

# Privacy Policy

## Preamble

With the following privacy policy we would like to inform you which types of your personal data (hereinafter also abbreviated as "data") we process for which purposes and in which scope. The privacy statement applies to all processing of personal data carried out by us, both in the context of providing our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online services").

The terms used are not gender-specific.

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## **Controller**

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## **Contact information of the Data Protection Officer**

Nina Wiese

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## **Overview of processing operations**

The following table summarises the types of data processed, the purposes for which they are processed and the concerned data subjects.

### **Categories of Processed Data**

- Inventory data.
- Location data.
- Contact data.
- Content data.
- Usage data.
- Meta, communication and process data.
- Job applicant details.

- Log data.

## Categories of Data Subjects

- Communication partner.
- Users.
- Job applicants.

## Purposes of Processing

- Communication.
- Security measures.
- Web Analytics.
- Organisational and Administrative Procedures.
- Job Application Process.
- Feedback.
- Profiles with user-related information.
- Provision of our online services and usability.
- Information technology infrastructure.
- Public relations.

## Relevant legal bases

**Relevant legal bases according to the GDPR:** In the following, you will find an overview of the legal basis of the GDPR on which we base the processing of personal data. Please note that in addition to the provisions of the GDPR, national data protection provisions of your or our country of residence or domicile may apply. If, in addition, more specific legal bases are applicable in individual cases, we will inform you of these in the data protection declaration.

- **Consent (Article 6 (1) (a) GDPR)** - The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- **Performance of a contract and prior requests (Article 6 (1) (b) GDPR)** - Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legitimate Interests (Article 6 (1) (f) GDPR)** - the processing is necessary

for the protection of the legitimate interests of the controller or a third party, provided that the interests, fundamental rights, and freedoms of the data subject, which require the protection of personal data, do not prevail.

- **Job application process as a pre-contractual or contractual relationship (Article 6 (1) (b) GDPR)** - If special categories of personal data within the meaning of Article 9 (1) GDPR (e.g. health data, such as severely handicapped status or ethnic origin) are requested from applicants within the framework of the application procedure, so that the responsible person or the person concerned can carry out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law, their processing shall be carried out in accordance with Article 9 (2)(b) GDPR, in the case of the protection of vital interests of applicants or other persons on the basis of Article 9 (2)(c) GDPR or for the purposes of preventive health care or occupational medicine, for the assessment of the employee's ability to work, for medical diagnostics, care or treatment in the health or social sector or for the administration of systems and services in the health or social sector in accordance with Article 9 (2)(d) GDPR. In the case of a communication of special categories of data based on voluntary consent, their processing is carried out on the basis of Article 9 (2)(a) GDPR.

**National data protection regulations in Germany:** In addition to the data protection regulations of the GDPR, national regulations apply to data protection in Germany. This includes in particular the Law on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special provisions on the right to access, the right to erase, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated individual decision-making, including profiling. Furthermore, data protection laws of the individual federal states may apply.

**Relevant legal basis according to the Swiss Data Protection Act:** If you are located in Switzerland, we process your data based on the Federal Act on Data Protection (referred to as "Swiss DPA"). Unlike the GDPR, for instance, the Swiss DPA does not generally require that a legal basis for processing personal data be stated and that the processing of personal data is conducted in good faith, lawfully and proportionately (Art. 6 para. 1 and 2 of the Swiss DPA). Furthermore, we only collect personal data for a specific purpose recognizable to the data subject and process it only in a manner compatible with this purpose (Art. 6 para. 3 of the Swiss DPA).

**Reference to the applicability of the GDPR and the Swiss DPA:** These privacy policy serves both to provide information pursuant to the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation (GDPR). For this reason, we ask you to note that due to the broader spatial application and

comprehensibility, the terms used in the GDPR are applied. In particular, instead of the terms used in the Swiss FADP such as "processing" of "personal data", "predominant interest", and "particularly sensitive personal data", the terms used in the GDPR, namely "processing" of "personal data", as well as "legitimate interest" and "special categories of data" are used. However, the legal meaning of these terms will continue to be determined according to the Swiss FADP within its scope of application.

## **Security Precautions**

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, in order to ensure a level of security appropriate to the risk.

