

# DATA PRIVACY

## 1. An overview of data protection

This privacy policy applies to visitors to our websites, to our social media presence and to the general handling of the data of our business partners, prospective customers and applicants.

### **General information**

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

### **Data recording on this website**

Who is the responsible party for the recording of data on this website (i.e., the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information about the responsible party (referred to as the “controller” in the GDPR)” in this Privacy Policy.

### **How do we record your data?**

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g., web browser, operating system, or time the site was accessed). This information is recorded automatically when you access this website.

### **What are the purposes we use your data for?**

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns. If contracts can be concluded or initiated via the website, the transmitted data will also be processed for contract offers, orders or other order enquiries.

### **What rights do you have as far as your information is concerned?**

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures.

You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

### **Analysis tools and tools provided by third parties**

There is a possibility that your browsing patterns will be statistically analyzed when you visit this website. Such analyses are performed primarily with what we refer to as analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

## **2. Hosting and Content Delivery Networks (CDN)**

We are hosting the content of our website at the following provider:

### **Amazon Web Services (AWS)**

The provider is the Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg (hereinafter referred to as “AWS”).

When you visit our website, your personal data will be processed on AWS servers. This may also result in the transfer of personal data to the parent company of AWS in the United States. The transfer of data to the US is based on the EU’s standard contractual clauses. For details please consult:

<https://aws.amazon.com/de/blogs/security/aws-gdpr-data-processing-addendum/>.

For more information, please see the AWS Data Privacy Policy:

[https://aws.amazon.com/de/privacy/?nc1=f\\_pr](https://aws.amazon.com/de/privacy/?nc1=f_pr)

AWS is used on the basis of Art. 6(1)(f) GDPR. We have a legitimate interest in a depiction of our website that is as reliable as possible. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDDG, insofar the consent includes the storage of cookies or the access to

information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDDG. This consent can be revoked at any time.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5776>

### **Cloudflare**

We use the "Cloudflare" service provided by Cloudflare Inc., 101 Townsend St., San Francisco, CA 94107, USA. (hereinafter referred to as "Cloudflare").

Cloudflare offers a content delivery network with DNS that is available worldwide. As a result, the information transfer that occurs between your browser and our website is technically routed via Cloudflare's network. This enables Cloudflare to analyze data transactions between your browser and our website and to work as a filter between our servers and potentially malicious data traffic from the Internet. In this context, Cloudflare may also use cookies or other technologies deployed to recognize Internet users, which shall, however, only be used for the herein described purpose.

The use of Cloudflare is based on our legitimate interest in a provision of our website offerings that is as error free and secure as possible (Art. 6(1)(f) GDPR).

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details and further information on security and data protection at Cloudflare can be found here:

<https://www.cloudflare.com/privacypolicy/>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5666>.

### 3. General information and mandatory information

#### **Data protection**

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e., through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third-party access.

#### **Information about the responsible bodies (referred to as the “controller” in the GDPR)**

a) The controller responsible for data processing on this website is:

BeeWaTec AG  
Kunstmühlestraße 16  
72793 Pfullingen

Phone: +49 (0) 7121-62 87 16-0  
Fax.: +49 (0) 7121 - 62 87 16 – 499  
E-Mail: [info@beewatec.de](mailto:info@beewatec.de)

b) The respective independent companies of the BeeWaTec Group are controllers for their own services, such as own social media presence, applicant management, processing of data from business partners, etc.

These are in detail:

**BeeWaTec AG**  
**Kunstmühlestraße 16**  
**72793 Pfullingen**

Phone: +49 (0) 7121 - 62 87 16 - 0  
Fax.: +49 (0) 7121 - 62 87 16 - 499

E-Mail: [info@beewatec.de](mailto:info@beewatec.de)

**BeeWaTec Automation GmbH**

**Kunstmühlestraße 16**

**72793 Pfullingen**

Phone: +49 (0) 7121 - 62 87 16 - 0

Fax: +49 (0) 7121 - 62 87 16 - 499

E-Mail: [info@beewatec-automation.de](mailto:info@beewatec-automation.de)

**BeeWaTec AG**

**Wilerstrasse 68**

**CH-6062 Wilen (Sarnen)**

Phone: +41 (0) 62 - 891 00 00

E-Mail: [info@beewatec.ch](mailto:info@beewatec.ch)

**BeeWaTec GmbH**

**Leopold-Böhm-Straße 10/D53**

**AT-1030 Wien**

Phone: +43 (0) 8900 - 058

Fax: +43 (0) 8900 - 194

E-Mail: [info@beewatec.at](mailto:info@beewatec.at)

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g., names, e-mail addresses, etc.).

### **Storage duration**

Unless a more specific storage period has been specified in this privacy policy, your personal data will remain with us until the purpose for which it was collected no longer applies. If you assert a justified request for deletion or revoke your consent to data processing, your data will be deleted, unless we have other legally permissible reasons for storing your personal data (e.g., tax or commercial law retention periods); in the latter case, the deletion will take place after these reasons cease to apply.

General information on the legal basis for the data processing on this website

If you have consented to data processing, we process your personal data on the basis of Art. 6(1)(a) GDPR or Art. 9 (2)(a) GDPR, if special categories of data are processed according to Art. 9 (1) DSGVO. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR. If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based on § 25

(1) TDDDG. The consent can be revoked at any time. If your data is required for the fulfillment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1)(b) GDPR. Furthermore, if your data is required for the fulfillment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(f) GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

### **Designation of a data protection officer**

We have appointed a data protection officer.

