cases, declarations of completeness (hereinafter '**DoC**') as per section 11 VerpackG must be submitted in the login area of LUCID ('Declaration of completeness submission' button).

DoCs for the year 2018 must be submitted through LUCID and relate to the specific registration number of the producer in question. They do not yet require the information as set forth in section 11 (2) VerpackG, but rather the information set forth in section 10 (2) VerpackV. In addition, the audit confirmation as well as the corresponding audit reports, all bearing a qualified electronic signature, must be submitted using the login (section 10 (1), (5) VerpackV).

DoCs for the year 2019 and beyond must be submitted through LUCID and relate to the specific registration number of the producer in question. They do require the information as set forth in section 11 (2) VerpackG. In addition, the corresponding audit reports as well as the audit confirmation, all bearing a qualified electronic signature, must be submitted using the login (section 11 (1), (3) VerpackG).

Furthermore, every DoC submission requires a reason as well as the ID and name of an auditor registered with the Zentrale Stelle pursuant to section 27 (2) VerpackG (cf. Section II 2 of this Declaration of Data Protection); where the reason for the submission is by individual order, the file reference must also be included.

All the data that a producer enters in LUCID in the context of its DoC is summarised in a so-called 'producer declaration'. LUCID sends an e-mail to the producer, with a link to download the producer declaration. The producer may then pass the producer declaration on to the registered

auditor pursuant to section 27 (2) VerpackG, who will audit the DoC (cf. Section II 2 of this Declaration of Data Protection). To make this easier, during the DoC submission process, LUCID also gives producers the option of consenting to the transmission of the information they provided in the context of the DoC to the registered auditor pursuant to section 27 (2) VerpackG that they have specified. If producers have consented to this, their registered auditor pursuant to section 27 (2) VerpackG also receives an e-mail with a link for downloading the producer declaration.

The data is processed for the purposes of submitting the DoC, based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 11 VerpackG. For the year 2018, section 10 VerpackV shall also apply. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties. As concerns the transmission of data provided by a producer who has given its consent to a registered auditor pursuant to section 27 (2) VerpackG, data processing is based on article 6 (1) (a) GDPR. The transmission of data in this case thus makes it easier for the producer to submit its declaration of completeness.

Data reporting, section 10 VerpackG

Producers registered in LUCID are under obligation to provide the same information on packaging to the Zentrale Stelle Verpackungsregister that they provided to their system, without undue delay, and personally. When doing so, they must also provide at least the following information:

- ◆ Registration number;
- ◆ Type of material and mass of the participating packaging;
- ◆ Regarding the type of material, the producer may choose from the follow options to provide more details:
 - ◆ Initial planned volume report,
 - ◆ Intra-year volume report,
 - ◆ Year-end volume report,
 - ◆ Supplementary volume report (where applicable);
- ◆ Name of the system in which the packaging participates;
- ◆ Period of system participation;
- ◆ Changes to the above-mentioned information;
- ◆ Where applicable, [returns] as per section 7 (3) VerpackG ('rebated volumes').

The reports are submitted through LUCID, under the 'Data Reporting' option in the menu.

The data is processed in order to make it possible for producers to submit their data reports. The data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 10 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Transmission of data reports to systems

We give the systems the option of electronically retrieving the producer data reports relating to their specific system on our website.

This data is processed in the context of the use of the producer login and producer registration. The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 10(3) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Publication of producer data

In the interest of fulfilling our statutory tasks and duties, we publish the following producer data on our website:

- ◆ Name, address and contact details of the producer (in particular street and house number, postcode and town/city, country, telephone number, fax number if indicated, and e-mail address);
- ◆ Brand names under which the producer places its packaging subject to system participation on the market;
- ◆ Registration date:
 - ◆ For applications for registration received before 1 January 2019: the date on which the Zentrale Stelle Verpackungsregister received the full registration information, this date being set by default to 1 January 2019; for brand names registered prior to 1 January 2019, the date of registration is also set to 1 January 2019;
 - ◆ For applications for registration received on or after 1 January 2019 and for corresponding brand information: the date on which the Zentrale Stelle Verpackungsregister received the full registration information;
- ◆ Date of market exit in cases involving the termination of registration or, for specific brands, in the event that the brand is deleted.

The published producer data can be searched for and found on our website by third parties using the search functions provided on the website.

The data will be published until a period of three years has passed starting at the end of the year in which the producer registration ends.

The legal basis for this publication is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 9 (4) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

With your separate consent, third parties can also query whether you are registered (yes/no) on the basis of your VAT ID no./taxpayer reference number provided during registration. The VAT ID no./taxpayer reference number will not be made accessible to third parties on the basis of this consent.