The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access to, input, transmission, securing and separation of the data. In addition, we have established procedures to ensure that data subjects' rights are respected, that data is erased, and that we are prepared to respond to data threats rapidly. Furthermore, we take the protection of personal data into account as early as the development or selection of hardware, software and service providers, in accordance with the principle of privacy by design and privacy by default.

Securing online connections through TLS/SSL encryption technology (HTTPS): To protect the data of users transmitted via our online services from unauthorized access, we employ TLS/SSL encryption technology. Secure Sockets Layer (SSL) and Transport Layer Security (TLS) are the cornerstones of secure data transmission on the internet. These technologies encrypt the information that is transferred between the website or app and the user's browser (or between two servers), thereby safeguarding the data from unauthorized access. TLS, as the more advanced and secure version of SSL, ensures that all data transmissions conform to the highest security standards. When a website is secured with an SSL/TLS certificate, this is indicated by the display of HTTPS in the URL. This serves as an indicator to users that their data is being securely and encryptedly transmitted.

## **Transmission of Personal Data**

In the course of processing personal data, it may happen that this data is transmitted to or disclosed to other entities, companies, legally independent organizational units, or individuals. Recipients of this data may include service

providers tasked with IT duties or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and particularly conclude relevant contracts or agreements that serve to protect your data with the recipients of your data.

## International data transfers

Data Processing in Third Countries: If we process data in a third country (i.e., outside the European Union (EU) or the European Economic Area (EEA)), or if the processing is done within the context of using third-party services or the disclosure or transfer of data to other individuals, entities, or companies, this is only done in accordance with legal requirements. If the data protection level in the third country has been recognized by an adequacy decision (Article 45 GDPR), this serves as the basis for data transfer. Otherwise, data transfers only occur if the data protection level is otherwise ensured, especially through standard contractual clauses (Article 46 (2)(c) GDPR), explicit consent, or in cases of contractual or legally required transfers (Article 49 (1) GDPR). Furthermore, we provide you with the basis of third-country transfers from individual third-country providers, with adequacy decisions primarily serving as the foundation. "Information regarding third-country transfers and existing adequacy decisions can be obtained from the information provided by the EU Commission:

[https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection_en). Within the context of the so-called "Data Privacy Framework" (DPF), the EU Commission has also recognized the data protection level for certain companies from the USA as secure within the adequacy decision of 10th July 2023. The list of certified companies as well as additional information about the DPF can be found on the website of the US Department of Commerce at <https://www.dataprivacyframework.gov/s/>. We will inform you which of our service providers are certified under the Data Privacy Framework as part of our data protection notices.

## Rights of Data Subjects

Rights of the Data Subjects under the GDPR: As data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

- **Right to Object: You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on letter (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object**

**at any time to the processing of the personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.**

- **Right of withdrawal for consents:** You have the right to revoke consents at any time.
- **Right of access:** You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with the provisions of the law.
- **Right to rectification:** You have the right, in accordance with the law, to request the completion of the data concerning you or the rectification of the incorrect data concerning you.
- **Right to Erasure and Right to Restriction of Processing:** In accordance with the statutory provisions, you have the right to demand that the relevant data be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive data concerning you which you have provided to us in a structured, common and machine-readable format in accordance with the legal requirements, or to request its transmission to another controller.
- **Complaint to the supervisory authority:** In accordance with the law and without prejudice to any other administrative or judicial remedy, you also have the right to lodge a complaint with a data protection supervisory authority, in particular a supervisory authority in the Member State where you habitually reside, the supervisory authority of your place of work or the place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR.

Rights of the data subjects under the Swiss DPA:

As the data subject, you have the following rights in accordance with the provisions of the Swiss DPA:

- **Right to information:** You have the right to request confirmation as to whether personal data concerning you are being processed, and to receive the information necessary for you to assert your rights under the Swiss DPA and to ensure transparent data processing.
- **Right to data release or transfer:** You have the right to request the release of your personal data, which you have provided to us, in a common electronic format, as well as its transfer to another data controller, provided this does not require disproportionate effort.

- **Right to rectification:** You have the right to request the rectification of inaccurate personal data concerning you.
- **Right to object, deletion, and destruction:** You have the right to object to the processing of your data, as well as to request that personal data concerning you be deleted or destroyed.

