



## Privacy Policy

## Privacy Policy

### 1. An overview of data protection

#### General information

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

#### Data recording on this website

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

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

#### How do we record your data?

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

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

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

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyse your user patterns.

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

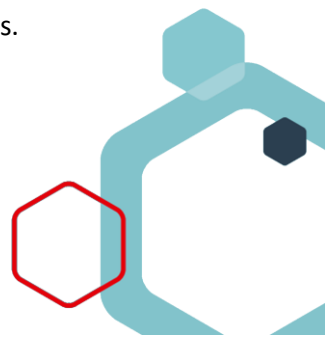
You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

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

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

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

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



## 2. Hosting

### External Hosting

Our websites are hosted by external service providers (hosts). Personal data collected on our websites are stored on the servers of the hosts. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a web site.

The external hosting serves the purpose of fulfilling the contract with our potential and existing customers (Art. 6(1)(b) GDPR) and in the interest of secure, fast, and efficient provision of our online services by a professional provider (Art. 6(1)(f) GDPR). If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6 (1)(a) GDPR and § 25 (1) TDDDGD, insofar the consent includes the storage of cookies or the access to information in the user's end device (e.g., device fingerprinting) within the meaning of the TDDDGD. This consent can be revoked at any time...

Our hosts will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

### Data processing

We have concluded data processing agreements (DPA) with the above-mentioned providers. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors and applicants only based on our instructions and in compliance with the GDPR.

## 3. General information and mandatory information

### Data protection

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

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

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

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

The data processing controller on this website is:

FIT Voltaira Group GmbH

Marktstrasse 155, Pfullingen,

D-72793, Germany

Phone: +49 (0) 7121 707 0

E-mail: [info@voltaira-group.com](mailto:info@voltaira-group.com)



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

### **Storage duration**

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

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

If you have consented to data processing, we process your personal data on the basis of Art. 6(1)(a) GDPR or Art. 9 (2)(a) GDPR, if special categories of data are processed according to Art. 9 (1) DSGVO. In the case of explicit consent to the transfer of personal data to third countries, the data processing is also based on Art. 49 (1)(a) GDPR. If you have consented to the storage of cookies or to the access to information in your end device (e.g., via device fingerprinting), the data processing is additionally based on § 25 (1) TDDDg. The consent can be revoked at any time. If your data is required for the fulfilment of a contract or for the implementation of pre-contractual measures, we process your data on the basis of Art. 6(1)(b) GDPR.

Furthermore, if your data is required for the fulfilment of a legal obligation, we process it on the basis of Art. 6(1)(c) GDPR. Furthermore, the data processing may be carried out on the basis of our legitimate interest according to Art. 6(1)(f) GDPR. Information on the relevant legal basis in each individual case is provided in the following paragraphs of this privacy policy.

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

We have appointed a data protection officer for our company.

FIT Voltaira Group GmbH  
Data Protection Officer  
Marktstrasse 155, Pfullingen,  
D-72793, Germany

Phone: +49 151 64832458

E-mail: [dpo@voltaira-group.com](mailto:dpo@voltaira-group.com)

### **Recipients of personal data**

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

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

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you



have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

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

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6(1)(E) OR (F) GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21(1) GDPR).

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

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

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

### **Right to data portability**

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

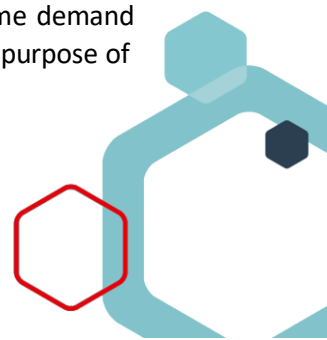
### **SSL and/or TLS encryption**

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

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

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

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified or eradicated. If you have questions about this



subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

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

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

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

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

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

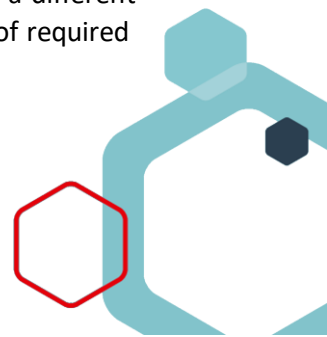
#### **Cookies**

Our websites and pages use what the industry refers to as “cookies.” Cookies are small data packages that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them, or they are automatically eradicated by your web browser.

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

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

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



occurs exclusively on the basis of the consent obtained (Art. 6(1)(a) GDPR and § 25 (1) TDDDG); this consent may be revoked at any time.

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

Which cookies and services are used on this website can be found in this privacy policy.