This query based on your VAT ID/taxpayer reference number can be performed at the latest until the end of your registration (market exit date). This information can also only be queried if consent has been given, i.e. can no longer be accessed after its revocation.

The legal basis for this query based on your VAT ID/taxpayer reference number is your consent pursuant to article 6 (1) (a) GDPR.

Publication of list of producers who have submitted a declaration of completeness

As from 16 May in the year following the reference year, a list of producers who have fully filed a declaration of completeness (DoC) in the LUCID Packaging Register for a given year (reference year) will be published on our website with the following details per reference year:

- ◆ Company name;
- ◆ Registration number;
- ◆ Postcode and city/town, country.

A declaration of completeness is deemed to be fully filed in LUCID if all documentation queried in the course of submitting the declaration of completeness has been successfully filed and if the auditor's confirmation pursuant to section 11 (1) VerpackG has not been denied. Each publication is subject to further verification of content-related accuracy.

The legal basis for this publication is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 26 (1) no. 6 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Transmission of producer data to supervisory and law enforcement authorities

To the extent permitted by law, we will also transmit your data to the responsible supervisory authorities and law enforcement agencies, for example if there is a suspected administrative offence pursuant to section 34 VerpackG.

The legal basis for this transmission is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and section 26 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Involvement of IT service providers and other contract data processors

We make use of contract data processors, in particular IT service providers, to make the login area available. We use the service Newsletter2Go to log the dispatch and delivery of e-mails to you. This service is provided by Newsletter2Go GmbH, Nürnberger Strasse 8, 10787 Berlin, Germany.

You can find detailed information on the Newsletter2Go functions at the following link:
<https://www.newsletter2go.de/features/newsletter-software//>

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 9 (3), 10 (2), 11 (3) VerpackG.

Storage period

We store producer data (including the data of the declaration of completeness, as well as the data reports provided by the producers) for at least three years after the end of the year in which the producer registration ends (market exit date), and thereafter for another ten years. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do.

2. Login for auditors

The following information provides you with an overview of what happens to your personal data when you apply for and use a login for a registered auditor pursuant to section 27(2) VerpackG (auditor login) on our website at

Further information about us, Zentrale Stelle Verpackungsregister as the 'controller' for data protection purposes, and about how your is processed data each time you visit our website, regardless of whether you are applying for or using your login, as well as information about your rights in connection with data processing, can be found in the General Section of this Declaration of Data Protection.

Applications for an auditor login

We collect the following data as part of the auditor login application process:

- ◆ Company name of the auditor (optional);
- ◆ Language for e-mail communication with the auditor (German/English);

- ◆ Title, academic title, first and last name of the auditor;
- ◆ E-mail address as a user ID;
- ◆ Login password.

Mandatory fields are marked accordingly (*) in the input masks. It is not possible to apply for an auditor login if the mandatory fields are left blank.

We store a cookie on your end device so that our server can remember your details as you work your way through the individual web pages to apply for your auditor login. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot apply for an auditor login without this session cookie.

After completing the auditor login application, you will receive an e-mail for verification purposes, sent to the e-mail address provided, with a confirmation link that must be accessed within 24 hours to confirm the auditor login application. If the link is not accessed within 24 hours, the records in the database will be deleted and you will have to complete a new auditor login application from scratch. We log the successful completion of the verification process for evidentiary purposes and store the following data for this purpose:

- ◆ IP address;
- ◆ Date;
- ◆ Time the link was confirmed;
- ◆ Browser language;
- ◆ Operating system;
- ◆ Browser version.

The auditor login is a prerequisite for your registration as an auditor in the register of auditors pursuant to section 27 (1) (registered experts pursuant to section 3 (15) VerpackG and section 27 (2) VerpackG (auditors, registered tax advisers and sworn accountants).

The data is processed in order to make the auditor login available and to facilitate its use. The data is processed based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG as well as sections 26 (1) no. 27, 27 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Google reCAPTCHA

We use Google reCAPTCHA ('reCAPTCHA') as part of providing the login area. The operator of reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

reCAPTCHA is designed to check whether any data entered during the process of login application emanates from a human source or from an automated programme. To do this, reCAPTCHA analyses a website visitor's behaviour based on a variety of different criteria before ending the login application with a picture identification procedure. The analysis begins automatically as soon as the website visitor identifies the pictures. As part of the analysis, reCAPTCHA evaluates a range of information (e.g., IP address, how long the visitor stays on the

website or the visitor's mouse movements). Data collected during the analysis is shared with Google.