The external data protection officer for BeeWaTec AG in Pfullingen is:

Edmund Hilt, hilt evolution  
Nelkenstraße 36  
71272 Renningen

Phone: +49 7159 49647-67

Fax: +49 7159 49647-68

E-Mail: [datenschutz\(at\)hilt-evolution.com](mailto:datenschutz(at)hilt-evolution.com)

### **Recipients of personal data**

In the scope of our business activities, we cooperate with various external parties. In some cases, this also requires the transfer of personal data to these external parties. We only disclose personal data to external parties if this is required as part of the fulfillment of a contract, if we are legally obligated to do so (e.g., disclosure of data to tax authorities), if we have a legitimate interest in the disclosure pursuant to Art. 6 (1)(f) GDPR, or if another legal basis permits the disclosure of this data. When using processors, we only disclose personal data of our customers on the basis of a valid contract on data processing. In the case of joint processing, a joint processing agreement is concluded.

### **Revocation of your consent to the processing of data**

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6(1)(E) OR (F) GDPR,

YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21(1) GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING AT ANY TIME. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21(2) GDPR).

#### **Right to log a complaint with the competent supervisory agency**

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

#### **Right to data portability**

You have the right to have data that we process automatically on the basis of your consent or in fulfillment of a contract handed over to you or to a third party in a common, machine-readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

#### **Information about, rectification and eradication of data**

Within the scope of the applicable statutory provisions, you have the right to demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data at any time. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

### **Right to demand processing restrictions**

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time. The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data instead of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21(1) GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

### **SSL and/or TLS encryption**

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line.

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

## **4. Recording of data on this website**

### **Cookies**

Our websites and pages use what the industry refers to as “cookies.” Cookies are small



data packages that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser.

Cookies can be issued by us (first-party cookies) or by third-party companies (so-called third-party cookies). Third-party cookies enable the integration of certain services of third-party companies into websites (e.g., cookies for handling payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of these cookies (e.g., the shopping cart function or the display of videos). Other cookies may be used to analyze user behavior or for promotional purposes.

Cookies, which are required for the performance of electronic communication transactions, for the provision of certain functions you want to use (e.g., for the shopping cart function) or those that are necessary for the optimization (required cookies) of the website (e.g., cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6(1)(f) GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of required cookies to ensure the technically error-free and optimized provision of the operator's services. If your consent to the storage of the cookies and similar recognition technologies has been requested, the processing occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TDDD); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete-function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited. Which cookies and services are used on this website can be found in this privacy policy.

### **Consent with ConsentManager**

Our website uses the ConsentManager consent technology to obtain your consent to the storage of certain cookies on your device or for the use of certain technologies and data protection legislation compliant documentation of the former. The party offering this technology is Jaohawi AB, Håltgelvägen 1b, 72348 Västerås, Sweden, website:

<https://www.consentmanager.de> (hereinafter referred to as “ConsentManager”).

Whenever you visit our website, a connection to ConsentManager’s servers will be established to obtain your consent and other declarations regarding the use of cookies. Moreover, ConsentManager shall store a cookie in your browser to be able to allocate your declaration(s) of consent or any revocations of the former. The data that are recorded in this manner shall be stored until you ask us to eradicate them, delete the ConsentManager cookie or until the purpose for archiving the data no longer exists. This shall be without prejudice to any mandatory legal retention periods.

ConsentManager uses cookies to obtain the declarations of consent mandated by law. The legal basis for the use of such cookies is Art. 6(1)(c) GDPR.

The services and cookies used are easily accessible and explained in the consent management tool.

### **Server log files**

The provider of this website and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address

This data is not merged with other data sources.

This data is recorded on the basis of Art. 6(1)(f) GDPR. The operator of the website has a legitimate interest in the technically error free depiction and the optimization of the operator’s website. In order to achieve this, server log files must be recorded.

### **Contact form**

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6(1)(b) GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6(1)(f) GDPR) or on your agreement (Art. 6(1)(a) GDPR) if this has been requested; the consent can be revoked at any time.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g., after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions, in particular retention periods.

#### **Request by e-mail, telephone, or fax**

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6(1)(b) GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6(1)(f) GDPR) or on the basis of your consent (Art. 6(1)(a) GDPR) if it has been obtained; the consent can be revoked at any time.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

## **5. presence on social media**

This section of the privacy policy applies to our social media presences

#### **Data processing through social networks**

We maintain publicly available profiles in social networks. The individual social networks we use can be found below.

Social networks such as Facebook, X etc. can generally analyze your user behavior comprehensively if you visit their website or a website with integrated social media

content (e.g., like buttons or banner ads). When you visit our social media pages, numerous data protection-relevant processing operations are triggered. In detail:

If you are logged in to your social media account and visit our social media page, the operator of the social media portal can assign this visit to your user account. Under certain circumstances, your personal data may also be recorded if you are not logged in or do not have an account with the respective social media portal. In this case, this data is collected, for example, via cookies stored on your device or by recording your IP address.

Using the data collected in this way, the operators of the social media portals can create user profiles in which their preferences and interests are stored. This way you can see interest-based advertising inside and outside of your social media presence. If you have an account with the social network, interest-based advertising can be displayed on any device you are logged in to or have logged in to.

