Privacy Policy

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the Astemo Poland Sp. Z.o.o.. The use of the Internet pages of the Astemo Poland Sp. Z.o.o. is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the Astemo Poland Sp. Z.o.o.. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, the Astemo Poland Sp. Z.o.o. has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

1. Definitions

The data protection declaration of the Astemo Poland Sp. Z.o.o. is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

- **a) Personal data**

  Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- **b) Data subject**

  Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

- **c) Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **d) Restriction of processing**

  Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

- **e) Profiling**

  Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

- **f) Pseudonymisation**

  Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

- **g) Controller or controller responsible for the processing**

  Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

- **h) Processor**

  Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

- **i) Recipient**

  Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

- **j) Third party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

- **k) Consent**

  Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

2. Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Astemo Poland Sp. Z.o.o.

ul. Bierutowska 91,

51-317 Wroclaw, Poland

Phone: +48 881 955 153

3. Name and Address of the Data Protection Officer

The Data Protection Officer of the controller is:

Astemo Poland Sp. Z.o.o.

Email: data-protection@hitachiastemo.com

Any data subject may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection.

4. Cookies

The Internet pages of the Astemo Poland Sp. Z.o.o. use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the dats subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, the Astemo Poland Sp. Z.o.o. can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

5. Collection of general data and information

The website of the Astemo Poland Sp. Z.o.o. collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, the Astemo Poland Sp. Z.o.o. does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the Astemo Poland Sp. Z.o.o. analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

6. Registration on our website

The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. The entirety of the controller’s employees are available to the data subject in this respect as contact persons.

7. Subscription to our newsletters

On the website of the Astemo Poland Sp. Z.o.o., users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The Astemo Poland Sp. Z.o.o. informs its customers and business partners regularly by means of a newsletter about enterprise offers. The enterprise's newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter shipping. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

8. Newsletter-Tracking

The newsletter of the Astemo Poland Sp. Z.o.o. contains so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, the Astemo Poland Sp. Z.o.o. may see if and when an e-mail was opened by a data subject, and which links in the e-mail were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the controller in order to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. The Astemo Poland Sp. Z.o.o. automatically regards a withdrawal from the receipt of the newsletter as a revocation.

9. Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

10. Rights of the data subject

- **a) Right of confirmation**

  Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

- **b) Right of access**

  Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

  - the purposes of the processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

- **c) Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

- **d) Right to erasure (Right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by the Astemo Poland Sp. Z.o.o., he or she may, at any time, contact any employee of the controller. An employee of Astemo Poland Sp. Z.o.o. shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of the Astemo Poland Sp. Z.o.o. will arrange the necessary measures in individual cases.

- **e) Right of restriction of processing**

  Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

  - The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
  - The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
  - The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
  - The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

  If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the Astemo Poland Sp. Z.o.o., he or she may at any time contact any employee of the controller. The employee of the Astemo Poland Sp. Z.o.o. will arrange the restriction of the processing.

- **f) Right to data portability**

  Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

  Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the Astemo Poland Sp. Z.o.o..

- **g) Right to object**

  Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

  The Astemo Poland Sp. Z.o.o. shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

  If the Astemo Poland Sp. Z.o.o. processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the Astemo Poland Sp. Z.o.o. to the processing for direct marketing purposes, the Astemo Poland Sp. Z.o.o. will no longer process the personal data for these purposes.

  In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the Astemo Poland Sp. Z.o.o. for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

  In order to exercise the right to object, the data subject may contact any employee of the Astemo Poland Sp. Z.o.o.. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

- **h) Automated individual decision-making, including profiling**

  Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

  If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the Astemo Poland Sp. Z.o.o. shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of the Astemo Poland Sp. Z.o.o..

- **i) Right to withdraw data protection consent**

  Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

  If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of the Astemo Poland Sp. Z.o.o..

11. Data protection for applications and the application procedures

The data controller shall collect and process the personal data of applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. This is the case, in particular, if an applicant submits corresponding application documents by e-mail or by means of a web form on the website to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure. Other legitimate interest in this relation is, e.g. a burden of proof in a procedure under the General Equal Treatment Act (AGG).

12. Data protection provisions about the application and use of Facebook

Elements of the Facebook social network are integrated into this website.

This service is provided by Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland. However, according to Facebook, the data collected is also transferred to the US and other third countries.