The reCAPTCHA analyses run completely in the background. Website visitors are not notified that the analysis is taking place.

The data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 26 (1) no. 27, 27 VerpackG, to ensure that LUCID functions smoothly, and to prevent the misuse of LUCID and any potential illicit automated data theft.

Further information about the Google reCAPTCHA and Google's privacy policy can be found at: <https://www.google.com/intl/en/policies/privacy/> and .

Inclusion in the register of auditors

We collect the following data as part of the application for inclusion in the register of auditors:

- ◆ Address (street and house number, postcode and town/city, country, and up to three optional additional address details), telephone number (mobile or land line) and fax number (if indicated);
- ◆ Type of auditor pursuant to Sections 3(15), 27(1) (2) VerpackG (type of expert within the meaning of section 3 (15) VerpackG: in particular a publicly appointed expert, environmental verifier or environmental verifier organisation, accredited expert, auditor, sworn accountant, tax adviser or expert in another state);
- ◆ When selecting the environmental verifier field within the meaning of section 3 (15) no. 2 VerpackG, indication of the NACE codes; information in the document submitted by you as evidence regarding the auditor's professional certification;
- ◆ Information to prove the auditor's professional qualification (e.g. date of issue of an admission or appointment notice and certifying body).

Mandatory fields are marked accordingly (*) in the input masks. It is not possible to register as an auditor if the mandatory fields are left blank.

We store a cookie on your end device so that our server can remember your details as you work your way through the individual web pages to register as an auditor. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot register as an auditor without this session cookie.

If the auditor registration is not successfully completed within seven days of applying for the auditor login, the records in the database will be deleted and you will have to complete a new auditor login application, and register for inclusion in the register of auditors again, from scratch.

Once the application for registration has been reviewed and the Zentrale Stelle Verpackungsregister has confirmed the application's readiness for approval, notice on your inclusion in the public register of auditors will be sent to the e-mail address specified as the user ID in the login application.

If you are not included in the register of auditors, you cannot legally audit or confirm any volume flow records (sections 8 (3), 17 VerpackG, certify notifications/notifications of changes for sector-

specific solutions (sections 8 (1), 8 (2) VerpackG) and you are not legally authorised to audit or confirm any declarations of completeness in accordance with section 11 VerpackG. The auditing and confirmation of declarations of completeness are also not feasible from a technical perspective. Zentrale Stelle Verpackungsregister publishes detailed instructions on the electronic filing procedure and on communication with Zentrale Stelle Verpackungsregister on its website at www.verpackungsregister.org.

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG, sections 26 (1) no. 27, 27 VerpackG. The data is processed in order to allow for the registration of auditors. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Use of the login area

In order to use the login area, you have to log in using the primary e-mail address and the password you provided during the application process.

You can use the login area to inform us of changes to the following master data concerning you:

- ◆ Company name of the auditor, if indicated;
- ◆ Language for e-mail communication with the auditor (German/English);
- ◆ Title, academic title, first and last name of the auditor;
- ◆ E-mail address as a user ID;
- ◆ Login password;
- ◆ Address (street and house number, postcode and town/city, country, and up to three optional additional address details), telephone number (mobile or land line) and fax number (if indicated);
- ◆ When selecting the environmental verifier (within the meaning of section 3 (15) no. 2 VerpackG field, indication of the NACE codes;
- ◆ Transmission of document proving the auditor's professional certification;
- ◆ Information to prove the auditor's professional qualification (e.g. date of issue of an admission or appointment notice and certifying body).

You can also notify us that you have ceased your auditing activities, use your login in the future to view the producer information on which the declarations of completeness pursuant to section 11 VerpackG are based, and deposit the further audit documents relating to the declarations of completeness pursuant to section 11 VerpackG.

We store a cookie on your end device so that our server can verify that your end device is logged in to the login area. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot use the login area without this session cookie.

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG, sections 26 (1) no. 27, 27 VerpackG. The data is processed to enable the use of the auditor login and auditor registration requested by you. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

You can also notify us that you have ceased your auditing activities; you can use your login to view the producer information on which the declarations of completeness pursuant to section 11 VerpackG are based; and you can deposit further audit documents relating to the declarations of completeness pursuant to section 11 VerpackG (audit confirmation with a qualified electronic signature, audit reports). We store a cookie on your end device so that our server can verify that your end device is logged in to the login area. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot use the login area without this session cookie.