### **Consent with CookieYes**

Our website uses CookieYes's consent technology to obtain your permission for storing certain cookies in your browser and using specific technologies, as well as to document these consents in compliance with data protection regulations. The provider of this technology is CookieYes Limited, 3 Warren Yard, Warren Park, Wolverton Mill, Milton Keynes, MK12 5NW, United Kingdom (hereinafter "CookieYes"). When you visit our website, a CookieYes cookie is stored in your browser to record your consents or any withdrawal of consent. This information is not shared with CookieYes. The data remains stored until you delete the CookieYes cookie from your browser or until the purpose of storage no longer applies. Mandatory legal retention periods remain unaffected. The use of CookieYes's consent technology serves to collect legally required consents for the use of cookies. The legal basis for this is Art. 6 (1) lit. c GDPR.

### **Server log files**

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

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

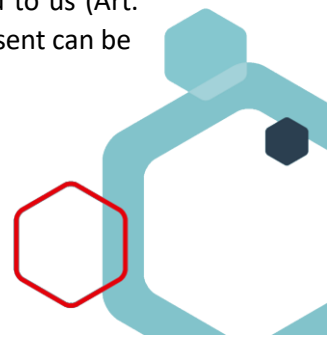
This data is not merged with other data sources.

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

### **Contact form**

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

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



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

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

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

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

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

## **5. Social media**

### **LinkedIn**

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

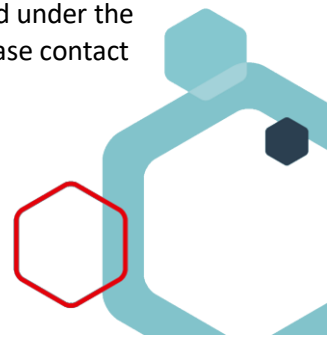
Any time you access a page of this website that contains elements of LinkedIn, a connection to LinkedIn's servers is established. LinkedIn is notified that you have visited this website with your IP address. If you click on LinkedIn's "Recommend" button and are logged into your LinkedIn account at the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

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

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.linkedin.com/help/linkedin/answer/a1343190/datenubertragung-aus-der-eu-dem-ewr-undder-schweiz?lang=de>.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at: <https://www.linkedin.com/legal/privacy-policy>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/5448>.





## 6. Analysis tools and advertising

### Google Tag Manager

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

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

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

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/5780>.

### Google Analytics

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

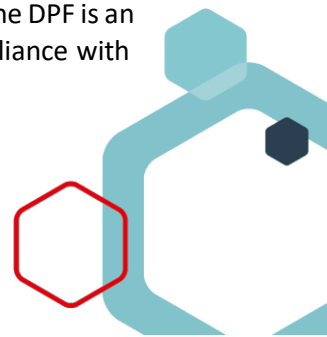
Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user's origin. This data is assigned to the respective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

Furthermore, Google Analytics allows us to record your mouse and scroll movements and clicks, among other things. Google Analytics uses various modeling approaches to augment the collected data sets and uses machine learning technologies in data analysis. Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g., cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

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

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://privacy.google.com/businesses/controllerterms/mccs/>.

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



these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/5780>.

### **IP anonymization**

Google Analytics IP anonymization is active. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases. On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession.

### **Browser plug-in**

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at: <https://support.google.com/analytics/answer/6004245?hl=en>.

### **Contract data processing**

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

### **LinkedIn Insight Tag**

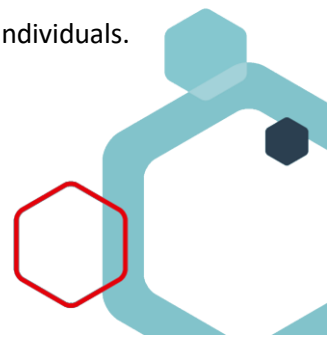
This website uses the Insight tag from LinkedIn. This service is provided by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

### **Data processing by LinkedIn Insight tag**

We use the LinkedIn Insight tag to obtain information about visitors to our website. Once a website visitor is registered with LinkedIn, we can analyze the key occupational data (e.g., career level, company size, country, location, industry, job title) of our website visitors to help us better target our site to the relevant audience. We can also use LinkedIn Insight tags to measure whether visitors to our websites make a purchase or perform other actions (conversion measurement). Conversion measurement can also be carried out across devices (e.g. from PC to tablet). LinkedIn Insight Tag also features a retargeting function that allows us to display targeted advertising to visitors to our website outside of the website. According to LinkedIn, no identification of the advertising addressee takes place.

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

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



please see LinkedIn's privacy policy at <https://www.linkedin.com/legal/privacy-policy#choices-oblig>.