## Provision of online services and web hosting

We process user data in order to be able to provide them with our online services. For this purpose, we process the IP address of the user, which is necessary to transmit the content and functions of our online services to the user's browser or terminal device.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties); Log data (e.g. log files concerning logins or data retrieval or access times.). Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability; Information technology infrastructure (Operation and provision of information systems and technical devices, such as computers, servers, etc.). Security measures.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

### Further information on processing methods, procedures and services used:

- **Centron GmbH:** Webhosting & Email; **Service provider:** Centron GmbH Heganger 29 96103 Hallstadt; **Website:** centron.de. **Privacy Policy:** www.centron.de/datenschutz.
- **Provision of online offer on rented hosting space:** For the provision of our online services, we use storage space, computing capacity and software that we rent or otherwise obtain from a corresponding server provider (also referred to as a "web hoster"); **Legal Basis:** Legitimate Interests (Article 6

(1) (f) GDPR).

- **Collection of Access Data and Log Files:** Access to our online service is logged in the form of so-called "server log files". Server log files may include the address and name of the accessed web pages and files, date and time of access, transferred data volumes, notification of successful retrieval, browser type along with version, the user's operating system, referrer URL (the previously visited page), and typically IP addresses and the requesting provider. The server log files can be used for security purposes, e.g., to prevent server overload (especially in the case of abusive attacks, known as DDoS attacks), and to ensure server load management and stability; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). **Retention period:** Log file information is stored for a maximum period of 30 days and then deleted or anonymized. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.
- **E-mail Sending and Hosting:** The web hosting services we use also include sending, receiving and storing e-mails. For these purposes, the addresses of the recipients and senders, as well as other information relating to the sending of e-mails (e.g. the providers involved) and the contents of the respective e-mails are processed. The above data may also be processed for SPAM detection purposes. Please note that e-mails on the Internet are generally not sent in encrypted form. As a rule, e-mails are encrypted during transport, but not on the servers from which they are sent and received (unless a so-called end-to-end encryption method is used). We can therefore accept no responsibility for the transmission path of e-mails between the sender and reception on our server; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

## Use of Cookies

The term "cookies" refers to functions that store information on users' devices and read it from them. Cookies can also be used for different purposes, such as ensuring the functionality, security, and convenience of online services, as well as analyzing visitor traffic. We use cookies in accordance with legal regulations. If necessary, we obtain users' consent in advance. If consent is not required, we rely on our legitimate interests. This applies when storing and reading information is essential to provide explicitly requested content and functions. This includes, for example, saving settings and ensuring the functionality and security of our online services. Consent can be withdrawn at any time. We clearly inform users about the scope of the consent and which cookies are used.

**Information on legal data protection bases:** Whether we process personal data using cookies depends on users' consent. If consent is given, it serves as the legal

basis. Without consent, we rely on our legitimate interests, as outlined in this section and in the context of the respective services and procedures.

**Storage duration:** The following types of cookies are distinguished based on their storage duration:

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user leaves an online service and closes their device (e.g., browser or mobile application).
- **Permanent cookies:** Permanent cookies remain stored even after the device is closed. For example, the login status can be saved, and preferred content can be displayed directly when the user revisits a website. Additionally, the user data collected with cookies may be used for audience measurement. Unless we provide explicit information to users about the type and storage duration of cookies (e.g., when obtaining consent), users should assume that these are permanent and may have a storage duration of up to two years.

**General information on withdrawal and objection (opt-out):** Users can withdraw their consent at any time and also object to the processing according to legal regulations, including through the privacy settings of their browser.

#### **Cookie Settings/ Opt-Out:**

[cookieconsent]

- **Processed data types:** Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Consent (Article 6 (1) (a) GDPR).

#### **Further information on processing methods, procedures and services used:**

- **Processing Cookie Data on the Basis of Consent:** We implement a consent management solution that obtains users' consent for the use of cookies or for the processes and providers mentioned within the consent management framework. This procedure is designed to solicit, log, manage, and revoke consents, particularly regarding the use of cookies and similar technologies employed to store, read from, and process information on users' devices. As part of this procedure, user consents are obtained for the use of cookies and the associated processing of information, including specific processing and providers named in the consent management process. Users also have the option to manage and withdraw their consents. Consent declarations are stored to avoid repeated queries and to provide proof of

consent according to legal requirements. The storage is carried out server-side and/or in a cookie (so-called opt-in cookie) or by means of comparable technologies in order to associate the consent with a specific user or their device. If no specific details about the providers of consent management services are provided, the following general notes apply: The duration of consent storage is up to two years. A pseudonymous user identifier is created, which is stored along with the time of consent, details on the scope of consent (e.g., relevant categories of cookies and/or service providers), as well as information about the browser, system, and device used; **Legal Basis:** Consent (Article 6 (1) (a) GDPR).