The data is processed to enable the use of the auditor login and auditor registration requested by you. The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG, sections 26 (1) no. 27, 27, 11 (3) VerpackG. The data is processed to enable the registered auditor pursuant to section 27 (2) VerpackG in question to perform an audit on the declaration of completeness. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Publication of your data as an auditor

Based on your consent to the publication of your auditor data prior to 1 January 2019 or, as of 1 January 2019, on the basis of the statutory obligation to maintain a public register of auditors pursuant to section 26 (1), section 27 VerpackG, the following data concerning you will be published in the register of auditors on the website of Zentrale Stelle Verpackungsregister:

- ◆ Your full name, with title and academic title;
- ◆ Company name, if indicated;
- ◆ Your preliminary auditor ID;
- ◆ Type of auditor specified by you;
- ◆ Registration date:
 - For applications for registration received before 1 January 2019: the date on which the Zentrale Stelle Verpackungsregister received the full registration information, this date being set by default to 1 January 2019;
 - For applications for registration received on or after 1 January 2019: the date on which the Zentrale Stelle Verpackungsregister received the full registration information;
- ◆ Date of change;
- ◆ Postcode and town/city, country.

The published auditor data can be found on our website by third parties using the search functions provided on our website via a filter (last name, company name, auditor ID, type of auditor, postcode and town/city, country).

The legal basis for this publication is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 GDPR as well as section 26 (1) no. 27, section 27 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Involvement of IT service providers and other contract data processors

We make use of contract data processors, in particular IT service providers, to make the login area available. We use the service Newsletter2Go to log the dispatch and delivery of e-mails to you. This service is provided by Newsletter2Go GmbH, Nürnberger Strasse 8, 10787 Berlin, Germany.

You can find detailed information on the Newsletter2Go functions at the following link:
<https://www.newsletter2go.de/features/newsletter-software/>

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 9 (3), 10 (2), 11 (3) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Storage period

We store auditor data in the public register of auditors for the duration of your registration and thereafter for another ten years.

3. System operator login

The following information provides you with an overview of what happens to your personal data when you apply for and use a login for an operator of a system pursuant to section 3 (16) VerpackG on our website at

Further information about us, Zentrale Stelle Verpackungsregister as the 'controller' for data protection purposes, and about how your is processed data each time you visit our website, regardless of whether you are applying for or using your login, as well as information about your rights in connection with data processing, can be found in the General Section of this Declaration of Data Protection.

Application for a login as system operator

We collect the following data when we grant logins for system operators:

- ◆ Company name of the system operator;
- ◆ Title, academic title, first and last name of the '**main contact**';
- ◆ Address of the system operator;
- ◆ E-mail address of the main contact;
- ◆ Password (encrypted).

Mandatory fields are marked accordingly (*) in the input masks.

The system operator login will facilitate mandatory data reporting according to section 20 VerpackG and the retrieval of producer data reports relating to your system. Without the login, you cannot fulfil these statutory obligations for technical reasons.

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR, section 3 BDSG, section 26 (1) nos. 3, 8 VerpackG, section 10 (3) VerpackG, section 20 VerpackG. The data is processed

in order to make the system operator login requested by you available and to facilitate its use. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Google reCAPTCHA

We use Google reCAPTCHA ('reCAPTCHA') as part of providing the login area. The operator of reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

reCAPTCHA is designed to check whether any data entered during the process of login application emanates from a human source or from an automated programme. To do this, reCAPTCHA analyses the behaviour of the website visitor based on a variety of different criteria before ending the login application with a picture identification procedure. The analysis begins automatically as soon as the website visitor identifies the pictures. As part of the analysis, reCAPTCHA evaluates a range of information (e.g., IP address, how long the visitor stays on the website or the visitor's mouse movements). Data collected during the analysis is shared with Google.

The reCAPTCHA analyses run completely in the background. Website visitors are not notified that the analysis is taking place.

The data is processed based on article 6 (1) (c), (1) (e) GDPR, section 3 BDSG, section 26 (1) nos. 3, 8 VerpackG, sections 10 (3) VerpackG, 20 VerpackG, to ensure that LUCID functions smoothly, and to prevent the misuse of LUCID and any potential illicit automated data theft.

Further information about the Google reCAPTCHA and Google's privacy policy can be found at: <https://www.google.com/intl/en/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

Use of the login area

In order to use the login area, the contact person of the system operator must log in using the primary e-mail address specified in the login application and provided to them for this purpose by Zentrale Stelle Verpackungsregister, as well as the password that they have chosen themselves.

You can use the login area as a technical tool to enter additional data as master data, change this master data, and transfer a login to one of the contact persons.

