

Privacy Policy pursuant to Art. 13 GDPR

Last updated: 25 August 2025

This privacy policy informs you about the type, scope and purpose of the processing of personal data (hereinafter referred to as "data") within our online offer as well as the websites, functions and content associated with it.

1. Controller

Climber Digital Assets, **Axel Herm**
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67663 Kaiserslautern
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E-mail: team@the-climber.com

Imprint: <https://the-climber.com/impressum/>

2. What data is processed?

- Inventory data (e.g. name, address)
- Contact details (e.g., email, phone number)
- Content data (e.g. form entries)
- Usage data (e.g. websites visited, click behaviour)
- Meta/communication data (e.g. IP address, device information)

3. Purposes of processing

- Provision of the online offer (incl. hosting)
- Communication with users
- Safety measures
- Reach measurement & analysis
- Preparatory affiliate tracking infrastructure
- Building a messenger community (Telegram)
- Preparation of external social media banners (e.g. X/Twitter)

4. Legal basis

- Art. 6 (1) (a) GDPR (consent)
- Art. 6 (1) (b) GDPR (performance of a contract)
- Art. 6 (1) (c) GDPR (legal obligation)
- Art. 6 (1) (f) GDPR (legitimate interest)

5. Hosting & Content Delivery

The website is operated by WordPress.com (provider: Aut O'Mattic A8C Ireland Ltd.). This will automatically use the Jetpack plugin. The following functions are used:

- Statistics function (Jetpack Site Stats)
- CDN (Content Delivery Network) for faster content delivery
- Spam-Schutz

Data processing is carried out on the basis of legitimate interests (Art. 6 para. 1 lit. f GDPR) in a stable, secure and high-performance website. Data can be transferred to servers in the USA. The legal basis for this is the Data Privacy Framework (DPF) and EU Standard Contractual Clauses.

Further information: <https://automattic.com/de/privacy/>

6. Cookies and consent management

This website uses cookies. Currently, no cookie banner is used. The integration of a corresponding consent management tool is in preparation.

- Session cookies are automatically deleted at the end of the session
- Persistent cookies can be stored for up to 2 years

Consent: Art. 6 (1) (a) GDPR

Necessary cookies: Art. 6 para. 1 lit. f GDPR

Communication & Contact Forms

If you contact us (e.g. via form, e-mail or via Telegram), we process your information to process the request. This is done on the basis of Art. 6 (1) (b) GDPR.

The establishment of a Telegram group is planned. Once enabled, this section will be expanded accordingly.

8. Affiliate Links (planned)

Our website prepares the technical integration of so-called affiliate links. When such links are clicked, tracking will take place in the future – with consent – by the third-party provider. However, at the time of this statement, there are no affiliate links active.

9. Social-Media-Verlinkung (X / Twitter)

Our website currently contains a simple link to our profile on platform X (formerly Twitter). By clicking on this link, you will leave our website and go to the external platform. X's privacy policy applies: <https://twitter.com/privacy>

The integration of widgets or banners is currently not active, but technically prepared.

10. Rights of data subjects

You have the right to:

- to information about your data (Art. 15 GDPR)
- to rectification (Art. 16 GDPR)
- to erasure (Art. 17 GDPR)
- to restriction (Art. 18 GDPR)
- on objection (Art. 21 GDPR)
- to data portability (Art. 20 GDPR)

11. Right to lodge a complaint

You have the right to complain to the competent supervisory authority:

State Commissioner for Data Protection Brandenburg

Stahnsdorfer Damm 77

14532 Kleinmachnow

<https://www.lda.brandenburg.de/>

12. Changes to this Privacy Policy

We reserve the right to amend this privacy policy, in particular in the event of technical changes or changes in the legal situation. The current version is available at any time at <https://the-climber.com/datenschutz/>.