Please also note that we cannot retrace all processing operations on the social media portals. Depending on the provider, additional processing operations may therefore be carried out by the operators of the social media portals. Details can be found in the terms of use and privacy policy of the respective social media portals.

### **Legal basis**

Our social media appearances should ensure the widest possible presence on the Internet. This is a legitimate interest within the meaning of Art. 6 (1) lit. f GDPR. The analysis processes initiated by the social networks may be based on divergent legal bases to be specified by the operators of the social networks (e.g., consent within the meaning of Art. 6 (1) (a) GDPR).

### **Responsibility and assertion of rights**

If you visit one of our social media sites (e.g., Facebook), we, together with the operator of the social media platform, are responsible for the data processing operations triggered during this visit. You can in principle protect your rights (information, correction, deletion, limitation of processing, data portability and complaint) vis-à-vis us as well as vis-à-vis the operator of the respective social media portal (e.g., Facebook).

Please note that despite the shared responsibility with the social media portal operators, we do not have full influence on the data processing operations of the social media portals. Our options are determined by the company policy of the respective provider.

### **Storage time**

The data collected directly from us via the social media presence will be deleted from our systems as soon as you ask us to delete it, you revoke your consent to the storage or the purpose for the data storage lapses. Stored cookies remain on your device until you delete them. Mandatory statutory provisions - in particular, retention periods - remain unaffected.

We have no control over the storage duration of your data that are stored by the social network operators for their own purposes. For details, please contact the social network operators directly (e.g., in their privacy policy, see below).

### **Your rights**

You have the right to receive information about the origin, recipient and purpose of your stored personal data at any time and free of charge. You also have the right to object, the right to data portability and the right to file a complaint with the responsible regulatory agency. Furthermore, you can request the correction, blocking, deletion and, under certain circumstances, the restriction of the processing of your personal data.

### **Individual social networks**

#### **Facebook**

We have a profile on Facebook. The provider of this service is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland (hereinafter Meta). According to Meta's statement the collected data will also be transferred to the USA and to other third-party countries.

We have signed an agreement with Meta on shared responsibility for the processing of data (Controller Addendum). This agreement determines which data processing operations we or Meta are responsible for when you visit our Facebook Fanpage. This agreement can be viewed at the following link:

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

You can customize your advertising settings independently in your user account. Click on the following link and log in:

<https://www.facebook.com/settings?tab=ads>.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) and  
<https://de-de.facebook.com/help/566994660333381>.

Details can be found in the Facebook privacy policy:

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

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/4452>

### **Instagram**

We have a profile on Instagram. The provider of this service is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) and  
<https://de-de.facebook.com/help/566994660333381>.

For details on how they handle your personal information, see the Instagram Privacy Policy: <https://privacycenter.instagram.com/policy/>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/4452>

### **LinkedIn**

We have a LinkedIn profile. The provider is the LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland. LinkedIn uses advertising cookies.

If you want to disable LinkedIn advertising cookies, please use the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.linkedin.com/legal/l/dpa> and  
<https://www.linkedin.com/legal/l/eu-sccs>.

For details on how they handle your personal information, please refer to LinkedIn's privacy policy:

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

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5448>

### **YouTube**

We have a profile on YouTube. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Details on how they handle your personal data can be found in the YouTube privacy policy:

<https://policies.google.com/privacy?hl=en>

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>

## **6. Social media - plugins on this website**

### **Facebook**

We have integrated elements of the social network Facebook on this website. The provider of this service is Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland. According to Facebook’s statement the collected data will be transferred to the USA and other third-party countries too.

An overview of the Facebook social media elements is available under the following link:

<https://developers.facebook.com/docs/plugins/>

If the social media element has been activated, a direct connection between your device and the Facebook server will be established. As a result, Facebook will receive information confirming your visit to this website with your IP address. If you click on the Facebook Like button while you are logged into your Facebook account, you can link content of this website to your Facebook profile. Consequently, Facebook will be able to allocate your visit to this website to your user account. We have to emphasize that we as the provider of the website do not receive any information on the content of the transferred data and its use by Facebook.

For more information, please consult the Data Privacy Policy of Facebook at:  
<https://de-de.facebook.com/privacy/explanation>

The use of this service is based on your consent in accordance with Art. 6 (1)(a) GDPR and § 25 (1) TDDDG.

Consent can be revoked at any time.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Facebook, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Facebook. The processing by Facebook that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us jointly have been set out in a joint processing agreement. The wording of the agreement can be found under:

[https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this agreement, we are responsible for providing the privacy information when using the Facebook tool and for the privacy-secure implementation of the tool on our website. Facebook is responsible for the data security of Facebook products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook directly with Facebook. If you assert the data subject rights with us, we are obliged to forward them to Facebook.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum),  
<https://de-de.facebook.com/help/566994660333381> and  
<https://www.facebook.com/policy.php>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to



ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/4452>.

### **LinkedIn**

This website uses elements of the LinkedIn network. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

Any time you access a page of this website that contains elements of LinkedIn, a connection to LinkedIn's servers is established. LinkedIn is notified that you have visited this website with your IP address. If you click on LinkedIn's "Recommend" button and are logged into your LinkedIn account at the time, LinkedIn will be in a position to allocate your visit to this website to your user account. We have to point out that we as the provider of the websites do not have any knowledge of the content of the transferred data and its use by LinkedIn.