## Contact and Inquiry Management

When contacting us (e.g. via mail, contact form, e-mail, telephone or via social media) as well as in the context of existing user and business relationships, the information of the inquiring persons is processed to the extent necessary to respond to the contact requests and any requested measures.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.); Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).
- **Data subjects:** Communication partner (Recipients of e-mails, letters, etc.).
- **Purposes of processing:** Communication; Organisational and Administrative Procedures; Feedback (e.g. collecting feedback via online form). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR). Performance of a contract and prior requests (Article 6 (1) (b) GDPR).

### Further information on processing methods, procedures and services used:

- **Contact form:** Upon contacting us via our contact form, email, or other means of communication, we process the personal data transmitted to us for the purpose of responding to and handling the respective matter. This typically includes details such as name, contact information, and possibly

additional information provided to us that is necessary for appropriate processing. We use this data exclusively for the stated purpose of contact and communication; **Legal Basis:** Performance of a contract and prior requests (Article 6 (1) (b) GDPR), Legitimate Interests (Article 6 (1) (f) GDPR).

## Web Analysis, Monitoring and Optimization

Web analytics (also referred to as "reach measurement") is used to evaluate the visitor flows of our online services and may include pseudonymous values related to visitor behavior, interests, or demographic information such as age or gender. Through reach analysis, we can, for example, identify when our online services or their functions and content are most frequently used or likely to encourage repeat visits. It also enables us to determine which areas need optimization.

In addition to web analytics, we may also use testing procedures to test and optimize different versions of our online services or their components.

Unless otherwise specified below, profiles (i.e., data combined from a usage process) may be created for these purposes, and information can be stored in and later retrieved from a browser or device. The data collected includes, in particular, visited websites and elements used on them, as well as technical information such as the browser used, the computer system, and information about usage times. If users have given consent to the collection of their location data to us or to the providers of the services we use, the processing of location data is also possible.

Additionally, users' IP addresses are stored. However, we use an IP masking process (i.e., pseudonymization by shortening the IP address) to protect users. In general, no clear user data (such as email addresses or names) is stored as part of web analytics, A/B testing, or optimization. Instead, pseudonyms are used. This means that neither we nor the providers of the software used know the actual identity of the users, only the information stored in their profiles for the respective procedures.

Legal basis information: If we ask users for their consent to use third-party providers, the legal basis for data processing is consent. Otherwise, user data is processed based on our legitimate interests (i.e., our interest in efficient, economic, and user-friendly services). In this context, we would also like to point out the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features). Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties).

- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Web Analytics (e.g. access statistics, recognition of returning visitors); Profiles with user-related information (Creating user profiles). Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Security measures:** IP Masking (Pseudonymization of the IP address).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Google Analytics:** We use Google Analytics to perform measurement and analysis of the use of our online services by users based on a pseudonymous user identification number. This identification number does not contain any unique data, such as names or email addresses. It is used to assign analysis information to an end device in order to recognize which content users have accessed within one or various usage processes, which search terms they have used, have accessed again or have interacted with our online services. Likewise, the time of use and its duration are stored, as well as the sources of users referring to our online services and technical aspects of their end devices and browsers.

In the process, pseudonymous profiles of users are created with information from the use of various devices, and cookies may be used. Google Analytics does not log or store individual IP addresses. Analytics does provide coarse geo-location data by deriving the following metadata from IP addresses: City (and the derived latitude, and longitude of the city), Continent, Country, Region, Subcontinent (and ID-based counterparts). For EU-based traffic, IP-address data is used solely for geo-location data derivation before being immediately discarded. It is not logged, accessible, or used for any additional use cases. When Analytics collects measurement data, all IP lookups are performed on EU-based servers before forwarding traffic to Analytics servers for processing; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:**

<https://marketingplatform.google.com/intl/en/about/analytics/>; **Security measures:** IP Masking (Pseudonymization of the IP address); **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessor/terms/>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland); **Opt-Out:** Opt-Out-Plugin:

<https://tools.google.com/dlpage/gaoptout?hl=en>, Settings for the Display of Advertisements: <https://myadcenter.google.com/personalizationoff>. **Further Information:** <https://business.safety.google/adsservices/> (Types of processing and data processed).