An overview of Facebook social media elements can be found here:

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

When the social media element is active, a direct connection is established between your device and the Facebook server. Facebook receives the information that you have visited this website with your IP address.

If you click the Facebook “Like” button while you are logged into your Facebook account, you can link the content of this website to your Facebook profile.

This allows Facebook to associate your visit to this website with your user account. We would like to point out that as the provider of the pages, we have no knowledge of the content of the data transmitted or its use by Facebook.
For more information, please refer to Facebook's privacy policy at

https://de-de.facebook.com/privacy/explanation .

The use of this service is based on your consent pursuant to Art.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 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 GDPR). Joint responsibility is limited exclusively to the collection of data and its transfer to Facebook.

The processing by Facebook following the transfer is not part of the joint responsibility. The obligations incumbent upon us jointly have been set out in a joint processing agreement. The wording of theagreement can be found at:

https://www.facebook.com/legal/controller_addendum.

According to this agreement, we are responsible for providing data protection information when using the Facebook tool and for the data protection-compliant 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 the data processed by Facebook directly with Facebook. If you assert data subject rights with us, we are obliged to forward them to Facebook.

Data transfers to the US are based on the standard contractual clauses of the EU Commission.Details can be found here:

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 under the EU-US Data Privacy Framework (DPF). The

DPF is an agreement between the European Union and the USA that is intended to ensure compliance

with European data protection standards when data is processed in the USA. Every company certified under

the DPF undertakes to comply with these data protection standards. Further

information on this can be obtained from the provider at the following link:

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

13. Data protection provisions about the application and use of Instagram

This website incorporates features of the Instagram service.

These features are provided by Meta Platforms Ireland Limited, Merrion Road, Dublin 4, D04 X2K5, Ireland. When the social media element is active, a direct connection is established between your device and the Instagram server. Instagram thereby receives information about your visit to this website.

If you are logged into your Instagram account, you can link the content of this website to your Instagram profile by clicking on the Instagram button.

This allows Instagram to associate your visit to this website with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the data transmitted or its use by Instagram.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 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 or Instagram, 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 GDPR). Joint responsibility is limited exclusively to the collection of data and its transfer to Facebook or Instagram. The processing by Facebook or Instagram following the transfer is not part of the joint responsibility.

The obligations incumbent upon us jointly have been set out in a joint processing agreement.

The wording of the agreement can be found at:

https://www.facebook.com/legal/controller_addendum.

According to this agreement, we are responsible for providing data protection information when using the Facebook or Instagram tool and for the data protection-compliant implementation of the tool on our website. Facebook is responsible for the data security of Facebook and Instagram products. Rights of data subjects (e.g., requests for information) regarding data processed by Facebook or Instagram can be asserted directly with Facebook.

If you assert your rights as a data subject with us, we are obligated to forward them to Facebook.

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

Details can be found here:

https://www.facebook.com/legal/EU_data_transfer_addendum,

https://privacycenter.instagram.com/policy/

and

https://de-de.facebook.com/help/566994660333381.

Further information can be found in Instagram's privacy policy:

https://privacycenter.instagram.com/policy/.

The company is certified under the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the US that aims to ensure compliance with European data protection standards when processing data in the US. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this can be obtained from the provider at the following link:

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

14. Data protection provisions about the application and use of LinkedIn

The controller has integrated components of the LinkedIn Corporation on this website. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts. Over 400 million registered people in more than 200 countries use LinkedIn. Thus, LinkedIn is currently the largest platform for business contacts and one of the most visited websites in the world.

The operating company of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn. Further information about the LinkedIn plug-in may be accessed under https://developer.linkedin.com/plugins. During the course of this technical procedure, LinkedIn gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on LinkedIn, LinkedIn detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the LinkedIn component and associated with the respective LinkedIn account of the data subject. If the data subject clicks on one of the LinkedIn buttons integrated on our website, then LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores the personal data.

LinkedIn receives information via the LinkedIn component that the data subject has visited our website, provided that the data subject is logged in at LinkedIn at the time of the call-up to our website. This occurs regardless of whether the person clicks on the LinkedIn button or

not. If such a transmission of information to LinkedIn is not desirable for the data subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our website is made.