The use of this service is based on your consent in accordance with Art. 6 (1)(a) GDPR and § 25 (1) TDDDG.

Consent can be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.linkedin.com/help/linkedin/answer/a1343190/datenubertragung-aus-der-eu-dem-ewr-undder-schweiz?lang=de>.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at:

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

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5448>.

## 7. Analysis tools and advertising

### Google Tag Manager

We use the Google Tag Manager. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create any user profiles, does not store cookies, and does not carry out any independent analyses. It only manages and runs the tools integrated via it. However, the Google Tag Manager does collect your IP address, which may also be transferred to Google's parent company in the United States.

The Google Tag Manager is used on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the quick and uncomplicated integration and administration of various tools on his website. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDDG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDDG. This consent can be revoked at any time.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user's origin. This data is assigned to the respective end device of the user. An assignment to a user-ID does not take place.

Furthermore, Google Analytics allows us to record your mouse and scroll movements and clicks, among other things. Google Analytics uses various modeling approaches to augment the collected data sets and uses machine learning technologies in data analysis.

Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/controllerterms/mccs/>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **IP anonymization**

Google Analytics IP anonymization is active. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google’s servers in the United States and abbreviated there only in exceptional cases.

On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google’s possession.

### **Browser plug-in**

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link:

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

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

### **Hotjar**

This website utilizes Hotjar. The provider is Hotjar Ltd., Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe (website: <https://www.hotjar.com>).

Hotjar is a tool used to analyze your user patterns on this website. Hotjar allows us to for instance record your mouse and scroll movements as well as your click. During this process, Hotjar also has the capability to determine how long your cursor remained in a certain position. Based on this information, Hotjar compiles so-called Heatmaps, that make possible to determine which parts of the website the website visitor reviews with preference.

We are also able to determine how long you have stayed on a page of this website and when you left. We can also determine at which point you suspended making entries into a contact form (so-called conversion funnels).

Furthermore, Hotjar can be deployed to obtain direct feedback from website visitors. This function aims at the improvement of the website offerings of the website operator.

Hotjar uses technologies that make it possible to recognize the user for the purpose of analyzing the user patterns (e.g., cookies or the deployment of device fingerprinting).

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TDDDG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR;

the website operator has a legitimate interest in the analysis of user patterns to optimize both, the web presentation and the operator's advertising activities.

### **Deactivation of Hotjar**

If you would like to deactivate the recording of data by Hotjar, please click on the link below and follow the instructions provided under the link:

<https://www.hotjar.com/policies/do-not-track/>.

Please keep in mind that you will have to separately deactivate Hotjar for every browser and every device. For more detailed information about Hotjar and the data to be recorded, please consult the Data Privacy Declaration of Hotjar under the following link:

<https://www.hotjar.com/privacy>.

### **Google Ads**

The website operator uses Google Ads. Google Ads is an online promotional program of Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display ads in the Google search engine or on third-party websites, if the user enters certain search terms into Google (keyword targeting). It is also possible to place targeted ads based on the user data Google has in its possession (e.g., location data and interests; target group targeting). As the website operator, we can analyze these data quantitatively, for instance by analyzing which search terms resulted in the display of our ads and how many ads led to respective clicks.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://policies.google.com/privacy/frameworks> and  
<https://business.safety.google/controllerterms/>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **Google AdSense**

This website uses Google AdSense, a service for the integration of ads. The provider of

this service is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google AdSense, we are in a position to place targeted ads by third parties on our site. The contents of the ads are based on your interests, which Google determines based on your past user patterns. Moreover, when choosing compatible ads, context information, such as your location, the content of the visited website or Google search terms you have entered, will be taken into account.

Google AdSense uses Cookies, Web Beacons (invisible graphics) and comparable recognition technologies. As a result, it is possible to analyze information, such as visitor traffic data, on these sites. The usage information for this website (including your IP address) recorded by Google AdSense and delivery of advertising formats are transferred to a Google server in the United States, where the information is stored. Google may share this information with one of its contracting partners. However, Google will not link your IP address with any other of your stored information.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

You may revoke your consent at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/controllerterms/mccs/>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **Google Ads Remarketing**

This website uses the functions of Google Ads Remarketing. The provider of these solutions is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

With Google Ads Remarketing, we can assign people who interact with our online offering to specific target groups in order to subsequently display interest-based advertising to them in the Google advertising network (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Ads Remarketing to device encompassing functions of Google. This makes it possible to display interest-based customized advertising messages, depending on your prior usage and browsing patterns on a device (e.g., cell phone) in a manner tailored to you as well as on any of your devices (e.g., tablet or PC).

If you have a Google account, you have the option to object to personalized advertising under the following link:

<https://adssettings.google.com/anonymous?hl=de>.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG. You may revoke your consent at any time.

For further information and the pertinent data protection regulations, please consult the Data Privacy Policies of Google at:

<https://policies.google.com/technologies/ads?hl=en>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **Formation of Target Groups with Customer Reconciliation**

For the formation of target groups, we use, among other things, the Google Ads Remarketing customer reconciliation feature. To achieve this, we transfer certain customer data (e.g., email addresses) from our customer lists to Google. If the respective customers are Google users and are logged into their Google accounts, matching advertising messages within the Google network (e.g., YouTube, Gmail or in a search engine) are displayed for them to view.