The master data of the system operator includes:

- ◆ Company name of the system operator;
- ◆ Address of the system operator;
- ◆ Title, academic title, first and last name of the '**main contact**';
- ◆ E-mail address of the main contact;
- ◆ Contact details of an expert contact for technical questions, if indicated, and the following information, which is optional in each case: First and last name, title, academic title,

telephone number, e-mail address, fax number, street and house number, postcode and town/city, and up to three optional additional address details;

- ◆ Contact details of an infrastructure contact for technical questions, if indicated, and the following information, which is optional in each case: First and last name, title, academic title, telephone number, e-mail address, fax number, street and house number, postcode and town/city, and up to three optional additional address details.

We store a cookie on your end device so that our server can verify that your end device is logged in to the login area. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot use the login area without this session cookie.

The legal basis for this data processing is article 6 (1) (c), (1) (f) GDPR in conjunction with section 3 BDSG and section 20 VerpackG. The data is processed in order to allow you to use the login as requested by you. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Involvement of IT service providers/contract data processors

We make use of contract data processors, in particular IT service providers, to make the login area available. We use the service Newsletter2Go to log the dispatch and delivery of e-mails to you. This service is provided by Newsletter2Go GmbH, Nürnberger Strasse 8, 10787 Berlin, Germany.

You can find detailed information on the Newsletter2Go functions at the following link:
<https://www.newsletter2go.de/features/newsletter-software/>

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 9 (3), 10 (2), 11 (3) VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Storage period

We will store the data specified under Section II 3 until the termination of the login and thereafter for another ten years. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do.

4. Login for automatic data reconciliation

The following is an overview of what happens with your personal data when you apply for and use a login for automatic data reconciliation on our website, www.verpackungsregister.org,

Further information about us, the Zentrale Stelle Verpackungsregister as the 'controller' for data protection purposes, and about how your data is processed each time you visit our website, regardless of whether you are applying for or using your login, as well as information about your rights in connection with data processing, can be found in the General Section of this Declaration of Data Protection.

The Zentrale Stelle Verpackungsregister offers automatic data reconciliation upon request. The VAT ID or taxpayer reference number provided by producers during registration can be used to

search for registration status (yes/no); the number itself is not disclosed during the automatic data reconciliation process. Retailers and other business partners can use this automated search function to find a producer's registration status to ensure that its products/goods are registered in the Packaging Register LUCID and that there is no bar to distribution. It only contains producers that have voluntarily consented to automatic data reconciliation ('consent').

Automatic data reconciliation is a voluntary service offered by the Zentrale Stelle Verpackungsregister.

Application for login – part I

You must apply for login to use automatic data reconciliation (for information on how users can access the login area for automatic data reconciliation, see below). We collect the following data as part of the login application process:

- ◆ User name;
- ◆ Company name (optional);
- ◆ Title, academic title, first and last name of the user;
- ◆ E-mail address as user ID, and a login password.

Mandatory fields are marked accordingly (*) in the form fields. It is not possible to apply for a login if the mandatory fields are left blank.

We store a so-called 'cookie' on your end device so that our server can remember your details as you work your way through the individual web pages to apply for login. Cookies are text files that are stored on your computer and enable an analysis of your use of the website. To this end, the information generated by the cookie about the use of this website is stored on our server. It is a 'session cookie' that is deleted when you close the browser window on your end device. You cannot apply for login without this session cookie.

After completing the login application, you will receive an e-mail for verification purposes, sent to the e-mail address provided, with a confirmation link that must be accessed within 24 hours to confirm the application. If the link is not accessed within 24 hours, the records in the database will be deleted and you will have to complete a new login application from scratch. We log the successful completion of the verification process for evidentiary purposes and store the following data for this purpose:

- ◆ IP address;
- ◆ Date;
- ◆ Time the link was confirmed;
- ◆ Browser language;
- ◆ Operating system;
- ◆ Browser version.

Google reCAPTCHA

We use Google reCAPTCHA ('reCAPTCHA') as part of providing the login area. The operator of reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

reCAPTCHA is designed to check whether any data entered during the process of login application emanates from a human or from an automated programme. To do this, reCAPTCHA analyses a website visitor's behaviour based on a variety of different criteria before ending the application for login with a picture identification procedure. The analysis begins automatically as soon as the website visitor identifies the pictures. As part of the analysis, reCAPTCHA evaluates a range of information (e.g., IP address, how long the visitor stays on the website or the visitor's mouse movements). Data collected during the analysis is shared with Google.

The reCAPTCHA analyses run completely in the background. Website visitors are not notified that the analysis is taking place.

The data is processed on the basis of article 6 (1) (b), (1) (f) GDPR, to ensure that LUCID functions smoothly, and to prevent the misuse of LUCID and any potential illicit automated data theft.