### **Legal basis**

If your approval (consent) has been obtained the use of the abovementioned service shall occur on the basis of Art. 6(1)(a) GDPR and § 25 TDDDG (German Telecommunications Act). Such consent may be revoked at any time. If your consent was not obtained, the use of the service will occur on the basis of Art. 6(1)(f) GDPR; the website operator has a legitimate interest in effective advertising promotions that include the utilization of social media.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://www.linkedin.com/legal/l/dpa> and <https://www.linkedin.com/legal/l/eu-sccs>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/5448>.

### **Objection to the use of LinkedIn Insight Tag**

You can object to LinkedIn's analysis of user behavior and targeted advertising at the following link: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.

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

### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **7. Newsletter**

### **Newsletter data**

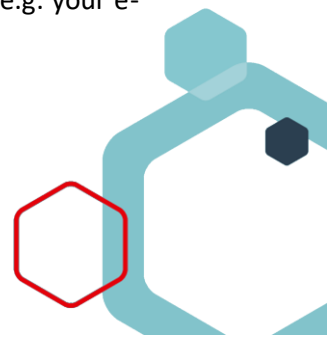
If you would like to receive the newsletter offered on the website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data is not collected or only on a voluntary basis. For the handling of the newsletter, we use newsletter service providers, which are described below.

### **Mailchimp**

This website uses the services of Mailchimp to send out its newsletters. The provider is the Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

Among other things, Mailchimp is a service that can be deployed to organize and analyze the sending of newsletters. Whenever you enter data for the purpose of subscribing to a newsletter (e.g. your e-mail address), the information is stored on Mailchimp servers in the United States.

With the assistance of the Mailchimp tool, we can analyze the performance of our newsletter campaigns. If you open an e-



mail that has been sent through the Mailchimp tool, a file that has been integrated into the email (a so-called web-beacon) connects to Mailchimp's servers in the United States. As a result, it can be determined whether a newsletter message has been opened and which links the recipient possibly clicked on. Technical information is also recorded at that time (e.g. the time of access, the IP address, type of browser and operating system). This information cannot be allocated to the respective newsletter recipient. Their sole purpose is the performance of statistical analyses of newsletter campaigns. The results of such analyses can be used to tailor future newsletters to the interests of their recipients more effectively.

If you do not want to permit an analysis by Mailchimp, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message.

The data is processed based on your consent (Art. 6(1)(a) GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

Data transmission to the US is based on the Standard Contractual Clauses (SCC) of the European Commission. Details can be found here: <https://mailchimp.com/eu-us-data-transfer-statement/> and [https://mailchimp.com/legal/data-processing-addendum/#Annex C - Standard Contractual Clauses](https://mailchimp.com/legal/data-processing-addendum/#Annex_C_-_Standard_Contractual_Clauses).

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

For more details, please consult the Data Privacy Policies of Mailchimp at: <https://mailchimp.com/legal/terms/>.

The company is certified in accordance with the "EU-US Data Privacy Framework" (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/7693>.

### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **8. Plug-ins and Tools**

### **Google reCAPTCHA**



We use “Google reCAPTCHA” (hereinafter referred to as “reCAPTCHA”) on this website. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to determine whether data entered on this website (e.g., information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyzes the behavior of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g., IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google.

reCAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway.

Data are stored and analyzed on the basis of Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the protection of the operator’s websites against abusive automated spying and against SPAM. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR and § 25 (1) TDDD, insofar the consent includes the storage of cookies or the access to information in the user’s end device (e.g., device fingerprinting) within the meaning of the TDDD. This consent can be revoked at any time. For more information about Google reCAPTCHA please refer to the Google Data Privacy Declaration and Terms Of Use under the following links:

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

The company is certified in accordance with the “EU-US Data Privacy Framework” (DPF). The DPF is an agreement between the European Union and the US, which is intended to ensure compliance with European data protection standards for data processing in the US. Every company certified under the DPF is obliged to comply with these data protection standards. For more information, please contact the provider under the following link: <https://www.dataprivacyframework.gov/participant/5780>.

## 9. Application Process

**Purpose of Processing:** Your data is processed for the purpose of carrying out application and recruitment procedures on the basis of Art. 6 (1) lit. b GDPR. There is no legal or contractual obligation to provide your data, but the processing of your application is not possible without the provision of the information.

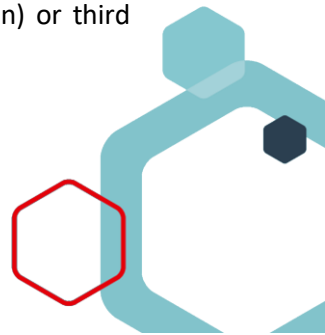
**Note:** You are applying to an international company. Therefore, depending on the position applied for, your application may also be forwarded to HR managers of affiliated companies.