- **Google as a recipient of consent:** The consent given by users in the context of a consent dialogue (also known as "Cookie Opt-In/Consent", "Cookie Banner", etc.) serves multiple purposes. Firstly, it helps us to fulfil our obligation to obtain consent for the storage and reading of information on and from the end-user's device (in accordance with ePrivacy Directives). Secondly, it covers the processing of users' personal data in accordance with data protection requirements. Additionally, this consent is also applicable to Google, as the company is required by the Digital Markets Act to obtain consent for personalised services. Therefore, we share the status of consents given by users with Google. Our consent management software informs Google about whether consents have been given or not. The aim is to ensure that user consents—or their absence—are taken into account when using Google Analytics and integrating features and external services. Thus, user consents and their revocation can be dynamically adjusted within our online offerings through Google Analytics and other Google services, depending on user selection; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://support.google.com/analytics/answer/9976101?hl=en>; **Privacy Policy:** <https://policies.google.com/privacy>. **Basis for third-country transfers:** Switzerland - Adequacy decision (Ireland).
- **Google Tag Manager:** We use Google Tag Manager, a software provided by Google, which enables us to manage so-called website tags centrally via a user interface. Tags are small code elements on our website that serve to record and analyse visitor activities. This technology assists us in improving our website and the content offered on it. Google Tag Manager itself does not create user profiles, store cookies with user profiles, or perform any independent analyses. Its function is limited to simplifying and making the integration and management of tools and services we use on our website more efficient. Nevertheless, when using Google Tag Manager, users' IP addresses are transmitted to Google, which is technically necessary to implement the services we use. Cookies may also be set in this process. However, this data processing only occurs if services are integrated via the Tag Manager. For more detailed information about these services and their data processing, please refer to the further sections of this privacy policy; **Service provider:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://marketingplatform.google.com>; **Privacy Policy:** <https://policies.google.com/privacy>; **Data Processing Agreement:** <https://business.safety.google/adsprocessorterms>. **Basis for third-country**

**transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

## Profiles in Social Networks (Social Media)

We maintain online presences within social networks and process user data in this context in order to communicate with the users active there or to offer information about us.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, e.g. by making it more difficult to enforce users' rights.

In addition, user data is usually processed within social networks for market research and advertising purposes. For example, user profiles can be created on the basis of user behaviour and the associated interests of users. The user profiles can then be used, for example, to place advertisements within and outside the networks which are presumed to correspond to the interests of the users. For these purposes, cookies are usually stored on the user's computer, in which the user's usage behaviour and interests are stored. Furthermore, data can be stored in the user profiles independently of the devices used by the users (especially if the users are members of the respective networks or will become members later on).

For a detailed description of the respective processing operations and the opt-out options, please refer to the respective data protection declarations and information provided by the providers of the respective networks.

Also in the case of requests for information and the exercise of rights of data subjects, we point out that these can be most effectively pursued with the providers. Only the providers have access to the data of the users and can directly take appropriate measures and provide information. If you still need help, please do not hesitate to contact us.

- **Processed data types:** Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Communication; Feedback (e.g. collecting feedback via online form). Public relations.

- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Instagram:** Social network, allows the sharing of photos and videos, commenting on and favouriting posts, messaging, subscribing to profiles and pages; **Service provider:** Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.instagram.com>; **Privacy Policy:** <https://privacycenter.instagram.com/policy/>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).
- **Facebook Pages:** Profiles within the social network Facebook - We are jointly responsible (so called "joint controller") with Meta Platforms Ireland Limited for the collection (but not the further processing) of data of visitors to our Facebook page. This data includes information about the types of content users view or interact with, or the actions they take (see "Things that you and others do and provide" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>), and information about the devices used by users (e.g., IP addresses, operating system, browser type, language settings, cookie information; see "Device Information" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>). As explained in the Facebook Data Policy under "How we use this information?" Facebook also collects and uses information to provide analytics services, known as "page insights," to site operators to help them understand how people interact with their pages and with content associated with them. We have concluded a special agreement with Facebook ("Information about Page-Insights", [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)), which regulates in particular the security measures that Facebook must observe and in which Facebook has agreed to fulfill the rights of the persons concerned (i.e. users can send information access or deletion requests directly to Facebook). The rights of users (in particular to access to information, erasure, objection and complaint to the competent supervisory authority) are not restricted by the agreements with Facebook. Further information can be found in the "Information about Page Insights" ([https://www.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://www.facebook.com/legal/terms/information_about_page_insights_data)). The joint controllership is limited to the collection and transfer of the data to Meta Platforms Ireland Limited, a company located in the EU. Further processing of the data is the sole responsibility of Meta Platforms Ireland Limited; **Service provider:** Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.facebook.com>; **Privacy Policy:** <https://www.facebook.com/privacy/policy/>. **Basis for third-country**

**transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

- **Facebook-Groups:** We use the "Groups" function of the Facebook platform to create interest groups within which Facebook users can contact each other or us and exchange information. In doing so, we process personal data of the users of our groups as far as this is necessary for the purpose of the group use as well as its moderation. These data include information on first and last names, as well as published or privately shared content, as well as values on the status of group membership or group-related activities, such as entry or exit, as well as the time information on the aforementioned data. Our guidelines within the groups may contain further specifications and information on the use of the respective group. Furthermore, we would like to point out the processing of data of the users by Facebook itself. This data includes information about the types of content users view or interact with, or the actions they take (see under "Things You and Others Do and Provide" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>), as well as information about the devices users use (e.g., IP addresses, operating system, browser type, language settings, cookie data; see under "Device Information" in the Facebook Data Policy: <https://www.facebook.com/privacy/policy/>). As explained in the Facebook Data Policy under "How do we use this information?", Facebook also collects and uses information to provide analytics services, called "Insights," to group operators to provide them with insights about how people interact with their groups and with content associated with them; **Service provider:** Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.facebook.com>; **Privacy Policy:** <https://www.facebook.com/privacy/policy/>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

- **LinkedIn:** Social network - We are jointly responsible with LinkedIn Ireland Unlimited Company for the collection (but not the further processing) of visitor data, which is used to create "Page Insights" (statistics) for our LinkedIn profiles. This data includes information about the types of content users view or interact with, as well as the actions they take. It also includes details about the devices used, such as IP addresses, operating systems, browser types, language settings, and cookie data, as well as profile details of users, such as job function, country, industry, seniority, company size, and employment status. Privacy information regarding the processing of user data by LinkedIn can be found in LinkedIn's privacy policy: <https://www.linkedin.com/legal/privacy-policy>. We have entered into a special agreement with LinkedIn Ireland ("Page Insights Joint Controller Addendum," <https://legal.linkedin.com/pages-joint-controller-addendum>), which specifically

regulates the security measures LinkedIn must comply with and in which LinkedIn has agreed to fulfill the rights of data subjects (i.e., users can, for example, direct requests for information or deletion directly to LinkedIn). The rights of users (particularly the right to information, deletion, objection, and to lodge a complaint with the competent supervisory authority) are not restricted by our agreements with LinkedIn. The joint responsibility is limited to the collection of data and its transmission to LinkedIn Ireland Unlimited Company, a company based in the EU. Further processing of the data is the sole responsibility of LinkedIn Ireland Unlimited Company, particularly concerning the transfer of data to the parent company LinkedIn Corporation in the USA; **Service provider:** LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; **Legal Basis:** Legitimate Interests (Article 6 (1) (f) GDPR); **Website:** <https://www.linkedin.com>; **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>; **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland). **Opt-Out:** <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

## Plugins and embedded functions and content

Within our online services, we integrate functional and content elements that are obtained from the servers of their respective providers (hereinafter referred to as "third-party providers"). These may, for example, be graphics, videos or city maps (hereinafter uniformly referred to as "Content").

The integration always presupposes that the third-party providers of this content process the IP address of the user, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of these contents or functions. We strive to use only those contents, whose respective offerers use the IP address only for the distribution of the contents. Third parties may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include technical information about the browser and operating system, referring websites, visit times and other information about the use of our website, as well as may be linked to such information from other sources.