Further information about the Google reCAPTCHA and Google's privacy policy can be found at: <https://www.google.com/intl/en/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

Application for login – part II

After the activation link is confirmed, we collect the following data as part of the application for login:

- ◆ Address (street and house number, postcode and town/city, country, and up to three optional additional address details).

To complete the process of applying for login, click on the 'send application' button. You will then receive an email about your application for login. The Zentrale Stelle Verpackungsregister will subsequently decide on the application. You will be notified of the decision (login assigned or rejection) by e-mail.

Automatic data reconciliation requires a VAT ID or taxpayer reference number. Only the status (yes/no) of those producers that have consented (see above) – and have not terminated their registration (market exit date) – can be searched.

The legal basis for the data processing is article 6 (1) (b), (1) (f) GDPR. The data is processed for the purposes of the automatic data reconciliation requested by you.

Use of the login area

In order to use the login area after the login has been assigned, you have to log in using the primary e-mail address and the password you provided during the application process. There you can

- ◆ edit the data you provided in the application,
- ◆ enter an end date (for the end of the use of the login for automatic data reconciliation),
- ◆ execute automatic data reconciliation by uploading an XML ('upload file') that you have created containing VAT IDs or taxpayer reference numbers. The download file will then show the VAT IDs/taxpayer reference numbers with a yes or no regarding (registration) status.
- ◆ You can also cancel your login.

Involvement of IT service providers and other contract data processors

We make use of contract data processors, in particular IT service providers, to make the login area available. For example, we use the Newsletter2Go service to send e-mails. This service is provided by Newsletter2Go GmbH, Nürnberger Strasse 8, 10787 Berlin, Germany.

Newsletter2Go is a service that can be used, among other things, to organise and analyse the dispatch of newsletters. The data entered by you when you subscribe to the newsletter will be stored on the Newsletter2Go servers in Germany. We use this service to log the delivery of e-mails to you.

You can find detailed information on the Newsletter2Go functions at:
<https://www.newsletter2go.de/features/newsletter-software/>

The legal basis for this data processing is article 6 (1) (b) GDPR.

Storage period

The files you upload will not be stored. The download file (XML output file) will be saved in LUCID until the next query for automatic data reconciliation. We will retain data pertaining to the automatic data reconciliation user for up to ten years following the query. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do.

5. Login for system auditors

The following is an overview of what happens with your personal data when you apply for and use a login for system auditors on our website, www.verpackungsregister.org.

Further information about us, the Zentrale Stelle Verpackungsregister as the 'controller' for data protection purposes, and about how your data is processed each time you visit our website, regardless of whether you are applying for or using your login, as well as information about your rights in connection with data processing, can be found in the General Section of this Declaration of Data Protection.

Data collection for the purposes of setting up a login is handled only by employees of the Zentrale Stelle Verpackungsregister (see a) below). Following this, the system auditor can request the login / have the login transferred (see b) below).

a) System auditor data to be compiled

The clearing house for dual systems (Gemeinsame Stelle dualer Systeme Deutschlands GmbH) notifies the Zentrale Stelle Verpackungsregister of the four system auditors they have appointed for a maximum of five years. The system auditors have agreed to the transfer of data collected with the Gemeinsame Stelle dualer Systeme Deutschlands GmbH and required to set up a login.

We collect the following data when we grant logins for system auditors:

- ◆ Company name;
- ◆ Title, academic title, first and last name of the system auditor;
- ◆ Address (street and house number, postcode and town/city, country, and up to three optional additional address details);
- ◆ Telephone and fax number of the system auditor;
- ◆ E-mail address of the system auditor;
- ◆ Start and end date for the period during which the system auditor shall audit the system operator, and have access to system operator data and corresponding producer data to exercise auditing activities.

b) Requesting a system auditor login

System auditors can inform the Zentrale Stelle Verpackungsregister via e-mail to have their login transferred. To complete the producer login application, the system auditor will receive an e-mail for verification purposes, sent to the e-mail address provided at the time the system auditor data was entered into the system, with a confirmation link that must be accessed within 24 hours to confirm the login application. If the link is not accessed within 24 hours, a new link must be requested from the Zentrale Stelle Verpackungsregister. Once the link has been confirmed, the system auditor will be prompted to set a password.

Following a successful login, the system auditor will have to review, update and/or complete their master data as well as to agree to the Terms of Use to be able to use the login area.

We log the successful completion of the verification process for evidentiary purposes and store the following data for this purpose:

- ◆ IP address;
- ◆ Date;
- ◆ Time the link was confirmed;
- ◆ Browser language;
- ◆ Operating system;
- ◆ Browser version.