LinkedIn provides under https://www.linkedin.com/psettings/guest-controls the possibility to unsubscribe from e-mail messages, SMS messages and targeted ads, as well as the ability to manage ad settings. LinkedIn also uses affiliates such as Eire, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame. The setting of such cookies may be denied under https://www.linkedin.com/legal/cookie-policy. The applicable privacy policy for LinkedIn is available under https://www.linkedin.com/legal/privacy-policy. The LinkedIn Cookie Policy is available under https://www.linkedin.com/legal/cookie-policy.

15. Data protection provisions about the application and use of Pinterest

On this website, we use elements of the social network Pinterest, which is operated by Pinterest Europe Ltd., Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland.

When you visit a page that contains such an element, your browser establishes a direct connection to the Pinterest servers. This social media element transmits log data to the Pinterest server in the USA. This log data may include your IP address, the address of the

websites you visited that also contain Pinterest functions, the type and settings of your browser, the date and time of the request, your use of Pinterest, and cookies.

The use of this service is based on your consent in accordance with Art. 6 para. 1 lit. a GDPR and § 25 para. 1 TDDDG. Consent can be revoked at any time.

Further information on the purpose, scope, and further processing and use of the data by Pinterest, as well as your rights and options for protecting your privacy, can be found in

Pinterest's privacy policy:

https://policy.pinterest.com/de/privacy-policy.

16. Data protection provisions about the application and use of Xing

On this website, the controller has integrated components of XING. XING is an Internet-based social network that enables users to connect with existing business contacts and to create new business contacts. The individual users can create a personal profile of themselves at XING. Companies may, e.g. create company profiles or publish jobs on XING.

The operating company of XING is XING SE, Dammtorstraße 30, 20354 Hamburg, Germany.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a XING component (XING plug-in) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding XING component of XING. Further information about the XING plug-in the may be accessed under https://dev.xing.com/plugins. During the course of this technical procedure, XING gains knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on XING, XING detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the XING component and associated with the respective XING account of the data subject. If the data subject clicks on the XING button integrated on our Internet site, e.g. the "Share"-button, then XING assigns this information to the personal XING user account of the data subject and stores the personal data.

XING receives information via the XING component that the data subject has visited our website, provided that the data subject is logged in at XING at the time of the call to our website. This occurs regardless of whether the person clicks on the XING component or not. If such a transmission of information to XING is not desirable for the data subject, then he or she can prevent this by logging off from their XING account before a call-up to our website is made.

The data protection provisions published by XING, which is available under https://www.xing.com/privacy, provide information on the collection, processing and use of personal data by XING. In addition, XING has published privacy notices for the XING share button under https://www.xing.com/app/share?op=data_protection.

17. Data protection provisions about the application and use of YouTube

This website incorporates 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 our web pages that incorporates YouTube, a connection to the YouTube servers is established. This tells the YouTube server which of our pages you have visited.

Furthermore, YouTube may store various cookies on your device or use comparable technologies for recognition (e.g., device fingerprinting). In this way, YouTube can obtain information about visitors to this website. This information is used, among other things, to compile video statistics, improve user-friendliness, and prevent fraud. Furthermore, the collected data is processed in the Google advertising network.

If you are logged into your YouTube account, you enable YouTube to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account.

The use of YouTube is in the interest of an appealing presentation of our online offerings.

This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR. If corresponding consent has been requested, processing is carried out exclusively on the basis of Art. 6 para. 1 lit. A GDPR and § 25 para. 1 TDDDG, insofar as the consent includes the storage of cookies or access to information on the user's device (e.g., device fingerprinting) within the meaning of the TDDDG. The consent can be revoked at any time.

Further information on the handling of user data can be found in YouTube's privacy policy at:

https://policies.google.com/privacy?hl=de.

The company is certified under the EU-US Data Privacy Framework (DPF). The DPF is an agreement between the European Union and the US that aims to ensure compliance with

European data protection standards when data is processed in the US. Every company certified under the DPF undertakes to comply with these data protection standards. Furtherinformation on this can be obtained from the provider at the following link:

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

18. Legal basis for the processing

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

19. The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

20. Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

21. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

22. Existence of automated decision-making

As a responsible company, we do not use automatic decision-making or profiling.

This Privacy Policy has been generated by the Privacy Policy Generator of the DGD - Your External DPO that was developed in cooperation with German Lawyers from WILDE BEUGER SOLMECKE, Cologne.