### **Google Conversion-Tracking**

This website uses Google Conversion Tracking. The provider of this service is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google Conversion Tracking, we are in a position to recognize whether the user has completed certain actions. For instance, we can analyze the how frequently which buttons on our website have been clicked and which products are

reviewed or purchased with particular frequency. The purpose of this information is to compile conversion statistics. We learn how many users have clicked on our ads and which actions they have completed. We do not receive any information that would allow us to personally identify the users. Google as such uses cookies or comparable recognition technologies for identification purposes.

The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

You may revoke your consent at any time.

For more information about Google Conversion Tracking, please review Google's data protection policy at:

<https://policies.google.com/privacy?hl=en>

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **Meta Pixel (formerly Facebook Pixel)**

To measure conversion rates, this website uses the visitor activity pixel of Meta. The provider of this service is Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Meta's statement the collected data will be transferred to the USA and other third-party countries too.

This tool allows the tracking of page visitors after they have been linked to the website of the provider after clicking on a Meta ad. This makes it possible to analyze the effectiveness of Meta ads for statistical and market research purposes and to optimize future advertising campaigns.

For us as the operators of this website, the collected data is anonymous. We are not in a position to arrive at any conclusions as to the identity of users. However, Meta archives the information and processes it, so that it is possible to make a connection to the respective user profile on Facebook or Instagram and Meta is in a position to use the data for its own promotional purposes in compliance with the Meta Data Usage Policy (<https://www.facebook.com/about/privacy/>). This enables Meta to display ads on Facebook or Instagram and other advertising channels. We as the operator of this website have no control over the use of such data.



The use of these services occurs on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

You may revoke your consent at any time.

Insofar as personal data is collected on our website with the help of the tool described here and forwarded to Meta, we and Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland are jointly responsible for this data processing (Art. 26 DSGVO). The joint responsibility is limited exclusively to the collection of the data and its forwarding to Meta. The processing by Meta that takes place after the onward transfer is not part of the joint responsibility. The obligations incumbent on us have been jointly set out in a joint processing agreement. The wording of the agreement can be found under:

[https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). According to this agreement, we are responsible for providing the privacy information when using the Meta tool and for the privacy-secure implementation of the tool on our website. Meta is responsible for the data security of Meta products. You can assert data subject rights (e.g., requests for information) regarding data processed by Facebook or Instagram directly with Meta. If you assert the data subject rights with us, we are obliged to forward them to Meta.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

[https://www.facebook.com/legal/EU\\_data\\_transfer\\_addendum](https://www.facebook.com/legal/EU_data_transfer_addendum) and  
<https://de-de.facebook.com/help/566994660333381>.

In Meta's Data Privacy Policies, you will find additional information about the protection of your privacy at:

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

You also have the option to deactivate the remarketing function "Custom Audiences" in the ad settings section under

[https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). To do this, you first have to log into Facebook. If you do not have a Facebook or Instagram account, you can deactivate any user-based advertising by Meta on the website of the European Interactive Digital Advertising Alliance:  
<http://www.youronlinechoices.com/de/praferenzmanagement/>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data

protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/4452>.

### **LinkedIn Insight Tag**

This website uses the Insight tag from LinkedIn. This service is provided by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

### **Data processing by LinkedIn Insight Tag**

We use the LinkedIn Insight tag to obtain information about visitors to our website. Once a website visitor is registered with LinkedIn, we can analyze the key occupational data (e.g., career level, company size, country, location, industry, job title) of our website visitors to help us better target our site to the relevant audience.

We can also use LinkedIn Insight tags to measure whether visitors to our websites make a purchase or perform other actions (conversion measurement). Conversion measurement can also be carried out across devices (e.g. from PC to tablet). LinkedIn Insight Tag also features a retargeting function that allows us to display targeted advertising to visitors to our website outside of the website.

According to LinkedIn, no identification of the advertising addressee takes place.

LinkedIn itself also collects log files (URL, referrer URL, IP address, device and browser characteristics and time of access). The IP addresses are shortened or (if they are used to reach LinkedIn members across devices) hashed (pseudonymized). The direct identifiers of LinkedIn members are deleted by LinkedIn after seven days. The remaining pseudonymized data will then be deleted within 180 days.

The data collected by LinkedIn cannot be assigned by us as a website operator to specific individuals. LinkedIn will store the personal data collected from website visitors on its servers in the USA and use it for its own promotional activities. For details, please see LinkedIn's privacy policy at

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

### **Legal basis**

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TDDG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR;

the website operator has a legitimate interest in effective advertising promotions that include the utilization of social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://www.linkedin.com/legal/l/dpa> and  
<https://www.linkedin.com/legal/l/eu-sccs>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5448>.

### Objection to the use of LinkedIn Insight Tag

You can object to LinkedIn's analysis of user behavior and targeted advertising at the following link:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

In addition, LinkedIn members can control the use of their personal information for promotional purposes in the account settings. To prevent LinkedIn from linking information collected on our site to your LinkedIn account, you must log out of your LinkedIn account before you visit our site.

## Use of HubSpot

We use HubSpot, a tool for digital marketing and analysis purposes, on our websites. The service provider is HubSpot Inc. (<https://legal.hubspot.com/>).

This also involves the use of "cookies", which are stored on your computer and enable us to analyze your use of the website. HubSpot evaluates the information collected (e.g. IP address, geographical location, type of browser, duration of visit and pages accessed) on our behalf in order to generate reports on visits to our websites.