The legal basis for the data processing is article 6 (1) (b) GDPR. The data is processed in order to make the login available.

Google reCAPTCHA

We use Google reCAPTCHA ('reCAPTCHA') as part of providing the login area. The operator of reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

reCAPTCHA is designed to check whether any data entered during the process of login application emanates from a human source or from an automated programme. To do this, reCAPTCHA analyses a website visitor's behaviour based on a variety of different criteria before ending the login application with a picture identification procedure. The analysis begins automatically as soon as the website visitor identifies the pictures. As part of the analysis, reCAPTCHA evaluates a range of information (e.g., IP address, how long the visitor stays on the website or the visitor's mouse movements). Data collected during the analysis is shared with Google.

The reCAPTCHA analyses run completely in the background. Website visitors are not notified that the analysis is taking place.

The data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 26 (1) no. 1, 9 (3) VerpackG, to ensure that LUCID functions smoothly, and to prevent the misuse of LUCID and any potential illicit automated data theft.

Further information about the Google reCAPTCHA and Google's privacy policy can be found at: <https://www.google.com/intl/en/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

Involvement of IT service providers and other contract data processors

We make use of contract data processors, in particular IT service providers, to make the login area available. For example, we use the Newsletter2Go service to send e-mails. This service is provided by Newsletter2Go GmbH, Nürnberger Strasse 8, 10787 Berlin, Germany.

Newsletter2Go is a service that can be used, among other things, to organise and analyse the dispatch of newsletters. The data entered by you when you subscribe to the newsletter will be stored on the Newsletter2Go servers in Germany. We use this service to log the delivery of e-mails to you.

You can find detailed information on the Newsletter2Go functions at: <https://www.newsletter2go.de/features/newsletter-software>

The legal basis for the data processing is article 6 (1) (b), (1) (e) GDPR in conjunction with section 3 BDSG and section 20 (2) VerpackG.

Storage period

If no login transfer is requested, we will store the data relating to any given system auditor until the termination of the relevant login, and thereafter for up to another ten years. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do.

6. Appointed third party login

The following is an overview of what happens with your personal data when you apply for and use an appointed third party (section 33 VerpackG) login to submit the declaration of completeness on our website, www.verpackungsregister.org.

Further information about us, the Zentrale Stelle Verpackungsregister as the ‘controller’ for data protection purposes, and about how your data is processed each time you visit our website, regardless of whether you are applying for or using your login, as well as information about your rights in connection with data processing, can be found in the ‘General section of this declaration of data protection’.

In accordance with section 33 VerpackG, the entries for the declaration of completeness within the meaning of section 11 VerpackG can also be filed by an appointed third party for a producer. In order to carry out the filing, the appointed third party needs a login of their own to the LUCID Packaging Register (LUCID), which they apply for with the Zentrale Stelle Verpackungsregister, cf. the following. Producers can instruct an appointed third party with a login to file their declaration of completeness for them. Please refer to II.1 above – under ‘Use of the login area’, ‘Declaration of completeness submission’ – for more information.

Applications for an appointed third party login

The appointed third party's login application is carried out in two steps.

First step

At first, we collect the following data as part of the login application process:

- ◆ Company name;
- ◆ Title, academic title, first and last name of the appointed agent;
- ◆ E-mail address of the appointed third party as the user ID;
- ◆ Login password.

Furthermore, the appointed third party will be asked to consent to the processing of the personal data they entered through the Zentrale Stelle Verpackungsregister, and to accept the Terms of Use.

Mandatory fields are marked accordingly (*) in the form fields. It is not possible to apply for a login if the mandatory fields are left blank.

We store a so-called ‘cookie’ on your end device so that our server can remember your details as you work your way through the individual web pages to apply for login. Cookies are text files that are stored on your computer and enable an analysis of your use of the website. To this end, the information generated by the cookie about the use of this website is stored on our server. It is a ‘session cookie’ that is deleted when you close the browser window on your end device. You cannot apply for login without this session cookie.

After completing the login application, you will receive an e-mail for verification purposes, sent to the e-mail address provided, with a confirmation link that must be accessed within 24 hours to confirm the application. If the link is not accessed within 24 hours, the records in the database will be deleted and you will have to complete a new login application from scratch. We log the successful completion of the verification process for evidentiary purposes and store the following data for this purpose:

- ◆ IP address;
- ◆ Date;
- ◆ Time the link was confirmed;
- ◆ Browser language;
- ◆ Operating system;
- ◆ Browser version.

The login is a technical prerequisite for the third party to submit a producer's declaration of completeness electronically via LUCID, as the producer's appointed third party. Without a login, an appointed third party cannot submit a declaration of completeness for a producer. The data is processed in order to make the appointed third party login available and to facilitate its use. The data is processed based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG as well as sections 11 (1) to (3), 33 VerpackG.