**Type of data:** In principle, we process the data that you provide to us. In the case of applications, this is essentially:

- Applicant data (e.g. name, cover letter, work experience, desired annual income, picture data, gender, date of birth, place of birth, citizenship, etc.)
- Qualification (e.g. education, certificates, further education, etc.)
- Contact data (e.g. address, e-mail address, telephone number, etc.)
- Internal notes and evaluation data
- Communication data (e.g. content from e-mails or telephone calls, etc.)

We may also process data from other sources, e.g. professional networks (e.g. LinkedIn) or third parties (e.g. recruitment agencies).

**Recipients of the data:** Internal positions such as human resources managers and supervisors of specialist



departments of companies affiliated with us. Public authorities in the event of overriding legal provisions. External service providers or other contractors, e.g. for data processing. Other external bodies, insofar as the data subject has given his or her consent or a transfer is permissible for overriding interest.

**Third country transfers:** No processors outside the European Union are used. Your data may also be used by companies in third countries within our group of companies. For example, depending on the position applied for, your application may be shared with HR managers of affiliated companies to consider you for other positions or to optimize the application process. In particular, if you apply for a job that is advertised at several locations, a data transfer to the countries specified in the job advertisement is possible within our group of companies.

**Duration of data storage:** Application data is generally deleted within six months of notification of the decision, unless consent has been given for data to be stored for a longer period in the context of inclusion in the Talent Pool.

We use the recruiting tool "Recruitee" for our recruitment process. The service provider is Recruitee B.V., Kaizersgracht 313, 1016 EE Amsterdam. For more information about data processing when using Recruitee, please refer to their privacy policy at: <https://recruitee.com/de/privacy-policy>.

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

### Data processing

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

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

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

Please note that we do not have complete influence on the data processing procedures of the tools used. Our possibilities are largely determined by the corporate policy of the respective provider. Further information on data processing by the conference tools can be found in the data protection declarations of the tools used, and which we have listed below this text.

### Purpose and legal bases

The conference tools are used to communicate with prospective or existing contractual partners or to offer certain services to our customers (Art. 6(1)(b) GDPR). Furthermore, the use of the tools serves to generally simplify and accelerate communication with us or our company (legitimate interest in the meaning of Art.





6(1)(f) GDPR). Insofar as consent has been requested, the tools in question will be used on the basis of this consent; the consent may be revoked at any time with effect from that date.

### **Duration of storage**

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

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

### **Conference tools used**

We employ the following conference tools:

#### **Microsoft Teams**

We use Microsoft Teams. The provider is the Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. For details on data processing, please refer to the Microsoft Teams privacy policy: <https://privacy.microsoft.com/en-us/privacystatement>.

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

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

### **Data processing**

We have concluded a data processing agreement (DPA) for the use of the above-mentioned service. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

## **11. Information on Our Presence on the Kununu Platform**

### **Our Presence on kununu**

We maintain a company profile on the kununu platform, which is provided by New Work SE, headquartered in Hamburg. Additional contact options for the platform provider can be found at: <https://support.kununu.com/hc/de>.

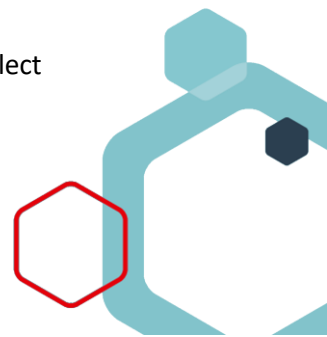
### **Purpose of Our kununu Profile**

The kununu platform primarily serves as a tool for employer reviews. Our company uses the platform to share information about us, our career opportunities, as well as our products and services.

### **Data Processing by kununu**

When visiting our company profile on kununu or interacting with this page, kununu may collect personal data, such as through cookies or other tracking technologies.

This data collection may also affect visitors who are neither



registered nor logged into kununu. Details about the data processing and privacy settings on kununu can be found in kununu's Privacy Policy: <https://privacy.xing.com/en/privacy-policy>

Please note that we have no control over the exact data collection and processing carried out by kununu. If you do not wish for kununu to process your data, we recommend refraining from visiting or using the platform.

### **Use of Statistics**

We receive anonymous statistics from kununu regarding our company page, such as the number of page views, visitor origin, or search queries. This data helps us continuously improve our presence on the platform. However, it is not possible for us to draw conclusions about individual users.

### **Responsibilities and Legal Bases**

#### **Joint Controllers**

We are jointly responsible for data processing with New Work SE.

#### **Legal Bases for Data Processing:**

- Your consent (Art. 6 (1)(a) GDPR)
- Legitimate interests (Art. 6 (1)(f) GDPR), particularly the provision of information about our company and career opportunities.
- In cases of contact inquiries, additionally Art. 6 (1)(b) GDPR (pre-contractual measures).

Details regarding data deletion by kununu can be found in kununu's Privacy Policy: <https://privacy.xing.com/en/privacy-policy>