We can also use HubSpot to link a user's visits to our websites with the personal details from forms (in particular name/email address) on the basis of consent given, thus recording them on a personal basis and informing users individually and in a targeted manner about preferred topics.

If you generally do not want HubSpot to collect data, you can object to the storage of cookies at any time or prevent them by changing your browser settings accordingly.

Further information on how HubSpot works can be found in the HubSpot Inc. privacy policy, available at:

<https://legal.hubspot.com/privacy-policy>.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5812>.

### **Oxomi**

A web service of the company scireum GmbH, Eisenbahnstraße 24 in 73630 Remshalden, DE (hereinafter: Oxomi) is loaded on our website. We use this data to ensure the full functionality of our website. In this context, your browser may transmit personal data to Oxomi. The legal basis for data processing is Art. 6 para. 1 lit. a GDPR (consent). The data will be deleted as soon as the purpose of its collection has been fulfilled. Further information on the handling of the transferred data can be found in Oxomi's privacy policy: <http://www.scireum.de/scireum/datenschutz>.

You can prevent Oxomi from collecting and processing your data by disabling script execution in your browser or by installing a script blocker (e.g., available at [www.noscript.net](http://www.noscript.net) or [www.ghostery.com](http://www.ghostery.com)).

Company processing the data  
scireum GmbH  
Eisenbahnstraße 24  
73630 Remshalden  
Germany

[Data privacy >](#)

Purpose of data processing  
Marketing (Consent – GDPR 6.1.a)  
Legal basis for data processing  
Consent (GDPR 6.1.a)

### **Use of Leady**

We use Leady, a digital marketing tool, on our websites.

The service provider is Imper CZ s.r.o., Nádražní 762/32, 150 00 Prague 5, CZ (<https://imper.cz/en/>).

Leady can be used to create detailed profiles of website visitors who visit our website. Leady analyzes which services and products are of interest to visitors, which channels the visitors use and what their purchasing behavior is like.

If consent has been obtained, the above-mentioned service is used exclusively on the basis of Art. 6 para. 1 lit. a GDPR and § 25 TDDDG. Consent can be revoked at any time. If consent has not been obtained, this service is used on the basis of Art. 6 para. 1 lit. f GDPR; the website operator has a legitimate interest in recording company visits to its website and user behavior.

The data is deleted as soon as the purpose of its collection has been fulfilled.

Further information on data protection at leady / Imper can be found in the privacy policy at:

<https://leady.com/privacy/>

## **8. Newsletter**

### **Newsletter data**

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail address provided and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6(1)(a) GDPR). You may revoke the consent you have given to the archiving of data, the e-mail address, and the use of this information for the sending of the newsletter at any time, for instance by clicking on the “Unsubscribe” link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider

and deleted from the newsletter distribution list after you unsubscribe from the newsletter or after the purpose has ceased to apply. We reserve the right to delete or block e-mail addresses from our newsletter distribution list at our own discretion within the scope of our legitimate interest in accordance with Art. 6(1)(f) GDPR.

Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist, if such action is necessary to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6(1)(f) GDPR). The storage in the blacklist is indefinite. You may object to the storage if your interests outweigh our legitimate interest.

## 9. Plug-ins and Tools

### **YouTube with expanded data protection integration**

This website integrates videos from the YouTube website. The operator of the website is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

When you visit one of these websites on which YouTube is integrated, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited. If you are logged into your YouTube account, you enable YouTube to assign your surfing behavior directly to your personal profile. You can prevent this by logging out of your YouTube account.

We use YouTube in extended data protection mode. According to YouTube, videos that are played in extended data protection mode are not used to personalize browsing on YouTube. Ads that are played in extended data protection mode are also not personalized. No cookies are set in extended data protection mode. Instead, so-called local storage elements are stored in the user's browser, which contain personal data similar to cookies and can be used for recognition. Details on the extended data protection mode can be found here:

<https://support.google.com/youtube/answer/171780>.

After activating a YouTube video, further data processing operations may be triggered over which we have no influence.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6(1)(f) GDPR, this is a legitimate interest. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDDG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDDG. This consent can be revoked at any time.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under:

<https://policies.google.com/privacy?hl=en>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **Google Maps**

This website uses the mapping service Google Maps. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland. With the means of this service, we can integrate map material on our website.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer. In case Google Maps has been activated, Google has the option to use Google Fonts for the purpose of the uniform depiction of fonts. When you access Google Maps, your browser will load the required web fonts into your browser cache, to correctly display text and fonts.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6(1)(f) GDPR. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDDG, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDDG. This consent can be revoked at any time.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here:

<https://privacy.google.com/businesses/gdprcontrollerterms/> and  
<https://privacy.google.com/businesses/gdprcontrollerterms/sccs/>.

For more information on the handling of user data, please review Google's Data Privacy Declaration under:

<https://policies.google.com/privacy?hl=en>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/5780>.

### **Seznam**

Seznam.cz is a Czech internet portal with a search engine. The provider is Seznam.cz, a.s., Radlicka 3294/10, 150 00 Prague 5, CZ (<https://o-seznam.cz/>)

Detailed information on the handling of personal data at Seznam can be found in the provider's privacy policy at:

<https://o-seznam.cz/pravni-informace/ochrana-udaju/>

### **HubSpot Video**

We embed videos on our website using "HubSpot Video".

HubSpot is a software company from the USA with a subsidiary HubSpot Ireland Limited in Ireland.