Google reCAPTCHA

We use Google reCAPTCHA ('reCAPTCHA') as part of providing the login area. The operator of reCAPTCHA is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ('Google').

reCAPTCHA is designed to check whether any data entered during the process of login application as appointed agent emanates from a human or from an automated programme. To do this, reCAPTCHA analyses a website visitor's behaviour based on a variety of different criteria before ending the application for login with a picture identification procedure. The analysis begins automatically as soon as the website visitor identifies the pictures. As part of the analysis, reCAPTCHA evaluates a range of information (e.g., IP address, how long the visitor stays on the website or the visitor's mouse movements). Data collected during the analysis is shared with Google.

The reCAPTCHA analyses run completely in the background. Website visitors are not notified that the analysis is taking place.

The data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 26 (1) no. 4, 11 (3), 33 VerpackG, to ensure that LUCID functions smoothly, and to prevent the misuse of LUCID and any potential illicit automated data theft.

Further information about Google reCAPTCHA and Google's privacy policy can be found at: <https://www.google.com/intl/en/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

Second step

After clicking the verification link and logging onto LUCID, we process the following data, in order to finalise the login process:

- ◆ Address (street and house number, postcode and town/city, country, additional address details) of the appointed third party;
- ◆ Telephone number and fax number (if indicated) of the appointed third party.

Mandatory fields are marked accordingly (*) in the form fields. It is not possible to apply for login if the mandatory fields are left blank. We store a cookie on your end device so that our server can remember your details as you work your way through the individual webpages to apply for login. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot apply for login without this session cookie.

Once the login application is concluded, you will receive an e-mail confirming your LUCID registration. Subsequently, an employee of Zentrale Stelle Verpackungsregister will check your data. You will be informed via another e-mail about acceptance or rejection of the login you applied for. In the event that your application is rejected, the login data filed in LUCID are deleted; the user will no longer be able to log onto the portal.

The data is processed based on article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG as well as sections 11 (3), 33 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Use of the login area as appointed third party

In order to use the login area, you have to log onto LUCID using the e-mail address and the password you provided during the application process. You can use the login area as a technical tool to inform us of changes to the data provided during the login application process; you can also terminate your login. In addition, you can file the data of the declaration of completeness (section 11 (1) to (3) VerpackG) for one or more producers in LUCID, provided that this producer/ these producers have instructed you to submit a declaration of completeness for them.

We store a cookie on your end device so that our server can verify that your end device is logged in to the login area. It is a 'session cookie' that is deleted when you close the browser window on your end device. Unfortunately, you cannot use the login area without this session cookie.

You will receive an e-mail via LUCID, informing you when a producer requests to instruct you to submit the declaration of completeness. After logging onto LUCID, you will see the following information below the "Consent for appointed-agent filing of declaration of completeness" button:

- ◆ Schedule of when to file the declaration of completeness to which the request relates;
- ◆ Date of the request;
- ◆ Company name of the requesting producer;
- ◆ First and last name of the requesting party;
- ◆ Address (street, postcode, town/city, country) of the requesting producer;
- ◆ E-mail address of the requesting party.

You will then have the choice to accept the assignment or to reject the producer's request to file the declaration of completeness. You, and the producer, will both receive an e-mail on this for your information. Please refer to II.1 above for more information on 'Declaration of completeness submission'.

The appointed third party's data is processed on the basis of article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 11 (3), 33 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Involvement of IT service providers and other contract data processors

We make use of contract data processors, in particular IT service providers, to make the login area available. For example, we use the Newsletter2Go service to send e-mails. This service is provided by Newsletter2Go GmbH, Nürnberger Strasse 8, 10787 Berlin, Germany.

Newsletter2Go is a service that can be used, among other things, to organise and analyse the dispatch of newsletters. The data entered by you when you subscribe to the newsletter will be stored on the Newsletter2Go servers in Germany. We use this service to log the delivery of e-mails to you.

You can find detailed information on the Newsletter2Go functions at:
<https://www.newsletter2go.de/features/newsletter-software/>

The legal basis for this data processing is article 6 (1) (c), (1) (e) GDPR in conjunction with section 3 BDSG and sections 11 (3), 33 VerpackG. In this, the Zentrale Stelle Verpackungsregister acts in the interest of fulfilling its statutory tasks and duties.

Storage period

After an appointed third party has finalised their login, we will store the login data for ten years. Above and beyond that, we store data only to the extent we are legally obliged or entitled to do.