- **Processed data types:** Usage data (e.g. page views and duration of visit, click paths, intensity and frequency of use, types of devices and operating systems used, interactions with content and features); Meta, communication and process data (e.g. IP addresses, timestamps, identification numbers, involved parties). Location data (Information on the geographical position of a device or person).

- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Purposes of processing:** Provision of our online services and usability.
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion". Storage of cookies for up to 2 years (Unless otherwise stated, cookies and similar storage methods may be stored on users' devices for a period of two years.).
- **Legal Basis:** Consent (Article 6 (1) (a) GDPR). Legitimate Interests (Article 6 (1) (f) GDPR).

**Further information on processing methods, procedures and services used:**

- **Google Maps:** We integrate the maps of the service "Google Maps" from the provider Google. The data processed may include, in particular, IP addresses and location data of users; **Service provider:** Google Cloud EMEA Limited, 70 Sir John Rogerson's Quay, Dublin 2, Ireland; **Legal Basis:** Consent (Article 6 (1) (a) GDPR); **Website:** <https://mapsplatform.google.com/>; **Privacy Policy:** <https://policies.google.com/privacy>. **Basis for third-country transfers:** EEA - Data Privacy Framework (DPF), Switzerland - Adequacy decision (Ireland).

## Job Application Process

The application process requires applicants to provide us with the data necessary for their assessment and selection. The information required can be found in the job description or, in the case of online forms, in the information contained therein.

In principle, the required information includes personal information such as name, address, a contact option and proof of the qualifications required for a particular employment. Upon request, we will be happy to provide you with additional information.

Where available, applicants are welcome to submit their applications via our online form, which is securely encrypted to the latest standards. Alternatively, applications can also be sent to us by email. However, we kindly remind you that emails are not inherently encrypted over the Internet. While emails are usually encrypted in transit, they are not encrypted on the servers from which they are sent and received. Therefore, we cannot assume responsibility for the security of the application during its transmission from the sender to our server.

**Processing of special categories of data:** To the extent that special categories of personal data (Article 9(1) GDPR, e.g., health data, such as disability status or ethnic origin) are requested from applicants or communicated by them during the application process, their processing is carried out so that the controller or the data

subject can exercise rights arising from employment law and the law of social security and social protection, in the case of protection of vital interests of the applicants or other persons, or for purposes of preventive or occupational medicine, for the assessment of the employee's work ability, for medical diagnosis, for the provision or treatment in the health or social sector, or for the management of systems and services in the health or social sector.

**Ereasure of data:** In the event of a successful application, the data provided by the applicants may be further processed by us for the purposes of the employment relationship. Otherwise, if the application for a job offer is not successful, the applicant's data will be deleted. Applicants' data will also be deleted if an application is withdrawn, to which applicants are entitled at any time. Subject to a justified revocation by the applicant, the deletion will take place at the latest after the expiry of a period of six months, so that we can answer any follow-up questions regarding the application and comply with our duty of proof under the regulations on equal treatment of applicants. Invoices for any reimbursement of travel expenses are archived in accordance with tax regulations.

**Admission to a talent pool** - Admission to a talent pool, if offered, is based on consent. Applicants are informed that their consent to be included in the talent pool is voluntary, has no influence on the current application process and that they can revoke their consent at any time for the future.

- **Processed data types:** Inventory data (For example, the full name, residential address, contact information, customer number, etc.); Contact data (e.g. postal and email addresses or phone numbers); Content data (e.g. textual or pictorial messages and contributions, as well as information pertaining to them, such as details of authorship or the time of creation.). Job applicant details (e.g. Personal data, postal and contact addresses and the documents pertaining to the application and the information contained therein, such as cover letter, curriculum vitae, certificates, etc., as well as other information on the person or qualifications of applicants provided with regard to a specific job or voluntarily by applicants).
- **Data subjects:** Job applicants.
- **Purposes of processing:** Job Application Process (Establishment and possible later execution as well as possible later termination of the employment relationship).
- **Retention and deletion:** Deletion in accordance with the information provided in the section "General Information on Data Retention and Deletion".
- **Legal Basis:** Job application process as a pre-contractual or contractual relationship (Article 6 (1) (b) GDPR).

## **Changes and Updates**

We kindly ask you to inform yourself regularly about the contents of our data protection declaration. We will adjust the privacy policy as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, we ask you to note that addresses may change over time and to verify the information before contacting us.