With HubSpot Video, videos can be added to web pages, marketing emails, blog posts and knowledge base articles.

If the playback of embedded HubSpot videos is started after your consent, the provider "HubSpot Video" sets cookies.

"HubSpot Video" cookies are small text files that are stored locally in the cache of your web browser on your end device and enable us to analyze your use of the video content on our website. HubSpot evaluates the information collected (e.g. IP address, geographical location, type of browser, duration of visit and pages viewed) on our behalf



so that we can generate reports on the performance of video playback. The information collected using the "HubSpot Video" cookie is stored on the servers of HubSpot's service providers.

As personal data is transferred to the USA, further protective mechanisms are required to ensure the level of data protection required by the GDPR. To ensure this, we have concluded corresponding contracts with the provider HubSpot.

Further information on data protection and data use by HubSpot can be found here:

<https://legal.hubspot.com/de/privacy-policy>.

Information on the data processing agreement (DPA) can be found here:

<https://legal.hubspot.com/de/dpa>

## 10. Online-based Audio and Video Conferences (Conference tools)

### **Data processing**

We use online conference tools, among other things, for communication with our customers. The tools we use are listed in detail below. If you communicate with us by video or audio conference using the Internet, your personal data will be collected and processed by the provider of the respective conference tool and by us. The conferencing tools collect all information that you provide/access to use the tools (email address and/or your phone number). Furthermore, the conference tools process the duration of the conference, start and end (time) of participation in the conference, number of participants and other "context information" related to the communication process (metadata).

Furthermore, the provider of the tool processes all the technical data required for the processing of the online communication. This includes, in particular, IP addresses, MAC addresses, device IDs, device type, operating system type and version, client version, camera type, microphone or loudspeaker and the type of connection.

Should content be exchanged, uploaded, or otherwise made available within the tool, it is also stored on the servers of the tool provider. Such content includes, but is not limited to, cloud recordings, chat/ instant messages, voicemail uploaded photos and videos, files, whiteboards, and other information shared while using the service.

Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the

respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

### **Purpose and legal bases**

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6(1)(b) GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art. 6(1)(f) GDPR). Insofar as consent has been requested, the tools in question will be used on the basis of this consent; the consent may be revoked at any time with effect from that date.

### **Duration of storage**

Data collected directly by us via the video and conference tools will be deleted from our systems immediately after you request us to delete it, revoke your consent to storage, or the reason for storing the data no longer applies. Stored cookies remain on your end device until you delete them. Mandatory legal retention periods remain unaffected.

We have no influence on the duration of storage of your data that is stored by the operators of the conference tools for their own purposes. For details, please directly contact the operators of the conference tools.

### **Conference tools used**

We employ the following conference tools:

#### **Microsoft Teams**

We use Microsoft Teams. The provider is the Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland.

For details on data processing, please refer to the Microsoft Teams privacy policy:

<https://privacy.microsoft.com/en-us/privacystatement>.

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link:

<https://www.dataprivacyframework.gov/participant/6474>.

## 11. Custom Services

### 11.1 Handling applicant data

We offer website visitors the opportunity to submit job applications to us (e.g., via e-mail, via postal services on by submitting the online job application form). Below, we will brief you on the scope, purpose and use of the personal data collected from you in conjunction with the application process. We assure you that the collection, processing, and use of your data will occur in compliance with the applicable data privacy rights and all other statutory provisions and that your data will always be treated as strictly confidential.

#### Scope and purpose of the collection of data

If you submit a job application to us, we will process any affiliated personal data (e.g., contact and communications data, application documents, notes taken during job interviews, etc.), if they are required to make a decision concerning the establishment or an employment relationship. The legal grounds for the aforementioned are § 26 BDSG according to German Law (Negotiation of an Employment Relationship), Art. 6(1)(b) GDPR (General Contract Negotiations) and – provided you have given us your consent – Art. 6(1)(a) GDPR. You may revoke any consent given at any time. Within our company, your personal data will only be shared with individuals who are involved in the processing of your job application.

If your job application should result in your recruitment, the data you have submitted will be archived on the grounds of § 26 BDSG and Art. 6(1)(b) GDPR for the purpose of implementing the employment relationship in our data processing system.

#### Data Archiving Period

If we are unable to make you a job offer or you reject a job offer or withdraw your application, we reserve the right to retain the data you have submitted on the basis of our legitimate interests (Art. 6(1)(f) GDPR) for up to 6 months from the end of the application procedure (rejection or withdrawal of the application).

Afterwards the data will be deleted, and the physical application documents will be destroyed. The storage serves in particular as evidence in the event of a legal dispute. If it is evident that the data will be required after the expiry of the 6-month period (e.g., due to an impending or pending legal dispute), deletion will only take place when the purpose for further storage no longer applies.

Longer storage may also take place if you have given your agreement (Article 6(1)(a) GDPR) or if statutory data retention requirements preclude the deletion.

### **Admission to the applicant pool**

If we do not make you a job offer, you may be able to join our applicant pool. In case of admission, all documents and information from the application will be transferred to the applicant pool in order to contact you in case of suitable vacancies.

Admission to the applicant pool is based exclusively on your express agreement (Art. 6(1)(a) GDPR). The submission agreement is voluntary and has no relation to the ongoing application procedure. The affected person can revoke his agreement at any time. In this case, the data from the applicant pool will be irrevocably deleted, provided there are no legal reasons for storage.

The data from the applicant pool will be irrevocably deleted no later than two years after consent has been granted.

## **11.2 Notes on the general handling of data from business partners**

### **Processing purposes and legal basis**

Your personal data will be processed in accordance with the provisions of the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG) and other relevant data protection regulations. The processing and use of individual data depend on the agreed or requested service. Our contractual documents, forms, consent forms and other information provided to you (e.g. on the website or in the terms and conditions) can provide further details and supplements on the processing purposes.

### **Consent (Art. 6 (1) (a) GDPR)**

If you have given us consent to process personal data, the respective consent is the legal basis for the processing mentioned there. You can revoke consent at any time with effect for the future.

### **Fulfillment of contractual obligations (Art. 6 (1) (b) GDPR)**

We process your personal data for the execution of our contracts with you. Furthermore, your personal data is processed for the implementation of measures and activities in the context of pre-contractual relations.

### **Fulfillment of legal obligations (Art. 6 (1) (c) GDPR)**

We process your personal data if this is necessary to fulfill legal obligations (e.g. commercial, tax laws).

Furthermore, we may process your data for:

- the prevention of fraud and money laundering

- the prevention, combating and investigation of terrorist financing and crimes that endanger assets
- the fulfillment of control and reporting obligations under tax law
- archiving data for data protection and data security purposes
- auditing by tax and other authorities

In addition, the disclosure of personal data may become necessary in the context of official/court measures for the purpose of gathering evidence, criminal prosecution or enforcement of civil claims.

### **Legitimate interest of us or third parties (Art. 6 (1) (f) GDPR)**

We may also use your personal data on the basis of a balance of interests to protect the legitimate interest of us or third parties. This is done for the following purposes:

- for advertising or market research, if you have not objected to the use of your data
- for obtaining information and exchanging data with credit agencies, if this exceeds our economic risk
- for the limited storage of your data, if deletion is not possible or only possible with disproportionate effort due to the special nature of storage
- for comparison with European and international anti-terrorism lists, if this goes beyond the legal obligations
- for the further development of services and products as well as existing systems and processes
- for the disclosure of personal data as part of due diligence, e.g. in the case of company sales
- for statistical evaluations or for market analyses
- for the assertion of legal claims and defense in legal disputes that are not directly related to the contractual relationship
- for internal and external investigations and/or security audits
- for the possible listening in or recording of telephone conversations for quality control and training purposes
- for securing and exercising our house rights through appropriate measures (e.g. video surveillance)

### **Categories of personal data processed by us**

We process the following data:

- personal data (name, date of birth, place of birth, nationality, marital status, occupation/industry and similar data)
- contact details (address, email address, telephone number and similar data)
- payment/Coverage confirmation for Bank and Credit Cards
- Information about your financial situation (creditworthiness data including scoring,

i.e. data for assessing the economic risk)

- Customer and supplier history

In addition, we process personal data from public sources (e.g. Internet, media, press, trade and civil registers).

We also process personal data that we have legally obtained from third parties (e.g. mailing list providers, credit agencies) if necessary for the provision of our services.

### **Who receives your data?**

We share your personal data within our company with those departments that require your data to comply with contractual and legal obligations or to pursue our legitimate interests.

In addition, the following entities/bodies may receive your data:

- Contract processors commissioned by us (Art. 28 GDPR) service providers for supporting activities and other responsible bodies within the meaning of the GDPR, especially in the areas of, e.g. IT services, logistics and printing services, external data centers, support/maintenance of data processing/IT applications, archiving, document processing, data destruction, marketing, auditing services, credit institutions.
- Public authorities and institutions in the event of a legal or official obligation under which we are obliged to disclose, report or share data or the disclosure of data is in the public interest
- Bodies and institutions on the basis of our legitimate interest or the legitimate interest of a third party (e.g. shared with public authorities, credit agencies, debt collection, lawyers, courts)
- other bodies for which you have given us your consent for the transfer of data

### **Transfer of your data to a third country or an international organization**

A transfer of data to countries outside the European Union (EU) or the European Economic Area (EEA), so-called third countries, takes place if it is necessary for the execution of an order/contract from or with you, if it is required by law (e.g. tax reporting obligations), if it is in the legitimate interest of us or a third party or if you have given us your consent.

In this context, the processing of your data in a third country may also take place in connection with the involvement of service providers as part of commissioned processing.

If there is no EU Commission decision on an adequate level of data protection for the country in question, we ensure that your rights and freedoms are adequately protected and guaranteed in accordance with EU data protection requirements by means of appropriate contracts and measures. We will provide you with the relevant detailed information upon request.

**How long do we store your data?**

We process your personal data during the entire course of our business relationship as necessary; this also includes the initiation and performance of a contract.

In addition, we are subject to various retention and documentation obligations that are set out in the German Commercial Code (HGB) and the German Fiscal Code (AO), among others. The retention and/or documentation periods specified there are up to ten years beyond the end of the business relationship or the pre-contractual legal relationship.

Ultimately, the retention period is also determined in line with statutory limitation periods, which under section 195 et seq. of the German Civil Code (BGB) are generally three years but may be up to thirty years in certain cases.

**To what extent is automated decision-making used in individual cases (including profiling)?**

We do not use purely automated decision-making procedures as referred to in Article 22 GDPR. Should we use these procedures in individual cases, we will inform you separately provided we are required to do so by law.